

The Lighthouse Green Fuels Order

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Applicant: LGF Projects Limited

Pipelines Statement

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Contents

Abbreviations	1
Executive Summary	2
2 Introduction	3
2.1 Overview	3
2.2 The Applicant.....	3
2.3 Overview of the Proposed Development.....	3
2.4 The Site	6
2.5 The DCO Process	6
2.6 The purpose and structure of this document.....	7
3 Proposed pipeline routes and connections.....	9
3.1 Overview	9
Natural gas supply (Work No 8)	9
Industrial gases supply (Work No 9A)	10
SAF and renewable naphtha export (Work No 11A)	11
CO ₂ export (Work Nos 11B or 11C).....	12
4 Contractual agreements	14
4.1 Overview	14
Natural gas supply (Work No 8)	14
Industrial gases supply (Work No 9A)	14
SAF and renewable naphtha export (Work No 11A)	14
CO ₂ export (Work Nos 11B or 11C).....	15
5 Responsibilities for designing and building the pipelines... 16	
5.1 Design	16
5.2 Build	16
5.3 Operation and maintenance.....	17
6 Land requirements	18
6.1 Overview	18
7 Consents required	19
7.1 Overview	19
8 Conclusions	20

8.1	Overview	20
References		21

Tables

Table 2.1	Works Description Summaries	4
Table 3.1	Natural gas connection pipelines	10
Table 3.2	Industrial gases connection pipelines.....	11
Table 3.3	SAF and renewable naphtha export pipelines.....	12

Abbreviations

Abbreviation	In Full / Term
AGI	Above Ground Infrastructure
APFP Regulations	The Infrastructure Planning (Applications: Prescribed Forms and Procedures) Regulations 2009
ASU	Air Separation Unit
CHP	Combined Heat and Power
CO ₂	Carbon dioxide
DCO	Development Consent Order
EIA	Environmental Impact Assessment
EPC	Engineering, Procurement and Construction
ES	Environmental Statement
km	kilometre
LGF	Lighthouse Green Fuels
MW	Megawatts
MWe	Megawatts electrical
NGT	National Gas Transmission
PINS	Planning Inspectorate
RCBC	Redcar and Cleveland Borough Council
SAF	Sustainable Aviation Fuel
SoS	Secretary of State
STBC	Stockton-on-Tees Borough Council

Executive Summary

- 1.1.1 This Pipelines Statement has been prepared to satisfy the requirements of Regulation 6(4) of the Infrastructure Planning (Applications: Prescribed Forms and Procedures) Regulations 2009 (APFP Regulations) [Ref 2] and to demonstrate that there is no reason why the pipeline connections would not be possible for the Proposed Development.
- 1.1.2 The pipeline connections that have been considered in this Statement are:
- the natural gas connection (Work No. 8 in Schedule 1 of the **Draft Development Consent Order (DCO) (Application Document Ref. 3.1)**);
 - industrial gases connections (Work No. 9A in in Schedule 1 of the **Draft DCO (Application Document Ref. 3.1)**);
 - pipelines for the export of SAF and renewable naphtha (Work No. 11A in Schedule 1 of the **Draft DCO (Application Document Ref. 3.1)**); and
 - pipelines for the export of carbon dioxide (CO₂) to the Northern Endurance Partnership transport and storage network (Work Nos. 11B and 11C in Schedule 1 of the **Draft DCO (Application Document Ref. 3.1)**).
- 1.1.3 The Statement demonstrates that these proposed pipelines and connections that are included within the Application (and assessed as part of the Environmental Impact Assessment (EIA) reported in the Environmental Statement (**ES**) (**Application Document Refs. 6.1-6.4**)) are feasible, that the necessary agreements are being/ have been secured, and appropriate powers are included in the **Draft DCO (Application Document Ref. 3.1)** to facilitate the delivery of the pipeline connections.

2 Introduction

2.1 Overview

- 2.1.1 This **Pipelines Statement (Application Document Ref. 7.2)** has been prepared by Ove Arup and Partners Limited (Arup) on behalf of LGF Projects Limited (the Applicant), to support an application (the Application) seeking development consent for the construction, operation, maintenance and decommissioning of the Lighthouse Green Fuels (LGF) project (the Proposed Development) on land within the administrative boundaries of Stockton-on-Tees Borough Council (STBC) and Redcar and Cleveland Borough Council (RCBC).
- 2.1.2 The Order limits for the Proposed Development are made up of the Main Site and Wider Site, together 'the Site'. A more detailed description of the Site is set out at Section 2.4.
- 2.1.3 The Application has been submitted to the Planning Inspectorate (PINS), and the decision whether to grant a Development Consent Order (DCO) will be made by the Secretary of State (SoS) for Energy Security and Net Zero pursuant to the Planning Act 2008 (the PA 2008) [Ref 1].
- 2.1.4 The Proposed Development comprises a commercial-scale second generation Sustainable Aviation Fuel (SAF) production facility and associated infrastructure.

2.2 The Applicant

- 2.2.1 The Applicant is wholly owned by Alfanar Energy Limited (Alfanar). Alfanar is part of a global project development, manufacturing, and engineering group headquartered in Saudi Arabia. Alfanar has developed significant in-house feedstock-to-SAF expertise. This experience will be utilised to construct and operate the Proposed Development.

2.3 Overview of the Proposed Development

- 2.3.1 The Proposed Development is anticipated to be the UK's first commercial-scale second generation SAF production facility.
- 2.3.2 The Proposed Development includes the construction, operation, maintenance and decommissioning of a commercial-scale facility that will produce approximately 180 million litres of advanced SAF and approximately 30 million litres of renewable naphtha each year.
- 2.3.3 The Proposed Development includes the following elements (the location of each Work No. is shown on the **Works Plans (Application Document Ref. 2.4)**):

Table 2.1 Works Description Summaries

Work Number:	
Work No. 1	SAF production facility comprising: • 1A - feedstock pre-treatment facility including flue gas treatment and stack • 1B - SAF processing facility including thermal oxidiser, flue gas treatment, and stack • 1C - up to two flare structures
Work No. 2	Combined heat and power (CHP) generating station comprising: • 2A - boilers and steam turbine generators • 2B - flue gas treatment and stack
Work No. 3	Feedstock and intermediate and final product handling and storage
Work No. 4	Cooling infrastructure for SAF production facility and CHP plant
Work No. 5	Bridge and culvert crossings of existing infrastructure
Work No. 6	Marine infrastructure comprising: • 6A - construction of permanent quay • 6B - permanent quay • 6C - capital and maintenance dredging
Work No. 7	Electrical connection works comprising: • 7A - underground and overground cable connections to the existing North Bank Supply Point • 7B - electrical connection works
Work No. 8	Modified or new natural gas connection and above ground infrastructure (AGI)
Work No. 9	Supply of industrial gases: Only one of Work No. 9A or Work No. 9B would be developed; • 9A - industrial gases connection works comprising installation of new and repurposing of oxygen and nitrogen pipeline connections, and connection to existing low pressure nitrogen supply • 9B - air separation unit (ASU) facility and connections to Work No. 1
Work No. 10	Modification or removal and replacement of industrial wastewater pipeline connection works
Works No. 11	• Export connection works: 11A - pipeline(s) for the export of SAF and renewable naphtha • 11B or 11C - a pipeline for the export of carbon dioxide (CO₂) connecting to AGI by others (being either AGI C1 or C2 of the Northern Endurance Partnership (NEP) transport and storage pipeline) Only one of Work No. 11B or Work No. 11C would be developed
Works No. 12	Surface water attenuation, and drainage and discharge works
Works No. 13	Laydown areas comprising:

	• 13A - temporary construction compounds and laydown areas • 13B - permanent laydown and storage
Work No. 14	Access works and private street improvements

- 2.3.4 In addition a range of associated development, both specified and unspecified, is proposed in relation to the above.
- 2.3.5 The new quay on the River Tees (**Work No. 6**) will allow delivery of modular plant and construction materials by ship during construction and biomass and waste wood feedstock during operation, reducing reliance on road transport. Feedstock will be stored (**Work No. 3**) then pre-treated at the Main Site and processed into SAF through gasification and gas-to-liquids processes (**Work No.1**).
- 2.3.6 To support operations, the Proposed Development will include a biomass and waste wood-fired CHP plant (**Work No. 2**) with an electrical output capacity of up to 200 megawatts electrical (MWe), providing a low-carbon energy supply for the SAF process. Cooling infrastructure (**Work No. 4**) will be required for the SAF process and the CHP plant. Connections will provide electricity for start-up and to maintain ancillary site supplies (**Work No. 7**), natural gas for start-up and as auxiliary fuel for some processes during operation (**Work No. 8**), and oxygen and nitrogen which will either be delivered to the Site via pipelines or produced by a new ASU in the Main Site (**Work No. 9A or 9B** respectively). Waste materials, including off-specification materials will be exported from the Main Site by road. Finished products (SAF, and a secondary product of the process, renewable naphtha) will be transferred via pipeline(s) (**Work No. 11A**) to local marine loading facilities for marine export or export by road. CO₂ from the acid gas removal unit in Work No. 1B will be exported via pipeline (**Work No. 11B or Work No. 11C**) subject to a suitable agreement to connect to one of two proximate AGIs in the NEP project.
- 2.3.7 The Proposed Development will also include replacement and new wastewater pipeline connection works (**Work No. 10**), surface water drainage systems (**Work No. 12**) and access and street improvements (**Work No. 14**). Space within the Wider Site is identified for temporary construction and laydown and space within the Main Site identified for permanent laydown and storage areas (**Work No. 13**).
- 2.3.8 The preliminary layout of the Proposed Development is shown on **Indicative General Arrangement Plan (Application Document Ref. 2.5.1)** and **Indicative General Arrangement Isometric (Application Document Ref. 2.5.2)**.

2.4 The Site

- 2.4.1 The Site location and boundary (which is also known as the 'Order limits') are shown on **Site Location Plan (Application Document Ref. 2.1)**. The Site is located in Teesside on land to the north and south of the River Tees with connection corridors crossing the Tees.
- 2.4.2 The Main Site is located in the industrial area of Seal Sands approximately 5km east of Billingham town centre and 4km north-east of Middlesbrough town centre, on the north bank of the River Tees in the borough of Stockton-on-Tees). The majority of the Main Site lies south of Seal Sands Road and largely comprises previously developed land formerly used as a chemical plant from the early 1970s. It was last operated by INEOS Nitriles.
- 2.4.3 The Main Site comprises the main SAF facility development area of the Site, lying to the south and north sides of Seal Sands Road and bounded by the proposed quay in the River Tees, with the River Tees to the east.
- 2.4.4 The eastern boundary of the Main Site is formed by the River Tees, where existing jetties will be demolished and a new quay developed.
- 2.4.5 The Wider Site comprises the connection corridors, including land required for road access, pipelines (including under the River Tees), dredging near to the Main Site, and utility connections and construction laydown in both North Tees and (in the borough of Redcar and Cleveland) South Tees.

2.5 The DCO Process

- 2.5.1 Part 3 of the PA 2008 defines which projects constitute a nationally significant infrastructure project (NSIP). Once classed as an NSIP, development consent (in the form of a DCO) is required under Part 4 of the PA 2008.
- 2.5.2 In legislative terms the Proposed Development comprises both a SAF production facility and a CHP generating station together with development associated with the SAF production facility and the CHP generating station.
- 2.5.3 The construction and operation of the main SAF production facility does not automatically fall within the definition of an NSIP. Therefore, on 12 August 2025, the Applicant formally requested a direction by the SoS for Energy Security and Net Zero, pursuant to section 35(1) of the PA 2008, that the following elements be treated as one for which development consent is required. The Section 35 direction request was made in respect of: a main gasification facility to process sustainably sourced biomass; feedstock pre-treatment, syngas clean-up apparatus; Fischer-Tropsch process units; refining units; feedstock, intermediates and finished product storage;

quayside with ship loading/ offloading infrastructure; supporting infrastructure and utility connections (hereafter called the ‘Specified Elements’).

- 2.5.4 The SoS for Energy Security and Net Zero issued a direction under Section 35 of the PA 2008 [Ref 1] on 08 September 2025 to confirm that the Specified Elements of the Proposed Development, together with any matters/ development associated with them, should be treated as development for which development consent under the PA 2008 is required.
- 2.5.5 The CHP plant (**Work No. 2**) surpasses the 50 Megawatt (MW) threshold for generating stations defined in Section 15 of the PA 2008 and is therefore a NSIP in its own right.
- 2.5.6 An application for development consent for the Proposed Development has been submitted to PINS acting on behalf of the SoS. Subject to the Application being accepted, PINS will then examine it and make a recommendation to the SoS who will then decide whether to grant a DCO.
- 2.5.7 The application for development consent for the Proposed Development supersedes a previous application that was being progressed by Lighthouse Green Fuels Limited centred on a site off Huntsman Drive in Seal Sands, TS2 1TT (PINS ref. EN010150). Statutory consultation on that application took place between 16 May 2024 and 20 June 2024. As shown on the PINS website¹, that application is discontinued.

2.6 The purpose and structure of this document

- 2.6.1 The purpose of this document is to meet the requirements of Regulation 6(4) of the APFP Regulations [Ref 2], which require the Applicant to provide details of the pipelines that form part of the Proposed Development, including the pipelines’ names, owners, start and end points, length, external diameter, what will be conveyed and information regarding land rights and consents for road or river crossings.
- 2.6.2 ‘Pipelines’ are defined in Section 65 of the Pipe-lines Act 1962 [Ref 3] to mean “*a pipe (together with any apparatus and works associated therewith), or system of pipes (together with any apparatus and works associated therewith), for the conveyance of any thing other than air, water, water vapour or steam*” (excluding drains and sewers, heating and cooling pipes, pipes for domestic purposes, pipes on the site of certain building operations or works of engineering construction, pneumatic dispatch-tubes and pipes situated within agricultural, educational or research premises).

¹ <https://national-infrastructure-consenting.planninginspectorate.gov.uk/projects/EN010150>

2.6.3 This document is structured as follows:

- Section 3 sets out the proposed pipeline routes and points of connection;
- Section 4 outlines the contractual agreements for the proposed pipelines;
- Section 5 provides details on the design and build responsibilities for the proposed pipelines;
- Section 6 outlines land ownership in respect of the land required for the proposed pipelines;
- Section 7 provides information on the consents required for the proposed pipelines; and
- Section 8 provides the summary and conclusions to the Statement.

3 Proposed pipeline routes and connections

3.1 Overview

- 3.1.1 The Applicant has included within this Statement the proposed routes and connection points for the following pipelines that form part of the Proposed Development:
- the natural gas connection (Work No. 8 in Schedule 1 of the **Draft DCO (Application Document Ref. 3.1)**);
 - industrial gases connections (Work No. 9A in in Schedule 1 of the **Draft DCO (Application Document Ref. 3.1)**);
 - pipelines for the export of SAF and renewable naphtha (Work No. 11A in Schedule 1 of the **Draft DCO (Application Document Ref. 3.1)**); and
 - pipelines for the export of carbon dioxide (CO₂) to the Northern Endurance Partnership transport and storage network (Work Nos. 11B and 11C in Schedule 1 of the **Draft DCO (Application Document Ref. 3.1)**).
- 3.1.2 The indicative routes and connection points of these pipelines are shown on the **Connection Route Plans (Application Document Ref. 2.9)**.
- 3.1.3 Environmental effects associated with the construction of the pipelines are assessed as part of the EIA, which is reported in the **ES (Application Document Refs. 6.1-6.4)**.

Natural gas supply (Work No 8)

- 3.1.4 The natural gas connection (Work No 8) pipeline route will be within the Main Site, connecting to the National Gas transmission network at or in the vicinity of an existing Above Ground Installation (AGI) south of Seal Sands Road in the western part of the Main Site. Refer to Table 3.1 for further information.

Table 3.1 Natural gas connection pipelines

Pipeline name	Owner	Start point	End point	Pipe external diameter (mm)	Pipe length (km)	Notes
Natural Gas	National Gas Transmission (NGT)	NGT Above Ground Infrastructure (AGI) on the west boundary line of the Site boundary.	LGF metering point within the Main Site	273	0.6	New pipeline required from the AGI to LGF plant. equipment - entirely within the Main Site boundary.

Note: Line sizes and final routings to be confirmed during detailed engineering.

Industrial gases supply (Work No 9A)

3.1.5 The industrial gases connections (Work No 9A) would provide oxygen and nitrogen to the Proposed Development (in the event a new Air Separation Unit (ASU) (Work No. 9B) is not developed in the northern part of the Main Site), as follows:

- Oxygen would be supplied via an existing oxygen pipeline in North Tees which links to an existing industrial gases facility in South Tees via a crossing under the Tees. The section of the existing oxygen pipeline in North Tees which runs adjacent to Seal Sands Road will need upgrading, and any other replacement and/or improvement works along the route will be confirmed by future surveys and engineering studies;
- Low pressure nitrogen would be supplied by a connection to an existing pipeline crossing the Main Site; and
- High pressure nitrogen would be supplied from an existing industrial gases facility in South Tees by repurposing an existing section of currently un-used pipeline under the Tees and installing new pipeline infrastructure both north and south of the Tees to interconnect the existing industrial gases facility with the Main Site.

3.1.6 Refer to Table 3.2 for further information.

Table 3.2 Industrial gases connection pipelines

Pipeline name	Owner	Start point	End point	Pipe external diameter (mm)	Pipe length (km)	Notes
High Pressure Nitrogen	Third party	Third party industrial gases facility in South Tees	LGF metering point located at the north east corner of the Main Site.	355	6	This includes the existing section under the River Tees in an existing crossing.
Low Pressure Nitrogen	Third party	Third party industrial gases facility in South Tees	LGF metering point located at the north east corner of the Main Site.	406	1	New pipeline required from existing distribution system.
Oxygen	Third party s	Third party industrial gases facility in South Tees	LGF metering point located at the north east corner of the Main Site.	355	6	This includes the existing section under the River Tees in an existing crossing.

Note: Line sizes and final routings to be confirmed during detailed engineering.

SAF and renewable naphtha export (Work No 11A)

- 3.1.7 The product (SAF and renewable naphtha) export pipelines (Work No 11A) will connect the SAF production facility to an existing local third-party bulk liquid storage facility for export by ship. The above ground pipelines will be routed along existing pipe corridors. Refer to Tabel 3.3 for further information.

Table 3.3 SAF and renewable naphtha export pipelines

Pipeline name	Owner	Start point	End point	Pipe external diameter (mm)	Pipe length (km)
SAF Export	Third party	LGF metering point located at the north east corner of the Main Site.	Third party on the north bank of the River Tees.	355	1.75
Renewable Naphtha Export	Third party	LGF metering point located at the north east corner of the Main Site.	Third party on the north bank of the River Tees.	355	1.75

Note: Line sizes and final routings to be confirmed during detailed engineering.
Third party to be confirmed during detailed engineering.

CO₂ export (Work Nos 11B or 11C)

- 3.1.8 Subject to a suitable agreement to connect to the Northern Endurance Partnership (NEP) CO₂ gathering network in Teesside, CO₂ produced by the Proposed Development will in future be transported by pipeline to the separately consented NEP network.
- 3.1.9 The CO₂ export pipeline (Work Nos. 11B or 11C) would transport CO₂ from the Main Site to the CO₂ gathering network which is routed along the existing pipe corridor that runs along southern boundary of the Main Site before turning north before it reaches Riverside Road. The location of the connection point has not yet been confirmed but it will be at either AGI C1 adjacent to the southern boundary of the Main Site (Work No. 11B) or AGI C2 which is located to the north-east of the Main Site (Work No 11C). Only one of these options will be constructed. Refer to Table 3.4 for further information.

Table 3.4 CO₂ export pipeline options

Pipeline name	Owner	Start point	End point	Pipe external diameter (mm)	Pipe length (km)	Notes
CO ₂ export via NEP AGI C1	NEP	LGF metering point located at the southern boundary of the Main Site.	NEP pipeline	610	1.5	New pipeline required from the Main Site to the NEP AGI.
CO ₂ export via NEP AGI C1	NEP	LGF metering point located to the north-east of the Main Site.	NEP pipeline	610	0.4	New pipeline required from the Main Site to the NEP AGI.
Note: Line sizes and final routings to be confirmed during detailed engineering.						

4 Contractual agreements

4.1 Overview

- 4.1.1 Engagement has been ongoing with the relevant third parties to agree the proposed pipeline routes and connection points.

Natural gas supply (Work No 8)

- 4.1.2 The Applicant has been engaging with National Gas Transmission and understands that there is sufficient capacity in the gas transmission network to accommodate the natural gas required for the Proposed Development, based on early discussions and previous natural gas supplies to the former chemical plant constructed on the Main Site.
- 4.1.3 The Applicant is working with National Gas Transmission to develop a formal connection offer and commercial agreement.

Industrial gases supply (Work No 9A)

- 4.1.4 The Applicant is working with an industrial gases supplier to enter into a commercial agreement regarding the supply of oxygen and nitrogen required for the Proposed Development.
- 4.1.5 Initial feasibility has been confirmed and the Applicant is working towards a formal supply agreement.

SAF and renewable naphtha export (Work No 11A)

- 4.1.6 The Applicant is engaging with third parties regarding potential commercial agreements to export SAF and renewable naphtha from the Proposed Development. Local third-party bulk liquid storage facilities have confirmed their ability to handle the products through their existing terminal facilities in North Tees. Feasibility studies are progressing.
- 4.1.7 The Applicant is working with the third parties and will make a commercial decision regarding the final export arrangements which will determine the final pipeline route and connection point. The **Traffic and Transport assessment (Chapter 18: Traffic and Transport, ES Volume I, Application Document Ref. 6.1)** has included an assessment of road export of SAF and renewable naphtha to ensure a worst-case assessment has been undertaken for the purposes of the EIA Regulations.

CO₂ export (Work Nos 11B or 11C)

- 4.1.8 The Applicant has made an application to the East Coast Cluster Track 1 Expansion Process which is due to conclude in 2027. The Applicant understands that there is sufficient capacity in the CO₂ gathering network to accommodate the CO₂ that would be exported from the Proposed Development but awaits the conclusion of the application process.

5 Responsibilities for designing and building the pipelines

5.1 Design

- 5.1.1 The chosen Engineering, Procurement and Construction (EPC) contractor(s) will undertake detailed design of the pipelines within the Main Site and the relevant third parties will design the pipelines and connections to their existing infrastructure outside the Main Site.
- 5.1.2 The detailed design of the pipeline connections will be secured by a Requirement in Schedule 2 of the **Draft DCO (Application Document Ref. 3.1)**.

5.2 Build

- 5.2.1 National Gas Transmission will be responsible for works within the existing AGI and/or construction of a new AGI within the Main Site adjacent to the existing AGI and works on National Transmission System infrastructure. It is anticipated that the Applicant's EPC Contractor(s) will construct the natural gas pipes from the AGI to the downstream equipment within the Main Site in relation to **Work No. 8**.
- 5.2.2 The industrial gases supplier would be responsible for the construction of the industrial gas supply pipelines to the metering point within the Main Site and the Applicant's EPC contractor will construct the downstream oxygen and nitrogen pipes within the Main Site, in relation to Work No 9A.
- 5.2.3 A local third party bulk liquid storage facility operator will be responsible for constructing the product export pipelines from the metering point on the Main Site to their existing storage and export facility and the Applicant's EPC contractor will construct the product export pipes upstream of the metering point within the Main Site in relation to Work No 11A.
- 5.2.4 NEP would be responsible for constructing the CO₂ export pipeline from the metering point within the Main Site to the NEP CO₂ gathering network and the Applicant's EPC contractor would construct the CO₂ pipe upstream of the metering point within the main site, in relation to Work No 11B or 11C.
- 5.2.5 It is envisaged that the installations will be undertaken over a two year period in the middle of the overall three to four year construction period for the Proposed Development.
- 5.2.6 The pipelines will follow existing service corridors. The oxygen and high pressure nitrogen pipelines are likely to be run underground using open cut techniques. The other pipelines will be run above ground on existing pipe tracks/racks where practicable. Open cut techniques or trenchless methods may also be required, e.g. for crossings.

- 5.2.6.1 The construction methodologies for installation of pipelines (including above ground, open cut and using Horizontal Directional Drilling (HDD)) are described in **Chapter 5: Construction Programme and Management (ES Volume I, Application Document Ref. 6.1)**.
- 5.2.7 The pipeline works will be undertaken in accordance with a Construction Environmental Management Plan (CEMP), to be prepared in accordance with the **Framework CEMP (fCEMP) (Appendix 5A, ES Volume III, Application Document Ref. 6.3)** which accompanies the DCO application. The preparation of a detailed CEMP is secured as part of a requirement within Schedule 2 of the **draft DCO (Application Document Ref. 3.1)**.

5.3 [Operation and maintenance](#)

- 5.3.1 The Applicant will be responsible for the operation and maintenance of all on-site plant and apparatus over the life of the Proposed Development.
- 5.3.2 It is expected that National Gas Transmission, the industrial gases supplier, the local third party bulk liquid storage company and NEP will be responsible for the operation and maintenance of their respective pipelines and equipment within the Site up to the relevant metering point or isolation valve, in relation to Work Nos 8, 9A, 11A and 11B or 11C.
- 5.3.3 Pipeline inspection plans will be prepared by each party.

6 Land requirements

6.1 Overview

- 6.1.1 The land required for the pipeline connections (Works Nos. 8, 9A, 11A, 11B and 11C) is shown on the **Land Plans (Application Document Ref. 2.2)** and third parties within interests in each land parcel are listed in the **Book of Reference (Application Document Ref. 4.3)**.
- 6.1.2 The majority of the land required for the pipeline connections is within the Main Site (land in the control of the Applicant) and along existing utility corridors.
- 6.1.3 The Applicant is engaging with the relevant third parties to seek the required land agreements (see the **Pre-application Land and Rights Negotiations Tracker (Application Document Ref. 4.4)**).

7 Consents required

7.1 Overview

- 7.1.1 The proposed pipeline connection works are included within the Application and therefore no separate planning permissions are anticipated to be required. The proposed works are covered by Work Nos. 8, 9A, 11A, 11B and 11C in **Schedule I of the draft DCO (Application Document Ref. 3.1)**.

8 Conclusions

8.1 Overview

- 8.1.1 This Pipelines Statement has been prepared to satisfy the requirements of Regulation 6(4) of the APFP Regulations [Ref 2] and to demonstrate that there is no reason why the pipeline connections would not be possible for the Proposed Development.
- 8.1.2 The pipeline connections that have been considered in this Statement are:
- the natural gas connection (Work No. 8 in Schedule 1 of the **draft DCO (Application Document Ref. 3.1)**);
 - industrial gases connections (Work No. 9A in in Schedule 1 of the **draft DCO (Application Document Ref. 3.1)**);
 - pipelines for the export of SAF and renewable naphtha (Work No. 11A in Schedule 1 of the **draft DCO (Application Document Ref. 3.1)**); and
 - pipelines for the export of carbon dioxide (CO₂) to the Northern Endurance Partnership transport and storage network (Work Nos. 11B and 11C in Schedule 1 of the **draft DCO (Application Document Ref. 3.1)**).
- 8.1.3 This Statement has demonstrated that these proposed pipelines and connections that are included within the Application (and assessed as part of the EIA reported in the **ES (Application Document Refs. 6.1-6.4)** are feasible, that the necessary agreements are being secured, and appropriate powers are included in the **draft DCO (Application Document Ref. 3.1)** to facilitate the delivery of the pipeline connections.

References

- Ref 1 UK Government (2008) Planning Act 2008. Available online:
<https://www.legislation.gov.uk/ukpga/2008/29/contents>. [Accessed July 2026]
- Ref 2 UK Government (2009) Infrastructure Planning (Applications: Prescribed Forms and Procedures) Regulations 2009. Available online:
<https://www.legislation.gov.uk/uksi/2009/2264/contents/made>. [Accessed July 2026]
- Ref 3 UK Government (1962) Pipe-Lines Act 1962. Available online:
<https://www.legislation.gov.uk/ukpga/Eliz2/10-11/58/contents>. [Accessed July 2026]



www.lighthousegreenfuels.co.uk

