

The Lighthouse Green Fuels Order

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Applicant: LGF Projects Limited

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Appendix G1 Consideration of comments from consultees under S42(1)(a) and (b) of the Act

Consultee	Comments made in response to statutory consultation	Applicant response
Anglian Water	Anglian Water's response focuses on ensuring that any existing water infrastructure within the Order Limits is identified, protected and appropriately managed throughout the Proposed Development. Anglian Water seeks bespoke Protective Provisions within the DCO, appropriate stand-off distances around assets, and construction management measures to safeguard its assets. Anglian Water welcomes continued discussions with the Applicant. Anglian Water also notes that Northumbrian Water is the water and sewerage provider for the area including the site.	The Applicant acknowledges the presence of Anglian Water assets within the draft Order Limits. Details of water supply requirements and water environment considerations are assessed in Chapter 12: Water Environment (ES Volume 1, Application Document Ref. 6.1.12). The Applicant commits to ongoing engagement with Anglian Water to agree appropriate protection measures and confirms that Protective Provisions are included within Schedule 11 of the Draft Development Consent Order (Application Document Ref. 3.1) with discussions to continue on their scope and suitability. The Applicant confirms that Northumbrian Water has been consulted as part of the consultation process.
Canal and River Trust	The Canal and River Trust stated that the scheme does not raise any issues or concerns.	The Applicant acknowledges the comments from the Canal and River Trust.
Civil Aviation Authority	The Civil Aviation Authority (CAA) advises that consultation is only required in limited circumstances, including developments involving wind turbines, structures exceeding 90 metres in height, lasers or floodlighting, or where a planning authority is minded to approve a development that has been objected to by a safeguarded airport or NATS. The CAA also notes that the relevant airport operator or NATS would typically be the appropriate consultee in such cases.	The Applicant notes these comments from the CAA and confirms it has also consulted NATS as part of the statutory consultation. No objections from nearby airports or NATS have been received to the Proposed Development. The Applicant has also consulted airspace@caa.co.uk as part of the statutory consultation on the Proposed Development as the development involves structures of a height of 90 metres or more.

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Cleveland Fire Brigade	Cleveland Fire Brigade notes that it cannot undertake a full assessment of access and water supply arrangements at this stage due to limited information on the completed site layout. The Brigade also strongly supports the inclusion of Automatic Fire Suppression Systems (AFSS) such as sprinklers or equivalent systems, where these would improve fire safety. It notes that further comments may be provided through the Building Regulations consultation process as additional design information becomes available.	The Applicant notes the comments from Cleveland Fire Brigade.
Coal Authority (Mining Remediation Authority)	The Coal Authority (the Mining Remediation Authority) confirmed that the Proposed Development site sits outside the defined coalfield and is not located within an area of past, present or future coal mining activity. As a result, it has no comments or concerns regarding the Proposed Development.	The Applicant notes the comments from the Coal Authority.
Durham County Council	Durham County Council raised no objections in principle to the Proposed Development and considers it unlikely to have significant impacts on the County due to its location within an established industrial area and its distance from the county. Durham County Council notes the need for updated evidence on aggregate supply and waste management, including clearer information on construction materials, waste volume, and available	The Applicant notes the Council's comments and confirms that the latest available data on waste management, highway, air quality and ecological impacts are included in the ES (Application Document Ref. 6.1) .

Consultee	Comments made in response to statutory consultation	Applicant response
	landfill capacity. The Council also notes that highway, air quality and ecological impacts on the county are expected to be negligible, although it requests that the Applicant continues to share any updated air quality modelling and ensures that assessments are based on latest available data.	
Environment Agency	The Environment Agency's response focuses on water quality, flood risk, groundwater protection and environmental permitting, while broadly supporting the proposed assessment approach subject to further detail being provided. The EA requests additional information on construction environmental controls, surface water and foul drainage arrangements, wastewater treatment and discharge, and a more comprehensive Water Framework Directive (WFD) Assessment covering a wider range of water quality impacts beyond nitrogen. It also seeks further consideration of flood risk, hydraulic modelling, intertidal habitat loss associated with the proposed quay, and the protection of flood defence infrastructure. The EA requests further site investigation, groundwater risk assessments, remediation and monitoring measures, and assessment of impacts from activities such as piling	The Applicant confirms that the Environment Agency's comments have been incorporated across the ES (Application Document Ref. 6.1). The Applicant continues to engage the Environment Agency throughout the application process. Additional pollution prevention and construction drainage measures have been included within the Framework Construction Environmental Management Plan (Application Document Ref. 6.3.4), while comments on drainage, water quality, WFD compliance, flood risk and hydraulic modelling have been addressed in Chapter 12: Water Environment (ES Volume 1, Application Document Ref. 6.1.12), the Framework Drainage Strategy (Application Document Ref. 5.7), Flood Risk Assessment (Application Document Ref. 5.7), and the Water Environment Regulations Assessment (Application Document Ref. 5.10). The Applicant also note that Schedule 2 of the draft Development Consent Order (ES Volume 3, Application Document Ref. 3.1) includes a groundwater and contamination requirement and the Environment Agency are a consultee in relation to the scheme required to be submitted and approved by the relevant planning authority under that requirement. Comments on additional matters raised in the response are referenced in the corresponding chapters of the ES (Application Document Ref. 6.1), including Chapter 16: Materials and Waste (Application Document Ref. 6.6.16), Appendix 5B: Framework Site Waste Management Plan (Application Document Ref. 6.3.5), Chapter 11: Freshwater and Marine Ecology (Application Document Ref. 6.1.11), Chapter 22: Cumulative and Combined Effects (Application Document Ref. 6.1.22) and the Other Consents and Licences Statement (Application Document Ref. 5.4)

Consultee	Comments made in response to statutory consultation	Applicant response
	and drainage infiltration. It also emphasises the need for robust management of contaminated land, landfill gas and waste, together with ongoing engagement on ecological impacts, cumulative effects and the various environmental permits, licences and consents that may be required for the development.	
Forestry Commission (Yorkshire & North East)	The Forestry Commission highlights the importance of protecting ancient woodland and other sensitive woodland habitats from potential air quality impacts associated with the Proposed Development. It recommends incorporating tree planting and woodland creation into the Proposed Development's mitigation strategy and ensuring that sensitive species such as lichens and bryophytes are considered within the assessment.	The Applicant notes the comments from the Forestry Commission. No ancient woodland or sensitive woodland has been identified as sensitive receptors potentially to be dependent by development. Air quality impacts have been considered in Chapter 8: Air Quality (Application Document Ref. 6.1.8) .
Fulcrum Pipelines	Fulcrum Pipelines confirmed that it has no pipelines or equipment within or adjacent to the Proposed Development and therefore raised no concerns regarding the Proposed Development.	The Applicant notes the comments from Fulcrum Pipelines.
Historic England	Historic England notes that cultural heritage has been scoped out of the EIA, which is considered appropriate given the site's industrial nature and distance from designated heritage assets. As a result, Historic England raises no concerns at this stage.	The Applicant notes the comments from Historic England.

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Health & Safety Executive	HSE notes that parts of the Proposed Development appear to fall within consultation zones for Major Accident Hazard (MAH) sites and pipelines. HSE recommends that the Applicant engage with the relevant sites and pipeline operators to assess potential risks, identify any development constraints, and determine whether infrastructure changes or additional mitigation may be required. Based on the information currently available, HSE would not advise against the development provided workplace buildings remain below certain occupancy and height thresholds. HSE also highlights the need to assess the Proposed Development's vulnerability to major accidents, consider whether Hazardous Substances Consent is required, and obtain any other necessary health and safety approvals. The Explosives Inspectorate has no concerns and HSE requests continued engagement as the DCO process progresses.	The Applicant confirms that GIS data for the draft Order Limits was provided to HSE and notes the advice regarding Major Accident Hazard (MAH) sites, pipelines, workplace occupancy thresholds and the potential need for Hazardous Substances Consent and COMAH licence. The Applicant will continue to engage with relevant site and pipeline operators during the design and construction phases. Potential interactions with MAH sites and pipelines, together with the Proposed Development's vulnerability to major accidents, have been assessed in Chapter 19: Major Accidents and Disasters (ES Volume 1, Application Document Ref. 6.1.19). The Applicant also acknowledges HSE's guidance on relevant consents, approvals and ongoing consultation requirements.
Indigo Networks	Indigo Networks confirms it has no utilities in this location.	The Applicant notes the comment from Indigo Networks.
Maritime & Coastguard Agency	The Maritime & Coastguard Agency (MCA) is satisfied that the PEIR provided a suitable basis for assessing shipping and navigation impacts and raises no major concerns at this stage. Its main focus is on ensuring that the proposed quay construction, dredging	The Applicant notes the MCA's comments and confirms that marine navigation, marine licensing requirements and navigational safety risks have been assessed through a Navigation Risk Assessment included within Chapter 20: Marine Navigation (ES Volume 1, Application Document Ref. 6.1.20). The Applicant has consulted with PD Ports and will continue engagement with the Statutory Harbour Authority.

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	activities and marine operations are assessed appropriately, with any required marine licences and consents obtained. The MCA highlights the role of PD Ports, as the Statutory Harbour Authority, in maintaining navigational safety throughout the project. The MCA supports the preparation of a Navigational Risk Assessment (NRA), developed in consultation with PD Ports and other marine stakeholders, to assess risks such as collisions, groundings and vessel movements during construction, operation and decommissioning. It encourages continued engagement with local marine users and expects any concerns raised by PD Ports or other stakeholders to be addressed as the project develops.	
Marine Management Organisation (MMO)	The Marine Management Organisation (MMO) highlights the need to ensure that all marine licensable activities are appropriately consented and assessed. The MMO generally supports the approach set out in the PEIR but expects the Environmental Statement (ES) to provide further detail on marine licensing requirements, marine planning policy compliance and the potential impacts of works within the marine environment.	The Applicant acknowledges the MMO's comments and confirms that marine licencing requirements, marine environmental impacts and navigational issues have been assessed within Chapter 20: Marine Navigation (ES Volume 1, Application Document Ref. 6.1.20), Chapter 11: Freshwater and Marine Ecology (Application Document Ref. 6.1.11) and Chapter 12: Water Environment (ES Volume 1, Application Document Ref. 6.1.12). The need for marine and protected species licences is noted, and the deemed marine licences have been drafted and included in Schedule 11 of the Draft Development Consent Order (ES Volume 3, Application Document Ref. 3.1). The Applicant confirms that the MMO has been consulted on the deemed marine licences and that ongoing engagement with the MMO will continue. The Applicant has also incorporated the MMO's recommendations on underwater noise, piling, dredging, marine ecology, fisheries, shellfish, invasive species and cumulative effects within the relevant chapters of the ES (Application Document Ref. 6.1).

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	The MMO has noted the need for a more detailed assessment of marine physical processes and ecology. The MMO requests further consideration of impacts on estuarine flows, sediment transport, suspended sediments, water quality and ecological receptors, particularly in relation to the proposed quay and dredging activities. It also seeks additional assessment of impacts on fish, shellfish, invasive non-native species and commercial fisheries, including underwater noise, vessel movements, lighting, turbidity and cumulative effects. The MMO considers that further surveys, modelling and mitigation measures may be required as the design develops. The MMO also raised several points regarding dredging, sediment management and material disposal, as well as the suitability and capacity of offshore disposal and requests that the issues raised are addressed within the ES and reserves the right to provide further comments as the project progresses.	
Ministry of Defence	The Ministry of Defence (MOD) raised no objection in principle to the Proposed Development. The MOD's main requirement is that any tall, narrow structures are appropriately notified and charted on aviation maps to maintain aviation	The Applicant confirms that it will continue to engage with the Ministry of Defence throughout the DCO process as a prescribed consultee. It also acknowledges the MOD's requirement to be notified prior to the commencement of works, including the construction and operation of any tall structures, to ensure appropriate aviation safeguarding and charting measures are implemented. These requirements are covered within the Draft Development Consent Order (Application Document Ref. 3.1).

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	safety. It requests advance notification of the location, height and construction timetable for such structures and notes that any future changes to the design, dimensions or location of the development should be referred back to the MOD for further assessment. Overall, the response raises no safeguarding concerns, subject to the implementation of appropriate aviation charting and notification measures.	
National Gas Transmission LTD	National Gas Transmission (NGT) raised a holding objection because the Proposed Development interacts with the FM06 high-pressure gas pipeline and associated infrastructure. NGT requires further engagement through its Asset Protection team, a Deed of Consent for works within the pipeline easement, and appropriate protective provisions to safeguard its assets and maintain access throughout construction and operation.	The Applicant acknowledges National Gas Transmission's comments and confirms that it is actively engaging with NGT regarding the presence of gas infrastructure within the draft Order Limits. The Applicant and NGT continue to engage regarding appropriate asset protection measures, easement requirements and crossing arrangements. The Applicant also acknowledges NGT's requirements regarding safe working practices, utility crossings and the need for prior consultation and agreement before works affecting NGT assets are undertaken. Protected Provisions for National Gas Transmission are included in Schedule 11 of the Draft Development Consent Order (Application Document Ref. 3.1).
National Grid Electricity Transmission	National Grid Electricity Transmission (NGET) does not object to the proposal but seeks ongoing engagement due to the presence of existing and planned electricity transmission infrastructure within or near the Order Limits. NGET highlights nearby substations, overhead lines and underground cables, and requests that appropriate Protective Provisions	The Applicant is working with NGET to secure appropriate protection for its electricity infrastructure and acknowledges the need to safeguard NGET's assets and rights. Protective Provisions are included within Schedule 11 of the Draft Development Consent Order (Application Document Ref. 3.1), with discussions to continue on their scope and suitability.

Consultee	Comments made in response to statutory consultation	Applicant response
	are included within the DCO to safeguard its assets and rights. NGET also requests that potential impacts on its infrastructure are considered within the Environmental Statement and that consultation continues throughout the DCO process.	
National Highways	National Highways raises no objection in principle and supports the overall approach to the traffic and transport assessment, including the preparation of a Transport Assessment (TA), Construction Worker Travel Plan (CWTP) and Construction Traffic Management Plan (CTMP). It considers the proposed assessment methodology appropriate and consistent with the agreed scoping approach. National Highways requests further detail on construction worker travel assumptions, shift patterns, sustainable travel measures and traffic reduction targets, as well as more information on HGV movements, traffic generation and routing on the Strategic Road Network. It also expects ongoing engagement regarding abnormal indivisible loads (AILs) and the provision of traffic modelling, flow diagrams and mitigation measures within the final Transport Assessment and traffic management plans.	The Applicant notes National Highways' comments and confirms that the Appendix 18A: Transport Assessment including Annex C Framework Construction Worker Travel Plan (Application Document Ref. 6.3.23), and Appendix 18D: Framework Construction Traffic Management Plan (Application Document Ref. 6.3.26) provide the requested information on construction traffic, worker travel patterns, shift arrangements, HGV movements and traffic routing. The Applicant acknowledges the requirement to consult with the National Highways Abnormal Loads Team. More information on traffic is provided in Chapter 18: Traffic and Transport (ES Volume 1, Application Document Ref. 6.1.18).

Consultee	Comments made in response to statutory consultation	Applicant response
NATS En-Route Safeguarding	NATS confirms that it has no infrastructure within 10km of the proposed site and therefore does not anticipate any impact from the development. As a result, NATS has no comments or concerns regarding the Proposed Development.	The Applicant notes the comment from NATS.
Natural England	Natural England considered that the PEIR still contains some gaps. It requested separate Habitats Regulations and SSSI assessments, supported by site-specific surveys and a draft oCEMP containing firm mitigation measures. The key potential impacts requiring further assessment are air and water quality, disturbance to birds and marine mammals, loss of functionally linked habitat, and cumulative effects on protected sites. Natural England also seeks further assessment of air emissions, wastewater discharges, dredging, sediment dispersal and contaminated sediments. It recommends expanded bird surveys, including year-round and nocturnal work, updated noise data, seal surveys and detailed underwater-noise modelling based on worst-case piling scenarios. The Environmental Statement should clearly assess impacts on designated habitats and species, use justified Zones of Influence, guarantee mitigation measures, and include all relevant nearby developments within the	The Applicant confirms that Natural England's comments have been addressed through ongoing consultation, the preparation of separate Habitats Regulations Assessment (HRA) (Application Document Ref. 5.11.1) and SSSI Assessment (Application Document Ref. 6.3.15) , and mitigation measures within the Framework Construction Environmental Management Plan (fCEMP) (Application Document Ref. 6.3.4) . Additional assessment, modelling and evidence relating to air quality, nutrient deposition, wastewater, nutrient neutrality and cumulative effects are included in the ES (Application Document Ref. 6.1) , and additional supplementary surveys have also been undertaken.

Consultee	Comments made in response to statutory consultation	Applicant response
	cumulative and in-combination assessment.	
Net Zero North Sea Storage Ltd	Net Zero North Sea Storage (NZNSS) highlights significant overlaps between the Proposed Development and the consented Net Zero Teesside (NZT) and Northern Endurance Partnership (NEP) infrastructure, including carbon dioxide pipelines, gas infrastructure, above-ground installations, wastewater connections and construction areas. NZNSS notes that these nationally significant carbon capture and storage projects are already progressing through construction and are critical to the East Coast Cluster and the UK's net zero objectives. The key concern is ensuring that the Proposed Development does not affect the safe operation, protection or future access to existing and consented NZT and NEP infrastructure. In particular, NZNSS seeks assurance on how construction activities, including the movement of large modules across the Sembcorp pipeline corridor, will be managed without impacting existing assets. NZNSS requests that these interactions and potential safety implications are fully considered within the EIA and that it remains closely engaged throughout the ongoing development of the project.	The Applicant acknowledges the interactions between the Proposed Development and the Net Zero Teesside (NZT) and Northern Endurance Partnership (NEP) projects and confirms that ongoing engagement is taking place to ensure appropriate protection measures are agreed. The Applicant has carried out a robust EIA which is presented in the ES (Application Document Ref. 6.1). Protective Provisions for Net Zero North Sea Storage are included within Schedule 11 of the Draft Development Consent Order (Application Document Ref. 3.1) and discussions on these will continue with NZNSS. The Applicant will also continue to engage with NZNSS regarding potential connections to their infrastructure for the export of CO₂. The Applicant also confirms that details of module transfers across NEP infrastructure are provided within Chapter 5: Construction Programme and Management (ES Volume 1, Application Document Ref. 6.1.5) and welcomes continued consultation with NZNSS throughout the development of the project.
Net Zero Teesside Power Ltd	Net Zero Teesside Power (NZT Power) highlights significant overlaps	As set out above, the Applicant acknowledges the interaction between the Proposed Development and the Net Zero Teesside (NZT) Project and confirms that it has engaged, and will continue to

Consultee	Comments made in response to statutory consultation	Applicant response
	between the Proposed Development and the consented Net Zero Teesside (NZT) Project, including gas, carbon capture, wastewater and access infrastructure. NZT notes that it is a nationally significant carbon capture and power generation project that is already under construction and forms a key part of the East Coast Cluster and the UK's net zero objectives. NZT Power's main concern is ensuring that the Proposed Development does not adversely affect the delivery, operation or safety of NZT infrastructure. It requests that interactions between the two projects are fully considered within the EIA and asks to remain engaged in ongoing consultation as the project develops.	engage, with both NZT Power and NZNSS to ensure protection measures are agreed where appropriate. The Applicant also notes NZT's safety concerns and confirms that consultation will continue as the project develops. Further assessment of potential safety impacts is provided within the ES (Application Document Ref. 6.1).
Northern Gas Networks	Northern Gas Networks (NGN) advised that high-pressure gas infrastructure and Major Accident Hazard Pipelines (MAHPs) are present in the vicinity of the Proposed Development. NGN requested that safety restrictions relating to existing assets are taken into account during project development.	The Applicant notes the comments from NGN and confirms it is committed to ongoing consultation to understand the location of NGN's assets. Protective Provisions for Northern Gas Networks are included within Schedule 11 of the Draft Development Consent Order (Application Document Ref. 3.1) .
Northern Powergrid (Northeast) Limited	Northern Powergrid advises that multiple existing assets are located within or close to the Order Limits of the Proposed Development. Northern Powergrid's position is to maintain an objection until suitable Protective Provisions are agreed.	The Applicant acknowledges Northern Powergrid's concerns regarding the presence of electricity infrastructure within and near the draft Order Limits. Protective Provisions for Northern Powergrid are included within Schedule 11 of the Draft Development Consent Order (Application Document Ref. 3.1) .

Consultee	Comments made in response to statutory consultation	Applicant response
PD Ports (PD Teesport)	PD Teesport Limited (PDT) raised concerns about potential impacts on the safe operation of the Port, navigation on the River Tees, strategically important port land, construction laydown areas, pipeline corridors, access roads, emergency access routes and rail infrastructure within the Order Limits. PDT noted that insufficient information had been provided to fully understand the implications for the Port, its users and other businesses that rely on port operations, and highlighted concerns regarding potential compulsory acquisition powers and disruption to navigation, dredging activities and existing infrastructure. PDT requested further information, ongoing engagement and robust Protective Provisions.	The Applicant acknowledges PD Teesport's concerns and confirms its commitment to ongoing engagement to agree appropriate protections. The Applicant also confirms that no new crossings are proposed beneath the River Tees, and that mitigation will be developed where required. Protective Provisions for PD Teesport, as statutory harbour authority, are included within Schedule 11 of the Draft Development Consent Order (Application Document Ref. 3.1).
Redcar and Cleveland Borough Council	Redcar and Cleveland Borough Council confirms that it does not have any further comments at this stage.	The Applicant notes this comment.
Royal Mail Group	Royal Mail notes that it has identified the Proposed Development as having the potential to affect its operational interests. Royal Mail stated that there is currently insufficient information available to fully assess the level of risk.	The Applicant notes these comments.
Sembcorp Utilities (UK) Limited	Sembcorp Utilities (UK) Limited expressed support in principle for the Proposed Development but raised concerns about the potential impact on	The Applicant acknowledges Sembcorp's concerns regarding the potential impact of the Proposed Development on the Sembcorp Pipeline Corridor and confirms its commitment to ongoing engagement to agree appropriate protection measures. Protective Provisions for Sembcorp are

Consultee	Comments made in response to statutory consultation	Applicant response
	the Sembcorp Pipeline Corridor. Sembcorp requested further information on affected land and rights, early engagement and Protective Provisions, and strongly encouraged the use of private treaty agreements to safeguard critical infrastructure.	included within Schedule 11 of the Draft Development Consent Order (Application Document Ref. 3.1) .
Stockton-on-Tees Borough Council	Stockton-on-Tees Borough Council (SBC) expressed support for the Proposed Development in principle, subject to further assessment and mitigation of a number of environmental matters. SBC identified the need for further detailed assessments of construction and operational noise, road traffic noise, and construction dust, together with appropriate mitigation and Environmental Permit compliance.	The Applicant acknowledges Stockton-on-Tees Borough Council's comments and confirms that detailed assessments of air quality, noise and vibration have been completed and are reported within the relevant chapters of the ES (Application Document Ref. 6.1) , together with supporting mitigation measures. The Applicant confirms its commitment to ongoing engagement with Stockton-on-Tees Borough Council.
Tees Valley Combined Authority	Tees Valley Combined Authority (TVCA) expressed strong support in principle for the Proposed Development. TVCA highlighted the Proposed Development's potential contribution to skills development, supply chain growth and long-term economic resilience, and noted the strategic importance of its potential connection to the Northern Endurance Partnership carbon capture network. The Tees Valley Mayor also expressed strong support in principle for the Proposed Development.	The Applicant welcomes the comments from the TVCA and the Tees Valley Mayor and confirms that employment has been addressed within Chapter 17: Socioeconomics (ES Volume 1, Application Document Ref. 6.1.17) .
Trinity House	Trinity House confirms it has no comments to make at this stage.	The Applicant notes this comment.

Consultee	Comments made in response to statutory consultation	Applicant response
UK Health Security Agency	The UK Health Security Agency (UKHSA) and the Office for Health Improvement and Disparities (OHID) confirmed that they are satisfied with the approach taken to the Environmental Impact Assessment (EIA) and the conclusions presented within the PEIR. They raised no objections or additional comments at this stage.	The Applicant notes these comments.

Appendix G2 Consideration of comments from consultees under S42(1)(d) of the Act

Consultee	Comments made in response to statutory consultation	Applicant response
Able UK Ltd	Able UK Ltd stated that they had no objections at the time of statutory consultation.	The Applicant notes these comments. Following further refinement of the Order Limits, Able UK Ltd's interests are no longer included within the Order Limits for the Proposed Development.
BOC	BOC Limited raised concerns regarding the potential impacts of the Proposed Development on existing protected pipelines crossing or lying within the Order Limits. BOC requested further information on a number of elements of the scheme, including the proposed jetty works, rail infrastructure, product and utility pipeline routes, water and wastewater connections, and the location of construction compounds and working areas, to enable potential conflicts with existing assets to be properly assessed. Concerns were also raised regarding the possible acquisition of land, extinguishment of rights, and disruption to operational access. BOC emphasised the need for early and ongoing engagement with the Applicant, together with appropriate Protective Provisions.	The Applicant is committed to ongoing engagement to identify and address potential interactions between the Proposed Development and BOC's pipeline infrastructure, rights and operational activities. Protective Provisions are included within the Draft Development Consent Order (Application Document Ref. 3.1), with discussions to continue on their scope and suitability. Further detail in relation to quayside and jetty works and abnormal load routing, construction compounds, the routing of proposed SAF and pipelines, natural gas and other utility connections, water supply connections, and wastewater discharge arrangements, including surveys, remedial works and pipeline replacement, is included in the application documents.
CATS North Sea Limited	CATS North Sea Limited raised concerns regarding the proximity of the Proposed Development to its nationally significant gas transportation infrastructure and the potential interactions that could arise during construction. CATS emphasised the importance of ongoing engagement and advance planning to avoid any disruption to its operations, highlighting that unplanned shutdowns could have direct implications for	The Applicant acknowledges CATS North Sea Limited's concerns regarding potential interactions between the Proposed Development and existing gas transmission infrastructure. The Applicant commits to ongoing engagement with CATS to agree appropriate protection measures and confirms that Protective Provisions are included within Schedule 11 of the Draft Development Consent Order (Application Document Ref. 3.1) , with discussions to continue on their scope and suitability.

Consultee	Comments made in response to statutory consultation	Applicant response
	UK gas supply. Specific concerns were raised regarding the proposed road crossing over the existing 36-inch CATS gas pipeline between the main development site and temporary works area, with a request for early engagement on the design and delivery of these works. CATS also stated that all construction activities within 50 metres of its infrastructure must comply with its Authority to Work process to ensure risks are appropriately managed.	
ConocoPhillips	ConocoPhillips' response raised concerns regarding the potential increase in vehicular movements along Seal Sands Road during construction and operation, particularly in relation to maintaining effective emergency vehicle access on an already busy route. Concerns were also raised regarding the protection of their propane pipeline and 66kV electricity cables serving the Norsea Oil Terminal, both of which are located along the northern boundary of Seal Sands Road and cross the Proposed Order Limits. ConocoPhillips confirmed that discussions with the Applicant are ongoing and sought assurances that appropriate measures will be put in place to safeguard this infrastructure throughout the development process.	The Applicant is continuing to engage with ConocoPhillips. The Applicant notes the importance of managing potential traffic impacts. An assessment of traffic impacts is included in Chapter 18: Traffic and Transport (ES Volume 1, Application Document Ref. 6.1.18) and the associated Appendix 18A: Transport Assessment (Application Document Ref. 6.3.24) and Appendix 18D: Framework Construction Traffic Management Plan (Application Document Ref. 6.3.27) The Applicant confirms that ConocoPhillips will benefit from Protective Provisions included within Schedule 11 of the draft Development Consent Order (Application Document Ref. 3.1).
Green Earth Developments	Green Earth Developments raised concerns regarding the potential impact of the Proposed Development on the road running north from the main site, particularly where this could affect access for third-party landowners, including its own landholdings. They welcomed further engagement with the Applicant and also expressed an interest in	The Applicant recognises the importance of maintaining access along the routes identified and Green Earth Developments' potential interaction with the Proposed Development and is committed to ongoing engagement.

Consultee	Comments made in response to statutory consultation	Applicant response
	discussing opportunities to provide off-site Biodiversity Net Gain units for the Proposed Development.	
Green Lizard Estates	Green Lizard Estates Limited (GLE) expressed support in principle for the Proposed Development but raised concerns that the consultation material provided insufficient information to assess the impact on its land interests, infrastructure and future development proposals. GLE also questioned the adequacy of engagement to date and emphasised the need for further information, meaningful consultation and appropriate protections.	The Applicant acknowledges GLE's concerns regarding land interests, rights and compulsory acquisition, and confirms its commitment to ongoing engagement and negotiation. The Land Plans (Application Document Ref. 2.2) and Works Plans (Application Document Ref. 2.3) provide more information on the impact on GLE's land interests. The Applicant continues to engage with GLE. The Applicant also confirms that the Order Limits for the Proposed Development have been revised, reducing the impact of the Proposed Development on GLE's land interests.
Greenergy Biofuels Teesside	Greenergy Biofuels Teesside Ltd highlighted that it holds a number of land, access and operational interests within and adjacent to the proposed Order Limits, including interests at the former North Tees Works, storage facilities operated through Navigator and Exolum, and infrastructure that supports the operation of its Teesside Bioplant. Greenergy stressed the importance of ensuring that the Proposed Development does not adversely affect access, service corridors, storage arrangements or the continued operation of its biofuel production and fuel supply activities. While raising no specific objection to the Proposed Development, Greenergy requested ongoing engagement with the Applicant and emphasised the need for its land and operational interests to be taken into account as the Proposed Development evolves.	The Applicant acknowledges the importance of Greenergy's facilities and associated infrastructure. The Applicant confirms its commitment to ongoing engagement with Greenergy throughout the DCO process.
Industrial Chemicals	Industrial Chemicals Ltd (ICL) raised a holding objection due to concerns that the	The Applicant will continue to engage with ICL regarding its interests.

Consultee	Comments made in response to statutory consultation	Applicant response
	Proposed Development could affect access to its Port Clarence chemicals facility via Huntsman Drive, which falls within the proposed Order Limits. ICL sought assurances that existing access rights would be maintained and requested further information on any proposed works, traffic impacts, vehicle movements and access management arrangements. ICL also requested that Huntsman Drive and its site access are fully assessed within the Transport Assessment, socio-economic assessment and Outline Construction Environmental Management Plan (oCEMP), and called for ongoing engagement to ensure any impacts on its existing and planned operations are appropriately mitigated.	The Proposed Development is not expected to impact users of Huntsman Drive due to low vehicle movements. Wider traffic impacts have been considered within Chapter 18: Traffic and Transport (ES Volume 1, Application Document Ref. 6.1.18) and the associated Appendix 18A: Transport Assessment (Application Document Ref. 6.3.24), including Annex C Framework Construction Worker Travel Plan, and Appendix 18D: Framework Construction Traffic Management Plan (Application Document Ref. 6.3.27). The Applicant has made efforts to arrange a meeting with their representatives. Whilst this meeting has not yet taken place, the Applicant remains open to meeting with Industrial Chemicals Ltd and their agents to discuss any concerns they may have regarding the Proposed Development.
INEOS Energy	INEOS Energy stated that it is supportive in principle of the Proposed Development, provided appropriate Protective Provisions are secured to safeguard existing infrastructure and ongoing operations in the area. INEOS requested ongoing engagement with the Applicant to ensure any interactions with its infrastructure are properly managed.	The applicant is continuing to engage with the various INEOS entities and appropriate Protective Provisions are included within Schedule 11 of the Draft Development Consent Order (Application Document Ref. 3.1).
Navigator Terminals	Navigator Terminals raised concerns about the extent of overlap between the proposed Order Limits and its existing land, jetties, pipeline corridors, access routes and COMAH-regulated facilities at North Tees and Seal Sands. Navigator stated that there had been insufficient engagement and technical information to properly assess the impacts on its operations. Concerns were raised regarding potential compulsory acquisition, safety risks associated with	The Applicant acknowledged Navigator Terminals' concerns regarding the overlap between the proposed Order Limits and its COMAH-regulated terminals, jetties, pipeline corridors and operational infrastructure, and confirmed its commitment to ongoing engagement to identify and implement appropriate protection measures. Potential impacts relating to safety, COMAH interactions and operational risks have been assessed within the ES (Application Document Ref. 6.1). The Applicant also confirmed that Navigator's land interests, easements and rights have been captured within the Book of Reference (Application Document Ref. 4.3) and that Protective Provisions for Navigator Terminals are included within Schedule 11 of the Draft Development Consent Order (Application Document Ref. 3.1).

Consultee	Comments made in response to statutory consultation	Applicant response
	works near hazardous infrastructure, impacts on existing and planned storage facilities, and the need to protect ongoing access, maintenance and operation of its assets. Navigator also highlighted potential effects on navigation, vessel movements, dredging, sedimentation, hydrodynamics, vibration, noise and dust, and requested further technical assessments, refinement of the Order Limits, and ongoing engagement to ensure its operational, commercial and safety interests are appropriately protected.	
SABIC	SABIC raised concerns about the potential impact of the Proposed Development on its COMAH-regulated facilities, major accident hazard pipelines, Link Line Corridors, Tunnel No. 2 and North Tees operations. Key concerns related to maintaining uninterrupted access to critical infrastructure, protecting the Wilton to Grangemouth Ethylene Pipeline (WGEP) and other pipeline assets, safeguarding navigation and dredging activities on the River Tees, preserving operational access via Huntsman Drive and the Link Line Corridors, and avoiding any disruption that could affect industrial operations on Teesside and beyond.	The Applicant commits to ongoing engagement with SABIC to agree appropriate protection measures and confirms that Protective Provisions are included within Schedule 11 of the Draft Development Consent Order (Application Document Ref. 3.1) , with discussions to continue on their scope and suitability.
Tesco	Tesco raised concerns about the potential impact of the Proposed Development on the operation of its Teesport Distribution Centre, particularly in relation to site safety, business continuity, proposed pipeline infrastructure and any associated utility disruptions. Tesco requested the opportunity to review and comment on the Proposed Development's assessments and sought further information	The Applicant confirms that the potential effects of the development on landscape, traffic, flood risk, visual amenity, access, air quality, noise, marine environment and biodiversity are assessed within the relevant sections of the ES (Application Document Ref. 6.1) . The Applicant also confirmed that odour was scoped out of the EIA as the Proposed Development is not expected to generate odour during construction or operation. The Applicant confirms it will continue to engage with Tesco.

Consultee	Comments made in response to statutory consultation	Applicant response
	on the potential effects of the development on traffic and access, air quality, noise, flood risk, the marine environment, odour, biodiversity, and the wider landscape and visual environment, where these could affect its operations.	
Vodafone	Vodafone confirmed that telecommunications infrastructure is present within the vicinity of the proposed works and provided network information identifying the affected assets. Vodafone advised that where the Proposed Development affects its apparatus, early engagement will be required to assess the need for any diversions or protection measures. It also noted that changes to infrastructure layouts or levels may necessitate network alterations and requested that detailed scheme plans are provided to enable assessment of potential impacts and associated costs.	The Applicant notes these requirements and will engage with Vodafone regarding working near Vodafone assets. The Applicant confirms that Vodafone will benefit from Protective Provisions within Schedule 11 of the Draft Development Consent Order (Application Document Ref. 3.1) .
H2NorthEast Limited	H2NorthEast Limited (H2NEL) highlighted that there are areas of overlap and interaction between the H2NorthEast and Lighthouse Green Fuels Order Limits. While raising no objection to the Proposed Development, H2NEL emphasised the importance of ensuring that the Proposed Development does not impede the delivery of H2NorthEast and requested that its interests are taken into account as the Proposed Development evolves.	The Applicant notes the comments from H2NEL and will continue to engage with them.

Appendix G3 Consideration of comments from consultees under S47 of the Act

Issue	Response	Number of responses
General support for the project	The Applicant welcomes support of the Proposed Development.	7
Statement that the scheme is a significant improvement on the previously proposed project	The Applicant welcomes this comment. The Proposed Development is a revised iteration of an earlier project, also called Lighthouse Green Fuels, which was consulted on in 2024. The previous application has been formally withdrawn and is no longer being progressed. The new proposal reflects technical advancements and strategic improvements and is considered a new scheme under planning legislation. The two key changes are: • Location: The proposed Sustainable Aviation Fuel (SAF) facility will now be located at Seal Sands, approximately 500 metres north-east of the previous site. This new location has been chosen due to its suitability, size and proximity to necessary infrastructure to support SAF production. This larger, consolidated site will be able to accommodate the full SAF process in one location. • Feedstock: The new proposal will use sustainably sourced biomass as its primary feedstock, replacing the previous plan to use municipal solid waste (household waste) derived feedstock. This change supports greater carbon savings and aligns with sustainability criteria set by the UK Government.	1
Support for economic investment	The Applicant notes this comment. The project represents a significant investment in the UK's green economy and is expected to deliver substantial economic and community benefits.	1
Support for revival of the old INEOS site / use of idle land	The Applicant welcomes this comment. The Proposed Development is located on the former INEOS Nitriles site at Seal Sands, which is predominantly brownfield land previously occupied by large-scale industrial operations. The facility formerly on the site has been demolished, leaving a sizeable portion of industrial land unused.	1
Support for creation of net CO ₂ fuels	The Applicant welcomes these comments. The Proposed Development is designed to produce SAF capable of achieving major reductions in lifecycle carbon emissions when compared with conventional aviation fuels. In the future, the facility is expected to be capable of integrating with local carbon capture	2

Issue	Response	Number of responses
	and storage infrastructure, which could enable the production of fuels with extremely low - or potentially net-negative - carbon intensity.	
Support for use of locally produced biomass	The Proposed Development is committed to sourcing biomass as responsibly and as locally as possible. While the scale of feedstock required means that a proportion will need to be imported, the Applicant will seek to make use of UK-sourced biomass where feasible, ensuring that all materials meet strict sustainability standards. This includes opportunities to utilise residues from forestry operations, sawmills and agriculture, as well as locally available waste wood for the on-site CHP plant.	1
Support for use of sustainable biomass	The Applicant recognises the value of supporting regional supply chains and the associated environmental benefits of reducing transport distances where practicable. The Applicant will continue to explore opportunities to increase the share of domestic biomass within the feedstock mix, working with UK suppliers and industry partners to support long-term sustainable sourcing. The proposed development has been designed with regard to the sustainability requirements established by the SAF Mandate and will be required to demonstrate compliance with these standards.	1
Suggestion to create cycle path on redundant train tracks	The redundant railway tracks are largely located on third-party land and fall predominantly outside the Order Limits, meaning they are not within the control or powers of the Proposed Development.	1
Suggestion to “top up” Bio-SAF stream with renewable hydrogen-based e-SAF	The use of renewable hydrogen-based e-SAF is not currently considered a viable or established pathway at commercial scale within the UK. The Proposed Development will instead produce Bio-SAF directly through its own production process.	1
Statement that the landscape is already industrial	This site has been carefully chosen due to its suitability, size, and proximity to the necessary infrastructure required to support SAF production: • Located within an existing industrial area • Predominantly a brownfield site	2

Issue	Response	Number of responses
	• This larger, consolidated site accommodates the full SAF process in one location • Proximity to water and industrial gas supplies • Proximity to local carbon capture and storage infrastructure, supporting the project's ambition for low or carbon-negative SAF in the future • Access to nearby road, marine and rail terminals for export of SAF • Direct access to the River Tees for delivery of feedstock • Creation of jobs in a locally skilled workforce	
Statement that regard should be given to visual impact	The Applicant has carefully considered the visual impact of the proposals through Chapter 13: Landscape and Visual Amenity (ES Volume 1, Application Document Ref. 6.1.13) of the ES. The Proposed Development is located within an existing industrial area and would be experienced as a very small part of a much wider view and the development would not change the overall composition of the industrial landscape within the view.	1
Suggestion to consider colour schemes to blend into the landscape	The Applicant has carefully considered the visual impact of the proposals (including colour schemes) through Chapter 13: Landscape and Visual Amenity (ES Volume 1, Application Document Ref. 6.1.13) of the ES. The design principles that will inform the detailed design of the Proposed Development are set out in the Outline Design Principles document (Application Document Ref. 5.3.2).	1
Statement that the proposed development will not impact the landscape	The area surrounding the site is mostly comprised of industrial facilities. Major industrial buildings, including an oil refinery, oil storage and a chemical works, form part of the skyline. The Applicant has considered the landscape character of the site and its relationship with nearby communities to identify the potential effects on the local landscape and visual amenity through Chapter 13: Landscape and Visual Amenity (ES Volume 1, Application Document Ref. 6.1.13) of the ES.	1

Issue	Response	Number of responses
Concern regarding flare height	The Applicant has carefully considered the visual impact of the proposals through Chapter 13: Landscape and Visual Amenity (ES Volume 1, Application Document Ref. 6.1.13) of the ES. The maximum flare structure height is proposed to be up to 140 metres above existing ground levels. This reflects the worst-case design scenario assessed within the Environmental Statement. During the detailed engineering phase, the Applicant will seek to optimise the design and reduce the height of the flares where feasible. During operation, the Proposed Development is anticipated to be barely perceptible at residential receptors due to the distance and intervening industrial buildings and structures. The tall structures, including the proposed stacks and flares would be experienced in context of other large-scale industrial structures within the Tees estuary and be seen against higher ground beyond.	1
Concern regarding odour	There will be no significant sources of odour from the process, primarily based on the use of sustainably-sourced biomass feedstock with any potential for odour also being controlled through the environmental permit. There are also no nearby sensitive human receptors to be affected.	1
Statement that a significant portion of the river is included in the proposals	The Proposed Development will involve major upgrades to marine infrastructure, such as removing old jetties, building a new quay, and dredging to create a safe area for ships to deliver feedstock. These works are essential for the project's operations, enabling the docking and unloading of feedstock ships directly at the site. The project will secure a marine licence which will be regulated by the Marine Management Organisation (MMO) for relevant quayside and marine works. As part of the Environmental Impact Assessment (EIA), we have carefully studied how these marine activities could affect the local environment in the Navigational Risk Assessment in Chapter 20: Marine Navigation (ES Volume 1, Application Document Ref.	1

Issue	Response	Number of responses
	6.1.20), Chapter 12: Water Environment (Application Document Ref. 6.1.12) and Chapter 11: Freshwater and Marine Ecology (Application Document Ref. 6.1.11) of the ES.	
Concern regarding river traffic impact / coexistence of other river uses	As part of the Environmental Impact Assessment (EIA), we have carefully studied how these marine activities could affect river traffic in the Navigational Risk Assessment in Chapter 20: Marine Navigation (ES Volume 1, Application Document Ref. 6.1.20) of the ES.	1
Concern regarding increased traffic/impact on local road networks	The Applicant has assessed the potential impacts of the Proposed Development on the local and strategic road network in the surrounding area, as detailed in Chapter 18: Traffic and Transport (ES Volume 1, Application Document Ref. 6.1.18) of the ES and the associated Appendix 18A: Transport Assessment (Application Document Ref. 6.3.24), including Annex C Framework Construction Worker Travel Plan, and Appendix 18D: Framework Construction Traffic Management Plan (Application Document Ref. 6.3.27). Construction and operational access will primarily be via the former INEOS access on Seal Sands Road, connecting to the trunk road network via the A1185 and A689/A19. The transport strategy as outlined prioritises the use of main roads and avoid residential areas where possible. Where practicable, modular construction and delivery by ship will be used to reduce HGV traffic. The project team has worked closely with local authorities, residents, and transport specialists to ensure the transport strategy is efficient, minimises disruption, and prioritises public safety.	2
Statement that sea/river networks should be used to maximum effect	Marine transport during construction and operation is a core element in the Proposed Development.	1
Statement that rail networks should be used to maximum effect	The Applicant considered the potential use of rail for product export. However, due to volumes and delivery locations, the use of rail has	1

Issue	Response	Number of responses
	been removed, and the intent is to export the products by ship as the preferred export method	
General support for proposed transport routes	The Applicant welcomes support of the Proposed Development. More information is detailed in Chapter 18: Traffic and Transport (ES Volume 1, Application Document Ref. 6.1.18) of the ES.	1
Statement that the local area is experienced in the use of proposed transport routes		1
Statement that Seal Sands Road is busy at times / used by plenty of cyclists	The Applicant has assessed the potential impacts of the Proposed Development on the local and strategic road network in the surrounding area, as detailed in Chapter 18: Traffic and Transport (ES Volume 1, Application Document Ref. 6.1.18) of the ES and the associated Appendix 18A: Transport Assessment (Application Document Ref.6.3.24). The Applicant has assessed the impacts on users of Seal Sands Road and will implement a Construction Worker Travel Plan (CWTP) and Construction Traffic Management Plan (CTMP) to manage construction-related travel and traffic movements.	1
Concern regarding dust	A Framework Construction Environmental Management Plan (Application Document Ref. 6.3.4) has been developed as part of the DCO application to outline how construction activities will be managed throughout the construction process. It sets out strategies and measures for managing construction activities, including minimising dust and dirt, stakeholder engagement, site management, environmental considerations, community impact, health and safety, and monitoring and compliance. The construction environment management requirement in the Draft Development Consent Order (Application Document Ref. 3.1) requires the Applicant to submit a detailed construction environment management plan including a dust management plan (where relevant) to the local planning authority for approval prior to the commencement of works.	1
Concern regarding noise impact	The Applicant has carefully considered the noise and vibration impacts of the Proposed Development through Chapter 9: Noise	1

Issue	Response	Number of responses
	and Vibration (ES Volume 1, Application Document Ref. 6.1.9) of the ES. Noise impacts may arise from site preparation, earthworks, piling for on-site structures and quay construction, module installation, and pipeline works. Noise modelling predicts that rating levels at all assessed residential receptors will remain below thresholds for significant adverse impacts. Our assessment concludes that significant noise effects are unlikely during construction, operation, or decommissioning. Construction noise and vibration is managed through the Framework Construction Environmental Management Plan (Application Document Ref. 6.3.4), and the construction environment management requirement in the Draft Development Consent Order (Application Document Ref. 3.1) which requires the Applicant to submit a construction noise management plan (where relevant) as part of the detailed construction environmental management plan to the local planning authority for approval prior to the commencement of works. Operational noise is managed through the operational noise requirement in the Draft Development Consent Order (Application Document Ref 3.1). To manage noise, certain elements of the project cannot be brought into commercial use until a scheme for the management and monitoring of noise during operation of those elements has been submitted to and approved by the local planning authority. There are also operational noise limits which apply at day and at night.	
Statement that the proposed development should aim for a no-impact effect on local communities	As part of the DCO process the Applicant has carried out an Environmental Impact Assessment (EIA) to assess the likely significant effects (both positive and negative) the Proposed Development could have on the environment and local communities. The ES (Application Document Ref. 6.1) provides	1

Issue	Response	Number of responses
	details on a wide range of topics such as landscape and visual, biodiversity, cultural heritage, flood risk, traffic, noise and other considerations. The Proposed Development is expected to make a positive contribution to the local area through job creation, investment in the regional economy, and the development of local skills and training opportunities.	
Support for environmental improvements	The Applicant welcomes support of the Proposed Development.	1
Statement that the consultation was very informative / General support for the consultation	The Applicant welcomes these comments.	1



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