

The Lighthouse Green Fuels Order

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Glossary

Acronym	In Full / Term
AGI	Above Ground Infrastructure
APFP	Applications Prescribed Forms and Procedure
ASTM	Advancing Standards Transforming Markets
ASU	Air Separation Unit
BECCS	Bioenergy with Carbon Capture and Storage
CCC	Climate Change Committee
CCR	Carbon Capture Ready
CCS	Carbon Capture Storage
CCUS	Carbon Capture Utilisation and Storage
CDST	Carbon dioxide storage terminal
CGS	Clean Growth Strategy
CHP	Combined Heat and Power
CNP	Critical national priority
CO ₂	Carbon dioxide
DCO	Development Consent Order
DESNZ	Department for Energy Security and Net Zero
DNO	District Network Operator
DPD	Development Plan Document
ECC	East Coast Cluster
EIA	Environmental Impact Assessment
ES	Environmental Statement
EWP	Energy White Paper
ExA	Examining Authority
FES	Future Energy Scenarios
GGR	Greenhouse Gas Removal
GHG	Greenhouse Gas
HEFA	Hydroprocessed esters and fatty acids
HP	High pressure
HRA	Habitat Regulations Assessment
Km	Kilometre
LGF	Lighthouse Green Fuels
LIR	Local Impact Reports
LPG	Liquefied Petroleum Gas
LSO	Long Sea Outfall

MPS	Marine Policy Statement
MW	Megawatts
MWe	Megawatts electrical
NDC	Nationally determined contribution
NEP	Northern Endurance Partnership
NIC	National Infrastructure Commission
NPPF	National Planning Policy Framework
NPS	National Policy Statements
NSIP	Nationally Significant Infrastructure Projects
NWL	Northumbrian Water Limited
PA	Planning Act
PCCU	Post-Combustion Carbon Capture Unit
PINS	Planning Inspectorate
RCBC	Redcar and Cleveland Borough Council
RO	Renewables Obligation
RTFO	Renewable Transport Fuel Obligations
rWFD	Revised Waste Framework Directive
SAF	Sustainable Aviation Fuel
SAFST	Sustainable Aviation Fuel storage terminal
SFRA	Strategic Flood Risk Assessment
SoS	Secretary of State
SPA	Special Protection Area
SSSI	Site of Special Scientific Interest
STBC	Stockton-on-Tees Borough Council
TAA	Transition Access Agreement

Executive Summary

This Planning Statement (**Application Document Ref. 5.2.1**) has been prepared by DWD Property and Planning Ltd on behalf of LGF Projects Limited (the Applicant), to support an application (the Application) for a Development Consent Order (DCO) that has been submitted to the Secretary of State (SoS) for Energy Security and Net Zero, under Section 37 of the Planning Act 2008 (the 2008 Act).

The Applicant is seeking development consent for the construction, operation, maintenance and decommissioning of a commercial-scale second generation Sustainable Aviation Fuel (SAF) production facility and associated infrastructure (the Proposed Development), at a site at Seal Sands in Stockton-on-Tees Borough Council (STBC), with connection corridors extending into Redcar and Cleveland Borough Council (RCBC).

The Proposed Development would produce approximately 180 million litres of advanced SAF and approximately 30 million litres of renewable naphtha each year, and includes a biomass and waste wood-fired CHP plant with an electrical output capacity of up to 200 megawatts electrical, providing a low-carbon energy supply for the SAF process.

The main SAF Production Facility does not automatically fall within the definition of a 'Nationally Significant Infrastructure Project' (NSIP) under the 2008 Act. The SoS issued a direction under Section 35 of the 2008 Act on 8 September 2025, confirming that the relevant elements of the Proposed Development should be treated as development for which development consent is required. The CHP plant individually meets the definition of a NSIP under Section 15 of the 2008 Act, as a generating station with a capacity greater than 50 megawatts. As such, a DCO application is required to authorise the Proposed Development in accordance with Section 31 of the 2008 Act.

The DCO, if made by the SoS, would be known as 'The Lighthouse Green Fuels Order'.

The Site comprises a Main Site at Seal Sands, on previously developed land formerly occupied by a chemical plant, together with a Wider Site of connection corridors providing utility connections, including pipelines and cabling crossing the River Tees.

Under the 2008 Act regime, the policy framework for examining and determining applications for development consent is provided by National Policy Statements (NPSs). Section 5 of the 2008 Act allows the relevant SoS to designate NPSs setting out national policy in relation to the types of NSIP listed at Section 14 of the 2008 Act. As set out in Section 2 and

Section 4 of this document, EN-1 and EN-3 are considered to have direct effect upon the Proposed Development and EN-4 and EN-5 are considered partially relevant as the gas pipeline and electrical connection elements fall below the respective thresholds set out in Section 14 of the PA 2008.

The primary purpose of this document is to assist the Examining Authority (ExA) and the SoS in their assessment of the Proposed Development by demonstrating how the Applicant has taken account of relevant planning policy, notably the NPSs for energy infrastructure, and the extent to which the Proposed Development complied with the policies within those NPSs, as well as any other any *important and relevant* to the SoS's determination of the Application, including the UK Government energy and climate change policy, the National Planning Policy Frame (NPPF) and the relevant statutory development plans.

This document sets out the key benefits and likely significant adverse effects of the Proposed Development. Where relevant, this document cross-references the relevant application documents that provide more detail.

Section 1 of this document describes the Proposed Development and the Site, the associated development proposed, relevant planning designations, and the Site's planning history. It also sets out the process by which the Proposed Development has come to be treated as requiring a DCO.

Section 2 of this document sets out the legislative and policy framework for the consideration and determination of DCO applications, notably the relevant NPSs for energy infrastructure and the Marine Policy Statement.

Section 3 of this document considers the national needs case for the Proposed Development, having regard to UK Government policy on decarbonisation of the aviation sector and UK energy policy more generally.

Section 4 of this document assesses the Proposed Development against the relevant policies of NPS EN-1, EN-3, EN-4 and EN-5, the Marine Policy Statement, the NPPF and local development plan policy. The Applicant's assessment has not identified any conflict with NPS, NPPF or local policy.

Section 6 of this document identified the key benefits of the Proposed Development, together with any likely significant adverse effects, and weighs these against each other, having regard also to the findings of the **Report to Inform the HRA (Application Document Ref. 5.11.1)**.

Section 6 of this document sets out the conclusions of this Planning Statement in terms of the overall acceptability of the Proposed

Development, by reference to the criteria set out in Section 104 of the 2008 Act.

The Proposed Development would have a number of clear and substantial benefits:

- The UK's first commercial-scale second generation SAF Production Facility, making a material contribution to the UK Government's Jet Zero Strategy and the UK SAF Mandate;
- A substantial net climate benefit over the operational life of the Proposed Development, with a carbon payback ratio of approximately 3:1 between avoided emissions and total lifecycle emissions;
- Significant economic and employment benefits, including several thousand jobs and hundreds of millions of pounds of Gross Value Added within Teesside and across the UK during construction, and over 300 permanent operational roles thereafter;
- Effective re-use of previously developed industrial land at Seal Sands, making use of existing road, electricity, gas and marine infrastructure; and
- New permanent marine and utility infrastructure, including a new quay on the River Tees, supporting long-term port capacity in the area.

The Proposed Development would give rise to a limited number of significant adverse effects, notwithstanding the mitigation secured within the application, including:

- **Moderate adverse (significant)** effects of visual amenity at one viewpoint, during both construction and operation; and
- An outstanding in-combination matter, identified in the **Report to Inform the HRA (Application Document Ref. 5.11.1)** process, concerning the potential overlap of capital dredging activities with other consented projects' capital dredging activities (dependent on precise construction programmes adopted post consent), which would need to be resolved through further assessment.

The majority of effects identified across the remaining Environmental Statement topics are assessed as **not significant** or are reduced to **negligible** following the mitigation secured within the requirements of the **draft DCO (Application Document Ref. 3.1)**.

In conclusion, as set out in Section 6, having regard to the clear and urgent policy-based need for the Proposed Development and the probable Critical National Priority status of elements of the scheme, it is considered that the benefits of the Proposed Development considerably outweigh the limited adverse effects identified above, and that none of the exceptions in Section 104(4) to (8) of the 2008 Act apply. Development consent should therefore be granted.

1 Introduction

1.1 Overview

- 1.1.1 This **Planning Statement (Application Document Ref. 5.2.1)** has been prepared by DWD Property and Planning Ltd 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).
- 1.1.2 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 1.4.
- 1.1.3 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].
- 1.1.4 The Proposed Development comprises a commercial-scale second generation Sustainable Aviation Fuel (SAF) production facility and associated infrastructure.

1.2 The Applicant

- 1.2.1 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.

1.3 Overview of the Proposed Development

- 1.3.1 The Proposed Development is anticipated to be the UK's first commercial-scale second generation SAF Production Facility.
- 1.3.2 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.
- 1.3.3 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
Work 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
Work No. 12	Surface water attenuation, and drainage and discharge works
Work 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

- 1.3.4 In addition, a range of associated development, both specified and unspecified, is proposed in relation to the above.
- 1.3.5 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**).
- 1.3.6 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.
- 1.3.7 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**).
- 1.3.8 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).

1.4 The Site

- 1.4.1 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.
- 1.4.2 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.
- 1.4.3 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.
- 1.4.4 The eastern boundary of the Main Site is formed by the River Tees, where existing jetties will be demolished and a new quay developed.
- 1.4.5 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.

1.5 The DCO Process

- 1.5.1 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.
- 1.5.2 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.
- 1.5.3 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').

- 1.5.4 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.
- 1.5.5 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.
- 1.5.6 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.
- 1.5.7 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.

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

2 Proposed Development

- 2.1.1 The Proposed Development is anticipated to be the UK's first commercial-scale second generation SAF Production Facility.
- 2.1.2 The Proposed Development includes the construction, operation, maintenance and eventual 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.
- 2.1.3 The Proposed Development includes the following elements (the location of each Work No is shown on the **Works Plans (Application Document Ref. 2.4)**):
- a SAF Production Facility (**Work No. 1**), including –
 - i. feedstock pre-treatment, flue gas treatment, waste heat boilers, exhaust stack and storage of pre-treated feedstock (**Work No. 1A**);
 - ii. SAF processing (**Work No. 1B**) including -
 - feedstock preparation, gasification, syngas clean-up, acid gas removal and carbon dioxide vent, Fischer-Tropsch reactors and product upgrading,
 - compression, and
 - thermal oxidiser, flue gas treatment, exhaust stack; and
 - up to two flare structures (**Work No. 1C**).
 - A CHP plant of over 50MWe (**Work No. 2**); including –
 - boilers and steam turbine generators (**Work No. 2A**); and
 - flue gas treatment and stack (**Work No. 2B**).
 - feedstock handling and storage, and intermediate and final product handling and storage, including conveyors, storage silos, tanks and buildings (**Work No. 3**).
 - cooling infrastructure including towers and basins for SAF Production Facility and CHP plant (**Work No. 4**).
 - provision of a means of crossing over or under existing infrastructure including bridge, culverts, embankments and supporting structures (**Work No. 5**).
 - marine infrastructure (**Work No. 6**) including –

- i. construction of permanent quay and associated wing walls (**Work No. 6A**) including;
 - demolition of existing jetties and associated infrastructure;
 - demolition and reinstatement of existing mooring infrastructure;
 - relocation of existing navigational buoy;
 - extension of existing outfall;
- ii. permanent quay (**Work No. 6B**); and
- iii. capital and maintenance dredging activities (**Work No. 6C**).
- electrical connection works (**Work No. 7**) including –
 - i. underground and overground 132kV electrical cabling connections and associated equipment from North Bank Supply Point to the Main Site (**Work No. 7A**); and
 - ii. 11kV electrical connection works (**Work No. 7B**).
- natural gas connection works including modification of existing or construction of new Above Ground Infrastructure (AGI) (**Work No. 8**).
- supply of industrial gases (**Work No. 9**) provided by either –
 - i. industrial gases connection works (**Work No. 9A**) including:
 - oxygen pipeline connection works between existing industrial gases facility and **Work No. 1** including upgrading of existing oxygen pipeline up to 300mm nominal bore diameter,
 - high pressure nitrogen pipeline connection works between existing industrial gases facility and **Work No.1** including installation and repurposing of new and existing pipelines, up to 300mm nominal bore diameter, and
 - connection to existing low pressure nitrogen supply; or
 - ii. Air Separation Unit (ASU) facility and connection pipework and utilities to the Main Site (**Work No. 9B**).

Only one of **Work No. 9A** or **Work No. 9B** would be developed.

- removal of existing pipelines and replacement of new industrial wastewater pipeline up to 300mm nominal bore diameter, connecting the Main Site into existing wastewater infrastructure (**Work No. 10**).
- export pipeline works (**Work No. 11**) including –

- i. up to two pipelines of up to 300mm nominal bore diameter for the export of SAF and renewable naphtha from the Main Site to third party marine export facilities (**Work No. 11A**); and
- ii. a pipeline of up to 600mm nominal bore diameter between the Main Site and the Northern Endurance Partnership (NEP) Above Ground Installation (AGI) C1 for the export of CO₂ (**Work No. 11B**); or
- iii. a pipeline of up to 600mm nominal bore diameter between the Main Site and the NEP AGI C2 for the export of CO₂ (**Work No. 11C**).

Only one of **Work No. 11B** or **Work No. 11C** would be developed.

- surface water attenuation infrastructure and drainage and discharge works in connection with the Main Site (**Work No. 12**).
- laydown areas (**Work No. 13**) comprising –
 - i. temporary construction compounds and laydown areas (**Work No. 13A**); and
 - ii. permanent laydown and storage (**Work No. 13B**).
- access and private street improvements, including works to create, improve, repair, or maintain access roads and access points (**Work No. 14**).

2.2 Main Site and laydown area

2.2.1 The Main Site occupied by the SAF Production Facility is currently a largely brownfield industrial site located south of Seal Sands Road, Stockton-on-Tees. The majority of the Main Site was formerly occupied by the INEOS Nitriles chemical plant, which was decommissioned and demolished by 2023. A closed and revegetated historic landfill occupies the western end of the Main Site, and a rectangular parcel of undeveloped land lies immediately to the north of Seal Sands Road.

2.2.2 The SAF Production Facility (**Work No. 1**) comprises three elements. Feedstock pre-treatment (**Work No. 1A**) will thermally pre-treat sustainably sourced biomass feedstock in a low-oxygen environment at approximately 200 - 400°C to produce a homogenous, grindable biocarbon product for use in the gasification process. SAF processing (**Work No. 1B**) will convert the pre-treated feedstock into syngas via gasification, before passing it through a syngas clean-up and compression unit, Fischer-Tropsch reactors and a hydrocracker to produce SAF (technically known as synthetic paraffinic kerosene) and renewable naphtha. The tallest structures associated with the SAF Production Facility include pre-treatment and CHP

- single stacks (with multiple flues) of up to 140m and flare structures (**Work No. 1C**) of up to 140m.
- 2.2.3 The CHP plant (**Work No. 2**), with an electrical output of up to 200MWe, will provide all of the electricity and steam required to operate the SAF Production Facility. It will be fuelled by biomass or waste wood or a blend of the two, combusted at 750 - 900°C in boilers (likely to be a fluidised bed type).
- 2.2.4 Feedstock, and intermediate and final product handling and storage (**Work No. 3**) will include covered conveyors, storage silos, tanks and buildings for movement and storage of biomass feedstock on the Main Site. Up to 265,000 tonnes of feedstock and up to 60,000 tonnes of SAF and renewable naphtha product will be stored within the Main Site at any one time. The largest storage silo will be up to approximately 70m in diameter and up to approximately 70m in height (with an additional 20m on top for conveyor).
- 2.2.5 Steam exiting the steam turbines will be cooled and condensed, with the condensate returned to the boilers for re-use. Cooling towers (**Work No. 4**), of no more than 40m in height, will be provided to manage the condensation of steam exiting the steam turbines and provide cooling for the SAF Production Facility.
- 2.2.6 Oxygen and nitrogen required for the operation of the SAF Production Facility will either be provided by connections to supply from a third party provider (**Work No. 9A**) or from an Air Separation Unit (ASU) to be located on the part of the Main Site to the north of Seal Sands Road (**Work No. 9B**). The DCO provides for both options, and only one would be delivered.
- 2.2.7 A natural gas connection (**Work No. 8**) will be provided to the existing gas network within or close to the Main Site via a new or re-used Above Ground Infrastructure (AGI), to supply auxiliary fuel as auxiliary fuel for the SAF production process and some other processes, such as thermal pre-treatment, the CHP plant and the flare pilot.
- 2.2.8 The Main Site will also include surface water attenuation infrastructure and drainage and discharge works (**Work No. 12**). Site drainage systems will collect surface water and direct it to a series of attenuation (balancing) ponds prior to being pumped and discharged to the River Tees via a new extension of the existing outfall which will be incorporated into the new quay.
- 2.2.9 Temporary construction compounds and laydown areas (**Work No. 13A**) will be located both within the Main Site and on a parcel of land to the north of Seal Sands Road during the construction phase.

- 2.2.10 Permanent laydown and storage areas within the Main Site (**Work No. 13B**) and access and private street improvements (**Work No. 14**) form further elements of the Proposed Development on the Main Site.
- 2.2.11 Operational access to the Main Site will be from Seal Sands Road via the A1185 from the A1/A19 junction. The Main Site includes a main car park with muster point(s), manned gatehouse(s) and control building(s), together with secondary emergency access points onto Seal Sands Road.

2.3 Quay

- 2.3.1 The marine infrastructure (**Work No. 6**) will comprise a new quay located at the eastern end of the Main Site on the River Tees. The quay will be used for the import of modules and materials during construction and the import of feedstock during operation. It will also be used during the construction phase for the shipborne import of prefabricated plant modules (abnormal indivisible loads (AILs)), fill material and other construction materials required for construction (see **Chapter 5: Construction Programme and Management (ES Volume I, Application Document Ref. 6.1)**)
- 2.3.2 To construct the quay it will be necessary to demolish two existing jetties and associated infrastructure, plus demolition and reinstatement of existing mooring infrastructure and relocation of an existing navigational buoy (**Work No. 6A**) (see **Chapter 5: Construction Management and Programme (ES Volume I, Application Document Ref. 6.1)**).
- 2.3.3 During operation, continuous Ship Unloaders (CSUs), which will be rail-mounted on the topside of the quay and up to 65m high, will unload feedstock. The berth will be capable of handling vessels up to Panamax size (typically up to 290m in length).
- 2.3.4 Capital dredging (**Work No. 6C**) will be required to excavate a berthing pocket adjacent to the quay and an access channel. Maintenance dredging will be required on an ongoing basis to maintain navigable access from the berth to the River Tees main channel.
- 2.3.5 The construction of the quay will involve activities below Mean High Water Springs within the Tees Estuary, which are subject to marine licensing requirements and a Deemed Marine Licence is sought within Schedule 10 of the **Draft Development Consent Order (Application Document Ref. 3.1)**.
- 2.3.6 Decommissioning of the Proposed Development may incorporate retention of supporting infrastructure on the Main Site (such as the quay) that has residual design life and is capable of reuse.

2.4 Connection Corridors

- 2.4.1 The Wider Site comprises a number of connection corridors extending beyond the Main Site to provide the utility connections required for the construction and operation of the Proposed Development. These include pipelines, electrical connections and water infrastructure crossing the River Tees.
- 2.4.2 Electrical connection works (**Work No. 7**) will provide power for construction, start-up and to maintain ancillary site supplies. The Applicant has an offer for approximately 5MWe connection to the local 11kV grid network operated by the District Network Operator (DNO) (**Work No. 7B**). Subject to feasibility, an underground 132kV connection northward from the existing North Bank Supply Point approximately 500m south of the Main Site (**Work No. 7A**) is being explored. If the 132kV connection is delivered it would be utilised instead of the 11kV connection.
- 2.4.3 Industrial gases connection works (**Work No. 9A**) will supply the SAF Production Facility with high-pressure oxygen from an existing oxygen pipeline in North Tees, which would require upgrading, and links to an existing industrial gases facility in South Tees via a crossing under the River Tees.
- 2.4.4 Low-pressure nitrogen will be supplied by a connection to an existing pipeline crossing the Main Site. A high-pressure nitrogen supply from an existing industrial gases facility in South Tees will utilise an existing crossing under the river Tees but will require new pipeline infrastructure to be developed both north and south of the Tees.
- 2.4.5 An alternative to the use of third party oxygen and nitrogen would be by the construction and operation of an ASU proposed to be located on the part of the Main Site to the north of Seal Sands Road.
- 2.4.6 An industrial wastewater pipeline (**Work No. 10**) will replace an existing disused pipeline running from the Main Site through an existing tunnel under the River Tees and along the northern side of Dabholm Gut in South Tees. It will then be necessary to construct a new connecting pipeline to Northumbrian Water Limited's (NWL) Bran Sands Wastewater Treatment Works. The treated effluent is expected ultimately to be discharged to Tees Bay via NWL's proposed long sea outfall (LSO) once that infrastructure is operational.
- 2.4.7 Export pipelines (**Work No. 11**) will export SAF and renewable naphtha from the Main Site to third-party marine export facilities via up to two pipelines of up to 300mm nominal bore diameter (**Work No. 11A**). Two alternative pipeline routes for CO₂ export to the Northern Endurance

Partnership (NEP) infrastructure are provided for within the DCO (**Work Nos. 11B and 11C**), with only one to be developed. In future, CO₂ in the flue gas of the CHP plant and thermal pre-treatment of feedstock may be captured through a Post-Combustion Carbon Capture Unit (PCCU) and directed via the selected CO₂ export pipeline route (either **Work No. 11B or 11C**) to the NEP CO₂ Gathering Network pipeline for transport and permanent storage, supporting the potential for the Proposed Development to achieve negative carbon emissions in future.

- 2.4.8 Crossings of existing infrastructure (**Work No. 5**) and access and highway improvements (**Work No. 14**) associated with the connection corridors are also included within the Proposed Development where required along the route of the utility connections.

2.5 DCO process

- 2.5.1 Under the PA 2008, development consent can be granted in the form of a DCO for certain types of Nationally Significant Infrastructure Projects ('NSIPs') by the relevant SoS. For energy infrastructure projects, this is the SoS for the Department for Energy Security and Net Zero ('DESNZ').
- 2.5.2 A SAF Production Facility, while in the field of energy, is not listed within any of the categories of NSIPs under Section 14 of the PA 2008. The biomass and waste wood fired CHP Plant will have an electrical output capacity of up to 200 MWe and is a NSIP in its own right as it surpasses the 50MW threshold for generating stations defined in Section 15 of the PA 2008. However, the CHP plant (**Work No. 2**) is functionally subordinate to the SAF production plant (**Work No. 1**).
- 2.5.3 In view of the desirability of all aspects of the Proposed Development being consented together the Applicant sought a direction under Section 35 of the PA 2008 from the SoS to confirm that the Proposed Development constitutes development for which development consent is required, in accordance with the provisions of the Planning Act 2008. The request for the Section 35 direction did not include the CHP Plant given its existing NSIP status and explained that the CHP Plant would be included in a subsequent DCO application given its direct relationship to the SAF production plant.
- 2.5.4 On 8 September 2025, the SoS issued a Direction under Sections 35(1) and 35ZA of the PA 2008 which can be found in **Appendix A** of this document.
- 2.5.5 The Section 35 Direction applies to the following elements of the Proposed Development; the main gasification facility to process sustainably sourced biomass; a feedstock pre-treatment facility; 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.

2.5.6 These correspond with the works shown on the **Works Plans (Application Document Ref. 2.4)**, with **Work Nos. 1A, 1B and 1C** covering the main gasification facility to process sustainably sourced biomass; the feedstock pre-treatment facility; the syngas clean-up apparatus; the Fischer-Tropsch process units and the refining units. **Work No. 3** covers the feedstock intermediates and finished product storage and **Work Nos. 6A, 6B and 6C** cover the quayside with ship loading/offloading infrastructure. Supporting infrastructure and utility connections are comprised in the remainder of the works numbers (**Work Nos. 3-5 and 7-14**). **Work No. 2** comprises the CHP plant, a NSIP in its own right. In the integrated scheme design much of the aforementioned supporting infrastructure and utility connections are also required for the functioning of **Work No. 2**.

2.5.7 By virtue of the Section 35 Direction and the NSIP status of the CHP plant the Applicant is required to obtain a DCO to authorise the Proposed Development under the PA 2008. Section 37 of the PA 2008 governs the form and content of the documents that are required as part of a DCO application. The requirements are implemented through 'The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009' (the 'APFP Regulations'), which, amongst other things, state that an application must be accompanied by an Environmental Statement ('ES'), where a development requires an Environmental Impact Assessment ('EIA') (also known as an 'EIA development') under 'The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017' (the 'EIA Regulations').

2.5.8 An application for development consent for the Proposed Development will then be submitted to the Planning Inspectorate acting on behalf of the SoS. Subject to the Application being accepted (which will be decided within a period of 28 days following receipt of the Application), the Planning Inspectorate will then examine it and make a recommendation to the SoS, who will then decide whether or not to make (grant) the DCO. The DCO if made by the SoS, would be known as the Lighthouse Green Fuels Order.

2.6 [Details of Associated Development](#)

2.6.1 Section 115 of the PA 2008 provides that development consent may be granted for development which is "*associated development*" alongside "*development for which development consent is required*". The PA 2008 does not provide any particular definition to what can comprise "*associated development*". It is a matter of fact and degree for a given project having

regard to the published government guidance ('Planning Act 2008: Guidance on associated development applications or major infrastructure projects' (April 2013)).

2.6.2 The guidance sets out four principles for defining associated development:

“The definition of associated development requires a direct relationship between associated development and the principal development. Associated development should therefore either support the construction or operation of the principal development, or help address its impacts.

Associated development should not be an aim in itself but should be subordinate to the principal development.

Development should not be treated as associated development if it is only necessary as a source of additional revenue for the applicant, in order to cross-subsidise the cost of the principal development. This does not mean that the applicant cannot cross-subsidise, but if part of a proposal is only necessary as a means of cross-subsidising the principal development then that part should not be treated as associated development

Associated development should be proportionate to the nature and scale of the principal development. However, this core principle should not be read as excluding associated infrastructure development (such as a network connection) that is on a larger scale than is necessary to serve the principal development if that associated infrastructure provides capacity that is likely to be required for another proposed major infrastructure project. When deciding whether it is appropriate for infrastructure which is on a larger scale than is necessary to serve a project to be treated as associated development, each application will have to be assessed on its own merits. For example, the Secretary of State will have regard to all relevant matters including whether a future application is proposed to be made by the same or related developer as the current application, the degree of physical proximity of the proposed application to the current application, and the time period in which a future application is proposed to be submitted.”

2.6.3 The guidance provides no direct guidance on typical associated development for this type of NSIP.

2.6.4 As outlined within paragraph 4.2.2 of **Chapter 4: Proposed Development (ES Volume I, Application Document Ref. 6.1)**, to the extent that they do not form part of the Proposed Development, further Associated Development is detailed within Part 2 of Schedule 1 to the **draft DCO (Application Document Ref. 3.1)** and consists of:

- site clearance (including vegetation removal and demolition of existing structures), remediation and temporary hardstanding;

- works to alter existing services and utilities apparatus and connections (overground and underground);
- channelling, culverting, crossings and works to existing drainage ditches and systems;
- temporary lighting, security fencing, gates, boundary treatment and other means of enclosure;
- temporary generators and bunded storage tanks;
- creation of temporary construction access points and roadways;
- wheel wash facilities;
- signage;
- temporary materials and plant storage and laydown areas;
- contractor facilities including offices and staff welfare facilities;
- temporary vehicle, pedestrian and cycle facilities;
- ancillary plant and equipment, drainage and pipework in the Main Site; and
- administration, welfare, control, warehousing, workshop and stores buildings in the Main Site.

2.6.5 The above works would support the operation of the Proposed Development, are clearly subordinate in scale, and are considered to be associated development for the purposes of Section 115 of the PA 2008.

2.7 Land use and Relevant Planning Designations

2.7.1 As outlined in **Chapter 3: Site and Surrounding Area (ES Volume I, Application Document Ref. 6.1.3)**, the Main Site now largely consists of concrete hardstanding with some vegetated areas. In the east, along the frontage with the River Tees are two jetties previously used for loading and unloading operations at the former facility.

2.7.2 The Site encompasses land within the administrative boundaries of Stockton-on-Tees Borough Council ('STBC') and Redcar and Cleveland Borough Council ('RCBC') on either side of the River Tees.

2.7.3 The Main Site is located within the administrative boundary of STBC. Development within RCBC is restricted to Pipeline and Utility Corridors, and their construction laydown areas and access roads (part of the Wider Site). The Pipeline and Utility Corridors involves crossing the River Tees.

2.7.4 The following documents form the development plan for local applications in these areas:

- Stockton-on-Tees Local Plan (Adopted January 2019);
- Redcar and Cleveland Local Plan and Policies Map (Adopted May 2018);

- The Tees Valley Joint Minerals and Waste Core Strategy DPD (Adopted September 2011); and
- The Tees Valley Joint Minerals and Waste Policies and Sites DPD (Adopted September 2011).

- 2.7.5 The Site is within both Internationally Designated Sites (SPA and Ramsar) and Nationally Designated Sites (Sites of Special Scientific Interest). Parts of the Main Site have also been designated for Specialist Employment Allocations as per the Stockton on Tees Local Plan.
- 2.7.6 The Redcar and Cleveland Local Plan covers the parts of the Proposed Development to the east of the River Tees. The Pipeline and Utility Corridors when crossing the River Tees lie within the Teesmouth and Cleveland Coast Site of Special Scientific Interest ('SSSI') and Special Protection Area ('SPA'). The entirety of the Site to the east of the River Tees is located within a 'Protecting Employment Area' and the 'South Tees Development Corporation Area'. The Proposed Development intercepts a Strategic Landscape Area which runs parallel to the A1085 road. The Pipeline and Utilities Corridor intercepts the Eston Pumping Station Local Wildlife Site.
- 2.7.7 In the Tees Valley Joint Minerals and Waste DPDs, the entirety of the Site is located within a Coal and Gypsum Deep Resources safeguarding area. The Pipeline and Utilities Corridors intercepts the Tees Dock Marine dredged sand and gravel safeguarding wharf area.

2.8 [Planning history](#)

- 2.8.1 As outlined in Section 3.3 of **Chapter 3: Site and Surrounding Area (ES Volume I, Application Document Ref. 6.1.3)**, the Seal Sands industrial area including the Main Site was reclaimed from formerly natural environments of the Tees Estuary which comprised the channel of the River Tees and tidal sand banks including Seal Sands. In 1950, this commenced with construction of a track and jetty in the south of the Site enabling dredged material from the Tees Estuary to be used to backfill the reclaimed area.
- 2.8.2 A chemical plant complex was developed in the east and centre of the Main Site south of Seal Sands Road in the 1960s, which was originally owned by Monsanto. BASF acquired the plant in 1985, and INEOS took ownership in 2008. Operations at the chemical plant ceased in 2020, and the plant was decommissioned and demolished by 2023. The site was cleared to ground slab level. It is assumed that former building foundations and other sub-structures may remain beneath the Site.

- 2.8.3 Available historical maps indicate that the vegetated portion of the Main Site lying to the north of Seal Sands Road has not previously been developed.
- 2.8.4 The western end of the Main Site south of Seal Sands Road is brownfield land which includes a historic landfill site. Anecdotal evidence suggests that this landfill site ceased operations by 1985. The landfill is not capped but is covered with a thin layer of soil and has naturally revegetated with grass and scrub. The portion north of Seal Sands Road is not previously developed land.
- 2.8.5 The historic landfill, under the NPPF definition, if it has been restored in line with development management procedures, could constitute greenfield land. While this cannot be ruled out, based on available records, the historic landfill has the character of brownfield land overall.
- 2.8.6 In planning terms, the Main Site is therefore predominantly, but not entirely, 'previously developed land' or 'brownfield land'.
- 2.8.7 The results from a search of the planning history at the Site from 1974 until September 2026 is included within **Appendix B:** of this document.

3 The Planning Act 2008 and National Policy Statements

3.1 Legislative and Decision Making Framework

- 3.1.1 This section of the Planning Statement sets out the legislative and policy framework for the consideration of and determination of applications for NSIPs such as the Proposed Development, notably the National Policy Statements ('NPS') for energy infrastructure.
- 3.1.2 Under the PA 2008 regime, the primary policy framework for examining and determining applications for development consent is provided by NPSs. Section 104 of the PA 2008 requires the SoS to determine applications for NSIPs in accordance with the relevant NPSs, while also having regard to a number of specified matters, where relevant.

3.2 Planning Act 2008

- 3.2.1 The PA 2008 establishes the legal framework for applying for, examining, and determining applications for NSIPs. The Proposed Development constitutes a NSIP development, in accordance with the PA 2008, following a Section 35 request to the SoS on 12 August 2025 which was subsequently directed that the Application be treated as development for which development consent is required. As such, a DCO application is required to authorise the Proposed Development in accordance with Section 31 of the PA 2008. A copy of the Direction can be found at **Appendix A** of this document.
- 3.2.2 Section 115 of PA 2008 also states that a DCO can include consent for 'associated development', that is, development that is not part of, but is associated with the NSIP. This may be development that supports the construction or operation of the NSIP, which helps to address the impacts of the NSIP (here the SAF Production Facility and the CHP Plant) or is of a type normally brought forward with the particular type of NSIP. The associated and further associated development included in Schedule 1 of the **Draft Development Consent Order (Application Document Ref. 3.1)** would support the operation of the Proposed Development and are considered to be associated development for the purposes of Section 115 of the PA 2008. This is further explained in the **Explanatory memorandum (Application Document Ref 3.2)**,
- 3.2.3 Under the PA 2008, the policy framework for examining and determining applications for a DCO is provided by NPS. Section 5 of the PA 2008 allows the Secretary of State ('SoS') to designate NPS setting out national policy in the fields (such as energy) listed at Section 14 of the PA 2008.

- 3.2.4 Part 5 of the PA 2008 sets out that an application for an order granting development consent must be made to the SoS. The approach taken to pre-application and engagement was designed to ensure compliance with the legislative requirements set out in Sections 42, 47, 48, 49 and 50 of the PA 2008 which were applicable prior to the enactment of the Planning and Infrastructure Act 2025. The **Consultation Report (Application Document Ref. 5.1.1)** details compliance with Sections 42, 47, 49 and 50 of PA 2008.
- 3.2.5 Part 6 of the PA 2008 is to be applied when determining applications for orders granting development consent. Sections 103 to 107 provide the framework for decision-making, which in turn frames the focus of the examination of the application for a Draft DCO.
- 3.2.6 The NPS are the primary policy used by the SoS to examine and determine applications for NSIP. In addition, Section 104 (2) of the PA 2008 states the SoS must have regard to:
- any national policy statement which has effect in relation to development of the description to which the application relates;
 - the appropriate marine policy documents;
 - any local impact report submitted;
 - any matters prescribed in relation to development of the description to which the application relates; and
 - any other matters which the SoS thinks are both important and relevant to the SoS's decision.
- 3.2.7 Section 104 of the PA 2008 requires the SoS to determine applications for NSIPs in accordance with the relevant NPS unless this would:
- lead to the UK being in breach of its international obligations;
 - be in breach of any statutory duty that applies to the SoS;
 - be unlawful; or
 - result in the adverse impacts of the development outweighing the benefits.
- 3.2.8 For the purpose of Section 104, the following NPSs are considered to have 'effect' in relation to the Proposed Development as discussed below in section 4.3:
- Overarching NPS for Energy (NPS EN-1) ('EN-1') (2025) [Ref 2] by virtue of the project being in the field of energy, and as confirmed in relation to Section 35 projects in paragraph 1.3.10 of EN-1;

- NPS for Renewable Energy Infrastructure (NPS EN-3) ('EN-3') (2025) [Ref 3], in relation to **Work No. 2**.

3.2.9 The following NPSs are considered to possess relevance to parts of the Proposed Development:

- NPS for Natural Gas Supply Infrastructure and Gas and Oil Pipelines (NPS EN-4) ('EN-4') (2023) [Ref 4] in relation to **Work No. 8**; and
- NPS for Electricity Networks Infrastructure (NPS EN-5) ('EN-5') (2025) [Ref 5] in relation to **Work No. 7**.

3.2.10 Of further relevance is Section 106 of the PA 2008 which provides that the SoS may disregard representations if they relate to the merits of policy set out in a national policy statement. Similar provisions are made in relation to the Examining Authority as set out in Sections 87(3), 94(8) and 102(4) of the PA 2008.

3.2.11 STBC and RCBC are encouraged to submit Local Impact Reports ('LIRs') as the host authorities. The neighbouring authorities may also choose to submit a LIR. The reports would give details of the likely impacts of a project on the local authority's area. Section 104(2)(b) of the PA 2008 explains that the Examining Authority and the Secretary of State must have regard to any LIR submitted when deciding the application, as explained in the updated advice on Nationally Significant Infrastructure Projects: Advice for Local Authorities [Ref 6].

3.2.12 The prescribed matters referred to in Section 104 of the PA 2008 (refer to paragraph 3.2.6) are set out in the Infrastructure Planning (Decisions) Regulations 2010 ('the Decisions Regulations'). The provisions within the Decisions Regulations that could be of relevance to the Proposed Development include:

- Regulation 3 – When deciding a DCO application which affects a listed building or its setting; a conservation area; or a scheduled monument or its setting, the SoS must have regard to the desirability of preserving the listed building or its setting or any features of special architectural or historic interest which it possesses; preserving or enhancing the character or appearance of the conservation area; or preserving the scheduled monument or its setting.
- Regulation 6 – When deciding a DCO application which would involve the presence of a hazardous substance on, over or under land to which Section 12(2B) of the Planning (Hazardous Substances) Act 1990 applies (deemed hazardous substances consent: government authorisation), the SoS must have regard to

any current or contemplated use of land to which the application relates, the way in which other land in the vicinity is being used or is likely to be used, and any planning permission or development consent that has been granted for development of that other land in the vicinity. The Applicant considers that sufficient information on hazardous substances is included within the DCO Application to inform the SoS's decision on the DCO Application, as set out within Section 4.2 of this Planning Statement and **Chapter 19: Major Accidents and Disasters (ES Volume I, Application Document Ref. 6.1)**.

- Regulation 7 – When deciding a DCO application the SoS must have regard to the United Nations Environmental Programme Convention on Biological Diversity of '92 ('1992 Convention'). The Applicant considers that sufficient information on biodiversity is included within the DCO Application to inform the SoS's decision (namely Chapter 10: Terrestrial Ecology (**ES Volume I, Application Document Ref. 6.1**) and Chapter 11: Freshwater and Marine Ecology (**ES Volume I, Application Document Ref. 6.1**)). Information on biodiversity net gain ('BNG') has been provided Appendix A of the **Landscape and Biodiversity Mitigation and Enhancement Strategy (Application Document Ref. 5.8)**.

3.2.13 In the case of the Proposed Development, other matters that are important and relevant may include recent and relevant UK Government energy and climate change policy. These documents set out important UK Government objectives for increasing the supply of SAF and aviation decarbonisation. These are discussed further in Section 4 of this Planning Statement.

3.2.14 Other matters that the SoS considers are both important and relevant may include the policies within the National Planning Policy Framework ('NPPF') [Ref 7], Planning Practice Guidance ('PPG') and the local development plan. This is discussed further in this Section of this Planning Statement. Each technical chapter of the ES refers to the relevant policies from the NPS and other policy documents that are relevant to the assessment of the environmental effects reported within that chapter.

3.3 National Policy Statements

3.3.1 The Energy NPSs (EN-1 to EN-7) set out the UK Government's policy for the delivery of energy infrastructure and provide the legal framework for planning decisions for nationally significant infrastructure projects. As identified above the NPSs applicable are EN-1, EN-3, EN-4 and EN-5. These were published in December 2025 and came into force on 6 January

2026, with the exception of NPS EN-4 which was published in November 2023 and came into force on 17 January 2024.

- 3.3.2 The Section 35 Direction, a copy of which can be found in **Appendix A:**, states amongst other things, “*the Proposed Development sits within one of qualifying infrastructure fields (...) (energy)*”, and that the Proposed Development, “*is nationally significant*”.

Paragraph 1.3.10 of EN-1 states that:

“EN-1, in conjunction with any relevant technology specific NPS, will be the primary policy for Secretary of State decision making on projects in the field of energy for which a direction has been given under Section 35.”

- 3.3.3 Furthermore, paragraph 3.2.14 EN-1 states that where an energy infrastructure project is not covered by Sections 15 – 21 of the PA 2008 but has received a direction under Section 35 of the PA 2008 “*the Secretary of State should give substantial weight to the need established at paragraphs 3.3.4 to 3.3.7*” of EN-1.
- 3.3.4 It therefore follows that Section 104 of the PA 2008 is the decision-making framework for the entirety of the Proposed Development, and Section 105 does not apply. Furthermore, EN-1, and potentially other energy NPSs are important and relevant to the determination of the entirety of the Proposed Development. As such, EN-1 and EN-3 are considered to have direct effect upon the Proposed Development and EN-4 and EN-5 are partially relevant because the gas pipeline and electrical connection elements fall below the respective thresholds set out in Section 14 of the PA 2008.
- 3.3.5 The **Policy Compliance and Accordance Tables (Application Document Ref. 5.2.2)** provide a comprehensive assessment of compliance with EN-1 and EN-3 and accordance with EN-4 and EN-5. Section 4 of EN-1, however, has been addressed within Section 4 of this document. These documents, from a planning policy perspective, have been the focus in terms of scoping the EIA, as reported on in **Appendix 2B: Scoping Report Responses (ES Volume III, Application Document Ref. 6.3)**.
- 3.3.6 Each technical chapter of the ES (**ES Volume I, Application Document Ref. 6.1**) explains the policies in the NPS that have informed, and are informing, the design, assessment, and controls applicable to the Proposed Development.
- 3.4 **Overarching NPS for Energy (EN-1)**
- 3.4.1 EN-1 sets out the national policy for the delivery of nationally significant energy infrastructure. Part 2 of EN-1 sets out the policy context for how

energy NSIPs, including meeting net zero by 2050, decarbonising the power sector and ensuring affordability and security of energy supplies.

- 3.4.2 Paragraph 1.3.5 of EN-1 states that where the need for a particular type of energy infrastructure set out at paragraph 1.3.2 is established by the NPS, but that type of infrastructure is outside the scope of one of the technology specific NPSs, EN-1 along will have effect and be the primary basis for SoS decision making. It goes on to state:

“This will be the case for, but is not limited to, unconventional hydrocarbon extraction sites, hydrogen pipeline and storage infrastructure, Carbon Capture Storage (CCS) pipeline infrastructure and other infrastructure not included in EN-2 or EN-3.”

- 3.4.3 Section 2.2 (Clean Power 2030 and net zero by 2050) of EN-1 confirms the UK Government’s legally binding target (legislated for through the Climate Change Act 2008 (2050 Target Amendment) Order 2019) of achieving net zero in terms of GHG emissions by 2050.

- 3.4.4 The Clean Power 2030 Action Plan (DESNZ, December 2024) sets out the infrastructure deployment pathways and generation capacity ranges that will ensure by 2030 clean sources produce at least 95% of energy generation, meeting the sixth Carbon Budget advice and pushing the country towards net zero 2050.

- 3.4.5 Following the release of the seventh carbon budget (covering the period from 2038-2042) in February 2025, it was subsequently signed into law in June 2026. This would follow on from the extant Carbon Budget Delivery Plan (DESNZ, March 2023) which covers the period from 2033-2037.

- 3.4.6 The seventh carbon budget outlines that “by 2040, our Balanced Pathway sees SAF meet 17% of aviation fuel demand, providing an alternative to kerosene in planes.”

- 3.4.7 Section 2.3 (Meeting Clean Power 2030 and Net Zero) of EN-1 underlines how the provision of energy infrastructure will be critical to the UK achieving net zero by 2050. Paragraph 2.3.3 confirms the UK Government’s objectives for the energy system, which are to ensure our supply of energy always remains secure, reliable, affordable, and consistent with meeting the UK’s target to cut GHG emissions to net zero by 2050. It states that this will require a step change in the decarbonisation of our energy system. Paragraph 2.3.4 goes on to state that meeting these objectives necessitates a significant investment in new energy infrastructure, both large and small-scale. Paragraph 2.3.5 outlines how this will be driven through the rapid deployment of low carbon generation, flexible infrastructure, and electricity transmission infrastructure.

- 3.4.8 Paragraph 2.3.6 stresses that securing affordable, homegrown and abundant renewable resources means we will be able to run our power system for increasing periods of clean, low carbon generation, with renewables providing the vast majority of generation, and nuclear continuing to deliver a backbone of vital low carbon power.
- 3.4.9 Paragraph 3.1.1 of EN-1 outlines that the government sees a need for significant amounts of new large-scale energy infrastructure to meet its energy objectives and why the government considers that the need for such infrastructure is urgent. Paragraph 3.1.2 goes on to state *“it will not be possible to develop the necessary amounts of such infrastructure without some significant residual adverse impacts.”*, which will be minimised by policies later parts 4 and 5 of the document as well as the technology specific NPSs.
- 3.4.10 Paragraph 3.2.4 explains the role of developers in proposing energy infrastructure projects that they consider appropriate in the market-based UK energy system:
- “It is not the role of the planning system to deliver specific amounts or limit any form of infrastructure covered by this NPS. It is for industry to propose new energy infrastructure projects that they assess to be viable within the strategic framework set by government. This is the nature of a market-based energy system. With the exception of new coal or large-scale oil-fired electricity generation, the government does not consider it appropriate for planning policy to set limits on different technologies but planning policy can be used to support the government’s ambitions in energy policy and other policy areas.”*
- 3.4.11 Paragraph 3.2.6 explains that it is not the government’s intention in presenting any of the figures or targets in this NPS to propose limits on any new infrastructure that can be consented in accordance with the energy NPSs. It states:
- “A large number of consented projects can help deliver an affordable electricity system, by driving competition and reducing costs within and amongst different technology and infrastructure types. Consenting new projects also enables projects utilising more advanced technology and greater efficiency to come forward. The delivery of an affordable energy system does not always mean picking the least cost technologies. A diversity of supply can aid in ensuring affordability and security for the system overall and relative costs can change over time, particularly for new and emerging technologies. It is not the role of the planning system to compare the costs of individual developments or technology types.”*

- 3.4.12 At 3.2.7 it is further clarified that “The government has other mechanisms to influence the delivery of its energy objectives and imposing limits on the consenting of different types of energy infrastructure would reduce competition, increase costs, and disincentivise newer, more efficient solutions coming forward.” And points out that not everything that obtains development consent will get built.
- 3.4.13 Paragraphs 3.2.8 – 3.2.10 of EN-1 clearly express how the need and urgency for energy NSIPs will be considered by the Secretary of State:
“The Secretary of State should assess all applications for development consent for the types of infrastructure covered by this NPS on the basis that the government has demonstrated that there is a need for those types of infrastructure which is urgent, as described for each of them in this Part.

In addition, the Secretary of State has determined that substantial weight should be given to this need when considering applications for development consent under the Planning Act 2008.

The Secretary of State is not required to consider separately the specific contribution of any individual project to satisfying the need established in this NPS.”
- 3.4.14 Part 3.3 of EN-1 establishes the need for nationally significant energy infrastructure, and in particular the need for different types of electricity infrastructure, to address the energy security objectives and carbon reduction requirements, replace closing generating capacity and delivery affordable decarbonisation.
- 3.4.15 Paragraph 3.3.35 sets out the role of combustion power stations, stating:
“Combustion power stations use fuel for generation. This means that it is possible for them to provide dispatchable generation when the output from intermittent renewables is low, but they are dependent on the supply of fuel for generation. Most forms of combustion power also produce residual emissions of greenhouse gases, and where this is the case, their use will need to be limited over time unless they can decarbonise. Whilst we will continue to rely on unabated gas to ensure security of supply, we will be driving the deployment of low carbon technologies. All commercial scale (at or over 300 MW) combustion power stations fuelled by gas, coal, oil or biomass have to be constructed Carbon Capture Ready (CCR). More information on government policy on CCR requirements and plans to transition to a new regime, Decarbonisation Readiness, is set out in Section 4.9.”
- 3.4.16 The role of Energy from Waste in combustion power stations is covered in paragraphs 3.3.36 – 3.3.41. Paragraph 3.3.36 states:

“EfW plants operate at over 90 per cent availability but also produce residual carbon emissions, due to the presence of fossil-based carbon, i.e. plastics, which exists alongside the biodegradable materials in the waste.”

- 3.4.17 Paragraphs 3.3.37 and 3.3.38 discuss the diversion of non-recyclable waste away from landfill as being the principal purpose of EfW plants. The CHP plant will use Grade C waste wood sourced from specialised European markets which may have otherwise gone to landfill.
- 3.4.18 The role of Bioenergy in combustion power stations is covered in paragraph 3.3.42 which states that “Bioenergy could provide either baseload or dispatchable low carbon generation. The need for negative emissions to offset residual emissions through BECCS, might provide a case for baseload deployment. In addition, the amount of bioenergy for generating electricity will be constrained by the availability of sustainable biomass and the extent to which it may be more cost effective in decarbonising other sectors (such as heat and transport) over the long-term.”
- 3.4.19 Paragraph 3.5.59 confirms all mentioned generating technologies are urgently needed to meet the government’s energy objectives by providing security of supply, providing an affordable, reliable system and ensuring the system is net zero consistent. Paragraph 3.3.60 confirms that Energy from Waste and Biomass are both within the scope of the EN-1 NPS.
- 3.4.20 Paragraphs 3.3.62 – 3.3.63 state:
“Government has concluded that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure. Section 4.2 states which energy generating technologies are low carbon and are therefore CNP infrastructure.

Subject to any legal requirements, the urgent need for CNP infrastructure to achieving our energy objectives, together with the national security, economic, commercial, and net zero benefits, means that it is likely the need case will outweigh any other residual impacts not capable of being addressed by application of the mitigation hierarchy, in all but the most exceptional circumstances. Government strongly supports the delivery of CNP infrastructure and it should be progressed as quickly as possible.”
- 3.4.21 Section 3.6 of NPS EN-1 sets out the need for new nationally significant oil and liquid fuels infrastructure which clearly encompasses SAF and renewable naphtha since paragraph 3.6.2 states:
“As we take steps to decarbonise and transition to net zero there will be an increase in the use of a diverse range of liquid fuels, including bio and low carbon fuels. We need to reduce our dependence on oil by improving vehicle efficiency and using new alternative fuelled vehicles. From 2030 we

will end the sale of new petrol and diesel cars, and all new cars and vans will be 100% zero emission by 2035. The Sustainable Aviation Fuel (SAF) Mandate, implemented in January 2025, will help secure demand for SAF, delivering GHG emission savings in the aviation industry.

- 3.4.22 While supportive of low carbon fuels, paragraph 3.6.5 recognises that the pathway for decarbonising aviation is not yet clear with several options including low carbon fuels under development. Paragraph 3.6.7 confirms that there is a need for reliable infrastructure to ensure the UK has a resilient supply of the liquid fuel products it requires. This clearly encompasses the manufacturing and distribution infrastructure required for the nascent SAF and renewable naphtha industry.
- 3.4.23 Paragraph 4.1.3 of EN-1 states that “Given the level and urgency of need for infrastructure of the types covered by the energy NPSs set out in Part 3 of this NPS, the Secretary of State will start with a presumption in favour of granting consent to applications for energy NSIPs. That presumption applies unless any more specific and relevant policies set out in the relevant NPSs clearly indicate that consent should be refused.”
- 3.4.24 Part 4.2 of EN-1 goes into more detail about the critical national priority for low carbon infrastructure. Paragraph 4.2.16 stresses that “*there is a critical national priority for the provision of nationally significant low carbon infrastructure to meet the Clean Power 2030 Mission and net zero.*” The CNP policy set out in EN-1 applies to the categories of low carbon infrastructure described in paragraphs 4.2.17 and 4.2.18.
- 3.4.25 Paragraph 4.2.17 defines low carbon infrastructure for the purposes of the CNP policy. For electricity generation, this means “all onshore and offshore generation that does not involve fossil fuel combustion... as well as natural gas fired generation which is carbon capture ready”. It also includes all transmission infrastructure in scope of EN-5 and their associated infrastructure such as substations. Energy from waste developments are expressly excluded from CNP policy as they aren’t considered critical to meeting the Clean Power 2030 Mission.
- 3.4.26 The CHP plant will be fuelled by biomass and waste wood. It is considered to overall represent a CNP project since it is to be fuelled by biomass along with a comparable feedstock (waste wood) that shares its fundamental characteristic (i.e. it is not a fossil fuel and is formed primarily of cellulose) with biomass and conforms to the waste hierarchy. The generating station is not comparable in nature to a conventional energy from waste generating station that combusts a domestic, commercial and/or industrial waste feedstock comprised of wide range of origin materials. A definition of low carbon generation is set out at paragraph 4.2.17 of EN-1 as generation not

involving fossil fuel combustion. The purpose of the waste wood feedstock in increasing the resilience of feedstock supply, for a generating station whose sole purpose is providing electricity and steam for the production of SAF Mandate compliant low carbon fuel, is also relevant in this context.

- 3.4.27 The Proposed Development as a whole is considered capable of representing a CNP project.

3.5 NPS for Renewable Energy Infrastructure (EN-3)

- 3.5.1 EN-3 together with EN-1, provides the primary basis for decisions on nationally significant energy infrastructure. EN-3 provides a framework for assessment and technology-specific information for specified renewable energy technologies. It begins by stating at paragraph 1.1.1 that *“There is an urgent need for new electricity generating capacity to meet our energy objectives.”*

- 3.5.2 The importance of the generation of electricity from renewable sources is stated in Paragraph 1.1.2 of EN-3 as follows:

“Electricity generation from renewable sources is an essential element of the transition to Clean Power 2030 Mission, net zero and meeting our statutory targets for the sixth carbon budget (CB6). Our analysis suggests that demand for electricity is likely to increase significantly over the coming years and could more than double by 2050. This could require a fourfold increase in low carbon electricity generation, with most of this likely to come from renewables.”

- 3.5.3 Biomass and Energy from Waste is specifically discussed in EN-3 under Section 2.7, which includes relevant information on the technology to inform assessment and decision-making. Paragraph 2.7.1 states that *“the combustion of biomass for electricity generation plays an important role in meeting the UK’s energy needs, and supports the decarbonisation of the sector.”*

3.6 NPS for Natural Gas Supply Infrastructure and Gas and Oil Pipelines (EN-4)

- 3.6.1 EN-4 is relevant to the Proposed Development in relation to the gas pipeline infrastructure within **Work No. 8** and potentially also the product export pipelines within **Work No. 11A**.
- 3.6.2 Paragraph 1.1.1 sets out that the transmission of gas remains crucial to meeting our energy needs during the transition to a net zero economy, enabling secure, reliable and affordable supplies of energy as we develop the means to address pollution, including the development of low carbon alternatives.

3.6.3 Part 2 of EN-4 covers the general assessment of proposals including factors influencing site selection and design, climate change adaptation, good design, hazardous substances and control of major accident hazards in Sections 2.2 to 2.6, as well as the technology-specific information for the applicant assessment, mitigation and SoS decision-making in Section 2.8 to 2.23 of EN-4.

3.7 NPS for Electrical Networks Infrastructure (EN-5)

3.7.1 EN-5 has relevance for the substation and electrical connection elements of the Proposed Development, which are within **Work No. 7**.

3.7.2 Paragraph 1.1.1 of EN-5 recognises that:

“The security and reliability of the UK’s current and future energy supply is highly dependent on having an electricity network which will enable the new electricity generation, storage, and interconnection infrastructure that our country needs to meet the rapid increase in electricity demand required to transition to Clean Power by 2030 and net zero, while maintaining energy security.”

3.7.3 Paragraph 1.1.5 goes on to state that:

“As identified in EN-1, government has concluded that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure.”

3.7.4 As set out above in Section 3.4, the Proposed Development as a whole is considered capable of representing a CNP project.

3.8 Marine Policy Statement and Plans

3.8.1 As stated above, EN-1 confirms that Section 104 of the PA 2008 applies to the Proposed Development, with paragraphs 5.6.20 - 5.6.21 requiring the SoS to have regard to “*the appropriate marine policy documents in taking any decision which relates to the exercise of any function capable of affecting any part of the UK marine area.*” and “*regard to any relevant Shoreline Management Plans.*” A number of elements of the Proposed Development involve works within the UK Marine Area within the tidal section of the River Tees. The marine policy documents that are relevant to the Proposed Development for the purposes of Section 104 of the PA 2008 are the UK Marine Policy Statement (‘MPS’) (2011) [Ref 8] and the North East Inshore and Offshore Marine Plan (2021) [Ref 9]. An overview of the relevant marine policy documents is provided below.

3.8.2 The UK MPS, adopted in March 2011, provides the policy framework for preparing marine plans and taking decisions affecting the marine

environment. It has been prepared and adopted for the purposes of Section 44 of the MCAA 2009 and is intended to sit alongside terrestrial consenting regimes, including the PA 2008 regime. The MPS was subject to updates in September 2020 relating to how references to European Union ('EU') law should be interpreted from 1 January 2021 following the UK's withdrawal from the EU.

3.8.3 Chapter 3 of the UK MPS sets out the policy objectives for key activities that take place in the marine environment. Section 3.3 of the MPS deals specifically with 'Energy production and infrastructure development'. Paragraph 3.3.1 notes that a secure, sustainable and affordable supply of energy is of central importance to the economic and social well-being of the UK. Paragraph 3.3.4 sets out issues that decision makers should consider when examining and determining applications for energy infrastructure. Those of relevance to the Proposed Development, which will use the River Tees to transport biomass and waste wood via boat, that should be taken into account include:

- the national level of need for new energy infrastructure, as set out in the EN-1; and
- the positive wider environmental, societal and economic benefits of low carbon electricity generation and storage as key technologies for reducing carbon dioxide emissions.

3.8.4 Marine plans are intended to set out detailed policy and spatial guidance for a particular area. The UK is divided into several marine planning regions with associated plan authorities that are responsible for preparing marine plans. In England, the Marine Management Organisation ('MMO') is the plan authority.

3.8.5 The Site lies within the 'North East Inshore Marine Area', which stretches from Flamborough Head in Yorkshire to the Scottish Border. The Plan Area contains three main tidal rivers, including the River Tees.

3.8.6 The North East Inshore Marine Plan is intended to provide a strategic approach to decision-making on developments within the Marine Plan area, considering future use and providing a clear approach to managing resources, activities and interactions within the area.

3.8.7 Section 2 of the North East Inshore Marine Plan sets out the policies to support the delivery of the Plan objectives. Paragraph 32 confirms that the policies cover a wide range of topics, including activities and uses, economic, social and environmental considerations and cross-cutting issues such as integration of decision-making on land and at sea. The

policies are set out in detail in the Technical Annex to the North East Inshore Marine Plan.

- 3.8.8 There are no policies that specifically cover SAF production or CHP plants, however, Policy NE-REN-1 is considered to be of some relevance to the Proposed Development as it states that *“Proposals that enable the provision of renewable energy technologies and associated supply chain, will be supported.”*
- 3.8.9 Policy NE-CCUS-3 is considered to be of some relevance to the Proposed Development as it supports proposals associated with the deployment of low carbon infrastructure for industrial clusters. Policy NE-REN-1 states: *“Supply chains play an important role in developing technology, reducing the associated costs of infrastructure and realising the economic and social benefits of renewable energy to the UK economy. NE-REN-1 recognises the importance of the supply chain within the lifecycle of renewable energy projects. NE-REN-1 enables public authorities to support proposals that will reduce costs, ensuring that businesses are operating competitively and with a long-term strategy.”*
- 3.8.10 The North East Inshore Marine Plan also includes policies aimed at managing the impacts of development upon heritage assets (Policy NE-HER-1); Seascape and landscape (Policy NE-SCP-1); Air Quality and Emissions (Policy NE-AIR-1); water quality (Policy NE-WQ-1); enhancing biodiversity (Policies NE-BIO1 to 3) and ensuring that developments demonstrate they are resilient to the impacts of climate change and coastal change (Policy NE-CC-2).
- 3.8.11 An assessment of the Proposed Development against marine policy is provided in the **Policy Compliance and Accordance Tables (Application Document Ref. 5.2.2)** that sit alongside this Planning Statement.

3.9 Other matters considered relevant and important

- 3.9.1 As noted above, Section 104 of the PA 2008 sets out the matters that the SoS must have regard to in determining applications for development consent, which can include any other matters which the SoS thinks are *“important and relevant”* to their decision.
- 3.9.2 In the case of the Proposed Development, the Applicant considers that other matters that are important and relevant to the SoS’s decision include recent UK Government energy and climate change policy. These documents set out important government objectives for reaching the legally binding target of net zero by 2050.

- 3.9.3 The NPS for Ports [**Error! Reference source not found.**] provides the framework for decisions on proposals for new NSIP port development. Paragraph 3.1.5 (designated 2012) and 2.8 (2026 published but not yet designated) both confirm that Ports have a vital role in the import and export of energy supplies. The proposed quay comprised in **Work No. 6** falls well below the relevant threshold for a NSIP port namely 5 million tonnes material import. Nevertheless, the policy may possess relevance in relation to **Work No. 6**.
- 3.9.4 Other matters that the SoS may consider important and relevant include the policies contained within the NPPF and also local development plan policy. The Proposed Development's accordance with the NPPF and local development plan policy are considered in the **Policy Compliance and Accordance Tables (Application Document Ref. 5.2.2)**.

3.10 Local Planning Policy

- 3.10.1 The Site lies within the administrative areas of STBC and RCBC on either side of the River Tees.
- 3.10.2 The relevant development plan documents ('DPDs') for the Proposed Development are set out in **Table 3.1** below:

Table 3.1 Development plan by local authority

LOCAL AUTHORITY	DEVELOPMENT PLAN
Stockton-on-Tees Borough Council	Stockton-on-Tees Local Plan (Adopted January 2019)
Redcar and Cleveland Borough Council	Redcar and Cleveland Local Plan and Policies Map (Adopted May 2018)
Stockton-on-Tees Borough Council and Redcar and Cleveland Borough Council	The Tees Valley Joint Minerals and Waste Core Strategy (Adopted September 2011)
Stockton-on-Tees Borough Council and Redcar and Cleveland Borough Council	The Tees Valley Joint Minerals and Waste Policies and Sites DPD (Adopted September 2011)

- 3.10.3 It is considered that these documents may be 'important and relevant' as defined in the PA 2008 and NPS EN-1. The development plan policies of relevance to the Proposed Development are set out in **Appendix C** below. A full assessment of the Proposed Development's accordance with the

relevant Local Plan policies is set out in the **Policy Compliance and Accordance Tables (Application Document Ref. 5.2.2)**.

3.11 Adopted Non-Development Plan Policy

3.11.1 The following non-Development Plan Policy documents are considered relevant to the Proposed Development:

- South Tees Regeneration Master Plan (Adopted November 2019) [Ref 11];
- STBC Design Guide (Adopted March 2023) [Ref 12];
- STBC Strategic Flood Risk Assessment (Adopted March 2018) [Ref 13];
- RCBC South Tees Area Supplementary Planning Document (Adopted May 2018) [Ref 14];
- RCBC Developer Contributions Supplementary Planning Document (Adopted December 2014) [Ref 15];
- RCBC Landscape Character Supplementary Planning Document (Adopted March 2010); RCBC Urban Design Guidelines (Adopted April 2006) [Ref 16];

3.11.2 The local non-development plan policies of relevance to the Proposed Development are set out in **Appendix D** below.

3.12 Emerging Policy

3.12.1 On 24th January 2024, a Local Plan review was undertaken by STBC. It was agreed that a new Local Plan be undertaken under the new plan-making system which has been brought in force through the Levelling Up and Regeneration Act (2023). The Council anticipated that scoping work on the Local Plan was to commence in September 2025. On 5 August 2026, STBC announced that they are commencing the preparation of a new Local Plan through a 'Notice of intention to commence Local Plan preparation' under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2026. Alongside this, STBC published an 'Emerging Local Plan Timetable', which states that the adoption of the new Local Plan is expected to take place in October 2029.

3.12.2 Given the early stage of the development of the STBC emerging plan, it is considered to have no weight in the Town and Country Planning Act 1990 process and no relevance or importance under the PA 2008 process.

4 Need for the Proposed Development

- 4.1.1 This section sets out the national need for the Proposed Development and how it is supported by legislation, government policy, and guidance. In making decisions on applications for NSIPs, Section 104 of the PA 2008 states that the SoS must also have regard to any other matters that they consider to be both 'important and relevant' to their decision. This can clearly include matters on need and benefits additional to or reinforcing the need case in the relevant NPS.
- 4.1.2 This section summarises key elements of recent energy policy and guidance which provides updated and supplemental support to the urgent need for new energy infrastructure, including SAF production and sustainably sourced biomass and waste wood biomass out in EN-1 and EN-3.
- 4.1.3 The need for energy infrastructure in the UK is well established, with the NPS recognising that to achieve the goals it has set out will require a 'significant amount of new energy infrastructure'. This includes infrastructure for converting primary energy sources into usable forms such as electricity and steam as well as infrastructure for the manufacture of a diverse range of advanced fuels to support the decarbonisation of other sectors.
- 4.1.4 This section begins by providing an overview of key legislation and policy related to SAF. This is followed by an overview of legislation and policy related to biomass and waste wood combustion for power generation. This section includes policy related to the use of carbon capture.

4.2 Need for SAF Production

The Climate Change Act 2008

- 4.2.1 The Climate Change Act 2008 set up a framework for the UK to achieve its long-term goals of reducing greenhouse gas emissions and to ensure steps are taken towards adapting to the impact of climate change. The Climate Change Act 2008 committed the UK to reducing its greenhouse gas emissions by at least 80% by 2050 when compared with 1990 levels.
- 4.2.2 In June 2019, legislation as passed in the form of the Climate Change Act 2008 (2050 Target Amendment Order) 2019 to amend the Climate Change Act 2008 to set a new ambitious target requiring the UK to bring all greenhouse gas emissions to net zero (i.e. 100% reduction by 2050, compared with the previous target of at least 80% reduction from 1990 levels increasing the urgency and scale of the need to reduce greenhouse gas emissions). As outlined in Section 14.4 of **Chapter 14: Greenhouse**

Gas Emissions (ES Volume I, Application Document Ref. 6.1.15), the greenhouse gas emissions in the future baseline assumes zero emissions, meaning that the net change in GHG emissions from the future baseline, showing that the Proposed Development is relevant in meeting these targets.

[The Clean Growth Strategy \(October 2017\)](#)

- 4.2.3 The 'Clean Growth Strategy - Leading the way to a low carbon future' (the 'CGS') [Ref 17] sets out the UK Government's proposals to increase economic growth while simultaneously reducing carbon emissions. It estimates that the low carbon economy could grow 11% per year between 2015 and 2030, four times faster than the projected growth of the economy as a whole.
- 4.2.4 The UK Government's ambition for a low carbon transport sector includes the modernisation of the aviation sector "*through support for sustainable alternative fuels, improved efficiency and new technologies.*" The CGS confirms the UK Government will establish targets to support the development of advanced fuels for aviation and also extend the Renewable Transport Fuel Obligations (RTFO) to include incentives to use biofuels in aviation. The Proposed Development supports these targets through the production of SAF, supporting the UK Government's ambition.

[The Ten Point Plan for an Industrial Revolution \(November 2020\)](#)

- 4.2.5 'The Ten Point Plan for a Green Industrial Revolution – Building back better, supporting green jobs, and accelerating our path to net zero' [Ref 18], was published on 18 November 2020 and was aimed at delivering a "*Green Industrial Revolution*" in the UK, with the foreword by the then Prime Minister stating that "*the Plan will aim to mobilise £12 billion of government investment and potentially three times as much from the private sector, to create and support up to 250,000 green jobs*".
- 4.2.6 Point 6: Jet Zero and Green Ships sets out immediate steps to drive the uptake of sustainable aviation fuels. A Jet Zero Council was established as a sector-wide partnership to accelerate the development and adoption of new technologies to help develop a strategy to reach net zero aviation. In addition, £15 million was invested into FlyZero which was a 12-month study into the strategic, technical and commercial issues in designing and developing zero emission aircraft that could enter service in 2030. Furthermore, the £15 million Green Fuels, Green Skies competition was held in 2021 to support the production of SAF in the UK, of which the Proposed Development was awarded £2,417,500. A consultation also ran from 30 March 2023 to 22 June 2023 on a SAF Mandate to blend greener

fuels into kerosene, which will create a market-led demand for these alternative fuels.

[The Energy White Paper \(December 2020\)](#)

- 4.2.7 The Energy White Paper ‘Powering our Net Zero Future’ (EWP) set an agenda to reduce all greenhouse gas emissions to net zero by 2050. This was presented to Parliament in December 2020 and builds on the Ten Point Plan. It is outlined that achieving net zero will require rapid decarbonisation across all sectors, with many changes to the ways in which both power and heat is generated and used.
- 4.2.8 The EWP seeks to input a strategy for the wider energy system that transforms energy, supports a green recovery and creates a fair deal for consumers. Similar to the Ten Point Plan, the EWP iterates the UK Government’s support for new hydrogen technologies and Carbon Capture Utilisation and Storage (CCUS), aiming to draw upon the resources provided by the North Sea.
- 4.2.9 It is estimated that the measures in the EWP could reduce emissions across power, industry and buildings by up to 230Mt carbon dioxide (CO₂) in the period up to 2032. These measures could support up to 220,000 jobs per year by 2030. The EWP recognises that more will need to be done to meet key milestones on the journey to net zero.
- 4.2.10 Pages 16 to 17 of the EWP sets out the UK Government’s key commitments to put the UK on course for net zero. These include “Increasing the ambition in our Industrial Clusters Mission four-fold, aiming to deliver four low-carbon clusters by 2030 and at least one fully net zero cluster by 2040” and “Investing £1 billion up to 2025 to facilitate the deployment of Carbon Capture, Usage and Storage in two industrial clusters by the mid-2020s, and a further two clusters by 2030, supporting our ambition to capture 10 Mt per year by the end of the decade.”
- 4.2.11 Chapter 5 (Industrial Energy) of the EWP sets out the goal for emissions from industry to fall by around 90% from the date of release of the EWP by 2050. In order to achieve this, the UK Government “*will create a sustainable future for UK manufacturing industry through improved energy efficiency and the adoption of clean energy technologies*”.
- 4.2.12 The EWP confirmed that manufacturing and refineries, which form the majority of industrial emissions, accounted for around 1% of the UK’s greenhouse gas emissions. About half of these emissions are concentrated in the UK’s six major industrial clusters. This includes Teesside which accounts for 3.9 Mt CO₂e of emissions. The EWP outlined how we can’t rely on energy efficiency alone to reduce emissions in line with the UK

Government's 2050 goal. Industry will be required to capture its carbon for storage and switch from using fossil fuels to low-carbon alternatives. This is relevant to the Proposed Development as the Applicant intends to secure a Transition Access Agreement (TAA) which is a new contract aimed at projects requiring low or no government support to connect to the CO₂ transport and storage network which would secure CCUS for the Proposed Development.

[Green Fuels, Green Skies \(December 2021\)](#)

- 4.2.13 Green Fuels, Green Skies was a competition to provide grant funding to large scale SAF production projects to support their early-stage development. All selected projects were required to demonstrate that they have the potential to produce SAF capable of reducing emissions by more than 70% on a lifecycle basis when used in place of conventional fossil jet fuel.
- 4.2.14 The Applicant was awarded £2,417,500 by Green Fuels, Green Skies to support the FEED stage of the Proposed Development.

[Jet Zero Strategy \(July 2022\)](#)

- 4.2.15 In July 2022 the government published the Jet Zero Strategy which set out a vision for decarbonising aviation, focussing on the development of technologies in a way that maintains the benefits of air travel, especially post COVID 19, whilst maximising the opportunities that decarbonisation can bring for the UK.
- 4.2.16 The Jet Zero Strategy sets out the government focus for policies across SAF. It points out that SAF is currently commercially available, but not at the scale that is required to decarbonise the aviation sector. The Jet Zero Strategy subsequently explains that the government sees SAF as an essential means to achieve net zero aviation for medium and long haul flights, which account for around of the 80% CO₂ emissions from aviation. The Jet Zero Strategy 'high ambition' scenario projects approximately 5m tonnes of SAF are required by 2050 to meet the Jet Zero Strategy's net zero target.
- 4.2.17 The UK Government has committed to having at least five UK SAF plants under construction by 2025 and committed to £180 million of new funding between 2022-2025 to support the commercialisation of SAF plants and fuel testing in the UK. In addition, the UK Government committed to having the SAF Mandate in place with a target of at least 10% liquid aviation fuel usage to be met SAF by 2030.

- 4.2.18 The 'Jet Zero Strategy: One Year On' was published in August 2023 to highlight the key successes across the three guiding principles and six core policy measures in the Jet Zero Strategy as well as the next steps. Among its successes within SAF, the report counted the publications of the second SAF Mandate consultation, outlining the proposed detailed design of a scheme that will seek to generate demand for SAF and further round of Advanced Fuels Fund, making a further £55.8m available to support UK SAF projects through to construction. The report's next steps set a target for 2025 to bring the SAF Mandate into force and complete the funding period for projects supported by the Advanced Fuels Fund. The Jet Zero Strategy: One Year On confirms that the Jet Zero Strategy will continue to be reviewed every five years.
- 4.2.19 The Proposed Development supports the Jet Zero Strategy with it projected to produce 180 million litres of SAF each year, contributing to the ambitions set out in the Jet Zero Strategy.

[SAF Mandate \(December 2024\)](#)

- 4.2.20 The SAF Mandate which began on 1 January 2025 is the UK's key policy mechanism to secure demand for SAF. It will deliver reductions in GHG emissions from fuel used in the aviation sector by mandating the use of low carbon aviation fuels. The legislative basis for the SAF Mandate is found in The Renewable Transport Fuel Obligations (Sustainable Aviation Fuel) Order 2024.
- 4.2.21 The SAF Mandate secures demand for SAF by placing an obligation on fuel suppliers to supply a certain percentage of sustainable low-carbon aviation fuels from 2025. This means at least 2% of all jet fuel aboard flights taking off from UK airports must be SAF by law in 2025. This is set to expand to 10% in 2030 and 22% in 2040. Figures quoted by the Department for Transport (DfT) confirm that SAF production in Britain increased 188% from 2022 to 2023, rising from 48m to 138.1m litres. That accounted for less than 1% of the 14bn litres of conventional jet fuel consumed in the UK that year.
- 4.2.22 The DfT estimates that 1.5bn litres of SAF will be needed each year in order to meet the mandated 10% level required in 2030. Therefore in 2023 the UK produced 9.2% of the SAF that the industry will need in 2030. The Proposed Development will produce 180 million litres of SAF each year, contributing to the DfT's estimated need for SAF.

[The Advanced Fuels Fund \(July 2025\)](#)

- 4.2.23 The Advanced Fuels Fund was a competition to provide grant funding to first of a kind commercial and demonstration scale projects, with all

selected projects having demonstrated their potential to produce SAF capable of reducing emissions by more than 65% on a lifecycle basis when used in place of conventional fossil jet fuel. The Applicant has secured £27.7 million through three rounds of funding to support final engineering and pre-construction work.

[Low Carbon Fuels Fund \(August 2026\)](#)

- 4.2.24 The Low Carbon Fuels Fund is the successor to the Advanced Fuels Fund and will allocate up to £93 million in grant funding to primarily support First-of-a-Kind commercial scale SAF projects that require support to reach a near-term final investment decision. As outlined in the Advanced Fuels Fund above, the Applicant has secured £27.7 million in funding through the Advanced Fuels Fund which was the predecessor to this Fund.
- 4.2.25 The Applicant will continue to apply for future rounds of funding through the Low Carbon Fuel Fund.

[4.3 Need for Biomass and Waste Wood Fired Combined Heat and Power](#)

- 4.3.1 This section sets out the legislation and policy relevant to power generation in general including CHP and goes on to describe legislation and policy relevant to biomass and waste wood combustion.

[Biomass Task Force Report to Government \(October 2005\)](#)

- 4.3.2 The Biomass Task Force Report was presented to the UK Government in October 2005. It outlines a comprehensive strategy to optimise biomass's contribution to renewable energy targets, sustainable farming, and rural economies.
- 4.3.3 Chapter 4 (Delivery Biomass Energy Section A) covers Biomass-fired heat production and recommends that "the Government urgently introduce a single capital grant scheme to grant aid all biomass heating boilers and the heat element of CHP biomass-fuelled plants."
- 4.3.4 The Proposed Development is supported by the Biomass Task Force Report to Government as it comprises a biomass or waste wood fired CHP plant.

[Waste Wood as a Biomass Fuel \(June 2011\)](#)

- 4.3.5 The Waste Wood as a Biomass Fuel report was published by the Department for Environment, Food & Rural Affairs in June 2011. This report was prepared in response to recommendation 4 of the Biomass Task Force Report to the government which was published in October 2005.

4.3.6 This report identified Energy Recovery and Recycling as the main alternatives to sending waste wood to landfill. Section 2.3 of this report outlines that *“There are relatively strong financial incentives for aggregators to collect and process the high grades of waste wood, due to the relatively high demand for such materials from recyclers and increasingly from biomass energy generators.”*

4.3.7 Section 4.2 (Biomass Plants) of this report states that “Clean wood and waste wood can be used as a biomass fuel as follows:

- *In existing infrastructure which run on fossil fuels (generally co-fired but subject to the implementation of the “neutrality for waste” provisions proposed by the Renewables Obligation (RO) Banding Review in the case of waste wood);*
- *As a replacement for, or co-fired with other types of biomass; and*
- *In specifically constructed wood fuelled biomass plans.”*

4.3.8 The Proposed Development is supported by the Waste Wood and Biomass Fuels Report as it comprises a biomass or waste wood fired CHP plant which would utilise waste wood which would otherwise go to landfill.

[Waste \(England and Wales\) Regulations 2011](#)

4.3.9 The revised Waste Framework Directive (rWFD), which came into force in December 2008 (Directive 2008/98/EC), established the overarching framework for the management of waste across the EU.

4.3.10 Article 4(1) of the rWFD introduced a new five-point waste hierarchy, based on the priority order of:

- *Prevention (preferred option);*
- *Preparing for re-use;*
- *Recycling;*
- *Other recovery (e.g. energy recovery); and*
- *Disposal (i.e. landfilling or incineration without energy recovery).*

4.3.11 The emphasis of the hierarchy in the rWFD is a preference for waste prevention and the confirmation that waste treatment involving energy generation is a recovery operation (subject of it achieving energy recovery efficiency expressed as R1 of 0.65 or more). The rWFD was incorporated into national legislation, in England and Wales, by The Waste (England and Wales) Regulations 2011 (the Waste Regulations 2011). The Waste Regulations 2011 require, in Schedule 1 paragraph 2(1), that the waste

hierarchy, as set out in the rWFD, is applied by the appropriate authority as a 'priority order' in waste prevention and management policy. Schedule 1 paragraph 2(2) requires that when applying the waste hierarchy, the appropriate authority must ensure that it:

“(a) encourages the options that deliver the best overall environmental outcome, which may require specific waste streams to depart from the hierarchy where this is justified by life-cycle thinking on the overall impacts of the generation and management of such waste:

(b) takes into account:

- i. the general environmental protection principles of precaution and sustainability;*
- ii. technical feasibility and economic viability;*
- iii. protection of resources; and*
- iv. the overall environmental, human health, economic and social impacts.”*

- 4.3.12 The Proposed Development is supported by the Waste (England and Wales) Regulations as it comprises a biomass or waste wood fired CHP plant which would utilise grade C waste wood in conformity with the waste hierarchy.

[Our Waste, Our Resources: A Strategy for England \(December 2018\)](#)

- 4.3.13 Our Waste, Our Resources: A Strategy for England was published in December 2018 by the Department for Environment, Food and Rural Affairs and Environment Agency. According to the Ministerial Foreword at the start, this Strategy seeks to *“redress the balance in favour of the natural world. Our goal is to move to a more circular economy which keeps resources in use for longer.”*

- 4.3.14 Section 3.2.1 of the strategy (Driving greater efficiency of Energy from Waste (EfW) plants by encouraging use of the heat the plants produce) states that *“We will work closely with industry to secure a substantial increase in the number of EfW plants that are formally recognised as achieving recovery status, and will ensure that all future EfW plants achieve recovery status.”* The Proposed Development is not a conventional EfW but uses grade C waste wood and will efficiently generate electricity and recover heat as the dedicated CHP plant for the Proposed Development.

[Industrial Decarbonisation Strategy \(March 2021\)](#)

- 4.3.15 The Industrial Decarbonisation Strategy was published in March 2021 and sets out how industry can be decarbonised in line with net zero. This builds

upon the Ten Point Plan and sets out the UK Government's vision for a low carbon industrial sector within the UK by 2050.

- 4.3.16 Chapter 4 (Adopting low-regret technologies and building infrastructure) outlines that "to be on track to deliver net zero, we expect that the minimum, in all future scenarios, is 20TWh per year of fossil fuel use replaced with low carbon alternatives in 2030". It goes on to state that "Current evidence strongly suggests that, given limited sustainable biomass supply, we may need to prioritise the use of biomass where it can be combined with carbon capture and storage (BECCS), resulting in negative emissions".
- 4.3.17 The Proposed Development supports the Industrial Decarbonisation Strategy as it combined the use of a biomass or waste wood fired CHP plant with the potential to export CO₂ to the NEP.

[Net Zero Strategy: Build Back Greener \(October 2021, updated April 2022\)](#)

- 4.3.18 The Net Zero Strategy: Build Back Greener was first published in October 2021 and was last updated in April 2022. The strategy expanded on key commitments in the Ten Point Plan and the EWP and set out the next steps to cut emissions, seize green economic opportunities and leverage further investment in net zero.
- 4.3.19 Pages 68-69 of the strategy, outlines that "the exact technology and energy mix in 2050 cannot be known now, and our path to net zero will respond to the innovation and adoption of new technologies over time." They then go on to state that green technologies and energy carriers are to be relied on to meet demand across sectors and to remain low carbon. Biomass is considered as one of these green technologies, stating that "Biomass combined with CCUS can remove carbon from the atmosphere and support low carbon electricity and hydrogen generation. Biomass and other wastes can also support low carbon fuels for industry, buildings, and transport."
- 4.3.20 The Proposed Development is supported by the Net Zero Strategy: Build Back Greener as it comprises of biomass or waste wood fired CHP plant with the potential to export CO₂ to the NEP, facilitating the production of SAF which is a low carbon fuel for transport.

[Biomass Policy Statement \(November 2021\)](#)

- 4.3.21 The Biomass Policy Statement was published in November 2021 and identifies the priority sectors and applications across the economy to deliver net zero by 2050. Section 2.7 sets out BECCS and how the UK Government has committed to establishing the role which Bioenergy with Carbon Capture and Storage (BECCS). This section states that if adopted

early, Greenhouse Gas Removal (GGR) technologies could help meet our nationally determined contribution (NDC) in 2030, and Carbon Budgets 5 and 6. This is in line with UK Government timelines for committing to deploy CO₂ transport and storage infrastructure at four CCUS clusters by 2030 at latest.

- 4.3.22 This section outlines how “The Climate Change Committee (CCC) and National Grid’s 2020 Future Energy Scenarios (FES) also indicate that it is not possible to achieve net zero without BECCS. Therefore, where biomass is used, the UK Government will seek to explore where there are opportunities to support its use in combination with BECCS.”
- 4.3.23 The Proposed Development is supported by the Biomass Policy Statement as it comprises of biomass or waste wood fired CHP plant with the potential to export CO₂ to the NEP.

[British Energy Security Strategy \(April 2022\)](#)

- 4.3.24 The latest Energy Security Strategy was published largely in response to soaring energy (including gas) prices as a result of a sudden surge in demand following the COVID-19 pandemic as well as the Russian invasion of Ukraine. The previous Energy Security Strategy was published in 2012 against a different geopolitical backdrop by the Department of Energy and Climate Change, which has since been dissolved and functionally transitioned into the DESNZ.
- 4.3.25 The focus of the Strategy is upon reducing energy dependence as a nation thereby reducing costs to consumers. The underlying vulnerability to international oil and gas prices is to be addressed by reducing the UK’s dependence on imported oil and gas through both demand reduction (energy efficiency) and diversification of energy sources away from fossil fuel market-based energy generation.
- 4.3.26 The Proposed Development can be considered to be supported by the British Energy Security Strategy as using a biomass and waste wood fired CHP plant to supply energy and heat to the SAF production process is as a step towards reducing the UK’s dependence on international oil and gas in the energy sector.

[Other Energy Policy and Strategy \(March 2023\)](#)

- 4.3.27 In March 2023, the DESNZ published ‘Powering Up Britain’ in which it set out how the UK will achieve energy security, promote green growth, and meet its net zero targets. This states that “*We need investment at scale ... to rapidly rollout existing technologies ... at pace to meet our ambitions for decarbonising power and [lower] wholesale UK electricity prices.*” Powering

Up Britain observes that “*a significant proportion of technologies we will need for 2050 are currently at the demonstration or prototype phase*”. This implies that while the UK should continue to develop new low-carbon technologies, waiting for such technologies to deliver takes on risk because some may not deliver. Therefore, the rapid rollout of existing technologies, while continuing to invest in new technologies, is of critical importance in the fight against climate change.

- 4.3.28 The Proposed Development as a First-of-a-Kind assemblage of technologies represents and therefore represents the kind of innovative rollout of existing technologies to decarbonise the economy set out in ‘Powering Up Britain’.
- 4.3.29 In April 2023, the DESNZ published the ‘Carbon Capture, Usage and Storage Net Zero Investment Roadmap’ which outlines joint government and industry commitments to the deployment of CCUS in the UK and sets out the approach to delivering four CCUS low carbon industrial clusters, capturing 20-30 MtCO₂ per year across the economy by 2030 to help meet the UK’s 2050 net zero target. This includes a Track 1 cluster in Teesside, sequenced for the mid-2020s, known as the East Coast Cluster which the Proposed Development has the potential to export CO₂ to.
- 4.3.30 The National Infrastructure Commission (NIC) is an executive agency of the HM Treasury established in 2017 which provides the government with impartial, expert advice on major long term infrastructure challenges. The NIC advises government on all sectors of economic infrastructure, defined as: energy, transport, water and wastewater (drainage and sewerage), waste flood risk management and digital communications. One of the key outputs of the NIC is to produce a five-year analysis report of the UK’s long-term economic infrastructure needs. On 18 October 2023 the Second National Infrastructure Assessment (NIA2) was published [Ref 19] which provided recommendations for the government in relation to national infrastructure.

[Biomass Strategy \(August 2023\)](#)

- 4.3.31 The Biomass Strategy was published in August 2023 and sets out the role biomass can play in reaching net zero and where further action is needed. The document examines the sustainability, availability, priority uses as well as uses in different sectors of the economy.
- 4.3.32 Section 7.4 addresses the use of Biomass with CHP stating that “CHP has been identified as having an important role in the transition to low carbon fuels.” It goes on to outline how “Renewable fuels used in CHP are reported to have generated a total of 16.0 TWh of electricity and heat in 2022.”

- 4.3.33 The Strategy goes on to outline that a benefit of utilising CHP technology is that it can “maximise the efficiency of biomass conversion by producing heat and power simultaneously.” This goes on to state how “It is suitable for dispersed locations and off grid applications and can operate from small to large capacities (10 KW to 1.3 GW). It can therefore provide flexibility and security of supply for sites with an 8-15 year life cycle of main engine component allowing for long term investment decisions to be made.”
- 4.3.34 Section 7.4 goes on to state how “The use of BECCS alongside CHP must be carefully considered and strategically deployed to maximise the potential benefits. There are potential applications to combined BECCS with highly efficient CHP technology in dispersed hard to decarbonise sectors such as cement production that are geographically suitable for the onward transportation of the captured carbon.”
- 4.3.35 The Proposed Development is an example of the use case detailed in Section 7.4 of the Biomass Strategy. The biomass and waste wood fired CHP plant will be used to provide energy and heat to the SAF production process and will be carbon capture ready in order to potentially achieve negative carbon emissions.

[The Second National Infrastructure Assessment \(October 2023\)](#)

- 4.3.36 As outlined in Section 4.2 above, The National Infrastructure Commission (NIC) was an executive agency of the HM Treasury established in 2017 which provides the government with impartial, expert advice on major long term infrastructure challenges. The NIC advises government on all sectors of economic infrastructure, defined as: energy, transport, water and wastewater (drainage and sewerage), waste flood risk management and digital communications. One of the key outputs of the NIC is to produce a five-year analysis report of the UK’s long-term economic infrastructure needs.
- 4.3.37 On 18 October 2023 the Second National Infrastructure Assessment (NIA2) was published [Ref 19] which provided recommendations for the UK Government in relation to national infrastructure.
- 4.3.38 Pages 128-129 of the Assessment outline how energy from waste is a major source of emissions. It then goes on to state that “To hit net zero, the tonnage of waste treated at energy from waste plants without carbon capture and storage will need to reduce by around a quarter by 2035 and by around 80 percent by 2050.” It goes on to state that “All new plants need to be carbon capture ready to hit net zero”.
- 4.3.39 It goes on to outline how the ‘Emissions Trading Scheme’ is due to cover energy from waste by 2028, and will provide a strong incentive to provide

carbon capture technology with energy from waste. It goes on to state that *“Government should send a signal that unabated energy from waste is not a viable option long term and it should take appropriate action to prevent further lock in of emissions from waste incineration.”* It goes on to state that *“There should be a ban on future energy from waste plants which are not already in the local or national planning system, and which do not have plans for carbon capture.”*

- 4.3.40 Page 129 outlines that “Energy from biogenic waste – waste which emits carbon dioxide – combined with carbon capture and storage can also deliver negative emissions. UK Government should support the transition of the energy from waste sector to carbon capture and storage through its industrial decarbonisation programme.”
- 4.3.41 The Proposed Development will be carbon capture ready and there is potential for CO₂ to be exported to the NEP. This would result in the Proposed Development achieving negative carbon emissions as recommended in the Second National Infrastructure Assessment.

[Industrial Carbon Capture Business Models \(November 2025 \)](#)

- 4.3.42 The Industrial Carbon Capture Business Models were published in October 2023, with them being updated in November 2025, in order to *“unlock private investment and scale up deployment”* of industrial CCUS. The business models were designed to incentivise industrial users who have no viable alternative to achieving deep decarbonisation.
- 4.3.43 On 05 February 2026, applications to take part in the East Coast Cluster (ECC) Teesside selection process were opened until 10 March 2026. This launch also introduces the Transition Access Agreement (TAA) which is a new contract aimed at projects requiring low or no government support to connect to the CO₂ transport and storage network. This is the route that the Applicant intends to take.
- 4.3.44 The business models comprise a capital grant funded from the £1 billion CCUS Infrastructure Fund, and ongoing revenue support funded by the Industrial Decarbonisation and Hydrogen Revenue Support scheme.

[Clean Power 2030 Action Plan \(December 2024\)](#)

- 4.3.45 On 13 December 2024 the UK Government published the Clean Power Action Plan to meet its clean power target. The Clean Power Action Plan recognises that a clean power system will include and require dispatchable technologies, with sustainably sourced biomass a low carbon fuel for renewable electricity generation and which, *“could play an important role in*

Clean Power 2030 by providing flexible or firm generation". It also notes that large scale biomass plants:

"...have the potential to transition to power BECCS. This carbon capture technology can combine the conversion of sustainable biomass, biogas and biogenic wastes into electricity while capturing a high percentage of the CO₂ emissions contained in that biomass in long-term storage in geological sequestration. Large scale power BECCS has the potential to support low carbon electricity and deliver negative emissions, helping to balance residual emissions from hard-to-abate sectors."

- 4.3.46 The Proposed Development is supported by the Clean Power 2030 Action Plan as it comprises a biomass or waste wood fired CHP plant with the potential to be export CO₂ to the NEP.

[Sustainable Aviation Fuel Act 2026 \(March 2026\)](#)

- 4.3.47 The Sustainable Aviation Fuel Act 2026 (the 'SAF Act') reached royal assent and came into force on 5 March 2026, save for Section 1, which came into force on 5 May 2026. It allows the SoS to offer revenue certainty contracts to SAF producers and provides a framework to make regulations to require a levy on suppliers of aviation fuel. The Sustainable Aviation Fuels Revenue Certainty Mechanism discussed below follows from the Sustainable Aviation Fuel Act 2026 and strengthens the support from the UK Government for the Proposed Development.

[Sustainable Aviation Fuels Revenue Certainty Mechanism \(July 2026\)](#)

- 4.3.48 The UK Government is in the development of a revenue certainty mechanism as introduced by the SAF Act which will provide an incentive for the production of SAF via a guaranteed strike price. This mechanism uses a Contracts-for-Difference style model that provides supply-side revenue support for new first-of-a-kind industries. In January 2026, the UK Government published a consultation on a SAF revenue certainty mechanism, seeking views from industry on the indicative Heads of Terms and contract allocation for the first application round. This is in addition to a consultation which ran between 22 June 2026 and 2 August 2026 on the detailed design of a variable levy on aviation fuel suppliers to fund the scheme. A revenue certainty mechanism will help de-risk SAF projects in the UK by addressing barriers to investment in a nascent market that is using innovative technologies. Such a mechanism will help provide greater certainty of future revenue and attract investment in commercial scale SAF plants within the UK including the Proposed Development.

Summary of Need Case

- 4.3.49 The Jet Zero Strategy introduced the UK Government's ambitious targets to decarbonise the aviation sector, committing to a 'High ambition' scenario, which would see a 19.3 MtCO₂e of residual emissions in 2050 to be offset or removed. The Jet Zero Strategy contextualised the UK Government's ambitions for SAF production and uptake which has translated into the legally binding obligations for SAF blending set out in the SAF Mandate. The first five year review of the Jet Zero Strategy will be published in 2027. The review will take stock of how emerging technologies are developing, how the strategy is performing against its key performance indicators and adapt the strategy's approach if required.
- 4.3.50 Other UK Government mechanisms to foster demand for SAF have sought to provide technical support and funding towards the development, testing and qualification of alternative fuels such as the Advanced Fuel Fund, which the Proposed Development has benefitted from, or provide greater certainty of future revenue to reduce risk and attract investment e.g. the SAF Revenue Certainty Mechanism. The UK SAF policy environment therefore continues to develop at pace commensurate with the increasingly urgent need for commercial deployment at scale.
- 4.3.51 The 'SAF Mandate statistics 2025: Fourth provisional release' measures SAF supply based on data available as of 27 April 2026. The final update for 2025 will be published in November 2026. The provisional data shows that 370 million litres of SAF was supplied in 2025 against total aviation fuel supply of 14.7 billion litres. This provisional figure accounts for approximately 2.4% of total reported aviation fuel successfully exceeding the 2% target set out in the SAF Mandate.
- 4.3.52 The SAF Mandate statistics reveal that 100% of SAF supplied in 2025 was produced via the (hydroprocessed esters and fatty acids) HEFA pathway specifically from used cooking oil, being the most readily available SAF pathway. Furthermore, over 90% of HEFA SAF was imported to the UK. No other SAF production pathway contributed to the SAF Mandate.
- 4.3.53 The SAF Mandate includes a cap on the proportion of SAF that can be supplied by HEFA ('the HEFA cap') to encourage investment and innovation in production of more advanced non-HEFA SAF types, including Biomass to Liquid and Power to Liquid (PtL). The HEFA cap is scheduled to come into effect in 2027 and will gradually decrease each year, restricted to 71% in 2030 and 35% in 2040.
- 4.3.54 In addition to decarbonisation considerations, previous and current UK Government policies have identified the important role that the

development of advanced and diverse fuel production will play. The British Energy Security Strategy signalled greater emphasis on reducing Great Britain's reliance on and exposure to international energy markets by bolstering domestic production. The HEFA Cap is also designed to scale up domestic production of advanced SAF to insulate the UK from greater global demand for HEFA as more countries introduce SAF policies and demand from other transport sectors increases.

- 4.3.55 The Proposed Development will use sustainably sourced biomass to produce 180 million litres of second-generation SAF each year. The Proposed Development is expected to be operational from 2031 and contribute to that year's SAF Mandate which is estimated to exceed 1.47 billion litres. The HEFA Cap is estimated to be lower than 71% in 2031 which results in a non-HEFA SAF requirement of circa 426 million litres. The Proposed Development would make a substantial contribution to achieving the SAF Mandate, accounting for over 10% of the total requirement and over 40% of the non-HEFA component. Moreover, the Proposed Development would provide domestic supply of advanced SAF which the provisional 2025 data shows does not exist. The alignment of the Proposed Development with the SAF Mandate demonstrates the urgent need for the Proposed Development.
- 4.3.56 The Proposed Development is the only recipient of funding in all DfT SAF funding round, including all three rounds of the Advanced Fuels Fund and funding from Green Fuels fund and the Green Skies fund. This demonstrates the government's confidence and reinforces the substantial need for the Proposed Development to meet aviation decarbonisation objectives.
- 4.3.57 The delivery of SAF by 2031 is possible through the incorporation of secure onsite power and heat production with resilient fuel supplies. This will come through an onsite CHP plant to supply all power and heat for SAF production rather than relying on a grid connection becoming available. Onsite power and heat production also minimises the carbon intensity of the SAF.
- 4.3.58 The fuel supply of the CHP will be comprised of biomass and waste wood. The biomass will be managed in accordance with the safe RTFO sustainability requirements as the biomass used in SAF production. Grade C waste wood, which is not considered biomass, will be used exclusively in the CHP plant. The choice of feedstock for the CHP plant is supported by UK Government policy. Section 4.2 of Waste Wood as a Biomass Fuel (June 2011), referenced above, states that waste wood may be used as fuel *"as a replacement for, or co-fired with other types of biomass"*. The

import of feedstock will maximise the use of water freight and the proposed quay. The design of the CHP plant and the Main Site in general allows sufficient space for the future installation of a PCCU, subject to separate planning permission, which will be able to connect to the NEP or other suitable CO₂ gathering network for transport and permanent storage. This will further reduce the carbon intensity of the final SAF product.

- 4.3.59 The established need is consistent with and amplifies that set out in NPS EN-1 and EN-3 which confirms that there is a need for significant amounts of new large-scale energy infrastructure to meet the government's energy objectives and the need for such infrastructure is urgent. This does not just apply to the SAF Production Facility but also the biomass and waste wood fired CHP plant which is necessary to minimise the carbon intensity of the SAF. The Proposed Development may transport CO₂ to the separately consented Northern Endurance Partnership (NEP) infrastructure which would further reduce the carbon intensity of the SAF. NPS EN-1 and EN-3 are clear that bioenergy combustion will play an important role in supporting decarbonisation providing further demonstration that the Proposed Development is aligned with Government policy need.
- 4.3.60 In summary, a significant increase in the supply of advanced SAF is needed for the UK to meet the SAF Mandate which forms a critical part of the UK Government's aviation decarbonisation strategy. The Proposed Development would be a first of its kind second generation SAF Production Facility in the UK which would make a substantial contribution towards the fuel supply obligations of the SAF Mandate from 2031 of which there is an increasingly urgent need.

5 Assessment of the Proposed Development against Planning Policy

5.1 Introduction

5.1.1 This section provides an assessment of the Proposed Development against the relevant planning policy.

5.1.2 As confirmed in Section 4 of this Planning Statement, Section 104 of the PA 2008 requires the SoS to determine applications for development consent in accordance with the relevant NPSs, having regard to a number of specified matters (e.g. appropriate marine policy documents, any local impact report etc.), including any other matters which the SoS thinks are both important and relevant to their decision.

5.1.3 As discussed above in Section 3, Paragraph 1.3.10 of EN-1 confirms that EN-1, in conjunction with any relevant technology specific NPS, will be the primary policy for SoS decision making on energy projects for which a direction has been given under Section 35. EN-3 is relevant to the Proposed Development as it has a direct effect upon the CHP element of the Proposed Development (**Work No. 2**).

5.1.4 The Proposed Development includes a natural gas supply pipeline and an electricity grid connection, which are associated development for the purposes of Section 115(1)(b) of the PA 2008, as set out in Section 2 above. EN-4 and EN-5 are therefore considered important and relevant for the determination of the Application, though they do not have 'effect' for the infrastructure proposed. The assessment therefore considers the degree of general accordance with EN-4 and EN-5 policies

5.1.5 The assessment of the Proposed Development against the NPSs that have effect has been structured so as to follow the relevant 'assessment principles' and 'generic impact' headings set out in EN-1 and also to take account of the assessment and technology specific information contained within EN-3 in relation to renewable energy infrastructure. Each heading references the relevant part or section of the NPS. The assessment considers the degree of compliance with EN-1 and EN-3 policies.

5.1.6 The **Policy Compliance and Accordance Tables (Application Document Ref. 5.2.2)** provide a comprehensive assessment of compliance with EN-1, EN-3, and the relevant marine plans, and accordance with EN-4, EN-5, the NPPF and local planning policies. Planning professional judgement has been applied to determine the policies of relevance. Policies that are considered to be irrelevant to the Proposed Development do not appear in the tables. In the case of the STBC Local Plan and RCBC Local

Plan the relevant policies applicable were agreed with officers at pre application stage.

5.2 [EN-1: Overarching National Policy Statement for Energy – Assessment Principles](#)

5.2.1 Part 4 of EN-1 sets out 'Assessment Principles' which are the general policies for the submission and assessment of applications relating to energy infrastructure. Applicants and the SoS should have regard to these principles in preparing and determining applications for development consent. The assessment principles in EN-1 are of relevance to nationally significant energy infrastructure.

5.2.2 While the focus of this section is on the assessment principles in EN-1, relevant technology specific policies that link to these principles are dealt with in this section for ease of reading.

[General Policies and Considerations \(EN-1, 4.1\)](#)

5.2.3 Paragraph 4.1.3 of EN-1 states that, given the level and urgency of the need for infrastructure projects of the types covered by the NPSs, the SoS will start with a presumption in favour of granting consent for applications for energy NSIPs, and that presumption applies unless any more specific and relevant policies set out in the relevant NPSs clearly indicate that consent should be refused. Paragraph 4.1.4 states that the presumption is also subject to the provisions of the PA 2008 (Section 104(3) to (8) referred to at paragraph 1.1.4 of EN-1).

5.2.4 When weighing the adverse impacts against the benefits of energy NSIPs, paragraph 4.1.5 of EN-1 states that the SoS should take into account both the potential benefits, including the contribution to meeting the need for the Clean Power 2030 Mission and net zero, energy infrastructure, job creation, ecological enhancements, and any long-term or wider benefits as well as any potential adverse impacts, including on the environment, and any long-term and cumulative adverse impacts, as well as any measures to avoid, reduce, mitigate, or compensate for any adverse impacts, following the mitigation hierarchy.

5.2.5 With regard to the above, Section 3 of this Planning Statement sets out the relevant legislation and National Policy. Furthermore, Section 4 of this Planning Statement has set out how the Proposed Development is in accordance with and supports key UK Government policy and will make a significant contribution toward the legally binding target of net zero greenhouse gas emissions with 2050, it also demonstrates the clear need for the Proposed Development, not just in terms of low carbon energy generation but also contributing toward the decarbonisation of industry on

Teesside. Section 6 provides an assessment of the key benefits and the potential adverse effects/impacts of the Proposed Development. It shows that the Proposed Development will have a number of substantial benefits that clearly outweigh its limited potential adverse impacts in the planning balance.

- 5.2.6 Paragraph 4.1.6 of EN-1 brings to the attention of the SoS that environmental, social, and economic benefits and adverse impacts both nationally, regionally and locally should be taken into account.
- 5.2.7 Paragraph 4.1.7 of EN-1 sets out that the technology specific NPSs require applicants to mitigate particular impacts as far as possible but should residual adverse effects remain, the SoS should weigh those against the benefits of the Proposed Development. Critically, it goes on to state that for CNP projects *"it is likely that the need case will outweigh the residual effects in all but the most exceptional cases"*. Further detail on the CNP status of the Proposed Development is likely to represent is set out above in Section 3, and compliance with the policies for CNP infrastructure is provided in Section 6.
- 5.2.8 Paragraph 4.1.11 of EN-1 confirms that the suite of energy NPSs have taken into account the NPPF and PPG, and that Local Development Plan documents are a matter that is *"important and relevant"* to decision making on energy NSIPs (paragraph 4.1.12). However, in the event of a conflict between these or any other documents and NPSs, the NPS prevails (as per paragraph 4.1.16).
- 5.2.9 It is also relevant to note that the Government's sustainable aviation, and energy and climate change policy is important and relevant to the decision-making on the Proposed Development. This policy, and how the Proposed Development would contribute toward key policy objectives is considered in Section 4 of this Planning Statement.
- 5.2.10 In respect of the above, Section 5 of this document provides an assessment of the compliance of the Proposed Development with EN-1, EN-3 and the relevant Marine Plans and the accordance of the Proposed Development with EN-4, EN-5, the NPPF, biomass policy and local development plan policies.
- 5.2.11 Notably, the Applicant and both relevant local authorities have agreed the list of relevant policies set out in Section 4 above, with STBC agreeing by email on 28 August 2026 and RCBC agreeing by email on 09 September 2026. The assessment undertaken in Tables 10.1 to 13.1 of the **Policy Compliance and Accordance Tables (Application Document Ref. 5.2.2)**

shows that the Proposed Development shows general accordance with local policy.

- 5.2.12 The Applicant's assessment of the Proposed Development, notably through the **Environmental Statement (Application Document Refs. 6.1 to 6.4)** has identified some effects that require mitigation. However, the necessary mitigation has either been embedded within the design of the Proposed Development; is secured through the requirements in Schedule 2 to the **Draft DCO (Application Document Ref. 3.1)**; or is controlled through other 'non-DCO' licences, permits and consents as set out within the **Other Consents and Licences Statement (Application Document Ref. 5.4)**.
- 5.2.13 Paragraph 4.1.20 of EN-1 emphasises the importance of early engagement with key stakeholders in relation to the Proposed Development. This process of engagement with both public regulators and statutory bodies, alongside those likely to have an interest in the application, is set out within the submitted **Consultation Report (Application Document Ref. 5.1.1)**.
- 5.2.14 Paragraph 4.1.22 of the EN-1 requires applicants to have considered both the financial and technical viability of the Proposed Development. For the Proposed Development, the Applicant has given due consideration to commercial and financial matters which have informed the decision to proceed with an application for the Proposed Development. The **Funding Statement (Application Document Ref. 4.2)** gives consideration to the proposed costs of the development and sets out how the Proposed Development may be funded as well as including details of the financial position of the Applicant. The **Design Approach Document (Application Document Ref. 5.3.1)** sets out the front-end engineering design process that was carried out and associated constructability requirements that were considered.
- 5.2.15 Chapter 4 Proposed Development (ES Volume I, Application Document Ref. 6.1.4) and Chapter 5: Construction Programme and Management (ES Volume I, Application Document Ref. 6.1.5) provide indicative outlines of how the Proposed Development will be constructed and describes the proposed technology and equipment to be used. The Electricity Grid Connection Statement (Application Document Ref. 7.1), Pipelines Statement (Application Document Ref. 7.2), Harbour Facilities Statement (Application Document Ref. 7.3) and Combined Heat and Power Statement (Application Document Ref. 7.4) each provide detail on the proposed technology, equipment and construction for the electricity grid connection, harbour facilities and combined heat and power plant respectively.

[The Critical National Priority for Low Carbon Infrastructure \(EN-1, section 4.2\)](#)

- 5.2.16 Paragraph 4.2.2 of EN-1 explains that ensuring a smooth transition to abundant, low carbon energy generation will ensure the UK is energy independent, resilient and secure. It identifies the criticality of the deployment of *"new low carbon sources of energy at speed and scale"* in terms of the UK's energy security and net zero ambitions.
- 5.2.17 Paragraphs 4.2.4 and 4.2.5 of EN-1 emphasise that the pace of planning delivery needs to significantly increase to allow the Government to meet its Clean Energy targets, and that this will require *"a significant and sustained effort from applicants, planners, LPAs, statutory advisors, Examining Authorities and decision makers, while listening to host communities"*. Proportionality and focus at all stages of project preparation, examination and decision-making are identified as vital. The Applicant has approached the preparation of the Application with these policies in mind, ensuring that the documentation submitted is proportionate, clear and focussed so as to facilitate efficient examination and decision-making.
- 5.2.18 Paragraphs 4.2.6 to 4.2.11 of EN-1 address the pre-application stage of the DCO process. EN-1 recommends that applicants consider additional consents, licences and permit requirements at the earliest possible stage, including parallel tracking of environmental permitting and planning applications and early engagement with the Environment Agency's pre-application service. As confirmed within the **Other Consents and Licences Statement (Application Document Ref. 5.4)**, the Applicant has undertaken enhanced pre-application engagement with the EA Permitting team.
- 5.2.19 Paragraph 4.2.8 of EN-1 advises that preliminary environmental information provided at the pre-application consultation stage should be sufficient for statutory advisors to develop an informed view of the likely significant environmental effects of the development, and that mitigations should be built in from the start rather than being tested through repeated rounds of consultation. The Applicant has had regard to this policy throughout the pre-application process, as documented in the **Consultation Report (Application Document Ref. 5.1.1)** and **Other Consents and Licences Statement (Application Document Ref. 5.4)**.
- 5.2.20 Paragraphs 4.2.12 and 4.2.13 address the preparation and submission of applications and Environmental Statements. EN-1 is clear that applications must be ready to be examined before they are made, that the planning system is designed to be frontloaded, and that applications should not enter the statutory system if they are not ready to be consented. With regard to

the Environmental Statement specifically, EN-1 requires that it be proportionate and focused, containing just sufficient detail to clearly identify the likely significant effects from the proposal. The Applicant has sought to comply with this policy. The **Environmental Statement (Application Document Refs. 6.1 to 6.4)** has been prepared to be proportionate and focused, identifying the likely significant effects of the Proposed Development in a clear and accessible manner for both the public and decision-makers.

- 5.2.21 Paragraphs 4.2.14 and 4.2.15 of EN-1 emphasise the importance of collaborative working between all parties involved in the DCO process, to ensure that impacts of projects are properly assessed and mitigated so that good quality schemes are consented efficiently. EN-1 encourages applicants to view their relationships with LPAs and statutory advisors as a valuable collaborative one, and to work together to streamline the formal DCO itself. The Applicant has sought to engage in this spirit throughout the preparation of the Application, as set out in **Consultation Report (Application Document Ref. 5.1.1)**.
- 5.2.22 Paragraph 4.2.16 of EN-1 confirms that the Government has concluded “there is a (CNP) for the provision of nationally significant low carbon infrastructure to meet the Clean Power 2030 Mission and net zero”. The CNP policy set out in EN-1 applies to the categories of low carbon infrastructure described in paragraphs 4.2.17 and 4.2.18. **Section 3.4** of this Planning Statement sets out how the Proposed Development is likely to represent a CNP project as per these paragraphs.
- 5.2.23 Paragraph 4.2.18 of EN-1 additionally identifies that the CNP policy extends to energy infrastructure directed into the NSIP regime under section 35 of the Planning Act 2008, where it fits within the normal definition of “*low carbon*”. As included at **Appendix B** of this Planning Statement, the SoS issued a section 35 direction on 8 September 2025 in respect of the specified elements of the Proposed Development. To the extent that the Proposed Development includes infrastructure directed to be nationally significant under section 35 which fits within the normal definition of low carbon and is fuelled by biomass, the CNP policy is engaged.
- 5.2.24 Paragraph 4.2.19 of EN-1 confirms that the overarching need case for each type of energy infrastructure, and the substantial weight which should be given to that need in assessing applications as set out at paragraphs 3.2.8 to 3.2.10 of EN-1, is the starting point for all assessments of energy infrastructure applications. This substantial weight applies to the Proposed Development. Paragraph 3.2.10 further advises that there is no

requirement on the SoS to consider separately the specific contribution of any individual project in satisfying the need established in EN-1.

- 5.2.25 Paragraph 4.2.20 of EN-1 advises that the CNP policy applies "following the normal consideration of the need case, the impacts of the project, and the application of the mitigation hierarchy". It points out that it is therefore relevant during SoS decision making and with particular reference to any residual impacts that have been identified and should be given consideration by the ExA when making its recommendation to the SoS.
- 5.2.26 Paragraph 4.2.21 of EN-1 notes that CNP policy "will therefore also influence how the [SoS] considers whether tests requiring clear outweighing of harm, exceptionality, or very special circumstances have been met by a CNP Infrastructure application".
- 5.2.27 Paragraphs 4.2.23 to 4.2.26 of EN-1 set out the policy requirements on applicants for CNP infrastructure. These confirm that applicants must continue to show how their application meets the requirements of EN-1 and the relevant technology specific NPS, applying the mitigation hierarchy, as well as all other applicable legal and regulatory requirements. Applicants must demonstrate that the mitigation hierarchy has been applied, that all residual impacts are those that cannot be avoided, reduced or mitigated, and that residual impacts will be compensated for as far as possible. Paragraph 4.2.24 makes clear that "*measures resulting in a significant reduction in generation capacity for CNP infrastructure are unlikely to be considered appropriate as mitigation*".
- 5.2.28 The Applicant's assessment of the Proposed Development, principally through the **Environmental Statement (Application Document Refs. 6.1 to 6.4)**, demonstrates compliance with these sections of EN-1. In particular, the necessary mitigation has either been embedded within the design of the Proposed Development or is secured through the requirements in Schedule 2 to the **Draft DCO (Application Document Ref. 3.1)** or will be controlled through other 'non-DCO' licences, permits and consents as set out within the **Other Consents and Licences Statement (Application Document Ref. 5.4)**..
- 5.2.29 Where the SoS is satisfied that the applicant's assessment demonstrates that the policies set out in paragraphs 4.2.23 to 4.2.26 have been met, the CNP presumptions set out at paragraphs 4.2.28 onwards apply. As demonstrated by this Planning Statement, the **Environmental Statement, Chapters 8 to 22 (Application Document Ref. 6.1)** and the **Design Approach Document (Application Document Ref. 5.3.1)**, the Applicant is satisfied that those requirements have been met in respect of the Proposed

Development, such that the CNP presumptions should apply in the SoS's decision-making.

- 5.2.30 Mitigation has been embedded into the design and will be adopted (where possible) to reduce potentially adverse environmental effects of the Proposed Development. **Chapter 23: Summary of Environmental Effects (ES Volume I, Application Document Ref. 6.1.23)** provides a summary of the significant residual effects of the Proposed Development on the receptors considered within the **Environmental Statement (Application Document Refs. 6.1, 6.2 and 6.3)**. **Chapter 6: Alternatives (ES Volume I, Application Document Ref. 6.1.6)** and the **Design Approach Document (Application Document Ref. 5.3.1)** demonstrate how, in accordance with the mitigation hierarchy, the site has been selected and the Proposed Development has been designed to avoid adverse impacts where possible.
- 5.2.31 Further to the embedded mitigation, each technical chapter of the **Environmental Statement, Chapters 8 to 22 (Application Document Ref. 6.1)** has considered the need for additional mitigation measures where necessary. **Chapter 23: Summary of Environmental Effects (ES Volume I, Application Document Ref. 6.1.23)** summarises the additional mitigation proposed and confirms how this is secured through the **Draft DCO (Application Document Ref. 3.1)**.
- 5.2.32 Paragraph 4.2.32 of EN-1 states that, "where, following Appropriate Assessment, CNP Infrastructure has residual adverse impacts on the integrity of sites forming part of the UK national site network, either alone or in combination with other plans or projects, the Secretary of State will consider making a derogation under the Habitats Regulations."
- 5.2.33 Under The Conservation of Habitats and Species Regulations 2017 (Habitats Regulations), consideration should be given as to whether a project may have a significant effect on a protected site or any site to which the same degree of protection is applied as a matter of policy, either alone or in combination with other plans and projects.
- 5.2.34 Paragraph 4.1.20 of EN-1 confirms that applicants should seek early engagement with the appropriate Statutory Nature Conservation Bodies (SNCB). There are a number of statutory designated sites within the Terrestrial Biodiversity Zones of Influence (Zoi) as identified within **Chapter 10: Terrestrial Ecology (ES Volume I, Application Document Ref. 6.1.10)** in Table 10.8 (International Statutory Designated Sites within 15km of the Site), **Table 10.9** (National Statutory Designated Sites within 20km of the Site), **Table 10.10** (Local Designated Sites within 2km of the Site). Potential impacts to these sites are considered throughout the **Chapter 10: Terrestrial Ecology (ES Volume I, Application Document Ref. 6.1.10)**,

which concludes that effects following implementation of additional mitigations would be negligible.

- 5.2.35 **Table 11.11 of Freshwater and Marine Ecology (Application Document Ref. 6.1.11)** identifies a number of statutory designated sites within the Freshwater and Marine Zols (2km from the Marine Infrastructure Area for Local/ Non-Statutory Sites, 5km for Nationally Designated Sites, and 10km for Internationally Designated Sites). Potential impacts to these sites are considered throughout the chapter, which concludes that effects following implementation of additional mitigations would be **negligible or minor adverse**. A **Report to inform Habitats Regulation Assessment (HRA) (Application Document Ref. 5.11.1)** has been prepared in accordance with the requirements of Habitats Regulations to consider whether or not the Proposed Development would cause 'likely significant effects' on the qualifying features of relevant sites (and their overlapping designations where appropriate).
- 5.2.36 Screening under the Habitats Regulations is required because the Proposed Development has the potential to affect eight European designated sites. The Site partially lies within the Teesmouth and Cleveland Coast SPA and directly adjacent to the Teesmouth and Cleveland Coast Ramsar. The Proposed Development also lies within 20km of designated sites for mobile qualifying bird species, including North York Moors SPA and Northumbria Coast SPA and Ramsar. In addition, the Proposed Development lies within impact pathway ranges for air and nitrogen pollution of Annex 1 habitats associated with North York Moors SAC, Durham Coast SAC and Castle Eden Dene SAC.
- 5.2.37 The report presents the findings of the Stage 1 screening for Likely Significant Effects (LSE) and a Stage 2 Appropriate Assessment undertaken in accordance with Regulation 63 of the Habitats Regulations. The report concludes that having regard to the conservation objectives of the relevant European sites, and taking account of the mitigation measures incorporated into and secured through the Proposed Development, it can be concluded beyond reasonable scientific doubt that the Proposed Development would not adversely affect the integrity of the European sites, when considered alone, and that the conservation objectives of those sites would continue to be achieved. **Table 2.1 of the Policy Compliance and Accordance Tables (Application Document Ref. 5.2.2)** considers the compliance of the Proposed Development against section 5.4 of EN-1, which includes consideration of the Habitats Regulations.

Environmental Effects / Considerations (NPS EN-1, section 4.3)

- 5.2.38 Paragraphs 4.3.1 and 4.3.2 of EN-1 discuss the requirement that project proposals are required to be accompanied by an ES describing the aspects of the environment likely to be significantly affected by the project, if the project is subject to the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. Paragraph 4.3.3 specifies the range of effects, their duration, and measures for avoiding or mitigating significant effects that must be considered at all project stages.
- 5.2.39 Paragraph 4.3.11 of EN-1 acknowledges that it may not be possible for all elements of an application to be settled in precise detail at the time of submission and that the Applicant should explain where details are yet to be finalised. Paragraph 4.3.12 of EN-1 goes on to state that where details are still to be finalised, the ES should assess likely worst-case environmental, social and economic effects of the proposed development. This is also known as the application of the 'Rochdale Envelope' approach.
- 5.2.40 Section 2.5 of **Chapter 2: Assessment Methodology (ES Volume I, Application Document Ref. 6.1.2)** sets out that a parameters-based approach was taken to the EIA, in accordance with the Rochdale Envelope principles set out in the *Planning Act 2008: Guidance on preparing an application: Part 2 – Application contents (2026)* [Ref 20]. This approach involves assessing the maximum (and/or, where relevant, minimum) parameters for the design elements which require flexibility to be retained. This ensures the 'worst-case' parameter is considered within the technical assessment, to allow for a robust, and worst-case, assessment of the potential impacts of the Proposed Development. Table 4.1 in **Chapter 4: Proposed Development (ES Volume I, Application Document Ref. 6.1.4)** sets out the parameters utilised in the ES.

Environmental Statement

- 5.2.41 As required by paragraphs 4.3.1 and 4.3.2 of EN-1 the Application includes an ES (Volumes I, II and III) and a Non-Technical Summary (ES Volume IV) (Application Document Refs. 6.1 to 6.4).
- 5.2.42 The ES includes an assessment of the environmental, social and economic effects of the Proposed Development, including direct effects and any indirect, secondary, cumulative, short, medium and long-term, permanent and temporary, positive and adverse effects for all its stages. It sets out the measures for avoiding, minimising and mitigating significant adverse effects and also identifies the Proposed Development's residual effects.
- 5.2.43 The environmental topics chapters of the **ES (ES Volume I, Chapters 8 to 22, Application Document Ref. 6.1)** identify the likely significant effects of

the Proposed Development in respect of that topic, the mitigation measures (where required) and the residual effects. The topic chapters, in assessing the effects of the Proposed Development, distinguish between the different stages of the Proposed Development (e.g. construction, operation and decommissioning), although the main focus has been upon construction and operation in view of the uncertainties and timescales relating to future decommissioning.

5.2.44 The following environmental topic chapters are included in the ES:

- Chapter 8 'Air Quality' (**ES Volume I, Application Document Ref. 6.1.8**)
- Chapter 9 'Noise and Vibration' (**ES Volume I, Application Document Ref. 6.1.9**)
- Chapter 10 'Terrestrial Ecology' (**ES Volume I, Application Document Ref. 6.1.10**)
- Chapter 11 'Freshwater and Marine Ecology' (**ES Volume I, Application Document Ref. 6.1.11**)
- Chapter 12 'Water Environment' (**ES Volume I, Application Document Ref. 6.1.12**)
- Chapter 13 'Landscape and Visual Amenity' (**ES Volume I, Application Document Ref. 6.1.13**)
- Chapter 14 'Greenhouse Gas Emissions' (**ES Volume I, Application Document Ref. 6.1.14**)
- Chapter 15 'Climate Change Resilience' (**ES Volume I, Application Document Ref. 6.1.15**)
- Chapter 16 'Materials and Waste' (**ES Volume I, Application Document Ref. 6.1.16**)
- Chapter 17 'Socio-Economics' (**ES Volume I, Application Document Ref. 6.1.17**)
- Chapter 18 'Traffic and Transport' (**ES Volume I, Application Document Ref. 6.1.18**)
- Chapter 19 'Major Accident Hazards and Disasters' (**ES Volume I, Application Document Ref. 6.1.19**)
- Chapter 20 'Marine Navigation' (**ES Volume I, Application Document Ref. 6.1.20**)
- Chapter 21 'Geology and Soils' (**ES Volume I, Application Document Ref. 6.1.21**)

- 5.2.45 Chapter 22 deals with cumulative and combined effects and Chapter 23 provides a summary of significant effects associated with the Proposed Development.

Alternatives

- 5.2.46 Paragraph 4.3.9 of EN-1 states that: "...the relevance or otherwise to the decision-making process of the existence (or alleged existence) of alternatives to a proposed development is in the first instance matter of law."
- 5.2.47 It goes on to state that "This NPS does not contain any general requirement to consider alternatives or to establish whether the proposed project represents the best option from a policy perspective. Although there are specific requirements in relation to compulsory acquisition and habitats sites, the NPS does not change requirements in relation to compulsory acquisition and habitats sites".
- 5.2.48 Paragraph 4.3.15 of EN-1 advises that applicants are "obliged to include in their ES, information about the reasonable alternatives they have studied. This should include an indication of the main reasons for the applicant's choice, taking into account the environmental, social and economic effects and including, where relevant, technical and commercial feasibility". This relates to the regulatory requirements on alternatives in Regulation 14(2)(d) of the EIA Regulations which states that an ES should include "a description of the reasonable alternatives studied by the applicant, which are relevant to the proposed development and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the development on the environment."
- 5.2.49 The Applicant has reported on the reasonable alternatives considered that could realistically achieve the objectives for the Proposed Development. Environmental considerations informed the consideration of alternatives, as did maintaining operational efficiency and cost-effectiveness, considering other relevant matters such as available land and planning policy. The main environmental factors considered are set out in **Chapter 6: Alternatives (ES Volume I, Application Document Ref. 6.1.6)**, the chosen Site is considered to offer a highly suitable location with good access to marine and road transport options during construction and operation. It also has good connections to electrical, natural gas, industrial gas, raw water supplies and future carbon dioxide transport and storage networks. Waste water treatment and disposal methods and industrial gases can be connected to the site using a mixture of existing and newly constructed pipelines using existing infrastructure to cross under the River Tees. As such the EIA Regulations are satisfied in respect of alternatives.

- 5.2.50 **Chapter 6: Alternatives (ES Volume I, Application Document Ref. 6.1.6)** demonstrates a consideration of the relevant policy and its applicability to the site selection process that the Applicant has undertaken, as well as the approach to design alternatives. The **Design Approach Document (Application Document Ref. 5.3.1)** sets out the Applicant's consideration of different design alternatives that the Applicant considered in order to meet the objectives of the Proposed Development. This is consistent with paragraphs 4.3.22 and 4.3.23 of EN-1, which guide the SoS on the weight that should be given to alternatives, specifying that only alternatives that can meet the objectives of the Proposed Development need to be considered.
- 5.2.51 **Chapter 6: Alternatives (ES Volume I, Application Document Ref. 6.1.6)** also outlines the alternatives considered including reasonable alternative site locations, primary feedstocks and technologies. The Applicant considers that sustainably sourced biomass provides the only commercially available solution at scale, with that feedstock able to be readily imported and/ or sourced from the UK supply chain in the required quantities to meet the operational needs of the Proposed Development.
- 5.2.52 Additionally, the chosen gasification process can produce low-carbon SAF and renewable naphtha using fewer processing steps and more readily demonstrated technology at commercial scale than other technologies. This provides a commercially viable, ASTM certified production process, that offers a high level of technological readiness compared to alternative routes to SAF production. Of the alternative technologies considered, the ES considers a the 'worst-case' parameter; incorporating flexibility to be able to choose specific technology closer to the construction period within the parameters defined in the **Draft DCO (Application Document Ref. 3.1)**. This will enable the optimum production of SAF.
- 5.2.53 EN-1 paragraphs 4.3.16 and 4.3.17 further note that: "In some circumstances, the NPSs may impose a policy requirement to consider alternatives" and that where "there is a policy or legal requirement to consider alternatives, the applicant should describe the alternatives considered in compliance with these requirements."
- 5.2.54 The circumstances relating to when policy specific alternatives consideration is required and the Applicant's response to these circumstances is set out, below:
- Where a scheme would involve the compulsory acquisition of land or interests in land (EN-1 paragraph 4.3.9): The DCO Application is seeking compulsory acquisition powers. The **Statement of Reasons (Application Document Ref. 4.1)** and **Chapter 6: Alternatives (ES Volume I,**

Application Document Ref. 6.1.6) set out the consideration of alternatives.

- Where a scheme would be located near a sensitive receptor site for air quality (EN-1 paragraph 5.2.7): As confirmed in **Chapter 8: Air Quality (ES Volume I, Application Document Ref. 6.1.8)**, the Proposed Development is not within an Air Quality Management Area (AQMA). There are no AQMAs declared within the STBC administrative area or RCBC administrative area, and none are in proximity to the Site.
- Where a scheme would lead to significant harm to biodiversity and geological conservation interests (EN-1 section 5.4): The Proposed Development would not likely give rise to significant harm on such receptors, as reported in **Chapter 10: Terrestrial Ecology (ES Volume I, Application Document Ref. 6.1.10)** and **Chapter 11: Freshwater and Marine Ecology (ES Volume I, Application Document Ref. 6.1.11)**.
- Where a scheme would result in an adverse effect on the integrity of a European site that cannot be avoided (EN-1 paragraph 5.4.27): The **Report to inform the Habitats Regulations Assessment (Application Document Ref. 5.11.1)** submitted as part of the DCO Application concludes that having regard to the conservation objectives of the relevant sites, and taking account of the mitigation measures incorporated into and secured through the Proposed Development, it can be concluded beyond reasonable scientific doubt that the Proposed Development would not adversely affect the integrity of the identified relevant European sites when considered alone, and that the conservation objectives of those sites would continue to be achieved.. In relation to in-combination effects, for the majority of impact pathways, embedded mitigation secured through project-specific CEMPs, together with regulatory controls such as Environmental Permits and the application of BAT, reduces the potential for cumulative effects to a negligible level. One outstanding in-combination matter concerning the potential interaction of dredging activities within the Teesmouth and Cleveland Coast SPA (Marine Component GB) and Ramsar site will need to be resolved through further measures, controls or assessment to rule out adverse effects on site integrity arising from overlapping dredging activities. This would only be required should the specific construction programmes adopted result in dredging activities overlapping, which is currently considered unlikely.
- Where a scheme would be located within, or partially within, Flood Zone 2 or Flood Zone 3 (EN-1 section 5.8), the Sequential Test should be undertaken: If following application of the Sequential Test, it is not possible for the project to be located in areas of lower flood risk the Exception Test can be applied, which provides a method of allowing necessary development to go ahead in situations where suitable sites at lower risk of flooding are not available. Limited parts of the Main Site, and parts of the Wider Site, are outside of Flood Zone 1 but the bulk of the Main Site lies

within Flood Zone 1. As set out within the **Flood Risk Assessment (Application Document Ref. 5.7)** and in **Section 5.2** of this Planning Statement, the Site is considered to satisfy the Sequential Test. The Proposed Development also meets the Exception Test criteria through its sustainability benefits, flood resilience, and safety, as discussed in section 9.3 of the **Flood Risk Assessment (Application Document Ref. 5.7)** and below in **Section 5.2** of this Planning Statement.

- Where a development would be located within a National Park, the Broads or an Areas of Outstanding Natural Beauty (now National Landscapes) (EN-1 section 5.10): The Proposed Development is not located within or indeed in the setting of any of these designations.
- Where a site is located on best and most versatile agricultural land: Paragraph 5.11.12 states that “*Applicants should seek to minimise impacts on the best and most versatile agricultural land (defined as land in grades 1, 2 and 3a of the Agricultural Land Classification) and preferably use land in areas of poorer quality (grades 3b, 4 and 5).*” The Applicant has selected a largely brownfield Main Site comprising land reclaimed from the sea in modern times. This is mapped on DEFRA’s *Predictive Agricultural Land Classification Map for England* primarily as ‘Urban Land’ with small sections of grade 3b (moderate quality agricultural land). Wherever possible existing pipeline corridors are used for new linear infrastructure and existing streets are used. The Site therefore avoids best and most versatile agricultural land.
- Where a development has potential for deterioration of a water body: Directive 2000/60/EC of the European Parliament and Council (the Water Framework Directive or WFD) came into force on 22nd December 2000 and established a framework for community action in the field of water policy. The role of a WFD Assessment is to evaluate the potential for deterioration in the overall status of a water body from a proposed development, based on the 2022 River Basin Management Plan (RBMP) and to determine whether the Proposed Development may hinder any existing Programmes of Measures in returning a failing water body to Good status. The **Water Environment Regulations Assessment (Application Document Ref. 5.10)** concludes that the Proposed Development is not anticipated to cause a deterioration in WER status or preventing the future attainment of status objectives for the relevant water bodies screened in for assessment.

5.2.55 The policy is clear that work should be undertaken on a proportionate basis and any alternative would need to be a reasonable alternative and so it would be expected to deliver the same capacity in the same timeframes. Indeed, there is acknowledgement that other sites may exist which potentially have lesser impacts than that proposed but that they may equally be required for further energy infrastructure in the future (EN-1 paragraph 4.3.24). This goes to the core of the approach to planning in

England and Wales, which is that applications should be judged on their own merits. Given the significant locational requirements applicable to this first of a kind assemblage of technologies comprised in the Proposed Development as reported on in **Chapter 6: Alternatives (ES Volume I, Application Document Ref. 6.16)** and the importance of establishing the facility in time to contribute towards the UK's SAF Mandate, along with the limited policy constraints applicable to the chosen site, it is not proportionate to carry out a policy based district or regional scale alternatives assessment for the Proposed Development.

Sequential Test

- 5.2.56 Policy F5 of the NPPF states "The aim of the sequential test is to steer new development to areas with the lowest risk of flooding from any source. Where the test applies, development proposals should not be located in areas at risk of flooding where alternative sites, appropriate for the development, are reasonably available in areas with a lower risk of flooding. The area to which the test is applied should not be greater than the anticipated catchment of the development in terms of its likely occupiers or users."
- 5.2.57 Table 2 in Annex F of the NPPF [Ref 7] states developments can be classified as Essential Infrastructure, Highly Vulnerable, More Vulnerable, Less Vulnerable or Water-Compatible in accordance with their vulnerability to flood risk. This allows more vulnerable developments to be steered into areas of lower flood risk.
- 5.2.58 The primary function of the Proposed Development is to produce, store and export SAF, which will require hazardous substance consent, an environmental permit and a COMAH licence. The Proposed Development needs to be located in a water-side location to receive feedstock by ship and to be in proximity to existing third party marine export facilities. A CHP generating station is also comprised in the Proposed Development. These are all located at the Main Site. In the Wider Site, development is limited to subsurface or surface level minor infrastructure within largely existing pipeline corridors or industrial areas. Development proposals requiring hazardous substance consent are classified as Highly Vulnerable, but the need to locate this proposal at a water-side location that is subject to flood risks classifies the Proposed Development including the quay, as "*Essential Infrastructure*".
- 5.2.59 Paragraph 5.8.21 of EN-1 states "... Where it is not possible to locate development in low-risk areas, the Sequential Test should go on the compare reasonably available sites with medium risk areas and then, only

where there are no reasonably available sites in low and medium risk areas, within high risk areas.”

- 5.2.60 The Main Site is located in Flood Zone 1, while pipeline and access route proposals within the Wider Site are located within Flood Zone 2 and 3. The quay is located in Flood Zone 3.
- 5.2.61 In the Wider Site, to reduce collective impact, proposed pipelines and some proposed cabling will be routed along existing shared corridors therefore the routing is a function of safety, process and existing route locations. These forms of development are also not normally occupied by people. This is consistent with NPPF section 5, CC2: Mitigation for climate change, Paragraph 1(d) which encourages applicants to take advantage of opportunities to utilise existing structures.
- 5.2.62 The Main Site requires access to quayside facilities for delivery of resilient feedstock supplies avoiding reliance on road transport, and an area that is large enough to accommodate the infrastructure of the Proposed Development and on site power generation. Furthermore, the infrastructure needs to be within proximity to access to existing utilities and CO₂ transport and storage proposals and transport access routes (marine, road & rail). This greatly limits the number of sites available; most available quayside sites are subject to similar, if not greater levels of flood risk. Compared to most forms of energy generation (besides conventional nuclear) it is a very locationally constrained type of development.
- 5.2.63 The consideration of alternative sites is presented in **Chapter 6: Alternatives (ES Volume I, Application Document Ref. 6.1.6.)**. This reports on the alternative sites considered on Teesside and the various and significant technical suitability and availability reasons why they were not taken forward.
- 5.2.64 No other alternative sites have been identified that are both available and suitable, in accordance with the requirements outlined above. Considering these factors, the Site is considered to comply with the principles of the Sequential Test.

Exception Test

- 5.2.65 Policy F6 of the NPPF states “... In certain other circumstances set out in Annex F, table 3, in addition to satisfying the sequential test in policy F5 where application, development will only be appropriate where an ‘exception test’ is satisfied. The exception test involves demonstrating that the development would meet all the following criteria:
- i. Provide wider sustainability benefits to the community that outweigh the flood risk;*

- ii. Be safe for its anticipated lifetime in accordance with policy F7; and*
- iii. Not increase flood risk elsewhere and, where possible, reduce flood risk overall.”*

- 5.2.66 Paragraph 5.8.10 of EN-1 states “... The Exception Test is only appropriate for use where the Sequential Test alone cannot deliver an acceptable site. It would only be appropriate to move onto the Exception Test when the Sequential Test has identified reasonably available, lower risk sites appropriate for the proposed development where, accounting for wider sustainable development objectives, application of relevant policies would provide a clear reason for refusing development in any alternative locations identified.”
- 5.2.67 The Sequential Test has resulted in an acceptable site from a flood risk perspective. Flood-resilient measures will be embedded into the design to ensure effective management and mitigation of flood risk. The majority of the Main Site is located within Flood Zone 1 (low risk), where the SAF production infrastructure and other critical assets are located. The Proposed Development has been designed to remain operational and safe during at least the 1-in-200-year flood event. There will be no cumulative impact on flood risk elsewhere: hydraulic modelling has been undertaken in **Flood Risk Assessment (Application Document. 5.7)** to demonstrate no increase in flood risk in areas of Flood Zone 2 and 3, or creation of new areas of flood risk, as a result of the Proposed Development.
- 5.2.68 Nonetheless it is the case that the Proposed Development will deliver substantial wider sustainability benefits. The need case for the Proposed Development is detailed in Section 4 of this document. It will strengthen the UK’s energy resilience, reduce greenhouse gas emissions (as detailed in **Chapter 14: Greenhouse Gas Emissions (ES Volume I, Application Document Ref. 6.1.14)**) and position Teesside as a key node in the UK’s green energy transition.

Design Flexibility/ Design Parameters

- 5.2.69 The Proposed Development will be the first commercial-scale second generation SAF Production Facility to be constructed in the UK. Although the individual elements of the Proposed Development draw on established technologies, the proposed SAF Production Facility is a first-of-a-kind technology assemblage intended to help decarbonise the aviation industry and support the UK’s transition to a Net Zero future.
- 5.2.70 The **Design Approach Document (Application Document Ref. 5.3.1)** sets out the approach taken to the design of the Proposed Development and how it has evolved up until submission. As discussed in **Chapter 2:**

Assessment Methodology (ES Volume I, Application Document Ref. 6.1.2) and Chapter 4: Proposed Development (ES Volume I, Application Document Ref. 6.1.4), final detailed design decisions have yet to be taken for the Proposed Development and exact dimensions and positions for each component cannot be fixed at this stage. This is to maintain appropriate flexibility to meet technical and safety requirements and to respond to the changing demands of the UK market at the time the Proposed Development will be constructed.

- 5.2.71 In order to provide sufficient flexibility while ensuring a robust EIA, the Applicant has adopted the principles of the 'Rochdale Envelope' approach in accordance with the Planning Inspectorate's '*Planning Act 2008: Guidance on preparing an application: Part 2 – Application contents*' I [Ref 20] and assessed, as part of the EIA, maximum design parameters for those elements of the Proposed Development where flexibility needs to be retained at the consenting stage. These parameters include:
- Maximum scale parameters (height, length and width) for the main buildings and structures at the Main Site, as set out in Table 4.1 of **Chapter 4: Proposed Development (ES Volume I, Application Document Ref. 6.1.4)**.
 - Maximum limits of deviation within which the various elements of the Proposed Development can be constructed within the Site, as defined on the **Works Plans (Application Document Ref. 2.3)**. The Works Plans show a degree of overlap between the various Work Nos. within the Main Site in order to accommodate the range of design configurations anticipated.
- 5.2.72 The approach taken is explained in Chapter 2: Assessment Methodology (ES Volume I, Application Document Ref. 6.1.2) and Chapter 4: Proposed Development (ES Volume I, Application Document Ref. 6.1.4). The maximum dimensions and parameters will be controlled and secured through the relevant articles and schedules of the Draft DCO (Application Document Ref. 3.1), including Requirement 3 in Schedule 2, in addition to the Land Plans (Application Document Ref. 2.2) and Works Plans (Application Document Ref. 2.3).
- 5.2.73 SAF production technology is a developing area in which there is ongoing technological advancement, and it is important that the detailed design of the Proposed Development retains some flexibility to allow for that advancement while a number of options for certain elements remain under consideration.

Combined and Cumulative Effects

- 5.2.74 **Chapter 22: Cumulative and Combined Effects (ES Volume I, Application Document Ref. 6.1.22)** considers how the effects of the Proposed Development could combine and interact with the effects of other planned and committed or consented developments within the area. The approach to assessing combined and cumulative effects is set out at Section 22.3 of ES Chapter 22.
- 5.2.75 Each of the technical assessments reported in the **ES (ES Volume I, Chapters 8 to 21, Application Document Ref. 6.1)** has identified effects which may occur as a result of the Proposed Development. Multiple effects upon one or more common receptors could theoretically interact or combine to result in a combined effect which is more or less significant than the effects individually. Chapter 22 therefore also considers these effects.
- 5.2.76 As described in Section 22.3 of ES Chapter 22, some of the technical assessments have already considered effects that result from the combination or interaction of different types of impacts on individual receptors. For example, the potential for air quality, dust and noise impacts to affect terrestrial ecology receptors is considered within **Chapter 10: Terrestrial Ecology (ES Volume I, Application Document Ref. 6.1.10)**, and the potential impacts of air quality and climate change upon water quality and flood risk are considered within **Chapter 12: Water Environment (ES Volume I, Application Document Ref. 6.1.12)**. Any effects arising from the interaction of impacts on individual receptors which have already been assessed within the technical assessments of the ES is reported in each technical chapter as required (ES Chapters 8 to 21).
- 5.2.77 This section of the Planning Statement considers only those combined effects which have not been identified elsewhere within the technical assessments in the ES. As such, it considers only the potential combined effects on human receptors, in relation to noise, air quality, traffic and transport, visual and socioeconomic impacts during construction, and noise, air quality, visual and socioeconomic impacts during operation.
- 5.2.78 For the cumulative effects assessment, other developments were identified within a 15km search area, consistent with the ZOI applied across the individual disciplines, in accordance with published PINS advice [Ref 21]. This process identified developments for consideration at Stage 1 (the long list), which were refined through Stages 2 and 3 to a shortlist of developments considered at stage 4, as set out in **ES Table 22.5 (Application Document Ref. 6.1.22)**. These have been assessed in relation to each environmental topic scoped into the cumulative assessment, with the exceptions of materials and waste, greenhouse

gases, and climate change resilience, each of which is either inherently cumulative in its assessment approach or not amenable to a meaningful cumulative assessment.

- 5.2.79 When considering combined effects, the mitigation measures as set out in ES Chapters 8 to 21, including embedded mitigation measures incorporated into the Proposed Development's design and measures included in **Appendix 5A: Framework Construction Environmental Management Plan (ES Volume III, Application Document Ref. 6.3)**, must be taken into account. Therefore, only residual effects (post-mitigation) are considered in Chapter 22 of the ES (**Application Document Ref. 6.1.22**).
- 5.2.80 Six receptor groups were identified for the assessment of combined effects during construction, as set out in **Table 22.15 (ES Volume I, Application Document Ref. 6.1.22)**. The identified significant effects are summarised below:
- Visitors to RSPB Saltholme, Cowpen Bewley Woodland and other recreational destinations: assessed as experiencing **minor adverse** effects from temporary construction traffic on local routes, **minor adverse** noise effects, and **moderate adverse** visual effects. The combined effect of construction activity and landscape change is assessed as **moderate adverse (significant)**, reflecting the reduction in visitor amenity at these locations.
 - Construction workforce: assessed as experiencing **negligible** effects across all environmental topics, alongside moderate beneficial socioeconomic effects associated with employment, training and expenditure. The combined effect is assessed as **moderate beneficial (significant)**.
- 5.2.81 The assessment of combined effects during operation are set out in **Table 22.16 (ES Volume I, Application Document Ref. 6.1.22)**. The identified significant effects are summarised below:
- Recreational receptors and visitors to local attractions: similarly assessed as experiencing **negligible adverse** effects across traffic, air quality and noise, but **moderate adverse** visual effects, with the combined effect assessed as **moderate adverse (significant)** due to permanent visual changes.
 - Operational workforce and supply chain: assessed as experiencing **negligible** effects across all environmental topics other than socioeconomics, which is assessed as **moderate beneficial**. The combined effect is assessed as **moderate beneficial (significant)**, reflecting long-term employment and economic activity.

- 5.2.82 The locations of the shortlisted other developments in relation to the Proposed Development are shown on **ES Figure 22.1 (Application Document Ref. 6.2.22)**. The cumulative effects have been assessed for the construction and operation stages of the Proposed Development, across air quality, noise and vibration, terrestrial ecology, freshwater and marine ecology, the water environment, landscape and visual amenity, socioeconomics, traffic and transport, and geology and soils.
- 5.2.83 The assessment of cumulative effects on terrestrial ecology has, for the majority of shortlisted developments, concluded that no cumulative effects on designated sites (including the Teesmouth and Cleveland Coast SPA, Ramsar and SSSI) are considered likely, reflecting the use of trenchless installation techniques, existing corridors, and distance from designated features. Where limited information was available at the time of assessment to confirm whether residual cumulative effects would arise, a conservative approach to assessment has been adopted.
- 5.2.84 For landscape and visual amenity, the cumulative schemes in combination with the Proposed Development, would be seen in the context of existing large-scale industry within the Tees Estuary. Due to this existing industrial baseline, cumulative landscape and visual effects are not considered likely to be significant during either construction or operation.
- 5.2.85 For socioeconomics, the cumulative assessment identifies the potential for combined demand on the same specialist construction labour market, supply chain and local accommodation as other major Teesside developments, with residual cumulative effects ranging from no residual effect to minor, depending on the degree of sectoral overlap with each shortlisted scheme, following implementation of an employment and skills plan, which is secured via Requirement 16 of Schedule 2 to the **draft DCO (Application Document Ref. 3.1)**.
- 5.2.86 For the remaining topics (air quality, water environment, freshwater and marine ecology, traffic and transport, and geology and soil), no significant cumulative effects have been identified.

Summary of Significant Effects

- 5.2.87 **Chapter 23: Summary of Significant Effect (ES Volume I, Application Document Ref. 6.1.23)** provides a summary of those significant adverse and beneficial environmental effects that were identified at this stage of the application for the Proposed Development.
- 5.2.88 Chapter 23 of the ES summarises in table form the likely significant environmental effects of the Proposed Development that have been identified throughout the EIA, including where a '**significant**' (**moderate or**

- major**) effect has been reduced to a 'not significant' effect following mitigation and/or wider contextualisation of the environmental impact.
- 5.2.89 The chapter also summarises the environmental effects that are identified as 'significant', following implementation of the embedded mitigation or impact avoidance measures included in the design of the Proposed Development (as detailed in ES Chapters 8 to 21, where relevant). It is only these 'significant' effects which are described below.
- 5.2.90 A range of **major and moderate adverse (significant)** effects were identified for terrestrial ecology and nature conservation prior to mitigation, relating to the exclusion of designated bird species from suitable habitats due to construction noise and vibration; permanent and temporary loss of habitats of principal importance and other habitats; habitat loss or fragmentation for amphibian, breeding bird and terrestrial invertebrate habitat. Following the implementation of acoustic screening in appropriate locations to provide up to a 10 dB(A) reduction in construction noise levels by removing line of sight to sensitive features, and compensatory habitat creation and translocation of notable species prior to construction, all of these effects are reduced to **negligible (not significant)**. No residual significant effects on terrestrial ecology are therefore identified.
- 5.2.91 For freshwater and marine ecology, a number of **moderate and major adverse (significant)** effects were identified prior to mitigation during both construction and operation, relating to intertidal and subtidal habitat loss, changes to water quality from chemical or fuel discharges and wastewater, vessel collision risk, and the introduction and spread of marine invasive non-native species (INNS). Due to the implementation of standard preventative measures secured through the **Appendix 5A: fCEMP (ES Volume III, Application Document Ref. 6.3.4)** and adherence to PD Ports guidance and international guidance on marine INNS, all of these effects are reduced to **negligible or minor adverse (not significant)**.
- 5.2.92 For landscape and visual amenity, **moderate adverse (significant)** residual effects are identified in relation to the loss of openness and introduction of large-scale development into views at Viewpoint 7 (Saltholme RSPB), during both the construction and operation stages of the Proposed Development. No additional mitigation is available for this effect beyond the Proposed Development's embedded design, and the effects therefore remain **moderate adverse (significant)** as residual effects.
- 5.2.93 No other residual significant effects (prior to or following mitigation) have been identified for the Proposed Development.

Health (NPS EN-1, 4.4)

- 5.2.94 Paragraph 4.4.1 of EN-1 highlights that energy infrastructure has the potential to impact the health and well-being of the population. EN-1 goes on to state that where development has the potential to affect human beings, the ES should assess those effects for each element of the project, identifying any adverse health impacts and measures to avoid, reduce, or compensate for the impacts as appropriate.
- 5.2.95 Paragraph 4.4.7 of EN-1 advises that the aspects of energy infrastructure which are "most likely to have a significantly detrimental impact on health are subject to separate regulation (for example air pollution) which will constitute suitable mitigation of them, so that it is unlikely that health concerns will either by themselves constitute a reason to refuse consent or require specific mitigation". Paragraph 4.4.8 continues, however, to advise that not all potential sources of health impacts will be mitigated in such a way and the "Secretary of State may want to take account of health concerns when setting requirements relating to a range of impacts such as noise".
- 5.2.96 Following the consideration of potential impacts in relation to human health, the Scoping Opinion issued on 11 November 2025 (**Appendix 2A, ES Volume III, Application Document Ref. 6.3.2**) confirmed that Human Health could be scoped out of the ES, noting that health effects would instead be assessed within the relevant topic chapters, with mitigation considered where relevant and appropriate. As such, the Proposed Development's potential impacts upon health are assessed in **Chapter 8: Air Quality (ES Volume I, Application Document Ref. 6.1.8)**; **Chapter 9: Noise and Vibration (ES Volume I, Application Document Ref. 6.1.9)**; **Chapter 17: Socioeconomics (ES Volume I, Application Document Ref. 6.1.17)**; and **Chapter 18: Traffic and Movement (ES Volume I, Application Document Ref. 6.1.18)**.
- 5.2.97 Regarding health impacts in relation to air quality, **Chapter 8: Air Quality (ES Volume I, Application Document Ref. 6.1.8)** reports that human health risk (in relation to dust and particulate matter emissions) is considered low. On an unmitigated, worst-case basis, construction dust impacts are following application of mitigation measures through the CEMP are not significant. Predicted concentrations of NO₂, PM₁₀ and PM_{2.5} at sensitive human receptors from construction traffic are below 75% of the relevant Air Quality Assessment Level (AQAL), with no exceedances of the air quality objectives identified, and effects on human receptors are therefore assessed as not significant. Emissions from construction plant will be controlled through the **Appendix 5A: fCEMP (ES Volume III,**

- Application Document Ref. 6.3.4)**, and the resultant effect on human health is assessed as not significant. During operation, all modelled pollutants at sensitive human health receptors are screened out as insignificant in line with Environment Agency Risk Assessment guidance and are concluded to be **not significant**.
- 5.2.98 Regarding noise impacts with respect to health, **Chapter 9: Noise and Vibration (ES Volume I, Application Document Ref. 6.1.9)** concludes that potential noise and vibration impacts have been assessed to be **not significant**, and as such no secondary mitigation is required during the construction. To manage and minimise potential impacts, mitigation measures in the form of best practicable means (BPM), as defined under the Control of Pollution Act 1974, are secured through the **Appendix 5A: fCEMP (ES Volume III, Application Document Ref. 6.3.4)**.
- 5.2.99 In regard to socio-economic impacts with respect to health, **Chapter 17: Socio-Economic (ES Volume I, Application Document Ref. 6.1.17)** applies the IEMA (now ISEP) Guide to Determining Significance for Human Health in Environmental Impact Assessment (2022) and notes that employment influences health from both an economic standpoint and a quality-of-life standpoint. Applying the IEMA health significance matrix and professional judgement, the effect on health during construction is assessed as **moderate beneficial (significant)**, reflecting the potential to contribute to narrowing health inequalities, albeit temporarily. During operation, while the creation of around 310 FTE direct jobs represents a positive change, the resulting change in population-level health determinants is limited. The effect is therefore assessed as **minor beneficial (not significant)**. Residual cumulative effects range from no residual effect to minor following implementation of an employment and skills plan, which is secured via Requirement 16 of Schedule 2 to the **draft DCO (Application Document Ref. 3.1)**.
- 5.2.100 **Chapter 18: Traffic and Movement (ES Volume I, Application Document Ref. 6.1.18)** concludes that severance, pedestrian amenity, fear and intimidation, and driver delay will – apart from the site access road (a private street in an industrial area) be negligible or **minor adverse and not significant** in nature across nearby transport links. As such, the limited and temporary nature of the traffic increase is not identified to result in any significant residual effects on health.
- 5.2.101 The above demonstrates that health impacts have been considered across the Proposed Development and, with the application of suitable mitigation measures, are not significant and do not present a reason for refusal. In relation to paragraph 4.4.8 of EN-1, that there is no evidence to suggest

that additional requirements relating to health need to be added to the DCO if the application for development consent be granted. It is therefore considered that the Proposed Development complies with the aims and intentions of the EN-1 policy requirements in regard to health.

Marine Considerations (NPS EN-1, section 4.5)

- 5.2.102 Paragraph 4.5.1 of EN-1 confirms that the UK Marine Policy Statement (MPS) is the framework for Marine Plans and for decisions affecting the marine environment under the Marine and Coastal Access Act 2009. The marine elements of the Proposed Development (notably **Work No. 6** quay construction/operation and capital and maintenance dredging, together with marine-adjacent pipelines and outfalls under Works Nos. 10, 11 and 12 up to Mean High Water Springs) have been developed having regard to the MPS and the applicable Marine Plans for the area.
- 5.2.103 Paragraph 4.5.3 of EN-1 notes the cross-Government Marine Spatial Prioritisation programme. While primarily directed at strategic seabed use and offshore wind, the Applicant has had regard to wider strategic marine management principles when shaping **Work No. 6**, including efficient use of the existing industrial riverside, optimising seabed use by minimising dredge footprint, and promoting co-location.
- 5.2.104 Paragraph 4.5.5 of EN-1 refers to forthcoming government guidance on considering environmental impacts on Marine Protected Areas and applying the mitigation hierarchy. The Applicant's approach aligns with these principles: avoidance through siting/design where practicable, reduction via embedded controls, and mitigation and monitoring secured through the **Framework Landscape and Biodiversity Mitigation and Enhancement Strategy (Application Document Ref. 5.8)**, **Appendix 5A: Framework Construction Environmental Management Plan (ES Volume III, Application Document Ref. 6.3.4)** and **Harbour Facilities Statement (Application Document Ref. 7.3)**. Where relevant features overlap or lie adjacent to the marine working area (e.g. Teesmouth and Cleveland Coast SPA/Ramsar/SSSI), this has been assessed through the **ES (Application Document Refs. 6.1 to 6.4)** and the **Report to Inform HRA (Application Document Ref. 5.11.1)**, with measures identified to avoid adverse effects on site.
- 5.2.105 Paragraph 4.5.6 of EN-1 explains that a deemed marine licence (DML) can be granted within the DCO for marine licensable activities up to Mean High Water Springs, developed in consultation with the MMO and statutory advisors. Activities have been screened against Part 4, section 66 of the Marine and Coastal Access Act 2009 to identify those requiring a licence. The construction of the quay will involve activities below Mean High Water

Springs within the Tees Estuary and will require an DML. The Application therefore includes a request to grant a DML within Schedule 10 of the **draft Development Consent Order (Application Document Ref. 3.1)** for the construction and operation of the quay (**Work No. 6C**) (including offshore disposal of dredgings).

- 5.2.106 Paragraph 4.5.7 of EN-1 encourages Applicants to engage the MMO pre-application. As set out in the **Consultation Report (Application Document Ref. 5.11)**, the Applicant has engaged the MMO pre-application. The Proposed Development was announced as one of the government's Lead Environmental Regulator pilot's [Ref 22].
- 5.2.107 In line with paragraph 4.5.8 of EN-1 and section 104(2) of the PA 2008, the Applicant has taken account of the relevant Marine Plan, the North East Inshore and North East Offshore Marine Plan, by completing a proportionate Marine Plan assessment as part of project development (see **Table 7.1 of the Policy Compliance and Accordance Tables (Application Document Ref. 5.2.2)**). Marine plan policies have informed site layout, construction methodologies (including dredging strategy and piling approaches), ecological mitigation (**Chapter 11: Freshwater and Marine Ecology (ES Volume I, Application Document Ref. 6.1.11)**), and navigation management (**Chapter 20: Marine Navigation (ES Volume I, Application Document Ref. 6.1.20)**), with the aim of avoiding constrained areas and minimising conflicts with other legitimate uses of the River Tees.
- 5.2.108 Paragraph 4.5.10 of EN-1 requires the SoS to have regard to appropriate marine policy documents, including any Marine Plan in effect for the relevant area(s). The Application provides the Marine Plan assessment within Table 7.1 of the **Policy Compliance and Accordance Tables (Application Document Ref. 5.2.2)** to enable the SoS to consider how the Proposed Development complies with the UK MPS and North East Inshore and North East Offshore Marine Plan. The embedded design, mitigation hierarchy application, and secured management and monitoring measures demonstrate compliance with those policy outcomes.
- 5.2.109 The marine components of the Proposed Development have been planned and assessed with regard to the UK MPS and North East Inshore and North East Offshore Marine Plan, fulfilling EN-1 paragraphs 4.5.1 to 4.5.2 and 4.5.8 to 4.5.9. The Application framework provides for a DML in consultation with the MMO (paragraphs 4.5.6–4.5.7), and the **ES (Application Document Refs. 6.1 to 6.4)** demonstrates that effects on marine receptors and protected sites are mostly avoided or reduced to non-significant levels through embedded design and secured management plans.

Environmental and Biodiversity Net Gain (NPS EN-1, section 4.6)

- 5.2.110 Paragraph 4.6.1 of EN-1 states that projects should not only avoid, mitigate and compensate harms, following the mitigation hierarchy, and consider whether there are opportunities for enhancements. Paragraph 4.6.2 encourages projects to consider and seek to incorporate improvements in natural capital, ecosystem services and the benefits they deliver when planning how to deliver biodiversity net gain (BNG). Paragraph 4.6.6 of EN-1 advises that Applicants should “*seek opportunities to contribute to and enhance the natural environment by providing net gains for biodiversity, and the wider environment where possible*”. This in summary amounts to a policy compliance minimum of ‘no net loss’.
- 5.2.111 The Department for Environment, Food and Rural Affairs published the ‘Nationally Significant Infrastructure Projects: Biodiversity Gain Statement’ for Energy in June 2026, which confirms the biodiversity gain objective (a minimum 10% net gain in biodiversity value, calculated using the statutory biodiversity metric) will apply to relevant energy NSIP DCO applications made on or after 2 November 2026. The statutory BNG requirement and the biodiversity gain statement for energy therefore do not apply to the Proposed Development, and the SoS is not required to be satisfied that the biodiversity gain objective is met as a condition of granting development consent.
- 5.2.112 The Applicant has considered from early in the pre application stage non mandatory (i.e. policy) BNG and has also recently had regard to the biodiversity gain statement and associated government guidance in developing its approach to biodiversity.
- 5.2.113 Paragraph 4.6.20 of EN-1 notes that the biodiversity gain objective will be set out in a biodiversity gain statement (as defined under the Environment Act 2021), and that “*these statements would be included within an NPS, but the Act allows for the statement to be published separately where a review of an NPS has begun before the provisions are commenced, as is the case with these energy NPSs.*” Under the provision of the Environment Act 2021, any such separate biodiversity gain statement will be regarded as being contained within these NPSs
- 5.2.114 While BNG is not a statutory requirement for the Proposed Development, the Applicant has adopted the core principles of the future NSIP BNG approach where practicable, including early baseline assessment, use of the statutory metric, and consideration of on-site and strategic off-site

habitat delivery, as set out in the **Framework Biodiversity Net Gain Plan (Appendix 5.8A of the Framework Landscape and Biodiversity Mitigation and Enhancement Strategy (fLBMES), ES Volume III, Application Document Ref. 5.8)**.

- 5.2.115 Paragraph 4.6.21 of EN-1 requires that the SoS should "give appropriate weight to environmental and biodiversity net gain, although any weight given to gains provided to meet a legal requirement (for example under the Environment Act 2021) should be limited". As there is no legal requirement the relevant test is policy compliance, with the minimum being no net loss.
- 5.2.116 The **Framework BNG Plan (Appendix 5.8A of the fLBMES, ES Volume III, Application Document Ref. 5.8)** sets out that terrestrial habitat surveys were undertaken across the Main Site and Wider Site between May 2025 and May 2026 using the UK Habitat Classification (UKHab) system, supplemented by secondary data sources where land access was restricted, and that condition assessments were carried out in accordance with the Statutory Biodiversity Metric technical supplement. Habitats within the BNG boundary have been entered into the Statutory Biodiversity Metric to calculate baseline and post-development biodiversity units (BDUs) for the Main Site and Wider Site. No irreplaceable habitats were identified during the UKHab surveys.
- 5.2.117 The Applicant has followed the mitigation hierarchy, first seeking to avoid and minimise losses of biodiversity on-site as far as practicable, and to provide an appropriate level of habitat compensation for residual losses and to maximise additional opportunities for biodiversity enhancement where possible. This is consistent with the mitigation hierarchy set out at paragraph 4.6.10 of EN-1 and Section 5.4 of EN-1 as well as the hierarchy of delivery of BNG which favours on site or near to site delivery.
- 5.2.118 As set out in **Chapter 10: Terrestrial Ecology (ES Volume I, Application Document Ref. 6.1.10)**, baseline habitats of medium distinctiveness or higher that are permanently impacted by the Proposed Development will be compensated through the off-site creation of like-for-like habitat. This compensatory approach is secured through the **fLBMES (Application Document Ref. 5.8)** and its **Framework BNG Plan (Appendix 5.8A of the fLBMES, ES Volume III, Application Document Ref. 5.8)**. Other habitats affected by the Proposed Development, including bracken, neutral grassland, scrub, littoral rock, vacant/derelict land and broadleaved woodland, will similarly be compensated off-site as part of the wider habitat mitigation strategy.
- 5.2.119 Applying the Statutory Biodiversity Metric, the **Framework BNG Plan (Appendix 5.8A of the fLBMES, ES Volume III, Application Document**

Ref. 5.8) identifies that the Proposed Development would result in a loss of 718.45 Area Habitat Units (-91.07%) and 0.06 Watercourse Units (-0.94%). To achieve no net loss, the Proposed Development therefore requires 718.45 Area Habitat Units and 0.06 Watercourse Habitat Units.

- 5.2.120 On-site habitat mitigation and compensation will be delivered through the **fLBMES (Application Document Ref 5.8)** and a Biodiversity Action Plan for the Wider Site. Off-site compensatory habitat will be created through a registered off-site provider as required by the mitigation detailed in **Chapter 10: Terrestrial Ecology (ES Volume I, Application Document Ref 6.1)** which is anticipated to generate 422.15 Area Habitat Units. The remaining 296.30 Area Habitat Units and 0.06 Watercourse Units will be purchased voluntarily from a registered off-site provider. Consistent with the approach for registered off-site biodiversity gains set out in the 'NSIPs: Biodiversity Gain Statement for Energy', any such voluntary off-site contribution would be secured by way of a legal agreement to ensure the relevant habitats are created and maintained for a minimum of 30 years, in line with paragraph 5.4.45 of EN-1. In relation to the marine environment, the 'NSIPs: Biodiversity Gain Statement for Energy' and paragraph 4.6.3 of EN-1 each confirm that mandatory BNG and BNG policy (respectively) in England will apply only to terrestrial and intertidal components of projects, with Marine Net Gain (MNG) still under development by government. **Chapter 11: Freshwater and Marine Ecology (ES Volume I, Application Document Ref. 6.1.11)** confirms that, as MNG policy, methodologies and guidance are not available, MNG does not form part of the Proposed Development.
- 5.2.121 The Tees Valley Local Nature Recovery Strategy (LNRS), prepared by the Tees Valley Combined Authority, had not been published at the time of preparing the Framework BNG Plan, with public consultation underway in Autumn 2026 and publication anticipated in December 2026. In the absence of a published LNRS, the Applicant has had regard to other relevant plans and strategies, including the Tees Valley Nature Partnership's Biodiversity Action Plan and Natural Networks and Opportunity Maps, and relevant policies in the Stockton-on-Tees and Redcar and Cleveland Local Plans, to inform the strategic significance of habitats and the identification of local priorities for biodiversity and nature recovery, consistent with paragraph 4.6.12 of EN-1.
- 5.2.122 It is also important to note that the Proposed Development will deliver benefits to wider national policy priorities (EN-1, paragraph 4.6.13), as set out above in **Sections 3 and 4** of this Planning Statement.
- 5.2.123 Overall, the Applicant has complied with EN-1 Section 4.6 by applying the mitigation hierarchy, using the statutory biodiversity metric to quantify

baseline and post-development biodiversity value, securing like-for-like habitat compensation for residual losses, and proposing a voluntary off-site contribution towards a no net loss outcome. Given the wider planning and sustainability benefits to reuse of brownfield land (the Main Site and the connection corridors in the Wider Site) and the particular locational factors and constraints affecting this type of development, ensuring no net loss is an appropriate objective that balances BNG policy with other policy objectives.

[Criteria for good design for Energy Infrastructure \(NPS EN-1, section 4.7; NPS EN-3, section 2.5 and NPS EN-4, section 2.4\)](#)

- 5.2.124 The Applicant's design approach is detailed in the Design Approach Document (DAD) (Application Document Ref. 5.3.1).
- 5.2.125 EN-1 paragraph 4.7.2 states, "Applying good design to energy projects should produce sustainable infrastructure sensitive to place, including impact on heritage, efficient in the use of natural resources, including land-use, and energy used in their construction and operation, matched by an appearance that demonstrates good aesthetic as far as possible."
- 5.2.126 Paragraph 4.7.4 of EN-1 states that design principles should be established during the early stages of the project lifecycle. Footnote 105 of EN-1 states that "*Design principles should take into account any national guidance on infrastructure design, this could include for example the Design Principles for National Infrastructure published by the National Infrastructure Commission*". Section 9 of the **DAD (Application Document Ref. 5.3.1)** describes the setting and securing of the Outline Design Principles.
- 5.2.127 EN-1 paragraph 4.7.6 states that applicants may have very limited choice in the physical appearance of some energy infrastructure. However, given the importance the PA 2008 places on good design and sustainability, paragraph 4.7.10 emphasises that the SoS needs to ensure that energy infrastructure development is as attractive, durable, and adaptable as possible. Paragraph 4.7.6 of EN-1 also states that applicants should seek to embed opportunities for nature-inclusive design within the design process.
- 5.2.128 The **DAD (Application Document Ref. 5.3.1)** demonstrates how the Proposed Development has been developed in accordance with a clear design framework, based on the criteria for good design set out in section 4.7 of EN-1. This has included the adoption of project level **Outline Design Principles (Application Document Ref. 5.3.2)** to guide future detailed design and embed good design outcomes for the Proposed Development.

- 5.2.129 The Outline Design Principles will feed into the delivery of the Proposed Development and ensure an integrated design approach. How these are secured is discussed in Section 9 of the **DAD (Application Document Ref. 5.3.1)**. Requirement 3 in Schedule 2 to the **Draft DCO (Application Document Ref. 3.1)** secures that the detailed design of the Proposed Development must accord with the **Outline Design Principles (Application Document Ref. 5.3.2)**.
- 5.2.130 Paragraph 4.7.7 of EN-1 requires applicants to demonstrate in their application how the design process was conducted and how the proposed design evolved. Section 5 of the **DAD (Application Document Ref. 5.3.1)** sets out the approach that the Applicant has taken to the design of the Proposed Development, to demonstrate the adoption of a good design process. Section 6 to 8 detail how the **Outline Design Principles (Application Document Ref. 5.3.2)** have evolved throughout the design process, being informed and refined by stakeholder engagement, consultation feedback, technical studies and environmental assessments. Those sections also set out how the proposed design of the main site and laydown, quay, and connection corridors has evolved over time, informed by ongoing environmental assessments, engineering and design considerations and engagement with consultees.
- 5.2.131 Paragraphs 2.5.1 and 2.5.2 of EN-3 and paragraph 2.4.2 of EN-4 refer to section 4.7 of EN-1 and emphasise that proposals for energy infrastructure should demonstrate good design with respect to landscape and visual amenity, and in the design of the project to mitigate impacts such as noise and effects on ecology.
- 5.2.132 Energy from waste has a broad definition within NPS EN-1 but the Proposed Development is not a conventional type of energy from waste development in a number of respects. Due to the broad definition, it is necessary to consider some EN-3 policy regarding biomass and energy from waste development while setting out which EN-3 policy is not of relevance.
- 5.2.133 Paragraphs 2.7.7 to 2.7.15 of EN-3 outline that waste treatment capacity and transport infrastructure must be factors that influence the Applicant's site selection and design. This requires Applicants to demonstrate that they are meeting a residual waste treatment need that cannot be met by existing EfW facilities and EfW facilities in active development. As set out in **Section 3.4** of this Planning Statement, the Proposed Developments generating station is not comparable in nature to a conventional energy from waste generating station that combusts a domestic, commercial and/or industrial waste feedstock comprised of wide range of origin

materials. The purpose is to add to the resilience of the feedstock supply for the CHP plant which is providing constant electricity and heat to the SAF plant. The waste wood is grade C and conforms to waste hierarchy since it has limited opportunities for further recycling, being already partly comprised of composite materials (e.g. plywood, MDF) formed from recycling grade A/B waste wood. The provision of a quay for feedstock delivery demonstrates that transport infrastructure has been properly considered. Nonetheless, an assessment of the compliance of the Proposed Development against EN-3 Section 2.7 and EN-4 Section 4.7 is provided in **Table 3.1** and **Table 4.1** respectively of the **Policy Compliance and Accordance Tables (Application Document Ref. 5.2.2)**.

Consideration of Combined Heat and Power (CHP) (NPS EN-1, section 4.8)

- 5.2.134 Paragraphs 4.8.1 to 4.8.3 of EN-1 explain that CHP is the generation of usable heat and electricity in a single process and that CHP can reduce the amount of fuel otherwise needed to generate the same amount of heat and power separately. CHP is technically feasible for many types of thermal generating stations, including EfW and Bioenergy with Carbon Capture and Storage (BECCS).
- 5.2.135 Paragraph 4.8.4 of EN-1 confirms that using less fuel to generate the same amount of heat and power reduces emissions, particularly CO₂, and that Government therefore promotes Good Quality CHP, being CHP certified as highly efficient under the CHP Quality Assurance programme. Paragraph 4.8.5 further identifies that Good Quality CHP provides cost-effective benefits due to the efficiencies inherent in cogeneration.
- 5.2.136 The Proposed Development incorporates a biomass and waste wood-fired CHP plant (**Work No. 2**) with an electrical output capacity of up to 200MWe. As described in **Chapter 4: Proposed Development (ES Volume I, Application Document Ref. 6.1.4)**, the CHP plant will provide low carbon electricity and steam to the SAF Production Facility. The CHP plant is an integral component of the Proposed Development, designed to meet the electricity and steam demands of the SAF production process.
- 5.2.137 The CHP boilers are likely to be a fluidised bed type, fuelled by either biomass or waste wood or a blend of the two (see **Chapter 4: Proposed Development (ES Volume I, Application Document Ref. 6.1.4)**). Steam from the boilers will be used to generate electricity through steam turbine generators, with extracted steam also let down in pressure separately and exported to the SAF Production Facility for use in the process. This demonstrates that the Proposed Development has been designed to maximise the useful recovery of heat and power from the CHP plant.

- 5.2.138 Paragraphs 4.8.6 and 4.8.7 of EN-1 identify that, to be economically viable, a CHP plant supplying off-site offtakers with heat needs to be located sufficiently close to industrial, non-domestic or domestic customers with heat demands, and that industrial heat users are likely to include chemical plants, refineries and similar intensive heat users. The Main Site is located in the Seal Sands industrial area of North Tees, with the end-user of the generated energy (the SAF Production facility) being co-located with the CHP plant within the Main Site. The CHP plant is therefore located immediately adjacent to its principal heat and energy demand, which represents an intensive industrial heat and energy user. This arrangement avoids the losses, cost and deliverability risks associated with long-distance heat transmission and is consistent with the locational principles set out in EN-1.
- 5.2.139 Paragraph 4.8.8 of EN-1 requires applications for thermal generating stations either to include CHP proposals or to contain evidence demonstrating that the possibilities for CHP have been fully explored. The Proposed Development includes CHP proposals, with the CHP plant designed to provide both electricity and steam to support SAF production, satisfying paragraph 4.8.8. As set out within the **Combined Heat and Power Statement (Application Document Ref. 7.4)**, at times when the SAF generated steam is unable to meet the process demand the necessary steam will be provided from the CHP plant, which has been sized to meet this site requirement.
- 5.2.140 Paragraphs 4.8.9 and 4.8.10 of EN-1 require applicants to consider current and future CHP opportunities from the outset, including through liaison with potential heat customers and Local Authorities. In this case, the heat customer is the SAF Production Facility itself, which forms part of the same Proposed Development. The CHP plant has been sized for and suitably embedded in the project design from the outset of the project in conformity with the policy's aims.
- 5.2.141 Paragraph 4.8.12 of EN-1 states that, if an application is "related to biomass and waste combustion as part of an EfW plant, the application must detail how the plant will maximise the amount of heat available and provide heat to a heat network within three years of entering operation". To the extent that this requirement is engaged by the CHP plant's use of biomass and waste wood, the Proposed Development meets this policy by providing useful heat to the SAF Production Facility from the commencement of operations. The heat network is therefore effectively internal to the Proposed Development, with steam exported directly from the CHP plant to the SAF process, rather than relying on an outside heat network.

- 5.2.142 Paragraph 4.8.13 of EN-1 confirms that utilisation of useful heat which displaces conventional heat generation from fossil fuel sources is encouraged, and that substantial weight will be given to applications incorporating CHP. The CHP plant will provide electricity and steam for the SAF Production Facility, and substantial weight should therefore be given to the benefits of the inclusion of the CHP element of the Proposed Development.
- 5.2.143 Paragraph 4.8.14 of EN-1 notes that CHP may require additional space and that this could conflict with space required for carbon capture readiness. In this case, the CHP plant has been incorporated into the Main Site layout. The Proposed Development also includes two potential alternative CO₂ export pipeline routes to the Northern Endurance Partnership (NEP) infrastructure (**Work Nos. 11B and 11C**), only one of which would be developed. **Chapter 4: Proposed Development (ES Volume I, Application Document Ref. 6.1.4)** explains that, in future, CO₂ from the CHP plant and thermal pre-treatment of feedstock may be captured in a post-combustion carbon capture unit (PCCU), although that unit does not form part of the Proposed Development and would require separate consent. As set out within the **Combined Heat and Power Statement (Application Document Ref. 7.4)**, sufficient space has been left within the Proposed Development footprint to allow for future retrofit of carbon capture technology to the CHP plant, and the space will meet the Decarbonisation Readiness requirements of the environmental permit, as set out in that document.
- 5.2.144 Paragraphs 4.8.15 to 4.8.17 of EN-1 confirm that the SoS should not grant development consent unless satisfied that CHP is included or that CHP opportunities have been fully explored. The Application includes CHP as a central element of the Proposed Development and demonstrates that it is sized and located to provide all heat requirements directly to the SAF Production Facility from the commencement of operation.

[Carbon Capture and Storage \(CCS\) \(NPS EN-1, section 4.9\)](#)

- 5.2.145 EN-1 paragraph 4.9.1 clarifies that CCS is a technology that enable carbon dioxide (CO₂) that would otherwise be released to the atmosphere to be captured and permanently stored. It can be applied to any large point source of CO₂, such as thermal generating power station or other industrial processes that are high emitters. Paragraph 4.9.5 highlights that the Government has clear ambitions for CCS, providing up to £21.7bn of funding to support the establishment of CCS.
- 5.2.146 Section 4 of this Planning Statement provides an overview of UK energy and climate change policy, and underlines how the Proposed Development

will support the delivery of this policy, including the East Coast Cluster (which includes Teesside), the decarbonisation of industry and the Government's legally binding target of net zero by 2050.

- 5.2.147 The Proposed Development is not a CCS equipped generating station and does not propose the installation of carbon capture technology as part of the current application. However, as set out within **Chapter 4: Proposed Development (ES Volume I, Application Document Ref. 6.1.4)** in future, CO₂ from the CHP plant and thermal pre-treatment of feedstock may be captured in a PCCU and directed via the selected CO₂ export pipeline route (either **Work No. 11B** or **11C**) to the NEP CO₂ Gathering Network pipeline for transport and permanent storage. The chapter also outlines that CO₂ from the SAF would be directed via the selected CO₂ export pipeline route (either **Work No. 11B** or **11C**) to the NEP CO₂ Gathering Network pipeline (subject to NEP or equivalent transport and storage network availability) for transport and permanent storage. This CO₂ is produced within the syngas clean-up and compression section of the SAF process, where the Acid Gas Removal Unit (AGRU) will remove acid gases. The purified CO₂ off-gas from the AGRU can be compressed (in **Work No.1**) for export via the proposed pipeline connection (**Work No. 11B or 11C**) to the consented CO₂ pipeline being developed by NEP. This would result in the Proposed Development achieving even greater negative carbon emissions and further reducing the carbon intensity of the final SAF product.
- 5.2.148 The CHP plant (**Work No. 2**) utilises biomass and waste wood as feedstock rather than fossil fuels, and the SAF Production Facility (**Work No. 1**) uses energy generated from the CHP plant rather than conventional combustion power generation. Section 4.9 of EN-1 is therefore not directly engaged by the Proposed Development as submitted, but is addressed below given its relevance to the future carbon capture potential of the Proposed Development and to the East Coast Cluster context in which it is located.
- 5.2.149 As described in **Chapter 4: Proposed Development (ES Volume I, Application Document Ref. 6.1.4)**, the Proposed Development is located within the East Coast Cluster at Teesside, immediately adjacent to the planned NEP Transport and Storage Network referenced at paragraph 4.9.5 and 4.9.6 of EN-1. The Government reached financial close for the East Coast Cluster projects in December 2024, with construction commencing from mid-2025. The Proposed Development has been designed with regard to this strategic context: export pipelines for CO₂ (**Work Nos. 11B and 11C**) are included within the Proposed Development to provide a connection to the NEP CO₂ Gathering Network. This would enable the export of CO₂ captured from the SAF production process for permanent offshore geological storage in accordance with paragraphs 4.9.9

and 4.9.10 of EN-1. This also reflects the recognition at EN-3 paragraphs 2.7.18 and 2.7.19 of the priority role of BECCS in delivering negative emissions from biomass combustion.

5.2.150 In relation to Carbon Capture Readiness (CCR), paragraph 4.9.25 of EN-1 confirms that CCR applies to new combustion plants with a generating capacity at or over 300MW that are of a type covered by the CCR (Electricity Generating Stations) Regulations 2013. The CHP plant (**Work No. 2**) has an electrical output capacity of up to 200MWe and therefore falls below the 300MW threshold at which CCR requirements would be engaged. The CCR requirements set out at paragraphs 4.9.28 to 4.9.37 of EN-1. As set out within the **Combined Heat and Power Statement (Application Document Ref. 7.4)**, the CCR requirements have now been replaced by decarbonisation readiness and included in The Environmental Permitting (England and Wales) Regulations 2016 [Ref 23]. As such, decarbonisation readiness will be demonstrated as part of the environmental permit application for the Proposed Development with one of the specific requirements of decarbonisation readiness being compliance with the 'space test' as per as per EN-1 paragraph 4.9.37 and the 'Decarbonisation readiness in environmental permit applications' guidance (2026) [Ref 24].

5.2.151 In summary, the Proposed Development is nonetheless consistent with the strategic policy context set out in section 4.9 of EN-1 and the decarbonisation readiness requirements, having been designed to support and not prejudice the future deployment of carbon capture technology within the East Coast Cluster, and incorporating export pipeline infrastructure (**Work Nos. 11B** and **11C**) to connect to the NEP Network as and when a future capture facility is consented.

[Climate Change Adaptation and Resilience \(NPS EN-1, section 4.10; EN-3, section 2.4; EN-4, section 2.3; and EN-5, section 2.3\)](#)

5.2.152 Paragraph 4.10.5 of EN-1 states that applications should take reasonable steps to maximise the use of nature-based solutions. Paragraph 4.10.7 notes that such solutions can also result in biodiversity benefits as well as increasing absorption of CO₂ from the atmosphere in adapting to climate change. Paragraph 4.10.8 of EN-1 states that applicants must consider the direct and indirect impacts of climate change when planning the location, design, build, operation and, where appropriate, decommissioning of new energy infrastructure.

5.2.153 EN-1 continues at paragraph 4.10.13 to advise that the SoS "should be satisfied that applicants for new energy infrastructure have taken into account the potential impacts of climate change". At 4.10.15 it states that

the SoS should "be satisfied that there are not features of the design of new energy infrastructure critical to its operation which may be affected by more radical changes to the climate beyond that projected by the latest set of UK climate projections".

- 5.2.154 Paragraph 2.4.5 of EN-3 acknowledges that biomass generating stations may be proposed for coastal or estuarine sites where climate change is likely to increase risks from flooding or rising sea levels. It specifies that in these cases Applicant's should set out how the proposal would be resilient to these risks. **Table 3.1 of the Policy Compliance and Accordance Tables (Application Document Ref. 5.2.2)** provides consideration with this part of EN-3.
- 5.2.155 Paragraph 2.4.7 of EN-3 notes that Energy from Waste generating stations may also require significant water resources and Applicant's must therefore consider how plant will be resilient to the increased risk of flooding and drought affecting river flows. While located adjacent to a river for transport purposes it is not part of the cooling methods of the Proposed Development. **Table 3.1 of the Policy Compliance and Accordance Tables (Application Document Ref. 5.2.2)** provides consideration with this part of EN-3.
- 5.2.156 Paragraph 2.3.4 of EN-4 notes that climate change is likely to increase risks to pipeline infrastructure, from flooding or rising sea levels for example, and requires Applicants to consider resilience from such risks. Consideration of accordance with EN-4 is provided within **Table 4.1 of the Policy Compliance and Accordance Tables (Application Document Ref. 5.2.2)**.
- 5.2.157 Paragraph 2.3.2 of EN-5 requires the consideration of the effects of flooding, winds and storms on overhead lines, higher average temperatures leading to increased transmission losses and earth movement or subsidence caused by flooding or drought on underground cables. **Table 5.1 of the Policy Compliance and Accordance Tables (Application Document Ref. 5.2.2)** provides consideration of accordance with this part of EN-5.
- 5.2.158 The National Infrastructure Commission's Design Principles for National Infrastructure (2020) [Ref 25] set out four principles for good design, one of which is in relation to climate change and ensuring flexibility and adaptation to ensure resilience. As such, the design approach of the Proposed Development evolved to embed these principles, as set out in the **DAD (Application Document Ref. 5.3.1)**. Further, DP20 of the **Outline Design Principles (Application Document Ref. 5.3.2)** relates to climate change resilience, specifying that finished floor levels should be informed by up to

date flood risk modelling including appropriate climate change allowances, as set out in the **Flood Risk Assessment (Application Document Ref. 5.7)**.

- 5.2.159 **Chapter 14: Greenhouse Gases (ES Volume I, Application Document Ref. 6.1.14)** includes a Greenhouse Gas (GHG) Emissions Assessment. The assessment considers GHG emissions and in-combination climate change impacts. The assessment concludes that overall the Proposed Development is considered to have a **minor adverse** effect that is **not significant**. The Proposed Development is expected to result in approximately 4.3 MtCO_{2e} of lifecycle emissions. However, its primary purpose is to produce low-carbon SAF that displaces conventional Jet (A1) fuel, mitigating GHG emissions by delivering an estimated 12.8 MtCO_{2e} of avoided emissions over its assumed 30-year operational life. This equates to a carbon payback ratio of approximately 3:1, whereby for every tonne of GHG emitted across its lifecycle, around 3.2 tonnes are avoided through SAF displacement of jet (A1) fuel.
- 5.2.160 **Chapter 15: Climate Change Resilience (ES Volume I, Application Document Ref. 6.1.15)** includes an assessment of climate change resilience. The assessment considers the impacts of climate change and how the Proposed Development can be resilient to these effects and concludes that there are no likely significant effects, assuming mitigation is successfully implemented into the design and operation of the Proposed Development. With the proposed mitigation measures in place, the Proposed Development is deemed to be resilient to climate change impacts including extreme heat, storms and high winds, heavy precipitation and flooding, drought and sea level rise.
- 5.2.161 In summary, it is considered that the Proposed Development will mitigate the effects of climate change by mitigating GHG emissions by delivering an estimated 12.8 Mt CO_{2e} of avoided emissions over its operational life, while its design would ensure that it is resilient to the future potential effects of climate change. The Proposed Development therefore complies with the NPSs.

[Network Connection \(NPS EN-1, section 4.11 and NPS EN-3, section 2.10\)](#)

- 5.2.162 The Proposed Development would not have a full export connection to the National Transmission network. The Proposed Development would connect to the local distribution network, however this would be for the import of power to support construction, startup and to maintain ancillary site supplies. Therefore, the SoS is not required to consider this matter.

Pollution Control and Other Environmental Regulatory Regimes (NPS EN-1, section 4.12)

- 5.2.163 Paragraph 4.12.1 of EN-1 states that “discharges or emissions from a proposed project which lead to other direct or indirect impacts on terrestrial, freshwater, marine, onshore, and offshore environments, or which include noise and vibration may be subjected to separate regulation under the pollution control framework or other consenting and licencing regimes”.
- 5.2.164 Paragraph 4.12.6 of EN-1 notes that many projects covered by EN-1 will be subject to the Environmental Permitting (EP) regime. Paragraph 4.12.7 advises applicants to understand what non-planning permits or consents the development will require and consider the timings for gaining these, and encourages applicants to make early contact with relevant regulators, such as the Environment Agency.
- 5.2.165 As confirmed within the **Other Consents and Licences Statement (Application Document Ref. 5.4)**, the Applicant has made early contact with the EA and has undertaken enhanced pre-application engagement with the EA's permitting team as part of the Lead Environmental Regulator pilot, progressing the Environmental Permit application largely in parallel with the DCO Application in accordance with the approach encouraged by EN-1. The Applicant has engaged the EA via their enhanced pre-application service and were assigned a principal permitting officer in February 2026 and are expecting to lodge the permit application approximately one month after submission of the DCO application. In respect of the marine elements of the Proposed Development, the Applicant has engaged with the MMO pre-application, and a deemed marine licence is sought within the **Draft DCO (Application Document Ref. 3.1)** in respect of the marine licensable activities associated with **Work No. 6C**, as described at paragraph 5.2.105 above.
- 5.2.166 The **Other Consents and Licences Statement (Application Document Ref. 5.4)** sets out the status of the permits and licences, and discussions with relevant regulators. It notes that the level of detail required to obtain a number of other permits is not available at this stage. The majority of engagement and subsequent applications is expected to be undertaken by the relevant contractor at detailed design stage when the relevant information becomes available, should DCO consent be granted.
- 5.2.167 The **Other Consents and Licences Statement (Application Document Ref. 5.4)** records that the Applicant is progressing the 'non-DCO' consents and licences required for the Proposed Development in a timely manner and explains that there is not considered to be any impediment to these consents and licences. The Applicant will continue to progress the

necessary consents and licences throughout the pre-examination period and, if required, during the examination and will update the document accordingly.

- 5.2.168 Paragraph 4.12.9 of EN-1 advises that the SoS should focus on whether the development itself is an acceptable use of the land and on the impact of that use rather than the control of processes, emissions, and discharges themselves. Paragraph 4.12.10 notes that the SoS should work on the assumption that the relevant pollution control regime and other environmental regulatory regimes will be properly applied and enforced by the relevant regulator and not duplicated within a DCO.
- 5.2.169 The Proposed Development's construction phase environmental impacts will be managed through the implementation of the measures set out in the **fCEMP (Appendix 5A, ES Volume III Application Document Ref. 6.3.4)**, which is secured by a requirement in Schedule 2 of the **Draft DCO (Application Document Ref. 3.1)**.
- 5.2.170 Ongoing impacts arising from the operational phase of the Proposed Development are assessed to be to be few and minor, as outlined by topic in the relevant sections of the **ES (Application Document Ref. 6.1)**. However, any arising impacts will be controlled through the separate Environmental Permit required for operation of the Proposed Development as well as a variety of management plans secured in the **Draft DCO (Application Document Ref. 3.1)**, such as the **fLBMES (Application Document Ref. 5.8)**.
- 5.2.171 In terms of paragraph 4.12.15 of EN-1, the Applicant considers there should be no reason for the SoS to believe that any operational pollution permits, licenses and/or other consents will not be granted or that the regulatory regimes outside of planning will not function.
- [Safety \(NPS EN-1, section 4.13\), Pipeline Safety \(NPS EN-4, section 2.21\) and Control of Major Accident Hazards \(EN-4, section 2.6\)](#)
- 5.2.172 Section 4.13 of NPS EN-1 addresses policy in respect of safety, covering health and safety and major accident matters, and confirms the role of the Health and Safety Executive (HSE) as the regulator responsible for enforcement of health and safety legislation relevant to the construction, operation and decommissioning of energy infrastructure, including the 'Control of Major Accident Hazards' (COMAH) Regulations 2015. Paragraph 4.13.8 of NPS EN-1 states that the SoS should be satisfied that a safety assessment has been prepared and that the HSE and the Environment Agency (EA), together the Competent Authority, have raised no safety objections.

- 5.2.173 NPS EN-4 addresses, at Section 2.6, safety in respect of gas supply infrastructure and gas and oil pipelines, recognising that such infrastructure is subject to stringent safety standards, including the COMAH Regulations and the Pipelines Safety Regulations 1996 (PSR), which together ensure that pipelines are designed, constructed and operated so as to maintain their integrity and reduce risk.
- 5.2.174 As set out in **Chapter 19: Major Accidents and Disasters (ES Volume I, Application Document Ref. 3.1.19)**, the Proposed Development involves the handling and processing of hazardous substances, and is located within an established major hazard industrial cluster. As such, the Proposed Development is anticipated to be subject to the COMAH Regulations, and the operation of the facility will be regulated through a COMAH licence issued by the HSE and an Environmental Permit issued by the EA
- 5.2.175 The Main Site lies within the Teesside industrial cluster, one of the UK's most concentrated areas of heavy industry, energy infrastructure and petrochemical activity. There are 21 COMAH-regulated sites, located within 3 miles (4.8km) including a number of Upper Tier sites. Of these, one site (operated by SABIC UK Petrochemicals Limited) lies within the Site itself, and a further COMAH site (operated by px (TGPP) Limited) lies approximately 45m to the west of the Main Site. A historical COMAH site is also recorded within the Main Site boundary. The Site is additionally located in an area containing a dense network of pipelines, including high-pressure gas, fuel/product and carbon dioxide pipelines whose consultation zones are shown in Figure 1). Some of these are Major Accident Hazard (MAH) pipelines regulated under the PSR and COMAH-related controls. HSE consultation zone mapping may include installations no longer operating so is likely to represent a conservative approach. The design of the Proposed Development will avoid three or more storeys of inhabited office type buildings in line with HSE standing advice as set out in the **Outline Design Principles (Application Document Ref. 5.3.2)**.

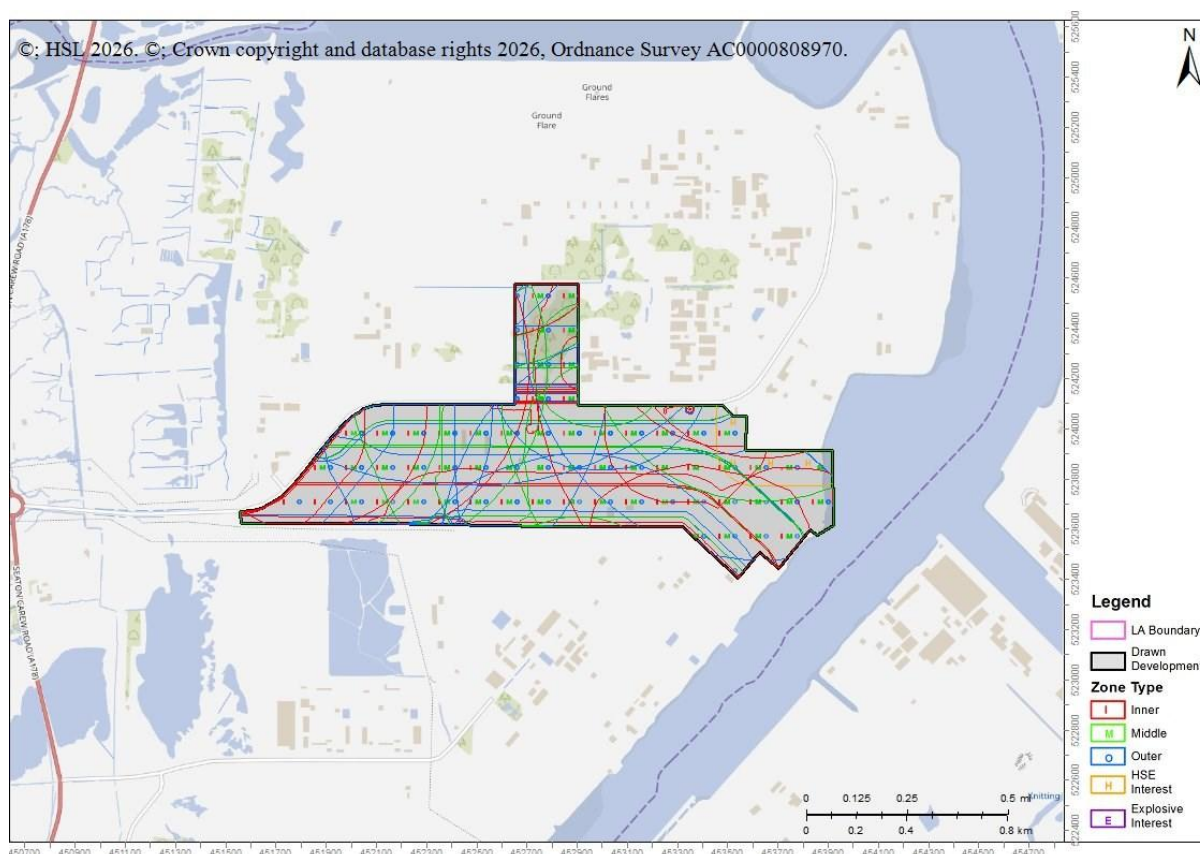


Figure 1: HSE Pipeline Consultation Zones

5.2.176 Paragraph 4.13.8 of EN-1 states that the SoS should be satisfied that a safety assessment has been prepared and that the Competent Authority has raised no safety objections. The Applicant has consulted with the HSE on the Proposed Development as part of both the Statutory and Targeted consultations. Potential interactions have been considered within **Chapter 19: Major Accidents and Disasters (ES Volume I, Application Document Ref. 6.1.19)**.

5.2.177 Other consultees, including National Grid Electricity Transmission plc and Navigator Terminals, have also identified the need for continued liaison regarding existing and future infrastructure and neighbouring COMAH facilities. This is confirmed as being addressed through the design process and through the assessment in **Chapter 19: Major Accidents and Disasters (ES Volume I, Application Document Ref. 6.1.19)** and **Chapter 22 Cumulative and Combined Effects (ES Volume I, Application Document Ref. 6.1.22)**.

5.2.178 **Chapter 19: Major Accidents and Disasters (ES Volume I, Application Document Ref. 6.1.19)** provides an assessment of the Major Accidents and Disasters (MA&D) that have the potential to arise during the construction, operation and decommissioning of the Proposed

Development, focusing on low probability/high consequence events. This includes consideration of natural hazards, major hazard sources (including neighbouring COMAH sites and pipelines), ground conditions and transport infrastructure, together with the measures envisaged to prevent or mitigate significant adverse effects and the preparedness for and proposed response to MA&D hazards and threats.

- 5.2.179 While there is no specific guidance on the approach for undertaking a MA&D assessment within an EIA, regard has been had to the COMAH Regulations, together with relevant HSE guidance on the identification and control of major hazards associated with comparable energy infrastructure, chemical storage and use, and major accident hazard pipelines. The HSE has published a number of applicable guidance notes, including in relation to the transport of CO₂ by pipeline [Ref 26]. The **Pipelines Statement (Application Document Ref. 7.2)** provides further information on how that process will take place.
- 5.2.180 Consistent with the requirements of the COMAH Regulations, the potential for domino effects has been explicitly considered as part of the **Chapter 19: Major Accidents and Disasters (ES Volume I, Application Document Ref. 6.1.19)** assessment, given the Proposed Development's location within a cluster of multiple COMAH-regulated facilities and major accident hazard pipelines. This considers both the potential for an incident at the Proposed Development to affect neighbouring installations, and the potential for an incident at a neighbouring installation to affect the Proposed Development.
- 5.2.181 A programme of embedded mitigation is proposed to manage risk to be As Low As Reasonably Practicable (ALARP) throughout the lifecycle of the Proposed Development. During design, this includes the application of process safety and safety-in-design principles, as set out in Section 4.7.3 of **Chapter 4: The Proposed Development (ES Volume I, Application Document Ref. 6.1)**. A design hazard management plan will be developed and maintained, supported by hazard identification (HAZID), environmental hazard impact identification (ENVID), hazard and operability (HAZOP) and, where required, Quantitative Risk Assessment (QRA) studies undertaken throughout the design process, including Front-End Engineering Design (FEED). These studies inform the identification and reduction of hazards through iterative design and will be secured via a COMAH licence.
- 5.2.182 During construction, risk will be managed through the use of suitably experienced contractors, robust risk assessments, method statements and a Construction Environmental Management Plan, in accordance with the

Construction (Design and Management) Regulations 2015 and the **fCEMP (Appendix 5A, ES Volume III, Application Document Ref. 6.3)**. During operation, the Proposed Development will be subject to ongoing management through the COMAH licence and Environmental Permit, including process safety systems, operational procedures and environmental and safety management systems.

- 5.2.183 **Chapter 19: Major Accidents and Disasters (ES Volume I, Application Document Ref. 6.1.19)** concludes that, considering the regulatory processes and embedded mitigation measures applicable to the Proposed Development, the MA&D events identified as having the potential to occur during construction, operation and decommissioning will all be managed to be ALARP (Tolerable). The Proposed Development is not therefore anticipated to give rise to any significant MA&D adverse effects during construction, operation or decommissioning, and is considered to accord with the safety and major accident hazard requirements of NPS EN-1 (Section 4.13) and NPS EN-4 (Section 2.6).

[Hazardous Substances \(NPS EN-1, section 4.14 and EN-4, section 2.5\)](#)

- 5.2.184 EN-1, paragraph 4.14.1, confirms that all establishments wishing to hold stocks of certain hazardous substances above a certain threshold need 'Hazardous Substances Consent' (HSC). Applicants should consult the HSE at the pre-application stage if a Proposed Development is likely to need such consent.
- 5.2.185 EN-4 (paragraph 2.5.2) states that all establishments wishing to hold stocks of certain hazardous substances, which include gas, above a threshold quantity must consult the Hazardous Substances Authority (HSA), which is usually the local planning authority, and the HSE at pre-application stage. In the case of natural gas, the threshold is 15 tonnes.
- 5.2.186 The Planning (Hazardous Substances) Regulations 2015 relate to the way hazardous substances consents operate, and the way in which the planning system reduces the likelihood and impact of major accidents.
- 5.2.187 The requirements of EN-1 section 4.14 and EN-4 section 2.5, as well as the relevant legislation, are considered in the assessment set out within **Chapter 19: Major Accidents and Disasters (ES Volume I, Application Document Ref. 6.1.9)**. Consideration of accordance with section 2.5 of EN-4 is provided within **Table 4.1** of the **Policy Compliance and Accordance Tables (Application Document Ref. 5.2.2)**.
- 5.2.188 As confirmed within the **Other Consents and Licences Statement (Application Document Ref. 5.4)**, an application for HSC is to be submitted in advance of construction.

- 5.2.189 The **Other Consents and Licences Statement (Application Document Ref. 5.4)** also confirms that a licence under the COMAH Regulations 2015 will also be required for construction and operation as the Proposed Development will be an upper tier COMAH establishment. COMAH Notification (Regulation 6) will be made prior to construction and a Major Accident Prevention Policy (MAPP) and Pre-Construction Safety Report (PCSR) will be prepared and submitted prior to construction.

[Common Law Nuisance and Statutory Nuisance \(NPS EN-1, section 4.15\)](#)

- 5.2.190 Paragraph 4.15.5 of EN-1 states that at the application stage of an energy NSIP, possible sources of nuisance under Section 79(1) of the Environmental Protection Act (EPA 1990), and how they may be mitigated or limited should be identified by the applicant so that appropriate requirements can be included in any subsequent order granting development consent. The **ES Volume I (Application Document Ref. 6.2)** for the Proposed Development addresses the likelihood of significant effects arising that could constitute a statutory nuisance, as identified in Section 79(1) of the EPA 1990.
- 5.2.191 The Applicant has prepared a **Statutory Nuisance Statement (Application Document Ref. 5.5)** to comply with Regulation 5(2)(f) of the APFP Regulations, which states that any application for development consent should be accompanied by a statement setting out whether the development could cause a statutory nuisance pursuant to Section 79(1) of the EPA 1990. If such a nuisance could occur, the statement must set out how the applicant proposes to mitigate or limit the effects.
- 5.2.192 Section 4 of the **Statutory Nuisance Statement (Application Document Ref. 5.5)** discusses the nuisance impacts set out in the EPA 1990 in relation to the Proposed Development and summarises the embedded and additional mitigation measures that will be applied to prevent these. The EPA 1990 describes a potential statutory nuisance to be caused by “*any premises in such a state as to be prejudicial to health or a nuisance*” and matters such as smoke; fumes or gases; dust, steam, smell or other effluvia; any accumulation of deposit; animals; insects; artificial light; noise from premises or vehicles or plant; that may be prejudicial to health or a nuisance; and any other matters declared by any enactment to be a statutory nuisance.
- 5.2.193 Chapter 4: The Proposed Development (ES Volume I, Application Document Ref. 6.1.4) and fCEMP (Appendix 5A, ES Volume I, Application Document Ref. 6.3.4) describe impact avoidance measures embedded into the proposed design and methods of construction. Chapter 8: Air Quality (ES Volume I, Application Document Ref. 6.1.8), Chapter 9: Noise and

Vibration (ES Volume I, Application Document Ref. 6.1.9), Chapter 13 Landscape and Visual Amenity (ES Volume I, Application Document Ref. 6.1.13) and Chapter 18: Traffic and Transport (ES Volume I, Application Document Ref. 6.1.18) and their associated appendices in ES Volume II (Application Document Ref. 6.2), where relevant, provide detailed assessments of these potential statutory nuisances and identify mitigation measures where necessary.

- 5.2.194 Embedded mitigation and appropriate controls for both construction and operation will be secured by requirements within Schedule 2 of the **Draft DCO (Application Document Ref. 3.1)**. Furthermore, the operation of the Proposed Development would be regulated by the EA through the environmental permit and would undergo regular monitoring and reporting.
- 5.2.195 As a result, and consistent with the location of the Proposed Development on existing largely brownfield land within established industrial areas at the Main Site and connection corridors within the Wider Site, it is not expected that the construction, operation or decommissioning of the Proposed Development would engage Section 79(1) and give rise to any statutory nuisance under the EPA 1990.

[Security Considerations \(NPS EN-1, section 4.16\)](#)

- 5.2.196 Paragraph 4.16.1 of EN-1 explains that national security considerations apply across all national infrastructure sectors. Paragraph 4.16.2 of EN-1 notes that the Department for Energy Security and Net Zero (DESNZ) works closely with Government security agencies, including the Centre for the Protection of National Infrastructure (CPNI) and the National Cyber Security Centre (NCSC), to provide advice to the most critical infrastructure assets on terrorism and other national security threats and risk mitigation.
- 5.2.197 Paragraph 4.16.4 of EN-1 goes on to state that Government policy is to ensure that proportionate protective security measures are designed into new infrastructure projects at an early stage. Paragraph 4.16.6 states that where "*national security implications have been identified, the applicant should consult with relevant security experts from NPSA, ONR (for civil nuclear) and/or DESNZ to ensure that security measures have been adequately considered in the design process and that adequate consideration has been given to the management of security risks*".
- 5.2.198 Where applications for development consent for infrastructure relate to potentially critical infrastructure, there may be national security considerations, which will be identified to the relevant government department (DESNZ) by the CPNI.

5.2.199 The Main Site will be a secure site and typical details of the substantial perimeter security boundary are provided in **Boundary Treatment and Lighting Plans (Application Document Ref. 2.13)**. The Applicant will consult with the appropriate bodies prior to construction in respect of security considerations and measures. Requirements 10 'Fencing and other means of enclosure', and 11 'External lighting' of Schedule 2 of the **Draft DCO (Application Document Ref. 3.1)** will secure relevant measures to ensure that the Proposed Development is secure during its construction and operation.

5.2.200 The Proposed Development therefore accords with the key assessment principles of the energy NPSs.

5.3 [EN-1: Overarching National Policy Statement for Energy - Generic Impacts](#)

5.3.1 The 'generic impacts' set out in Part 5 of EN-1 are considered in **Table 2.1** of the **Policy Compliance and Accordance Tables (Application Document Ref. 5.2.2)**. Detail on how the Application complies with each of the relevant sections of EN-3 (and accords with relevant sections, including technology specific information sections, of EN-4 and EN-5) are set out within **Tables 3.1, 4.1 and 5.1** of the **Policy Compliance and Accordance Tables (Application Document Ref. 5.2.2)** respectively.

5.3.2 The relevant generic impacts covered by Part 5 of EN-1 and Table 6.1 include:

- Air Quality and Emissions
- Biodiversity and Geological Conservation
- Civil and Military Aviation and Defence Interests
- Dust, Odour, Artificial Light, Smoke, Steam, and Insect Infestation
- Flood Risk
- Historic Environment
- Landscape and Visual
- Land use, Including Open Space, Green Infrastructure, and Green Belt
- Noise and Vibration
- Socio-economic
- Traffic and Transport
- Resource and Water Management
- Water Quality and Mineral Resources

- 5.3.3 These generic impact sections establish policy regarding the information required within DCO application submissions and the decision making by SoS.
- 5.3.4 The summary of each of the generic impacts below focusses on the Applicant's compliance with information requirements and the Secretary of State's decision making criteria in the case of EN-1 and EN-3, and accordance with policy in the case for EN-4 and EN-5.

Air Quality and Emissions

- 5.3.5 EN-1 states that the ES should describe existing air quality concentrations and the relative change in air quality from existing levels; any significant air quality effects, mitigation action taken and any residual effects. In addition, the predicted absolute emissions, concentration change and absolute concentrations as a result of the proposed project, after mitigation should be considered and any potential eutrophication impacts.
- 5.3.6 Paragraph 5.2.17 of EN-1 notes that the SoS should give air quality considerations substantial weight where a project is proposed near a sensitive receptor site. As set out in Tables 8.12 to 8.14 of **Chapter 8: Air Quality (ES Volume I, Application Document Ref. 6.1)** the Proposed Development is located near to a limited number of sensitive human receptors and several sensitive ecological receptors. Chapter 8 concludes that there are no anticipated significant residual effects on air quality during all stages of the Proposed Development with additional mitigation.
- 5.3.7 EN-3 notes at paragraphs 2.7.41 and 2.7.42 that applicants should include an assessment of the air emissions resulting from the proposed biomass or energy from waste infrastructure, and those associated with the delivery and movement of people, fuel and materials.
- 5.3.8 The assessment of compliance with EN-1 and EN-3 in respect of air quality and emissions is detailed above within Section 5.2 of this Planning Statement and within Table 2.1 and Table 3.1 of the **Policy Compliance and Accordance Tables (Application Document Ref. 5.2.2)**. This concludes that the Proposed Development is compliant with policy both in respect of the information contained in the DCO application submission and in relation to the SoS's decision making criteria.

Biodiversity and geological conservation

- 5.3.9 EN-1 section 5.4 sets out the policy regarding biodiversity and geological conservation and clarifies that applicants should include appropriate avoidance, mitigation, compensation and enhancement measures as an

integral part of the proposed development. This section of EN-1 is referred to within the technology-specific sections of EN-3.

- 5.3.10 EN-4 and EN-5 establish further considerations in relation to biodiversity and geological conservation. Paragraphs 2.21.30 and 2.21.31 of EN-4 explains that the ES must include an assessment of the biodiversity and landscape and visual effects of the proposed route and of the main alternative routes considered.
- 5.3.11 Section 2.9 of EN-5 considers the effects that electricity network infrastructure can have on biodiversity, especially birds. Paragraph 2.9.6 of EN-5 requires the applicant to consider any such possible impacts, particularly on feeding and hunting grounds, migration corridors and breeding grounds.
- 5.3.12 EN-1 paragraphs 5.4.40 to 5.4.57 set out how the SoS should weigh biodiversity and geological conservation matters when deciding an application, having regard to the Environmental Improvement Plan and Environment Act 2021 targets, applying the mitigation hierarchy (avoid, mitigate, compensate as a last resort) and giving significant weight to any residual harm, while also allowing net biodiversity/geological benefits to count in the project's favour. **Chapters 10: Terrestrial Ecology** and **11: Freshwater and Marine Ecology (ES Volume I, Application Document Ref. 6.1)**, together with the **Report to Inform the HRA (Application Document Ref. 5.11.1)**, provide the SoS with the evidence needed to determine these matters in respect of the Teesmouth and Cleveland Coast SPA/SSSI/Ramsar site, Teesmouth NNR and other designated sites.
- 5.3.13 The assessment of biodiversity and geological conservation compliance with EN-1, EN-3, EN-4 and EN-5 is detailed within **Tables 2.1, 3.1, 4.1 and 5.1** of the **Policy Compliance and Accordance Tables (Application Document Ref. 5.2.2)** respectively. This concludes that the Proposed Development is compliant with EN-1 and EN-3 policy both in respect of the information contained in the DCO application submission and in relation to the SoS's decision-making criteria and is in accordance with EN-4 and EN-5.

Civil and Military aviation and defence interests

- 5.3.14 Section 5.5 of EN-1 notes that civil and military aerodromes and aviation technical sites, as well as other types of defence interests can be affected by new energy developments.
- 5.3.15 The assessment of Civil and Military aviation and defence interests compliance with EN-1 is detailed within **Table 2.1** of the **Policy Compliance and Accordance Tables (Application Document Ref.**

5.2.2). This concludes that the Proposed Development is compliant with policy both in respect of the information contained in the DCO application submission and in relation to the SoS's decision making criteria.

Coastal Change

- 5.3.16 Section 5.6 of EN-1 notes that the construction of an onshore energy project on the coast may involve, for example, dredging, dredge spoil deposition, cooling water, culvert construction, marine landing facility construction and flood and coastal protection measures which could result in direct effects on the coastline, seabed and marine ecology and biodiversity. The Proposed Development includes dredging and marine landing facility construction.
- 5.3.17 The assessment of Coastal Change compliance with EN-1 is detailed within **Table 2.1** of the **Policy Compliance and Accordance Tables (Application Document Ref. 5.2.2)**. This concludes that the Proposed Development is compliant with policy both in respect of the information contained in the DCO application submission and in relation to the SoS's decision making criteria.

Dust, Odour, Artificial Light, Smoke, Steam and Insect Infestation

- 5.3.18 Paragraphs 5.7.5 to 5.7.7 of EN-1 provide advice regarding the assessment of the potential construction/demolition, operation and decommissioning impacts arising from emissions of odour, dust, steam, smoke and artificial light. As discussion above in relation to EN-1 section 4.15, nuisance from these sources arising on premises and fumes is considered in the **Statutory Nuisance Statement (Application Document Ref. 5.5)**, which identifies the matters set out at Section 79(1) of the EPA 1990 in respect of statutory nuisance and considers if the Proposed Development could result in a nuisance and the measures, where relevant, to prevent and mitigate such nuisance occurring. The Statutory Nuisance Statement confirms that the Proposed Development is not considered to have the potential to cause odour due to the lack of nearby sensitive human receptors. Furthermore, there are not expected to be any significant odours during operation.
- 5.3.19 EN-3 directs that the potential for insect infestation and emissions of odour should be assessed as set out in EN-1 Section 5.7.
- 5.3.20 The assessment of Dust, Odour, Smoke, Steam and Insect Infestation compliance with EN-1 and EN-3 is detailed within **Tables 2.1** and **3.1** of the **Policy Compliance and Accordance Tables (Application Document Ref. 5.2.2)**. This concludes that the Proposed Development is compliant with policy both in respect of the information contained in the DCO application submission and in relation to the SoS's decision making criteria.

Flood Risk

- 5.3.21 Paragraph 5.8.13 of EN-1 requires that applications for energy developments of 1 hectare or greater in Flood Zone 1 in England and all proposals for energy developments located in Flood Zones 2 and 3 in England should be accompanied by a Flood Risk Assessment (FRA).
- 5.3.22 Similar considerations apply to gas supply pipelines (EN-4, paragraph 2.3.4) and in relation to substations that are vital for the electricity transmission and distribution network (EN-5, paragraph 2.3.2). Applicants should set out how their developments will be resilient to flooding and not result in an increased risk of flooding.
- 5.3.23 A Level 3 FRA has been prepared for the Proposed Development (**Application Document Ref. 5.7**), which concludes that, subject to raising Main Site ground levels to a minimum of 5.08mAOD and the embedded mitigation set out in the FRA, the Proposed Development can remain safe and operational throughout its design life, including under climate change, without resulting in any material increase in flood risk elsewhere.
- 5.3.24 The assessment of compliance with EN-1, EN-3, and accordance with EN-4 and EN-5, in respect of flood risk is detailed within **Tables 2.1, 3.1, 4.1** and **5.1** of the **Policy Compliance and Accordance Tables (Application Document Ref. 5.2.2)** respectively. This concludes that the Proposed Development is compliant with EN-1 and EN-3 policy both in respect of the information contained in the DCO application submission and in relation to the SoS's decision making criteria and is in accordance with EN-4 and EN-5.

Historic Environment

- 5.3.25 Section 5.9 of EN-1 acknowledges that the construction, operation and decommissioning of energy infrastructure has the potential to result in adverse impacts on the historic environment, above at and below surface of the ground. This section of EN-1 is referred to within the technology-specific sections of EN-3.
- 5.3.26 Paragraph 5.9.12 establishes that as part of the ES the applicant should provide a description of the significance of the heritage assets affected by the proposed development, including any contribution made by their setting. The level of detail should be proportionate to the importance of the heritage assets and no more than is sufficient to understand the potential impact of the proposal on their significance. Paragraph 5.9.13 adds that where it is evaluated that a development site has potential to include heritage assets with archaeological interest, an appropriate desk based assessment should be carried out.

- 5.3.27 The potential impact of the Proposed Development upon the historic environment is not considered in its own chapter within the ES and was largely scoped out. The Applicant assessed visual effects on the Scheduled Monument Eston Nab in **Chapter 13: Landscape and Visual (ES Volume I, Application Document Ref. 6.1)** having regard to RCBC's Scoping Opinion comments (**Appendix 2B: Scoping Opinion Responses (ES Volume III Application Document Ref. 6.1)**). It was concluded that given the site's existing heavy industrial context, that the residual effect is not significant and its significance is unaffected. The Applicant therefore considers the application gives the SoS sufficient information to comply with regulation 3(1)-(3) of the Infrastructure Planning (Decisions) Regulations 2010 and to conclude, per EN-1 paragraphs 5.9.24 to 5.9.26, that there is no conflict with, or significant adverse effect on, the conservation or setting of Eston Nab or any other listed buildings, conservation areas and scheduled monuments.
- 5.3.28 The assessment of Historic Environment compliance with EN-1 and EN-3 is within **Tables 2.1 and 3.1 of the Policy Compliance and Accordance Tables (Application Document Ref. 5.2.2)**. This concludes that the Proposed Development is compliant with policy both in respect of the information contained in the DCO application submission and in relation to the SoS's decision making criteria.

[Landscape and Visual Impacts](#)

- 5.3.29 Paragraph 5.10.6 of EN-1 states that projects need to be designed carefully, taking account of the potential impact on the landscape. Having regard to siting, operational and other relevant constraints the aim should be to minimise harm to the landscape, providing reasonable mitigation where possible and appropriate.
- 5.3.30 Paragraph 5.10.16 outlines that the applicant should carry out a landscape and visual impact assessment and report it in the ES, including cumulative effects.
- 5.3.31 Paragraph 5.10.19 also clarifies that the applicant should consider landscape and visual matters in the early stages of siting and design, where site choices and design principles are being established.
- 5.3.32 EN-3 directs that the potential for landscape and visual should be assessed as set out in EN-1 Section 5.10.
- 5.3.33 EN-3 at paragraph 2.7.45 directs that an assessment of the landscape and visual effects of proposed biomass or energy from waste infrastructure should be undertaken in accordance with the guidance set out in section 5.10 of EN-1.

- 5.3.34 EN-4 and EN-5 briefly cover landscape and visual impacts and establish the following.
- 5.3.35 EN-4 paragraphs 2.21.26- 2.21.29 notes that the effects of gas supply pipelines on the landscape will generally be temporary and long-term impacts are likely to be limited as the infrastructure is usually buried. EN-5 paragraph 2.9.14 requires applicants to give appropriate consideration to undergrounding electrical connections as a way of mitigating landscape and visual impacts.
- 5.3.36 A Landscape and Visual Impact Assessment (LVIA) for the Proposed Development has been carried out and is reported in **Chapter 13: Landscape and Visual Amenity (ES Volume I, Application Document Ref. 6.1.13)**. The scope of the LVIA, including its consideration of published landscape and seascape character assessments, siting and design mitigation, cumulative effects, visual amenity, lighting and the justification of cooling plant design to minimise visible plumes, is considered to satisfy the requirements of EN-1 paragraphs 5.10.16 to 5.10.25. This scope was in line with the Planning Inspectorate scoping opinion and STBC and has been undertaken in accordance with recognised industry guidance (GLVIA3).
- 5.3.37 The assessment of compliance with EN-1 and EN-3 and accordance with EN-4 and EN-5 in respect of Landscape and Visual Impacts is detailed within **Tables 2.1, 3.1, 4.1 and 5.1** of the **Policy Compliance and Accordance Tables (Application Document Ref. 5.2.2)** respectively. This concludes that the Proposed Development is compliant with EN-1 and EN-3 policy both in respect of the information contained in the DCO application submission and in relation to the SoS's decision making criteria and is in accordance with EN-4 and EN-5.

[Land use including open space, green infrastructure and Green Belt](#)

- 5.3.38 EN-1 notes at Section 5.11 that energy infrastructure developments will have direct effects on the existing use of the site and may have indirect effects on the use, or planned use, of land in the vicinity for other types of development.
- 5.3.39 Paragraph 5.11.8 requires the applicants ES to identify existing and proposed land uses near the project, any effects of replacing an existing development or use of the site with the proposed project or preventing a development or use on a neighbouring site from continuing.
- 5.3.40 The suitability of the site and the rationale for selecting the Site over reasonable alternatives is addressed in **Chapter 6: Alternatives (ES Volume I, Application Document Ref. 6.1)** which compares the Site

against two alternative Teesside locations, as well as **Section 5.2** of this Planning Statement. **The Design Approach Document (Application Document Ref. 5.3.1)** further appraises the Site and its surrounding context, including the opportunities and constraints it presents for development, within **Section 4**.

- 5.3.41 The assessment of land use including open space, green infrastructure and green belt compliance with EN-1 is detailed within **Table 2.1** of the **Policy Compliance and Accordance Tables (Application Document Ref. 5.2.2)**. This concludes that the Proposed Development is compliant with policy both in respect of the information contained in the DCO application submission and in relation to the SoS's decision making criteria.

Noise and Vibration

- 5.3.42 Paragraph 5.12.6 of EN-1 states that where noise impacts are likely to arise from the proposed development, the applicant should include the following in the noise assessment: a description of the noise generating aspects of the development proposal leading to noise impacts; identification of noise sensitive receptors and noise sensitive areas that may be affected; the characteristics of the existing noise environment; a prediction of how the noise environment will change with the proposed development during the construction period, during the operating life of the infrastructure and at particular times of day. It should also include an assessment of the effect of predicted changes in the noise environment on any noise-sensitive receptors and details of all reasonable steps taken to mitigate and minimise potential adverse effects on health and quality of life.
- 5.3.43 EN-3 covers noise and vibration impacts at paragraphs 2.7.46 and 2.7.47; EN-4 at paragraphs 2.21.15 to 2.21.22, 2.22.3 to 2.22.5 and 2.23.2; and EN-5 at paragraph 2.9.40.
- 5.3.44 The assessment of Noise and Vibration compliance with EN-1 and EN-3 and accordance with EN-4 and EN-5 is detailed within **Tables 2.1, 3.1, 4.1 and 5.1** of the **Policy Compliance and Accordance Tables (Application Document Ref. 5.2.2)** respectively. This concludes that the Proposed Development is compliant with EN-1 and EN-3 policy, both in respect of the information contained in the DCO application submission and in relation to the SoS's decision making criteria, and is in accordance with EN-4 and EN-5.

Socio- economic

- 5.3.45 Paragraph 5.13.1 of EN-1 acknowledges that the construction, operation and decommissioning of energy infrastructure may have socio-economic impacts at local and regional levels.

- 5.3.46 Paragraph 5.13.2 of EN-1 requires that where the project is likely to have socio-economic impacts at local or regional levels, the applicant should undertake and include in their application an assessment of these impacts as part of the ES.
- 5.3.47 Paragraph 5.13.4 of EN-1 sets out the full list of socio-economic impacts of the Proposed Development that should be considered.
- 5.3.48 The assessment of socio-economic compliance with EN-1 is detailed within **Table 2.1** of the **Policy Compliance and Accordance Tables (Application Document Ref. 5.2.2)**. This concludes that the Proposed Development is compliant with policy both in respect of the information contained in the DCO application submission and in relation to the SoS's decision making criteria.

Traffic and Transport

- 5.3.49 Paragraph 5.14.5 of EN-1 requires the applicant to include a vision for transport and an assessment of potential impacts if a project is likely to have significant transport implications.
- 5.3.50 Paragraph 5.14.8 of EN-1 requires that the applicant prepare a travel plan adopting a vision-led approach to identify demand management and monitoring and fall-back measures that proactively mitigate transport impacts. Details of proposed measures to improve access by active, public and shared transport should also be addressed.
- 5.3.51 The assessment of compliance with EN-1 is detailed within **Table 2.1** of the **Policy Compliance and Accordance Tables (Application Document Ref. 5.2.2)**. This concludes that the Proposed Development is compliant with policy both in respect of the information contained in the DCO application submission and in relation to the SoS's decision making criteria.

Resource and Waste Management

- 5.3.52 Paragraph 5.15.7 of EN-1 states that the applicant should set out the arrangements that are proposed for managing any waste produced and prepare a report that sets out the sustainable management of waste and use of resources throughout any relevant demolition, excavation and construction activities.
- 5.3.53 EN-3 specifies at paragraph 2.7.52 that applicants should set out the extent to which the generating station and capacity proposed is compatible with, and supports the statutory, long-term residual waste reduction target for England.

- 5.3.54 The assessment of Resource and Waste Management compliance with EN-1 and EN-3 is detailed within **Tables 2.1 and 3.1** of the **Policy Compliance and Accordance Tables (Application Document Ref. 5.2.2)** respectively. This concludes that the Proposed Development is compliant with policy both in respect of the information contained in the DCO application submission and in relation to the SoS's decision making criteria.

Water Quality and Resources

- 5.3.55 Paragraph 5.16.3 of EN-1 states that, where a proposed development is likely to have effects on the water environment, the applicant should undertake an assessment of the existing status of, and impacts of the proposed project on, water quality, water resources and physical characteristics of the water environment, and how this might change due to the impact of climate change on rainfall patterns and consequently water availability across the water environment, as part of the ES.
- 5.3.56 Water quality and resource impacts for biomass and energy from waste projects are dealt within EN-3 at paragraphs 2.7.64 to 2.7.67. It establishes that where the project is likely to have effects on water quality or resources the applicant should undertake an assessment as required in EN-1, Section 5.16, noting that assessment should particularly demonstrate that appropriate measures will be put in place to avoid or minimise adverse impacts of abstraction and discharge of cooling water.
- 5.3.57 EN-4, Section 2.21 deals with water quality and resources relating to gas and oil supply pipelines. It explains that pipeline impacts could include drainage, groundwater flow pathways, mobilisation of contaminants, the introduction of new pollutants, flooding, disturbance to ecology, siltation, and disturbance to species and their habitats. Impacts during construction should be avoided as far as possible through route selection or mitigated if unavoidable and ground should be reinstated after construction.
- 5.3.58 The assessment of water quality and resource compliance with EN-1 and EN-3, and accordance with EN-4, is detailed within **Tables 2.1, 3.1 and 4.1** of the **Policy Compliance and Accordance Tables (Application Document Ref. 5.2.2)** respectively. This concludes that the Proposed Development is compliant with EN-1 and EN-3 policy both in respect of the information contained in the DCO application submission and in relation to the SoS's decision making criteria and is in accordance with EN-4.

Summary

- 5.3.59 As set out above, the planning policy assessment within **Tables 2.1, 3.1, 4.1 and 5.1** of the **Policy Compliance and Accordance Tables (Application Document Ref. 5.2.2)** draw upon the assessment criteria for

each of the generic impacts of energy infrastructure signposting where each assessment criteria is covered within the Application documents. The tables provide the necessary detail to demonstrate how the Proposed Development complies with the generic impacts sections of NPSs EN-1 and EN-3, and accords with the relevant sections including technology specific matters in EN-4 and EN-5.

5.4 Technology specific considerations

- 5.4.1 The technology specific considerations sections within NPS EN-1, EN-3, EN-4 and EN-5 establish the extent to which applicants should cover each of these issues within their submission and also offers some guidance to decision makers on how each of these issues should be assessed.
- 5.4.2 The 'technology specific considerations' of relevance to the Proposed Development as set out in EN-3, EN-4 and EN-5 are considered at **Tables 3.1, 4.1 and 5.1 of the Policy Compliance and Accordance Tables (Application Document Ref. 5.2.2)** respectively.
- 5.4.3 The above tables demonstrate that there is no conflict between the Proposed Development and the relevant technology specific considerations set out in the NPSs.

5.5 Marine Policy

- 5.5.1 The marine policy document that is relevant to the Proposed Development for the purposes of section 104 of the PA 2008 is the North East Inshore and North East Offshore Marine Plan.
- 5.5.2 The marine policy considerations of relevance to the Proposed Development as set out in EN-1, EN-3, EN-4 and EN-5 are considered at **Tables 2.1, 3.1, 4.1 and 5.1 of the Policy Compliance and Accordance Tables (Application Document Ref. 5.2.2)** respectively. These tables provide an assessment on where these matters are covered within the Application documents, such as the ES and how the application complies with each of the marine policy criteria.
- 5.5.3 **Policy Compliance and Accordance Tables (Application Document Ref. 5.2.2)** also includes a Marine Plan Policy Assessment. **Table 6.1** provides an assessment of the compliance of the Proposed Development with the UK MPS, and **Table 7.1** assesses compliance with the North East Inshore and North East Offshore Marine Plan.
- 5.5.4 The above tables demonstrate accordance between the Proposed Development and the relevant policies set out in the NPSs, UK MPS and the North East Inshore and North East Offshore Marine Plan.

5.6 The National Planning Policy Framework

- 5.6.1 The National Planning Policy Framework (NPPF) was introduced in March 2012 and was most recently republished in August 2026. The August 2026 NPPF is structured around distinct plan-making policies and national decision-making policies.
- 5.6.2 Paragraph 13 of the NPPF confirms that the Framework does not contain specific policies for NSIPs, which are determined in accordance with the PA 2008 and relevant NPSs for major infrastructure, and that NPSs may, where relevant, be a material consideration in preparing plans and making decisions on planning applications. The EIA and other studies and designs undertaken for the Proposed Development will therefore have regard to the relevant policies of the NPPF as part of the overall framework of national policy.
- 5.6.3 Chapter 4 of the NPPF 'Achieving sustainable development' confirms (paragraph 15) that the purpose of the planning system is to contribute to the achievement of sustainable development, by managing the use and development of land in the long-term public interest. Paragraph 16 summarises this, at a high level, as *"...meeting the needs of the present without compromising the ability of future generations to meet their own needs."*
- 5.6.4 Paragraph 17 of the NPPF goes on to identify three overarching objectives to the achievement of sustainable development, which are interdependent and need to be pursued in mutually supportive ways so that opportunities can be taken to secure net gains across all three. These are:
- a. *"An economic objective - to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*
 - b. *A social objective - to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible community facilities, public service infrastructure and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and*
 - c. *An environmental objective - to support efforts to mitigate and adapt to climate change, including moving to a low carbon economy; and to protect and enhance our natural, built and historic environment, including making effective use of land, improving biodiversity, using natural resources prudently, and minimising waste and pollution."*

- 5.6.5 Central to the NPPF is a presumption in favour of sustainable development, set out in Policy S3. For decisions within settlements this is applied through Policy S4, and outside settlements through Policy S5. In all locations, development proposals that accord with both an up-to-date development plan and the national decision-making policies in the NPPF should be approved without delay.
- 5.6.6 The NPPF remains supportive of infrastructure projects. The economic objective set out at paragraph 17(a) identifies the "*...provision of infrastructure*" as a means of achieving sustainable development, with the role of infrastructure further reflected throughout the plan-making policies in Chapter 2 of the NPPF.
- 5.6.7 Chapter 5 of the NPPF 'Meeting the challenge of climate change' sets out the Framework's policies on climate change mitigation and adaptation, with the objective of supporting the transition to net zero by 2050 and shaping places that are more resilient to the effects of climate change, including by contributing to radical reductions in greenhouse gas emissions and adapting to current and potential climate impacts.
- 5.6.8 Policy CC2 of the NPPF (Mitigation of climate change) sets out that development proposals should, where relevant, take advantage of opportunities to draw low carbon energy from decentralised networks and renewable and low carbon energy sources, and should not involve the extraction of fossil fuels other than in accordance with Policy M5. Substantial weight should be given to the benefits of drawing energy from renewable and low carbon sources where this would be achieved through proposals for development.
- 5.6.9 Policy W3(2), within Chapter 10 of the NPPF 'Securing clean energy and water', confirms that applicants should not be required to demonstrate the need for renewable or low carbon energy development and electricity network infrastructure.
- 5.6.10 NPPF policies of particular relevance to the Proposed Development include:
- Building a strong, effective economy (Chapter 7);
 - Securing clean energy and water (Chapter 10);
 - Making effective use of land (Chapter 12);
 - Achieving well-designed places (Chapter 14);
 - Promoting sustainable transport (Chapter 15);

- Meeting the challenge of climate change (Chapter 5) and Managing flood risk and coastal change (Chapter 18); and
- Conserving and enhancing the natural environment (Chapter 19).

5.6.11 A summary of those policies and how the Proposed Development complies with them is provided in the **Table 9.1** of the **Policy Compliance and Accordance Tables (Application Document Ref. 5.2.2)**. This demonstrates that there is no conflict between the Proposed Development and the key policies contained within the NPPF.

5.7 Local Planning Policy

5.7.1 **Table 9.1** of the **Policy Compliance and Accordance Tables (Application Document Ref. 5.2.2)** considers the general accordance of the Proposed Development with the relevant development plan policies, being:

- The Stockton-on-Tees Local Plan (Adopted January 2019); Redcar and Cleveland Local Plan and Policies Map (Adopted May 2018);
- The Tees Valley Joint Minerals and Waste Core Strategy DPD (Adopted September 2011); and
- The Tees Valley Joint Minerals and Waste Policies and Sites DPD (Adopted September 2011).

5.7.2 The following non-Development Plan Policy documents are agreed to be the most relevant to the Proposed Development:

- South Tees Regeneration Master Plan (Adopted November 2019[BS1.1]);
- Redcar and Cleveland South Tees Area Supplementary Planning Document (Adopted May 2018);
- Stockton-On-Tees Borough Council Strategic Flood Risk Assessment (Adopted March 2018);
- Redcar and Contributions Supplementary Planning Document (Adopted December 2014);
- Redcar and Cleveland Landscape Character Supplementary Planning Document (Adopted March 2010); and
- Redcar and Cleveland Urban Design Guidelines Supplementary Planning Document (Adopted April 2006).

5.7.3 The Proposed Development is generally considered to accord with the abovementioned Local Development Plan Policies. While there are some significant residual adverse impacts, it is considered that the Applicant has provided substantial and appropriate mitigation and that residual impacts

are outweighed by material considerations in the form of the benefits and need for the Proposed Development.

5.8 Summary

- 5.8.1 This section of the Planning Statement has considered the Proposed Development's conformity against the assessment principles, generic impacts and assessment and technology specific consideration of the energy NPSs that have 'effect' (EN-1, EN-3) and importance and relevance (EN-4 and EN-5). The NPSs that have 'effect' are the primary basis for the determination of development consent applications for energy infrastructure.
- 5.8.2 The Applicant's assessments have identified a number of environmental impacts, some of which are significant adverse, however, due to the mitigations included as part of the application and the significant benefits and the need for sustainable aviation fuel in line with the SAF Mandate, it is considered that the Proposed Development complies with the relevant NPSs. Furthermore, it has been demonstrated that there is no conflict with NPPF policy or local planning policy. It is important to recognise that although the NPPF and local development plan policy may be 'important and relevant', the NPSs are the primary consideration for the determination of NSIPs and take precedence where there is any conflict with such policies.

6 Assessment of the beneficial and adverse effects of the Proposed Development

6.1 Introduction

6.1.1 This section of the Planning Statement identifies the key benefits of the Proposed Development, together with its likely significant adverse effects, having regard to the planning policy assessment set out in Section 5 of this Planning Statement and the findings of the **ES (Application Document Refs. 6.1 to 6.1.23)**.

6.1.2 The ES has been prepared on a topic-by-topic basis **across Chapters 8 to 21 (ES Volume I, Application Document Ref. 6.1)**, with the cumulative and combined effects of the Proposed Development considered at **Chapter 22: Cumulative and Combined Effects (ES Volume I, Application Document Ref. 6.1.22)**. **Chapter 23: Summary of Significant Effects (ES Volume I, Application Document Ref. 6.1.23)** summarises the effects assessed as significant prior to mitigation, and the residual effect remaining once the embedded and additional mitigation secured through the **draft DCO (Application Document Ref. 3.1)** has been applied, or will be controlled through other 'non-DCO' licences, permits and consents as set out within the **Other Consents and Licences Statement (Application Document Ref. 5.4)**.

6.2 Compliance with the relevant NPS and Marine Policy

6.2.1 As set out within Section 5 of this Planning Statement, the Overarching NPS for Energy (EN-1) forms the primary policy framework for the SoS's determination of this Application following the Section 35 Direction dated 8 September 2025. The NPS for Renewable Energy Infrastructure (EN-3) has direct effect in relation to the CHP element of the Proposed Development (**Work No. 2**).

6.2.2 As demonstrated by the assessment at Section 5 of this Planning Statement, the Proposed Development is considered to comply with Section 4 of EN-1. The Applicant has provided detailed assessment against each relevant paragraph of Section 5 of EN-1 and Section 2 of EN-3 within the **Policy Compliance and Accordance Tables (Application Document Ref. 5.2.2)**, which confirms that the Proposed Development complies with the relevant provisions of both NPSs, including in respect of both the generic and technology-specific assessment principles. This demonstrated that while a number of residual significant adverse effects have been identified through the ES, the mitigation hierarchy has been applied, and these effects are outweighed by the substantial benefits the Proposed Development would deliver.

6.2.3 As the Proposed Development includes works within the UK Marine Area, principally the new quay, capital dredging and outfall works (**Work No. 6**), it also engages the UK MPS and the North East Inshore and North East Offshore Marine Plan. The Applicant's assessment against the UK MPS and the North East Inshore and North East Offshore Marine Plan, set out in **the Policy Compliance and Accordance Tables (Tables 6.1 and 7.1, Application Document Ref. 5.2.2)**, has not identified any conflict with the relevant marine policies, including those relating to sustainable development of the marine area, the safeguarding of navigation and port operations, and the protection of the marine environment. The Proposed Development is therefore also considered to comply with the relevant marine plan policies applicable to the Tees Estuary.

6.3 [Accordance with Other NPS, NPPF, Local Plans and Other Important and Relevant Considerations](#)

6.3.1 NPS EN-4 (Natural Gas Supply Infrastructure and Gas and Oil Pipelines) and NPS EN-5 (Electricity Networks Infrastructure) are partially relevant to elements of the Proposed Development, including the gas supply connection (**Work No. 8**) and product export pipeline (**Work No. 9**), and electrical connection works infrastructure (**Work No. 7**), respectively. The Applicant's detailed assessment against each relevant paragraph of EN-4 and EN-5 is set out in the **Policy Compliance and Accordance Tables (Application Document Ref. 5.2.2)**, which confirm that the Proposed Development is in accordance with the relevant provisions of both NPSs.

6.3.2 The NPPF is also an important and relevant consideration. The Proposed Development is considered to accord with the framework's core themes, including building a strong, effective economy (Chapter 7), securing clean energy and water (Chapter 10), making effective use of land through the redevelopment of previously developed industrial land (Chapter 12), achieving well-designed places (Chapter 14), promoting sustainable transport (Chapter 15), meeting the challenge of climate change and managing flood risk (Chapters 5 and 18), and conserving and enhancing the natural environment (Chapter 19), for the reasons set out in Table 9.1 of the **Policy Compliance and Accordance Tables (Application Document Ref. 5.2.2)**. No conflict between the Proposed Development and the NPPF has been identified.

6.3.3 As set out within **Section 3.10** and **Section 5.7** of this Planning Statement, the Proposed Development lies within the administrative areas of STBC and RCBC, and therefore the STBC Local Plan (2019), RCBC Local Plan and Policies Map (2018), the Tees Valley Joint Minerals and Waste Core Strategy (2011) and the Tees Valley Joint Minerals and Waste Policies and

Sites DPD (2011) are relevant. **Tables 10.1, 11.1, 12.1 and 13.1** of the **Policy Compliance and Accordance Tables (Application Document Ref. 5.2.2)** demonstrate that the Proposed Development generally accords with the relevant policies of both Local Plans, including those relating to biodiversity, flood risk, design and economic development.

- 6.3.4 Overall, the Applicant considers that the Proposed Development is in accordance with the relevant provisions of EN-4 and EN-5, and accords with all relevant provisions of the NPPF and local development plans, as demonstrated in detail in the **Policy Compliance and Accordance Tables (Application Document Ref. 5.2.2)**.

6.4 The Critical National Priority for Low Carbon Infrastructure

- 6.4.1 Section 4.2 of EN-1 confirms that the Government has concluded there is a CNP for the provision of nationally significant low carbon infrastructure needed to meet the Clean Power 2030 Mission and net zero. Paragraph 4.2.17 of EN-1 defines low carbon infrastructure for these purposes as including, amongst other matters, electricity generation that does not involve fossil fuel combustion. The Proposed Development is referred to throughout this Planning Statement as likely to represent a CNP project, for the reasons set out at **Section 3.4** above.

- 6.4.2 Paragraph 4.1.7 of EN-1 confirms that, having applied the mitigation hierarchy, any residual adverse effects of a CNP project should be weighed against its benefits, and states that *“it is likely that the need case will outweigh the residual effects in all but the most exceptional cases.”* CNP status is therefore directly relevant to the weighing of the residual adverse effects identified at **Section** Error! Reference source not found. , and in particular to the residual significant adverse effects on visual amenity, and on freshwater and marine ecology, which cannot be further reduced through mitigation.

- 6.4.3 Paragraph 4.2.32 of EN-1 further confirms that, where CNP infrastructure has residual adverse impacts on the integrity of sites forming part of the UK national site network, either alone or in combination with other plans or projects, following Appropriate Assessment, the SoS will consider whether a derogation under the Habitats Regulations is appropriate. This is relevant to identified potential in-combination adverse effect discussed below at **Section 6.5** below in respect of the Teesmouth and Cleveland Coast SPA (Marine Component GB) and Ramsar site.

6.5 Habitats Regulations Assessment

- 6.5.1 A **Report to Inform the HRA (Application Document Ref. 5.11.1)** has been prepared in accordance with Habitats Regulations, to consider

whether the Proposed Development would cause likely significant effects (LSE) on the qualifying features of relevant European sites. Screening identified credible source–pathway–receptor linkages, meaning that LSE could not be excluded, in relation to eight European sites: the Teesmouth and Cleveland Coast SPA (Marine Component GB) and Ramsar site, North York Moors SPA and Special Area of Conservation (SAC), Northumbria Coast SPA and Ramsar, Durham Coast SAC and Castle Eden Dene SAC. These sites were accordingly taken forward to Appropriate Assessment (AA).

- 6.5.2 Taking account of the mitigation measures incorporated into and secured through the Proposed Development, the AA concludes beyond reasonable scientific doubt that the Proposed Development would not adversely affect the integrity of any of the eight European sites assessed, when considered alone, and that the conservation objectives of those sites would continue to be achieved.
- 6.5.3 In relation to in-combination effects, the AA reaches the same conclusion for the majority of sites and impact pathways, on the basis that embedded mitigation secured through project-specific management plans, together with regulatory controls such as Environmental Permits and Best Available Techniques (BAT), would reduce potential cumulative effects to a negligible level. However, the HRA identifies that there is potential for capital dredging and dredge spoil disposal activities associated with the Proposed Development to interact with those of one other identified project (referred to in the HRA as NSIP3 and RCBC41 – see Table 22.5 of **Chapter 22: Cumulative and Combined Effects (ES Volume I, Application Document Ref. 6.1)**) within the Teesmouth and Cleveland Coast SPA (Marine Component GB) and Ramsar site, should construction programmes overlap. On the information available at this stage, the HRA states that it cannot be concluded beyond reasonable scientific doubt that no adverse effect on the integrity of those sites would occur in-combination, and that further measures, controls or assessment would be required to rule this out. This would only be required should the construction programme progress so that dredging activities overlap, which is currently considered unlikely.

6.6 Benefits of the Proposed Development

- 6.6.1 The Proposed Development would deliver a number of clear and substantial benefits, which can be summarised as follows:
- a) Scale and timeliness of contribution to the national need for SAF: The Proposed Development is anticipated to be the UK's first commercial-scale second generation SAF Production Facility, producing approximately 180

million litres of advanced SAF and approximately 30 million litres of renewable naphtha per annum, converting in excess of 1 million tonnes of sustainably sourced biomass feedstock. It is a first-of-a-kind technology assemblage SAF project, using a commercially viable, ASTM-certified production process (**Chapter 6: Alternatives (ES Volume I, Application Document Ref. 6.1.6)**). It directly supports the Government's Jet Zero Strategy and the UK's SAF Mandate, which requires an increasing proportion of SAF in the UK aviation fuel mix, rising to 22% by 2040. From 2040 onwards, the Proposed Development is expected to supply approximately 5% of the UK's mandated SAF requirement (**Chapter 14: Greenhouse Gas Emissions (ES Volume I, Application Document Ref. 6.1.14)**), making it a significant enabler of UK aviation decarbonisation and reducing reliance on imported SAF. The inclusion of a highly efficient biomass and waste wood fired CHP generating station ensures resilient electricity and heat supplies from the start of commercial operations, and contributes towards the ability of the Proposed Development to be operational as soon as 2031 manufacturing significant domestic supplies of SAF.

- b) Substantial net climate benefit: Over its assumed 30-year operational life, the Proposed Development is estimated to deliver approximately 12.8 MtCO₂e of avoided emissions through the displacement of conventional Jet (A-1) fuel, against total lifecycle emissions (construction, operation and decommissioning) of approximately 4.3 MtCO₂e - a carbon payback ratio of around 3:1. Construction emissions are expected to be offset within less than 1.5 years of operation. The ES concludes that the effect of the Proposed Development on GHG emissions is **minor adverse (not significant)**, notwithstanding the scale of the facility, given this net climate benefit (**Chapter 14: Greenhouse Gas Emissions (ES Volume I, Application Document Ref. 6.1.14)**). There is realisable potential for further reductions in carbon emissions through the future installation of a PCCU at the CHP plant (**Work No. 2**), subject to separate consent.
- c) Tangible economic and employment benefits: The Proposed Development is expected to support approximately 4,460 Full-Time Equivalent (FTE) job-years within Teesside and approximately 22,940 FTE job-years across the UK over the four-year construction period (2028–2031), with on-site employment peaking at around 2,200 workers in 2029. It is estimated to generate approximately £700 million in total GVA within Teesside and approximately £1.88 billion in total GVA across the UK during construction. **Chapter 17: Socio-economics (ES Volume I, Application Document Ref. 6.1.17)** assesses the effects of the Proposed Development on employment, GVA, local businesses (through supply chain participation) and health during construction as **moderate beneficial (significant)**, including a beneficial effect on health on the basis that construction-phase employment has the potential to contribute to the narrowing of health inequalities. During operation, the Proposed Development is expected to

create over 300 permanent, predominantly skilled full-time roles. The SAF Production Facility and CHP plant will operate continuously, 24 hours a day and 7 days a week, over an anticipated minimum operational life of 30 years. The creation of a substantial number of permanent, skilled jobs sustained over a 30-year operational period is a material planning benefit, particularly given the high levels of deprivation and worklessness identified within the Direct and Wider Impact Areas in **Chapter 17: Socio-economics (ES Volume I, Application Document Ref. 6.1.17)**. This benefit will be supported by an Employment and Skills plan, to be prepared prior to construction and secured by Requirement 16 of Schedule 2 to the **draft DCO (Application Document Ref. 3.1)**, which will promote local recruitment, training and skills development opportunities across both the construction and operational phases.

- d) Effective use of previously developed industrial land: The Main Site is located at Seal Sands on a largely brownfield site formerly occupied by the INEOS Nitriles chemical plant, within an established heavy-industry cluster, making use of existing roads, electricity and gas networks and industrial gas supplies, connecting to existing commercial marine export facilities, investing in new marine infrastructure within the Main Site, and connecting to the consented NEP CO₂ transport and storage infrastructure (**Chapter 4: Proposed Development (ES Volume I, Application Document Ref. 6.1.4)**). The Proposed Development includes provision for a pipeline connection to the NEP infrastructure, providing future optionality for the capture, compression and transport of CO₂ arising from the SAF production process.
- e) New marine and utility infrastructure: The Proposed Development includes construction of a new permanent quay on the River Tees, supporting construction and operational logistics and long-term port capacity in the area since the quay structure itself likely to remain available after decommissioning of **Work Nos 1 & 2 (Chapter 4: Proposed Development (ES Volume I, Application Document Ref. 6.1.4))**.

6.7 Impacts of the Proposed Development

- 6.7.1 Chapter 23: Summary of Significant Effects (ES Volume I, Application Document Ref. 6.1.23) confirms that, following the implementation of the embedded and additional mitigation secured through the draft DCO (Application Document Ref. 3.1), the significant residual adverse effects of the Proposed Development are limited.
- 6.7.2 **Chapter 13: Landscape and Visual Amenity (ES Volume I, Application Document Ref. 6.1.13)** identifies **moderate adverse (significant)** residual effects, at both construction and operation, on views from Viewpoint 7 (Saltholme RSPB reserve) - arising from the loss of openness and the introduction of large-scale development into views. No further effective

mitigation is available beyond the Proposed Development's embedded design. This is consistent with the position recognised in paragraph 5.10.5 of EN-1, which acknowledges that “*virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape.*” No significant effects on landscape character (as opposed to visual amenity) have been identified at any stage.

- 6.7.3 The majority of the significant adverse effects identified prior to mitigation across other topics are reduced to negligible or not significant residual effects. **Chapter 10: Terrestrial Ecology (ES Volume I, Application Document Ref. 6.1.10)** identifies a range of **major** and **moderate adverse** effects prior to mitigation relating to the exclusion of designated bird species and otter from suitable habitats due to construction noise and vibration, and to the permanent and temporary loss of habitats of principal importance, breeding bird habitat and terrestrial invertebrate habitat. Following the implementation of acoustic screening in appropriate locations to provide up to 10 dB(A) reduction in construction noise levels, compensatory habitat creation and translocation of notable species (all secured through Requirements in Schedule 2 of the **draft DCO (Application Document Ref. 3.1)** all of these effects are reduced to negligible (not significant), and no residual significant effects on terrestrial ecology are identified.
- 6.7.4 Chapters 8 (Air Quality), 9 (Noise and Vibration), 12 (Water Environment), 14 (Greenhouse Gas Emissions), 15 (Climate Change Resilience), 16 (Materials and Waste), 17 (Socio-economics), 18 (Traffic and Transport), 19 (Major Accidents and Disasters), 20 (Marine Navigation) and 21 (Geology and Soils) each conclude that no significant effects are predicted to occur at any stage of the Proposed Development (**ES Volume I, Application Document Refs. 6.1.8 to 6.1.21**, as applicable).
- 6.7.5 The **Statement of Reasons (Application Document Ref. 4.1)** sets out a compelling case in the public interest for the limited compulsory acquisition requirements for the Proposed Development (land required will be secured by agreement where possible). Any localised impacts upon land interests have been minimised through the use of appropriate working techniques and integration into existing infrastructure corridors and the use of previously developed land, and will be appropriately governed by protective provisions.
- 6.7.6 As set out at **Section 6.4** above, the **Report to Inform the HRA (Application Document Ref. 5.11.1)** concludes that no adverse effect on site integrity would arise in relation to any of the assessed European sites, with the exception of a potential cumulative effect associated with

overlapping dredging and dredge spoil disposal activities within the Teesmouth and Cleveland Coast SPA (Marine Component GB) and Ramsar site. On the information available at this stage, the HRA states that it cannot be concluded beyond reasonable scientific doubt that no adverse effect on the integrity of those sites would occur in-combination, and that further measures, controls or assessment would be required to rule this out. This would only be required should the construction programme progress so that dredging activities overlap, which is currently considered unlikely.

- 6.7.7 The Water Environment Regulations Assessment (**Application Document Ref. 5.10**) assessed the Proposed Development against the Water Environment Regulations and concluded that the Proposed Development is not anticipated to cause a deterioration in WER status or preventing the future attainment of status objectives for the relevant water bodies screened in for assessment. As such, the Proposed Development is deemed to be compliant with the requirements and objectives of the WER.

6.8 The S104 Balance

- 6.8.1 This section of the Planning Statement has identified that NPS policy is complied with and that there are no contrary wider legal matters that would indicate against the making of the DCO in the terms sought.
- 6.8.2 Section 104 of the PA 2008 requires that, where a National Policy Statement has effect in relation to development of the description to which the application relates, the SoS must decide the application in accordance with that NPS, except to the extent that one or more of the exceptions in section 104(4) - (8) applies, including where the adverse impacts of the Proposed Development would outweigh its benefits. Paragraph 4.1.5 of EN-1 confirms that this weighing exercise should take into account both the potential benefits of the Proposed Development, including its contribution to the Clean Power 2030 Mission and net zero, job creation, and any long-term or wider benefits and any potential adverse impacts, including long-term and cumulative adverse impacts, together with the mitigation measures proposed.
- 6.8.3 As set out at **Section 6.5** above, the Proposed Development would deliver very substantial benefits: it responds to an established national policy need to decarbonise aviation fuel supply and is likely to include CNP infrastructure in the form of the CHP plant; it would deliver a net climate benefit of some three tonnes of avoided emissions for every tonne of lifecycle emissions; and it would generate significant employment, GVA and supply-chain benefits within Teesside and the wider UK during construction.

- 6.8.4 Against this, the significant residual adverse effects of the Proposed Development identified through the EIA process are limited to **moderate adverse** effects on visual amenity at one viewpoint. The majority of effects identified across the remaining ES topic chapters are either not significant or are reduced to negligible following mitigation secured through the **draft DCO (Application Document Ref. 3.1)**. As set out at **Section 6.3**, EN-1 paragraph 4.1.7 confirms that, for CNP projects, the need case is likely to outweigh residual effects of this kind save in the most exceptional cases.
- 6.8.5 As set out at **Section 6.4** above, the HRA concludes beyond reasonable scientific doubt that no such adverse effect would arise when the Proposed Development is considered alone, in respect of all eight European sites assessed. In relation to in-combination effects, for the majority of impact pathways, embedded mitigation secured through project-specific CEMPs, together with regulatory controls such as Environmental Permits and the application of BAT, reduces the potential for cumulative effects to a negligible level. One outstanding in-combination matter concerning the potential overlap and interaction of capital dredging activities within the Teesmouth and Cleveland Coast SPA (Marine Component GB) and Ramsar site will need to be resolved through further measures, controls or assessment to rule out adverse effects on site integrity. This would only be required should the various construction programmes progress so that these dredging activities overlap, which is currently considered unlikely.
- 6.8.6 The significant benefits of the Proposed Development described above are considered on balance to outweigh the residual effects. It is further submitted that the residual effects, which follow the application of the mitigation hierarchy (as set out in the **ES (ES Volume I, Chapters 8 to 22, Application Document Ref. 6.1)** and **Policy Compliance and Accordance Tables (Application Document Ref. 5.2.2)**, fall to be outweighed by virtue of the probable CNP status of the Proposed Development.
- 6.8.7 Importantly, none of the residual impacts are considered to present these unacceptable risks or interferences. It is therefore considered that the benefits of the Proposed Development considerably outweigh its limited adverse impacts. The Applicant considers that the Proposed Development accords with the relevant NPSs and that none of the exceptions in section 104(4)-(8) of the PA 2008 apply. Development consent should therefore be granted.

7 Summary and Conclusions

- 7.1.1 Decisions on DCO applications where an NPS is designated are made against the criteria in section 104 of the PA 2008. This section sets out conclusions corresponding to the criteria in Section 104 subsection (2)(a) - (d) and subsections (3)-(9).
- 7.1.2 The Proposed Development has demonstrated in **Section 5** of this Planning Statement to be in conformity with the relevant NPSs. In particular:
- 7.1.2.1 There is a clear and urgent policy-based need for the Proposed Development, which responds directly to the UK's Jet Zero Strategy and SAF Mandate, and would make a material contribution to the decarbonisation of the aviation sector. As set out at Section 6, the CHP plant element of the Proposed Development is also likely to represent CNP infrastructure under Part 4.2 of EN-1, being fuelled by biomass and waste wood.
- 7.1.2.2 The Proposed Development complies with all relevant 'generic impacts' and 'assessment and technology specific consideration' in EN-1 and EN-3, and is in accordance with all relevant policy in EN-4 and EN-5 as detailed in as detailed in the **Policy Compliance and Accordance Tables (Application Document Ref. 5.2.2)**. This includes in respect of air quality, noise and vibration, terrestrial ecology, freshwater and marine ecology, water environment, landscape and visual amenity, greenhouse gas emissions, climate change resilience, materials and waster, socio-economics, traffic and transport, major accidents and disasters, marine navigation and geology and soils, by reference to the findings in the **Environmental Statement Volumes 1 to 3 (Application Document Refs: 6.1 to 6.4)**.
- 7.1.2.3 The Proposed Development has been assessed against marine policy in accordance with EN-1 section 4.5, including the UK MPS and the North East Inshore and North East Offshore Marine Plan, as the Proposed Development involves parts of the tidal River Tees. The assessment of the Proposed Development against the UK MPS and North East Inshore and North East Offshore Marine Plan has not identified any conflict with relevant marine policies.
- 7.1.3 Other matters important and relevant to decision making on the Application include the overarching aims of the NPPF and development plan policies. The **Policy Compliance and Accordance Tables (Application Document Ref. 5.2.2)** confirm that the Proposed Development appropriately addresses these matters.

- 7.1.4 No other laws, statutory duties or enactments indicate against making the DCO. The **Statement of Reasons (Application Document Ref. 4.1)** demonstrates that all reasonable alternatives to compulsory acquisition have been explored, and the proposed interference with the rights of those with an interest in the Order Land is necessary, proportionate and legitimate. No serious detriment to statutory undertakers would arise and appropriate protective provisions are included in the **draft DCO (Application Document Ref. 3.1)**.
- 7.1.5 The Proposed Development has a number of clear and substantial benefits, which EN-1 and EN-3 accord weight, and which considerably outweigh its limited adverse impacts, as set out in **Section 6** above.
- 7.1.6 The **draft DCO (Application Document Ref. 3.1)** includes appropriate requirements (Schedule 2) that will control the detailed design of the Proposed Development and its construction and operation in order to ensure that it accords with the robust assessment reported in the **ES Volumes 1 to 3 (Application Document Refs. 6.1 to 6.4)** and would not result in unacceptable effects.
- 7.1.7 It is therefore submitted that the Proposed Development conforms with the criteria in section 104 of the PA 2008 and is acceptable in all relevant respects.

References

- Ref 1 UK Government (2008) Planning Act 2008. Available online:
<https://www.legislation.gov.uk/ukpga/2008/29/contents>
- Ref 2 Overarching National Policy Statement for energy (EN-1), 2025H Available Online: <https://www.gov.uk/government/publications/overarching-national-policy-statement-for-energy-en-1-2025>
- Ref 3 National Policy Statement for renewable energy infrastructure (EN-3), 2025 Available Online: <https://www.gov.uk/government/publications/national-policy-statement-for-renewable-energy-infrastructure-en-3-2025>
- Ref 4 National Policy Statement for natural gas supply infrastructure and gas and oil pipelines (EN-4), 2025 Available Online:
<https://www.gov.uk/government/publications/national-policy-statement-for-natural-gas-supply-infrastructure-and-gas-and-oil-pipelines-en-4>
- Ref 5 National Policy Statement for electricity networks infrastructure (EN-5), 2025 <https://www.gov.uk/government/publications/national-policy-statement-for-electricity-networks-infrastructure-en-5-2025>
- Ref 6 National Significant Infrastructure Projects: Advice for Local Authorities
<https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-advice-for-local-authorities>
- Ref 7 National Planning Policy Framework
https://assets.publishing.service.gov.uk/media/6a8334c03bd75b81e2329ac4/National_Planning_Policy_Framework.pdf
- Ref 8 UK Marine Policy Statement (2011). Available Online:
<https://assets.publishing.service.gov.uk/media/5a795700ed915d042206795b/pb3654-marine-policy-statement-110316.pdf>
- Ref 9 North East Inshore and Offshore Marine Plan (2011). Available Online:
https://assets.publishing.service.gov.uk/media/60f6f3df8fa8f50c7450ebf1/FINAL_North_East_Marine_Plan_1.pdf
- Ref 10 National Policy Statement for Ports (2026)
<https://www.gov.uk/government/publications/the-national-policy-statement-for-ports>
- Ref 11 South Tees Regeneration Master Plan (Adopted November 2019)
<https://www.northeastfc.uk/Teesworks/171019South-Tees-Master-Plan-19-Nov-17.pdf>
- Ref 12 STBC Design Guide (Adopted March 2023)
<https://www.stockton.gov.uk/media/3987/Local-Design-Guide-Design->

[Process-Overview-March-2023/pdf/Local_Design_Guide_Design_Process_Overview_-_March_2023_-_DP_accessible.pdf?m=1681731703377](#)

- Ref 13 STBC Strategic Flood Risk Assessment (Adopted March 2018)
<https://www.stockton.gov.uk/flood-risk>
- Ref 14 RCBC South Tees Area Supplementary Planning Document (Adopted May 2018) <https://www.redcar-cleveland.gov.uk/planning/planning-strategy/supplementary-planning-documents/south-tees-area-spd>
- Ref 15 RCBC Developer Contributions Supplementary Planning Document (Adopted December 2014) <https://www.redcar-cleveland.gov.uk/planning/planning-strategy/supplementary-planning-documents/developer-contributions-spd>
- Ref 16 RCBC Landscape Character Supplementary Planning Document (Adopted March 2010) <https://www.redcar-cleveland.gov.uk/planning/planning-strategy/supplementary-planning-documents/landscape-character-spd>;
RCBC Urban Design Guidelines (Adopted April 2006) <https://www.redcar-cleveland.gov.uk/planning/planning-strategy/supplementary-planning-documents/urban-design-guidelines>
- Ref 17 'Clean Growth Strategy - Leading the way to a low carbon future' (2018)
<https://www.gov.uk/government/publications/clean-growth-strategy>
- Ref 18 'The Ten Point Plan for a Green Industrial Revolution – Building back better, supporting green jobs, and accelerating our path to net zero' (2020)
<https://www.gov.uk/government/publications/the-ten-point-plan-for-a-green-industrial-revolution>
- Ref 19 Second National Infrastructure Assessment
<https://webarchive.nationalarchives.gov.uk/ukgwa/20240306053402/https://nic.org.uk/studies-reports/national-infrastructure-assessment/second-nia/>
- Ref 20 Planning Act 2008: Guidance on preparing an application: Part 2 – Application contents (2026). Available online: [Planning Act 2008: Guidance on preparing an application: Part 2 - Application contents - GOV.UK](#)
- Ref 21 Planning Inspectorate (2024) Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment. Available online: <https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-advice-on-cumulative-effects-assessment>
- Ref 22 Lead Environmental Regulator pilots (2026). Available online: [Coordinating regulation for major infrastructure: Lead Environmental Regulator pilots – Environment Agency: For homes and habitats.](#)

- Ref 23 The Environmental Permitting (England and Wales) Regulations (2016). Available Online: [The Environmental Permitting \(England and Wales\) Regulations 2016](#)
- Ref 24 Decarbonisation readiness in environmental permit applications guidance (2025, update 2026). Available online: [Decarbonisation readiness in environmental permit applications - GOV.UK](#)
- Ref 25 The National Infrastructure Commission's Design Principles for National Infrastructure (2020). Available Online: [Design Principles for National Infrastructure | Major Projects Association](#)
- Ref 26 Guidance on conveying carbon dioxide in pipelines in connection with carbon capture and storage projects (2026). Available online: <https://www.hse.gov.uk/pipelines/co2conveying-full.htm>

Appendix A: Section 35 Direction Dated 12 September 2025



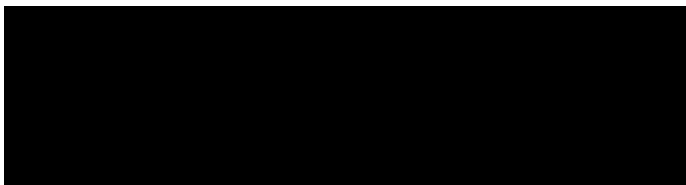
DIRECTION BY THE SECRETARY OF STATE FOR ENERGY SECURITY AND NET ZERO (“THE SECRETARY OF STATE”) UNDER SECTION 35 OF THE PLANNING ACT 2008 RELATING TO THE LIGHTHOUSE GREEN FUELS PROJECT

1. By letter to the Secretary of State received on 12 August 2025 (“the Direction Request”), LGF Projects Limited (“the Applicant”) formally requested that the Secretary of State exercise the power vested in him under section 35(1) of the Planning Act 2008 to direct that the proposed Lighthouse Green Fuels Project, as set out in the Direction Request, be treated as development for which development consent under the Planning Act 2008 is required.
2. The Secretary of State notes that the Direction Request relates to —
 - The following elements: a main gasification facility to process sustainably sourced biomass; feedstock pre-treatment facility, 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 as described in Schedule 1 of the Direction Request (“the Proposed Development”).
 - Additionally, it is proposed that linked development consisting of the construction and operation of a biomass-fired combined heat and power (CHP) generating station with up to approximately 200MWe generating capacity be developed on the site. The purpose of this is to provide electricity, steam and heat to support the operation of the Proposed Development. This activity falls within the existing definition of a “nationally significant infrastructure project” under the Planning Act 2008 and is therefore excluded from the Direction Request and this Direction.
3. Noting the above, the Secretary of State is satisfied that—
 - The Proposed Development sits within one of qualifying infrastructure fields listed in section 35(2)(a)(i) (energy) and that the Proposed Development will be wholly within England, waters adjacent to England up to the seaward limits of the territorial sea or the Renewable Energy Zone (in relation to which the Scottish Ministers do not have functions);
 - The Proposed Development does not fall within the existing definition of a “nationally significant infrastructure project” and therefore it is appropriate to consider use of the power in section 35(1) of the Planning Act 2008; and
 - The Applicant’s request constitutes a “qualifying request” in accordance with section 35ZA(11) of the Planning Act 2008.
4. Having considered the details of the Applicant’s proposals as set out in the Direction Request, the Secretary of State concludes that the Proposed

Development is nationally significant, for the reasons set out in the Annex below.

5. The Secretary of State considers that if the details of the Proposed Development change, before submitting any application to the Planning Inspectorate, the Applicant may wish to seek confirmation from the Secretary of State that the development that is the subject of the proposed application is the same as that for which the Direction is hereby given.
6. The Secretary of State has taken the decision within the conditions as required by sections 35A(2) and (5) of the Planning Act 2008 and issues this Direction accordingly under sections 35(1) and 35ZA of the Planning Act 2008.
7. THE SECRETARY OF STATE DIRECTS that the Proposed Development is to be treated as development for which development consent is required.
8. This Direction is given without prejudice to the Secretary of State's consideration of any application for development consent which is made in relation to the proposed Development.

Signed by

A large black rectangular box redacting the signature of Vicky Dawe.

Vicky Dawe

Director – Energy Development

For and on behalf of the Secretary of State for Energy Security & Net Zero

8 September 2025

ANNEX

REASONS FOR THE DECISION TO ISSUE THE DIRECTION

The Secretary of State is of the opinion that the Direction should be issued because—

- The Proposed Development will use sustainably sourced biomass which it will convert into energy and energy vectors;
- The Proposed Development will produce the following energy products from gasification and related processes:
 - 1) Sustainable Aviation Fuel (SAF), which is an energy vector to be blended and used in the aviation industry as an alternative to fossil-fuel derived kerosene fuel;
 - 2) Naphtha, which is a by-product of the SAF production process, will be used for sustainable chemical production or energy generation purposes.
- On 19 July 2022, the government published its Jet Zero Strategy, which sets out how the UK will achieve net zero in the aviation industry by 2050. The document also explains the ‘critical role aviation plays in boosting trade, tourism and travel’ in the UK. The Strategy states: sustainable aviation fuels are a key lever to accelerate the transition to Jet Zero and represent an industrial leadership opportunity for the UK. In 2023, Jet Zero Strategy: One Year On was published and re-affirmed the primacy of sustainable aviation fuels in the UK’s efforts to decarbonise and be a global leader in such fuel’s development.
- The Renewable Transport Fuel Obligations (Sustainable Aviation Fuel) Order 2024 came into force with effect from 1st January 2025, which introduces a SAF mandate relating to the supply of SAF.
- The urgent development of sustainable aviation fuel-producing facilities, like the Proposed Development, is of national and international significance in the pursuit of aviation sector decarbonisation so as to help the UK meet its statutory obligation to achieve net zero by 2050. SAF is an important part of the strategy to decarbonise air transport. SAF emits on average 70% fewer Greenhouse Gas emissions than using fossil jet fuel on a life cycle basis. SAF production is also estimated to add over £1.8 billion to the economy and over 10,000 jobs across the country whilst supporting decarbonisation. The Proposed Development will make an important contribution to the Government’s aims.
- The Proposed Development would be the UK’s first and largest commercial scale advanced second-generation sustainable aviation fuel project.

Appendix B: Planning History

Table B-1 Stockton-On-Tees Applications – Post 1 October 2015

Reference	Proposal	Major/Minor	Application Type	Submission Date	Decision	Decision Date	Status	Site Address
25/1753/SCO	Screening opinion for proposed development of a new SAF (Sustainable Aviation Fuel) storage terminal (SAFST) Comprising Ethanol and SAF storage tanks.	Minor	Screening Option	19/08/2025	EIA Not Required	12/09/2025	Decided	Navigator Terminals Seal Sands Seal Sands Road Seal Sands Middlesbrough TS2 1UA
25/1754/SOR	Scoping opinion request for proposed development of a new SAF (Sustainable Aviation Fuel) storage terminal (SAFST) Comprising Ethanol and SAF storage tanks.	Minor	Scoping Opinion	19/08/2025	Closed	12/09/2025	Decided	Navigator Terminals Seal Sands Seal Sands Road Seal Sands Middlesbrough TS2 1UA
25/0579/FUL	Installation of a Power Island with the provision of ancillary equipment and associated infrastructure	Minor	Full Application	17/03/2025	Approved with Conditions	26/09/2025	Decided	Conoco Phillips Petroleum Company Seal Sands Road Seal Sands Middlesbrough TS2 1UH
22/1525/NM A	Non material amendment to planning approval 22/1525/EIS (Increase in the boiler hall height from 41m to 45m. Increase in the size of the substation footprint and associated change to car park location).	Minor	Non-Material Amendment	20/02/2025	Approved	17/03/2025	Decided	Land At Seal Sands Billingham
24/2093/SCO	Screening opinion for the enhancement to habitats within and adjacent to the RSPB Saltholme Nature Reserve	Major	Screening Opinion	06/12/2024	EIA Not Required	07/01/2025	Decided	Land At RSPB Saltholme Nature Reserve Seaton

Planning Statement

Reference	Proposal	Major/ Minor	Application Type	Submission Date	Decision	Decision Date	Status	Site Address
								Carew Road Port Clarence TS2 1TR
24/1400/SOR	Scoping opinion request for the construction of a new quay, construction of a level storage area and associated infrastructure works	Major	Scoping Opinion	06/08/2024	Scoping Opinion Issued	12/09/2024	Decided	Land West Of Clarence Works Port Clarence Road Port Clarence TS2 1SD
24/1208/FUL	Installation and operation of a Carbon Dioxide storage terminal.	Major	Full Application	09/07/2024	Approved with Conditions	20/12/2024	Decided	Navigator Terminals Seal Sands Seal Sands Road Seal Sands Middlesbrough TS2 1UA
24/0751/SCO	Screening opinion for a new carbon dioxide storage terminal (CDST) comprising of a CO ₂ reception facility, CO ₂ storage facility and connecting pipeline, Seal Sands facility, North Tees.	Major	Screening Opinion	23/04/2024	EIA Not Required	07/06/2024	Decided	Navigator Terminals Seal Sands Seal Sands Road Seal Sands Middlesbrough TS2 1UA
23/2097/RET	Retrospective application for the erection of emergency staircase and HVAC plant.	Minor	Retrospective application	09/11/2023	Approved with Conditions	13/12/2023	Decided	Kd Pharma Seal Sands Road Seal Sands Stockton-On- Tees TS2 1UB
23/1987/SCO	Screening opinion for a steam boiler plant.	Minor	Screening Opinion	23/10/2023	EIA Not Required	15/11/2023	Decided	Subcoal Production TSP Limited Huntsman Drive Seal Sands Middlesbrough TS2 1TT
23/1156/FUL	Installation of an underground condensate gas pipe.	Minor	Full application	21/06/2023	Approved with Conditions	22/08/2023	Decided	Navigator Terminals Seal Sands Road Seal Sands Middlesbrough TS2 1UB

Planning Statement

Reference	Proposal	Major/ Minor	Application Type	Submission Date	Decision	Decision Date	Status	Site Address
23/1019/EIS	Development of Greenery Renewable Fuels and Circular Products Facility comprising a Sustainable Aviation Fuel Plant and Tyre Plant and associated infrastructure. A temporary construction laydown area, proposed services corridor, pipe bridge, ancillary buildings and car parking	Major	Environmental Impact Studies	31/05/2023	Approved with Conditions	06/11/2023	Decided	Land West Of Epax Pharma U K Limited North South Access Road Seal Sands TS2 1UB TS2 1UB
22/2450/FUL	Demolition of existing infrastructure and installation of a Liquefied Petroleum Gas (LPG) facility with associated works	Major	Full Application	28/11/2022	Approved with Conditions	06/04/2023	Decided	Seal Sands 'Satellite' South Site Seal Sands TS2 1UB
22/2411/DEM	Prior notification for the demolition of plant and machinery	Major	Prior Notification for Demolition	21/11/2022	Prior approval not required	13/01/2023	Decided	Tees Valley Energy From Waste Site 1 Huntsman Drive Seal Sands Middlesbrough TS2 1TT
22/2196/SOR	Scoping request for proposed waste to fuels project	Major	Scoping Opinion	30/09/2022	Scoping opinion issued	18/11/2022	Decided	Land At Seal Sands
22/1525/EIS	Erection of an energy recovery facility and associated infrastructure for fuel receipt and storage, power generation, power export, process emissions control, maintenance, offices and car parking together with associated operations.	Major	Full Application	01/07/2022	Approved with conditions	08/08/2024	Decided	Land At Seal Sands Billingham

Planning Statement

Reference	Proposal	Major/Minor	Application Type	Submission Date	Decision	Decision Date	Status	Site Address
22/1193/HAZ	Hazardous Substance consent for modification to conditions 3 and 4 as imposed on application 17/0258/HAZ (change in storage location and conditions for LPG)	n/a	Hazardous Substance Consent	20/05/2022	Approved with conditions	11/10/2022	Decided	Exolum Seal Sands Limited Seal Sands Road Seal Sands Middlesbrough TS2 1UB
22/1041/SOR	Scoping opinion request for proposed waste to fuel (WtF) facility at Reclamation Pond	Major	Scoping Opinion	27/04/2022	Scoping Opinion Issued	07/06/2022	Decided	Tees Valley Energy From Waste Site 1 Huntsman Drive Seal Sands Middlesbrough TS2 1TT
22/0064/FUL	Provision of on shore gas compression facilities with ancillary infrastructure	Major	Full application	12/01/2022	Approved with conditions	06/05/2022	Decided	Teesside Gas Processing Plant Seal Sands Road Seal Sands Middlesbrough TS2 1UB
21/2855/DEM	Application for the prior notification of demolition of Jetty 2 and 3 lifting frames, propane plant area and 1no. storage tank.	Minor	Prior Notification for Demolition	12/11/2021	Prior Approval Not Required	07/03/2022	Decided	Sabik Uk Petrochemicals Limited North Tees Works Port Clarence TS2 1TT
21/2651/DEM	Application for the prior notification for demolition of process plant, equipment and structures including reactors, columns, flare stacks, tanks, jetting loading arms, pipework, building and associated equipment.	Major	Prior Notification for Demolition	13/10/2021	Prior Approval Not Required	21/01/2022	Decided	Ineos Nitriles Seal Sands Road Seal Sands Middlesbrough TS2 1UB
21/1545/FUL	Application for the installation of a carbon dioxide capture plant	Minor	Full application	01/06/2021	Approved with Conditions	21/07/2021	Decided	B O C Teesside Hydrogen North Tees Site Seaton Carew

Planning Statement

Reference	Proposal	Major/ Minor	Application Type	Submission Date	Decision	Decision Date	Status	Site Address
	plus ancillary and related equipment/works.							Road Port Clarence TS2 1TT
21/1321/FUL	Construction of 2no storage tanks complete with a bunded area and associated infrastructure.	Major	Full application	10/05/2021	Approved with Conditions	07/07/2021	Decided	Navigator Terminals North Tees Inland Terminal Huntsman Drive Seal Sands Middlesbrough TS2 1TT
21/1222/DEM	Prior notification for the demolition of former chemical plant	Minor	Full application	28/04/2021	Prior Approval Not Required	27/05/2021	Decided	Basf Hmd Plant (Within Ineos Nitriles (Uk) Ltd Site) Seal Sands Stockton-On-Tees, Middlesbrough
20/1867/NM A	Non material amendment to planning approval 20/1867/RET - Part retrospective application for the erection of portakabin offices, weigh bridge office, weigh bridge and associated access road and palisade fencing (to support the Phase 4 reclamation works and a potential future aggregate recycling facility).	Major	Non-Material Amendment	14/04/2021	Approved with Conditions	19/05/2021	Decided	Land At East End Of Huntsman Drive Seal Sands TS2 1TT
21/1071/FUL	Proposed extension to the existing reception hall for the creation of new receiving bay and bunker and change in feedstock to residual waste.	Major	Full application	13/04/2021	Approved with Conditions	13/07/2021	Decided	Port Clarence Energy Limited Huntsman Drive Seal Sands TS2 1TT

Planning Statement

Reference	Proposal	Major/Minor	Application Type	Submission Date	Decision	Decision Date	Status	Site Address
20/1894/DEM	Application for the prior notification of demolition of Acrylonitrile AN6 plant, equipment and structures.	Major	Prior Notification for Demolition	01/09/2020	Granted-No Objection(s) Received	12/01/2021	Decided	Ineos Nitriles Seal Sands Road Seal Sands Middlesbrough TS2 1UB
20/1867/RET	Part retrospective application for the erection of portakabin offices, weigh bridge office, weigh bridge and associated access road and palisade fencing (to support the Phase 4 reclamation works and a potential future aggregate recycling facility).	Major	Retrospective Application	27/08/2020	Approved with Conditions	15/01/2021	Decided	Land West Of Sabic (North Tees Site) Huntsman Drive Seal Sands TS2 1TT
20/1864/SCO	Screening opinion on proposed gas pipeline	Major	Screening Opinion	26/08/2020	EIA Required	25/09/2020	Decided	C F Fertilisers U K Limited Haverton Hill Road Billingham TS23 1XT
20/1212/FUL	The existing column to be removed and replaced with a new 17.5m phosco monopole on existing concrete base. Existing 6no antennas to be removed and replaced with 6no new antennas on new headframe. Existing 2no dishes to be relocated on to the new pole and ancillary development thereto including 18no. Remote Radio Units.	Major	Full application	15/06/2020	Approved with Conditions	02/11/2021	Decided	Communication Station Vodafone Cell 4252 Seal Sands Road Seal Sands TS2 1UB
20/0868/ADV	Erection of 1 no. non illuminated fascia sign to the southern elevation	Minor	Application to Display Adverts	11/05/2020	Approved with Conditions	08/07/2020	Decided	Epax Pharma U K Limited Seal Sands Road Seal Sands TS2 1UB

Planning Statement

Reference	Proposal	Major/Minor	Application Type	Submission Date	Decision	Decision Date	Status	Site Address
20/0867/FUL	Erection of a 4 storey industrial building for the refinery of cod liver oil. Development to include large main refinery hall, with an ancillary block to the east and HGV canopy to the west.	Major	Full application	11/05/2020	Approved with Conditions	09/09/2020	Decided	Epax Pharma U K Limited Seal Sands Road Seal Sands TS2 1UB
20/0663/FUL	Erection of a 2 storey extension to existing control building. Works to include the removal of 2 no. temporary cabins and demolition of existing stairwell.	Major	Full application	23/03/2020	Approved with Conditions	13/07/2020	Decided	Greenery Biofuels Teesside Limited Seal Sands Road Seal Sands Middlesbrough TS2 1UB
20/0192/VARY	Section 73 application to vary condition no.3 (Environmental Statement) of planning approval 94/1049/P (TDC/94/065) to extend the waste types specifically to include the disposal of low level radioactive waste.	Major	Section 73 application	24/01/2020	n/a	n/a	Awaiting decision	Port Clarence Landfill Site Huntsman Drive Seal Sands Middlesbrough TS2 1UE
19/2702/FUL	Erection of an above ground 695 metre cubed capacity 10-metre-tall vertical carbon steel storage tank.	Major	Full application	17/12/2019	Approved with Conditions	01/04/2020	Decided	Ineos Nitriles Seal Sands Road Seal Sands TS2 1UB
19/2161/FUL	Erection of new plant, new buildings and extensions to existing buildings. Works to include Warehouse D Extension, Boiler House Structure, Amenities & Workshop Building, Drum Storage Workshop Extension, Amenities extension, 2 no. Warehouse buildings, Contractors cabins, Gate House	Major	Full application	30/09/2019	Approved with Conditions	21/02/2020	Decided	Lianhetech Seal Sands Seal Sands Road Seal Sands TS2 1UB

Planning Statement

Reference	Proposal	Major/ Minor	Application Type	Submission Date	Decision	Decision Date	Status	Site Address
	and Weighbridge, Receivers, Driers, Extension to existing Tank Farm, Tanker Offloading stations, Process and control buildings, Installation of new and replacement cooling towers and industrial apparatus, Pipe Bridge, Swale and the demolition of old plant and buildings.							
19/0860/FUL	Erection of 6 no. Portacabins	Minor	Full application	12/04/2019	Approved with Conditions	07/06/2019	Decided	Subcoal Production TSP Limited Huntsman Drive Seal Sands Middlesbrough TS2 1TT
19/0786/FUL	Erection of 2no. external vent stacks on the eastern façade. Installation of a 5500kW Cochran hot water boiler to the southern facade. Erection of external vent stack to south east. Provision of 2 no. fire suppression water tanks. Addition of two surface water drainage pipes totalling 185m of 0.35m dia pipe connected to the SUDS lagoon to collect run off water from around the northern doors of the MRF.	Minor	Full application	04/04/2019	Approved with Conditions	07/06/2019	Decided	Subcoal Production TSP Limited Huntsman Drive Seal Sands Middlesbrough TS2 1TT
13/0780/NM A	Application for a non material amendment to planning approval 13/0780/EIS - Erection of 49.8MW Renewable Energy Facility employing plasma gasification technology.	Major	Non-Material Amendment	04/03/2019	Approved	07/03/2019	Decided	Reclamation Pond Development Area Huntsman Drive Seal Sands TS2 1TT

Planning Statement

Reference	Proposal	Major/Minor	Application Type	Submission Date	Decision	Decision Date	Status	Site Address
18/2102/ADV	Advertisement consent for 5no flags	Minor	Advertisement	10/09/2018	Approved with Conditions	05/12/2018	Decided	Impetus Waste Management Huntsman Drive Seal Sands Middlesbrough TS2 1TT
18/1967/VARY	Section 73 application to vary condition(s) in relation to application 13/2185/VARY as detailed in application 11/0359/EIS (Conditions 2, 4, and 5)	Major	Section 73 application	23/08/2018	Approved with Conditions	22/11/2018	Decided	Reclamation Pond Huntsman Drive Seal Sands TS2 1TT
18/0218/FUL	Erection of a 20 metre radio mast with concrete base.	Minor	Full application	30/01/2018	Approved with Conditions	29/03/2018	Decided	Ineos Nitriles Seal Sands Road Seal Sands Middlesbrough TS2 1UB
13/2185/NMA	Non material amendment of approval 13/2185/VARY- Application to vary condition 2 (approved plans) of 11/0359/EIS (Erection of 49MW renewable energy facility employing plasma gasification technology with associated process and environmental control infrastructure, materials storage and handling facilities, oxygen production unit, power generation plant, administration and control buildings, and formation of new access points).	Major	Non material amendment	25/01/2018	Approved	12/02/2018	Decided	Reclamation Pond Huntsman Drive Seal Sands
17/2208/SCO	Screening opinion request for the development of a borrow pit for the excavation of materials.	Major	Screening Opinion	24/08/2017	EIA Not Required	21/09/2017	Decided	Land At Greatham Creek East Of Seaton Carew Road (A178) West Of Tees Road

Planning Statement

Reference	Proposal	Major/ Minor	Application Type	Submission Date	Decision	Decision Date	Status	Site Address
								(A178) North Of Greatham Creek
17/1988/DEM	Application for prior notification of proposed demolition of redundant chemical plant structures which make up the aromatics plants at North Tees	Major	Prior Notification for Demolition	26/07/2017	Prior Approval Not Required	21/08/2017	Decided	Sabik U K Petrochemicals North Tees Site Huntsman Drive Port Clarence Stockton On Tees TS2 1TT
01/2203/NM A	Non material amendment to condition no. 5 of planning approval 01/2203/P - Reclamation of 66ha of land and industrial reservoir known as Reclamation Pond (for General Industrial (B2) Uses) and the creation of a wetland habitat (Port Clarence Pool) south of the Petroplus facility, Land at Huntsman Drive (Reclamation Pond), and Seaton Carew Road (Port Clarence Pool), North Tees, Billingham.	Major	Non Material Amendment	16/06/2017	Approved	20/06/2017	Decided	Reclamation Pond (Huntsman Drive) And Port Clarence Pool (Seaton Carew Road) North Tees Billingham
17/1305/FUL	Application for the rerouting of a strong brine pipeline with installation of a new 1.1 km section of 8" piping, along with three shorter sections of strong brine, cooling water and high pressure (HP) airline piping.	Major	Full application	12/05/2017	Approved with Conditions	02/08/2017	Decided	North Tees Site Sabic UK Petrochemicals Seaton Carew Road Port Clarence TS23 4EX

Planning Statement

Reference	Proposal	Major/Minor	Application Type	Submission Date	Decision	Decision Date	Status	Site Address
17/1222/FUL	Construction of a new 3.9km long pipeline corridor containing 2no pipelines above ground at Teesside Oil Terminal and gas processing plant and below ground outside the terminal and ancillary equipment, compressor housing and accumulator.	Minor	Full application	08/05/2017	Approved with Conditions	22/06/2018	Decided	Conoco Phillips Petroleum Company Seal Sands Middlesbrough TS2 1UH
17/0722/SCO	Screening opinion request for the installation of new pipelines in brine fields.	Minor	Screening Opinion	15/03/2017	EIA Not Required	05/04/2017	Decided	Sabic U K Petrochemicals North Tees Site Seaton Carew Road Port Clarence Middlesbrough TS2 1TT
14/1106/NM D	Non material amendment of planning approval 14/1106/EIS - Proposed 45MWe renewable energy plant	Major	Non material amendment	27/01/2017	Approved	20/02/2017	Decided	Land At Clarence Works Port Clarence Road Port Clarence
16/3227/FUL	Erection of single storey pre-fabricated building to provide a toxic refuge, office and locker room and toilet facilities	Minor	Full application	23/12/2016	Approved with Conditions	28/02/2017	Decided	Ineos Nitriles Seal Sands Road Seal Sands Middlesbrough TS2 1UB
16/3001/FUL	Application for the siting of a Portakabin Gatehouse & Entry/Exit Barriers	Minor	Full application	22/11/2016	Approved with Conditions	10/03/2017	Decided	Navigator Inland Terminal Off Huntsman Drive Seal Sands TS2 1TT
16/2651/VARY	Section 73 application to vary condition no 3 (Environmental Impact Statement) of planning approval 14/1106/EIS to omit reference to the feedstock being sourced from a 150 mile radius -	Major	Section 73 application	14/10/2016	Approved with Conditions	10/01/2017	Decided	Land At Clarence Works Off Port Clarence Road Port Clarence

Planning Statement

Reference	Proposal	Major/ Minor	Application Type	Submission Date	Decision	Decision Date	Status	Site Address
	Proposed 45MWe renewable energy plant.							
16/1360/FUL	Application for planning permission to extend the area of storage and screening of solid vitrified aggregate product and for periodic storage of plant and equipment and temporary car parking provision.	Major	Full application	24/05/2016	Approved with Conditions	11/07/2016	Decided	Augean PLC Soil Treatment Centre Seal Sands Middlesbrough TS2 1UE
12/2766/NM A	Non material amendment of planning approval 12/2766/EIS to CHANGE WORDING OF CONDITIONS Condition 10: Dust Management Plan; Condition 14: Surface Water Management, Condition 16 Foul Drainage, Condition 17 Piling Techniques, Condition 23 Cycle Storage Spaces, Condition 26-BREAAM, Condition 27 10% Renewables, Condition 28 Programme of Archaeological Work and 29 Site Waste Management Plan	Minor	Non material amendment	22/03/2016	Approved	11/04/2016	Decided	Land At Seal Sands Billingham
14/1106/NM C	Non material amendment of planning approval 14/1106/EIS - Proposed 45MWe renewable energy plant for revisions to grid connection compound, slight increase in size of compound, relocation of meeting room and provision of new dedicated	Major	Non material amendment	11/03/2016	Approved	05/04/2016	Decided	Slag Processing Plant Port Clarence Road Port Clarence TS2 1SN TS2 1TT

Planning Statement

Reference	Proposal	Major/ Minor	Application Type	Submission Date	Decision	Decision Date	Status	Site Address
	entrance for Northern Powergrid Staff							
16/0321/FUL	Application for the erection of 5no petrochemical storage tanks with a total capacity of 27,830m3 for the storage of hydrocarbons and chemicals.	Major	Full application	05/02/2016	Approved with Conditions	26/04/2016	Decided	Inter Terminals Ltd Seal Sands Road Seal Sands Stockton-On-Tees TS2 1UB
14/1106/NM B	Non material amendment of planning approval 14/1106/EIS - Proposed 45MWe renewable energy plant for single storey extension to workshop and switch room with an increase in width of the admin/secretary building.	Major	Non material amendment	22/12/2015	Approved	12/01/2016	Decided	Land At Clarence Works Off Port Clarence Road Port Clarence
15/2894/SOR	Scoping opinion request for the construction of a new high pressure gas pipeline with compressors between Teesside Oil Terminal at Seal Sands and a gas processing facility located to the west of the CATS terminal.	Major	Scoping Opinion	18/11/2015	Scoping Opinion Issued	15/12/2015	Decided	Conoco Phillips Petroleum Company Seal Sands Middlesbrough TS2 1UH
15/2870/FUL	Erection of a new electrical substation.	Minor	Full application	16/11/2015	Approved with Conditions	17/12/2015	Decided	Greenenergy Huntsman Drive Seal Sands Stockton-On-Tees TS2 1TT

Table B-2 Redcar and Cleveland Applications – Post 1 October 2015

Reference	Proposal	Major/ Minor	Application Type	Submission Date	Decision	Decision Date	Status	Site Address
R/2025/0485/ SCP	EIA Scoping Report - Return Pipeline and Above Ground Installation (AGI)	Major	EIA Scoping	24/07/2025	Scoping response issued	27/08/2025	Decided	Net Zero Teesside Land within the eastern part of the Net Zero Teesside DCO Order Limits
R/2024/0565/ FFM	Extension of the existing substation and the erection of 210m length of 2.5m high metal palisade security fence	Major	Full application	14/08/2024	Approved	n/a	Decided	Tod Point Substation Tod Point Road Redcar
R/2024/0552/ AD	Display of 1no. non illuminated building mounted sign on South elevation	Minor	Advertisement	09/08/2024	Approved	10/10/2024	Decided	TESCO IMPORT CENTRE TEES DOCK ROAD GRANGETOWN MIDDLESBROUGH TS6 6UD
R/2024/0521/ PND	Prior notification for demolition of cooling tower	Minor	Prior notification - demolition	30/07/2024	PN Permission Not Required	27/08/2024	Decided	Land at Lackenby Teesworks
R/2024/0271/ ESM	Construction of an electrolytic low carbon hydrogen production facility, hydrogen export pipeline network, electricity and water connections, including water supply and effluent discharge, above ground installations, construction and laydown areas, and ancillary development	Major	Env Statement Major	22/04/2024	n/a	n/a	Withdrawn 19/09/2025	Land at the Foundry Site (Foundry Central), Teesworks, other land at Teesworks and land in the vicinity of and at Wilton International site and Lackenby

Planning Statement

Reference	Proposal	Major/ Minor	Application Type	Submission Date	Decision	Decision Date	Status	Site Address
R/2024/0121/ NM	Non-material amendment to planning permission R/2021/0409/FFM to amend surfacing treatment (from concrete to asphalt); relocate and reconfigure layby on access road; addition of small 'up and over' platform over existing NWL pipe asset; slightly reconfigure pump compound and amend site levels	Minor	Non-material amendment	20/02/2024	Approved	29/02/2024	Decided	LAND WEST OF NORTHUMBRIAN WATER TREATMENT WORKS TEESDOCK ROAD GRANGETOWN
R/2024/0098/ ESM	Full planning application for port handling facility and overland conveyor, above and below ground infrastructure, internal access roads, car parking, landscaping and supporting utility infrastructure	Major	Env Statement Major	09/02/2024	Approved	06/06/2025	Decided	Land between Wilton International and the River Tees
R/2023/0754/ SCP	SCOPING OPINION FOR A PORT HANDLING FACILITY AND OVERLAND CONVEYOR	Major	EIA Scoping	10/11/2023	Scoping response issued	14/12/2023	Decided	LAND BETWEEN WILTON INTERNATIONAL COMPLEX AND THE RIVER TEES
R/2023/0385/ NM	Non material amendment to planning approval r/2021/0409/ffm engineering works for the installation of a hardstanding platform alongside the levelling, improvement and extension of an existing access road.	n/a	Non-material amendment	23/05/2023	Approved	19/06/2023	Decided	LAND WEST OF NORTHUMBRIAN WATER TREATMENT WORKS TEESDOCK ROAD GRANGETOWN
R/2023/0334/ PND	PRIOR NOTIFICATION FOR DEMOLITION OF FORMER SWITCH ROOM BUILDING	n/a	Prior notification	28/04/2023	PN Permission	25/05/2023	Decided	TEES DOCK ROAD GRANGETOWN

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Reference	Proposal	Major/Minor	Application Type	Submission Date	Decision	Decision Date	Status	Site Address
			- demolition		Not Required			REDCAR AND CLEVELAND
R/2023/0291/ESM	The development involves the construction a 3 line low-carbon lithium refinery and associated dock-side reception, handling, storage, and manufacturing facilities, for the production of high-quality, battery-grade lithium hydroxide monohydrate to enable the planet's green energy transition. The development includes the construction of upto three production lines, with the production capacity of upto 75,000 tonnes per annum. The proposed development area will include an office and warehouse buildings, together with the associated site infrastructure and utility supplies.	Major	Env Statement Major	11/04/2023	Approved	25/07/2023	Decided	LAND OFF KINKERDALE ROAD TEESPORT GRANGETOWN TS6 6UE
R/2023/0300/DCO	CONSULTATION ON PINS REF: EN0700009 - THE PLANNING ACT 2008 (AS AMENDED) THE INFRASTRUCTURE PLANNING (ENVIRONMENT IMPACT ASSESSMENT) REGULATIONS 2017 (THE EIA REGULATIONS) - REGULATION 10 AND 11 APPLICATION BY H2 TEESSIDE LTD FOR AN	n/a	Development Consent Order	22/04/2023	Scoping response issued	04/05/2023	Decided	H2 TEESSIDE DCO PROJECT

Planning Statement

Reference	Proposal	Major/ Minor	Application Type	Submission Date	Decision	Decision Date	Status	Site Address
	ORDER GRANTING DEVELOPMENT CONSENT FOR THE H2 TEESSIDE PROJECT							
R/2023/0179/SCP	SCOPING OPINION FOR HYGREEN HYDROGEN PROJECT	DCO	Scoping opinion	06/03/2023	Scoping response issued	14/04/2023	Decided	LAND AT THE FOUNDRY SITE TEESWORKS AND IN THE VICINITY OF WILTON INTERNATIONAL LACKENBY AND GRANGETOWN NEAR REDCAR
R/2022/0675/SCP	SCOPING OPINION FOR A LITHIUM REFINING PLANT	Major	Scoping opinion	15/08/2022	Scoping response issued	21/09/2022	Decided	PD PORTS CONTAINER TERMINAL KINKERDALE ROAD GRANGETOWN MIDDLESBROUGH TS6 6UD
R/2022/0205/SC	SCREENING OPINION FOR DEMOLITION OF A JETTY AND ASSOCIATED BUILDINGS	Major	Screening opinion	04/03/2022	EIA not required	10/05/2022	Decided	BRAN SANDS JETTY DABHOLME GUT TEESPORT
R/2022/0050/FFM	ALTERATIONS TO EXISTING OFFICE BUILDING, CAR PARKING AND LANDSCAPING	Major	Major Application	24/01/2022	Approved	22/06/2022	Decided	STEEL HOUSE TRUNK ROAD REDCAR TS10 5QW
R/2022/0002/FFM	ENGINEERING WORKS FOR THE INSTALLATION OF UP TO 28 CONVEYOR FOOTINGS ALONG PART OF THE CONVEYOR ROUTE PREVIOUSLY APPROVED UNDER PLANNING	Major	Major Application	04/01/2022	Approved	25/04/2023	Decided	LAND BETWEEN THE A1085 AND THE NORTHUMBRIAN WATER TREATMENT

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Reference	Proposal	Major/ Minor	Applicatio n Type	Submission Date	Decision	Decision Date	Status	Site Address
	PERMISSION R/2017/0906/OOM							WORKS AT BRAN SANDS
R/2021/0809/ LAC	APPLICATION FOR PD RIGHTS UNDER SECTION 77 OF THE HABITATS REGULATIONS	Major	Local Authority Consultati on	21/09/2021	Awaiting determinati on	n/a	Decided	RIVERSIDE RO-RO FACILITY TEES ESTUARY SOUTHERN BANK TEES DOCK
R/2021/0409/ FFM	ENGINEERING WORKS FOR THE INSTALLATION OF A HARDSTANDING PLATFORM ALONGSIDE THE LEVELLING, IMPROVEMENT AND EXTENSION OF AN EXISTING ACCESS ROAD	Major	Major Application	18/05/2021	Approved	07/09/2022	Decided	LAND WEST OF NORTHUMBRIAN WATER TREATMENT WORKS TEESDOCK ROAD GRANGETOWN
R/2021/0323/ SC	SCREENING OPINION ON THE UPGRADING OF THE RIVERSIDE RO-RO FACILITY	Major	Screening opinion	15/04/2021	EIA not required	01/06/2021	Decided	RIVERSI DE RO-RO TEESPORT TEES DOCK
R/2020/0823/ ESM	OUTLINE PLANNING APPLICATION FOR THE DEVELOPMENT OF UP TO 15,794SQM (GROSS) OF OFFICE ACCOMMODATION (USE CLASS E) AND CAR PARKING AND ASSOCIATED INFRASTRUCTURE WORKS (ALL MATTERS RESERVED)	Major	Env Statement Major	22/12/2020	n/a	n/a	Awaiting determi nation	LAND BOUNDED BY A1085 TRUNK ROAD TO SOUTH EAST AND ROUNDAABOUT PROVIDING ACCESS TO LOCAL ROAD NETWORK; PRIVATE ACCESS TRACK TO EAST; INTERNAL ROADS TO WEST AND DARLINGTON TO SALTBURN RAILWAY TO

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Reference	Proposal	Major/ Minor	Application Type	Submission Date	Decision	Decision Date	Status	Site Address
								NORTH WEST REDCAR
R/2020/0710/FF	ALTERATIONS TO SITE ACCESS ARRANGEMENTS	Minor	Full	25/11/2020	Approved	20/01/2021	Decided	ASDA IMPORT CENTRE TEES DOCK ROAD GRANGETOWN MIDDLESBROUGH TS6 6UD
R/2020/0598/FF	RETROSPECTIVE DEMOLITION OF EXISTING GATEHOUSE; REDEVELOPMENT OF SITE TO PROVIDE NEW SINGLE STOREY GATEHOUSE WITH ASSOCIATED CAR PARKING AND LANDSCAPING	Major	Full	21/10/2020	Approved	18/12/2020	Decided	FORMER STEEL HOUSE GATEWAY REDCAR GATE OFF A1085 TRUNK ROAD REDCAR
R/2020/0599/AD	DISPLAY OF INTERNALLY ILLUMINATED LED DISPLAY SCREEN MOUNTED ON RAILBRIDGE TO REPLACE EXISTING SIGNAGE	Minor	Advertisement	21/10/2020	Approved	18/12/2020	Decided	FORMER STEEL HOUSE GATEWAY REDCAR GATE OFF A1085 TRUNK ROAD REDCAR
R/2019/0427/FFM	DEMOLITION OF STRUCTURES AND ENGINEERING OPERATIONS ASSOCIATED WITH GROUND PREPARATION AND TEMPORARY STORAGE OF SOILS AND ITS FINAL USE IN THE REMEDIATION AND PREPARATION OF LAND FOR REGENERATION AND DEVELOPMENT	Major	Major Application	01/07/2019	Approved	27/09/2019	Decided	LAND AT FORMER SOUTH BANK WORKS; GRANGETOWN PRAIRIE; BRITISH STEEL AND WARRENBY AREA

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Reference	Proposal	Major/Minor	Application Type	Submission Date	Decision	Decision Date	Status	Site Address
R/2023/0820/ESM	HAZARDOUS WASTE TO ENERGY PROCESS PLANT	Major	Env Statement Major	01/12/2023	Refused	24/01/2025	Appeal Allowed	WILTON WASTE TREATMENT PLANT BOUNDARY ROAD WEST WILTON INTERNATIONAL MIDDLESBROUGH
R/2019/0124/DCO	APPLICATION FOR AN ORDER GRANTING DEVELOPMENT CONSENT FOR THE TEESSIDE CLUSTER CARBON CAPTURE & USAGE PROJECT	n/a	Development Consent Order	22/02/2019	Response sent	20/03/2019	Decided	LAND AT THE FORMER SSI SITE FOR GENERATING STATION (MAIN SITE) INCLUDING ASSOCIATED GAS, ELECTRICAL, WATER, CO ₂ AND TRANSPORT CONNECTION CORRIDORS
R/2018/0499/SC	SCREENING OPINION FOR INSTALLATION OF 2 WIND TURBINES (145M MAXIMUM TIP HEIGHT)	Major	Screening opinion	13/08/2018	Response sent	02/10/2018	Decided	TESCO IMPORT CENTRE TEES DOCK ROAD GRANGETOWN TS6 6UD
R/2018/0374/NM	NON MATERIAL AMENDMENT TO PLANNING PERMISSION R/2014/0818/FFM FOR ERECTION OF A NEW PIPE BRIDGE BUILT ADJACENT TO THE EXISTING PIPE CORRIDOR TO ACCOMMODATE NEW ETHANE PIPE	Major	Non-material amendment	21/06/2018	Approved	03/07/2018	Decided	WILTON CENTRE, SABIC UK PETROCHEMICALS LTD WILTON SITE LAZENBY
R/2017/0906/OOM	OUTLINE PLANNING APPLICATION FOR AN OVERHEAD CONVEYOR AND	Major	Outline Application Major	21/12/2017	Approved	30/04/2018	Decided	LAND BETWEEN WILTON INTERNATIONAL

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Reference	Proposal	Major/ Minor	Application Type	Submission Date	Decision	Decision Date	Status	Site Address
	ASSOCIATED STORAGE FACILITIES IN CONNECTION WITH THE YORK POTASH PROJECT							AND BRAN SANDS REDCAR
R/2017/0770/LAC	SCOPING OPINION UNDER THE MARINE WORKS REGULATIONS 2007	Major	Local Authority Consultation	30/10/2017	No Comment	06/11/2017	Decided	TEESPORT HARBOUR
R/2017/0760/SCP	SCOPING OPINION FOR PROPOSED CONVEYOR AND STORAGE BUILDINGS	Major	Scoping Opinion	23/10/2017	Scoping response sent	28/11/2017	Decided	SIRIUS MINERALS TEESSIDE REDCAR
R/2017/0087/FFM	USE OF VACANT LAND AS A TEMPORARY FACILITIES AREA AND ASSOCIATED ENGINEERING WORK TO ALLOW PHASED CONSTRUCTION OF THE TEESREP BIOMASS FUELLED GENERATING STATION	Major	Major Application	07/02/2017	Approved	22/08/2017	Decided	LAND OFF TEES DOCK ROAD TEESPORT GRANGETOWN
R/2016/0215/HD	HAZARDOUS SUBSTANCES CONSENT FOR THE STORAGE OF 24 MAXIMUM TONNES OF LIQUEFIED NATURAL GAS (LNG) IN A NON MOVEABLE VESSEL	n/a	Hazardous Substances	01/04/2016	Approved	15/11/2016	Decided	BOC LTD TEES DOCK ROAD GRANGETOWN TS6 7RT
R/2016/0206/SC	SCREENING OPINION FOR USE OF DISUSED IMPORTATION JETTY	Major	Screening opinion	24/03/2016	Insufficient Information	05/04/2016	Decided	TEESPORT GAS JETTY TEESPORT
R/2015/0728/FF	INSTALLATION OF BIOMETHANE INJECTION PLANT (BIP) AND BIOMETHANE UPGRADE PLANT (BUP), PROPANE	Minor	Full	25/11/2015	Approved	26/02/2016	Decided	BRAN SANDS SEWAGE TREATMENT WORKS TEES

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Reference	Proposal	Major/ Minor	Application Type	Submission Date	Decision	Decision Date	Status	Site Address
	STORAGE & TRANSFER PLANT (PSTP) GRID ENTRY UNIT (GEU) AND ASSOCIATED PIPEWORK INFRASTRUCTURE AND SERVICES							DOCK ROAD GRANGETOWN
R/2015/0633/SC	SCREENING OPINION FOR UNDERGROUND ELECTRICITY CABLE AND ASSOCIATED FIBRE OPTIC CABLES IN RELATION TO THE DEVELOPMENT OF A BIOMASS POWER STATION	Major	Screening opinion	09/10/2015	EIA not required	29/10/2015	Decided	TEES DOCK, LACKENBY AND GRANGETOWN
R/2015/0634/CL	CERTIFICATE OF LAWFUL DEVELOPMENT FOR A PROPOSED UNDERGROUND ELECTRICITY CABLE	n/a	Certificate of Lawfulness	09/10/2015	Approved	29/10/2015	Decided	TEES DOCK - LACKENBY, GRANGETOWN
R/2015/0628/NM	NON-MATERIAL AMENDMENT TO PLANNING PERMISSION R/2012/0764/RMM TO AMEND CONDITION 2 TO ALLOW THE APPROVAL OF HARD SURFACE MATERIALS ON A PHASE BY PHASE BASIS	Major	Non-material amendment	05/10/2015	Approved	29/10/2015	Decided	CONTAINER TERMINAL TEESPORT GRANGETOWN

Table B-3 NSIP Applications - All

Reference	Proposal	Submission Date	Decision	Decision Date	Status	Site Address
EN010150	Lighthouse Green Fuels Project (Withdrawn) - a 'waste-to-sustainable aviation fuel' facility with on-site generating	N/A	N/A	N/A	Withdrawn 16/09/2025	Huntsmans Drive, Port Clarence, Stockton-on-Tees, TS2 1TT

Reference	Proposal	Submission Date	Decision	Decision Date	Status	Site Address
	station capacity of up to 150 MW and associated works.					
EN010103	Net Zero Teesside Project (NZN) – A full chain CCUS project, comprising a CO ₂ gathering network, including CO ₂ pipeline connections from industrial facilities on Teesside to transport the captured CO ₂ (including the connections under the tidal River Tees); a combined cycle gas turbine ('CCGT') electricity generating station with an abated capacity up to circa 860 MW of low carbon electricity, cooling water, gas and electricity grid connections and CO ₂ capture; a CO ₂ gathering/booster station to receive the captured CO ₂ from the gathering network and CCGT generating station; and the onshore section of a CO ₂ transport pipeline for the onward transport of the captured CO ₂ to a suitable offshore geological storage site in the North Sea.	16/08/2021	Granted	16/02/2024	Decided	Land at and in the vicinity of Teesworks, Redcar, Teesside, TS10 5QW
EN070009	H2T - A hydrogen production plant of up to 1,200 megawatt thermal capacity; hydrogen distribution pipelines; an air separation unit or oxygen supply pipeline; carbon dioxide capture and compression facilities and a connection NEP and other associated and ancillary infrastructure.	22/04/2024	N/A	N/A	Withdrawn 01/12/2025	Land within the boroughs of Redcar and Cleveland and Stockton-on-Tees and Hartlepool
EN0710005	H2NorthEast - carbon capture and storage enabled blue hydrogen production facility and associated works.	N/A	N/A	N/A	Pre-Application	The project is to be located on Seal Sands, within the administrative boundary of Stockton Borough Council and Redcar and Cleveland

Reference	Proposal	Submission Date	Decision	Decision Date	Status	Site Address
						Borough Council. The proposed hydrogen distribution pipeline will link from the Hydrogen Production Facility to Cowpen Bewley to the west (approximately 7km in length) and Wilton to the east (approximately 10km in length). The total length of the three customer spur pipelines is around 2.6km.
TR030002	York Potash Harbour Facilities Order - The installation of wharf/jetty facilities with two ship loaders capable of loading bulk dry material at a rate of 12m tons per annum (dry weight). Associated dredging operations to create berth. Associated storage building with conveyor to wharf/jetty. Including a materials handling facility (if not located at Wilton) served by a pipeline (the subject of a separate application) and conveyor to storage building and jetty.	27/03/2015	Granted	20/07/2016	Decided	Bran Sand, Teesport

Table B-4 Relevant STBC Applications – Pre 1 October 2015

Reference	Proposal	Application Type	Submission Date	Decision	Decision Date	Status	Site Address
15/2187/FUL	Proposed installation of a Gaseous Oxygen (GOX) Pipeline associated with Tees	Full	03/09/2015	Approved	29/10/2015	Decided	Air Products PLC Huntsman Drive Seal Sands Middlesbrough TS2 1TT

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Reference	Proposal	Application Type	Submission Date	Decision	Decision Date	Status	Site Address
	Valley 2 (TV2) Renewable Energy Facility (REF)						
15/0943/FUL	Proposed addition of an ethane pipeline to an existing pipe corridor. The pipeline will run from new storage facilities at the SABIC North Tees site, northeastwards along an existing pipe corridor through industrial land, before entering the Sembcorp Utilities No. 2 tunnel under the River Tees.	Full	20/04/2015	Approved	06/06/2015	Decided	North Tees Site Sabic U K Petrochemicals Seaton Carew Road Port Clarence Stockton-On-Tees TS2 1TT
14/2672/FUL	Erection of 9 petrochemical storage tanks with a total capacity of 35,828m3 for the storage of hydrocarbons and chemicals	Full	08/10/2014	Approved	14/01/2015	Decided	Simon Storage Ltd Seal Sands Middlesbrough TS2 1UB
14/2520/FUL	Proposed 4 inch carbon steel pipeline connecting Seal Sands Terminal to Harvest Energy Ltd. Pipework will run in the established pipe corridor.	Full	19/09/2014	Approved	05/12/2014	Decided	Simon Storage Ltd Seal Sands Middlesbrough TS2 1UB
13/1414/FUL	Application for geological test borehole and associated plant, infrastructure, equipment, laydown areas and contractor welfare facilities.	Full	13/06/2013	Approved	08/08/2013	Decided	Ineos Nitriles Seal Sands Road Seal Sands Middlesbrough TS2 1TX
12/2976/FUL	Erection of pre-fabricated single storey building of steel construction to provide a toxic refuge, office and locker room and toilet facilities	Full	24/12/2012	Approved	02/04/2013	Decided	Ineos Nitriles Seal Sands Link Road Billingham

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Reference	Proposal	Application Type	Submission Date	Decision	Decision Date	Status	Site Address
12/2843/FUL	Revised application for utilities infrastructure associated with the Renewable Energy Facility (Application Ref. 11/0359/EIS) and Industrial Gases Facility (Application Ref. 12/1828/FUL) along the north bank of the River Tees. Application relates to the re-alignment of a previously permitted scheme (Application Ref. 12/1681/FUL)	Full	03/12/2012	Approved	22/01/2013	Decided	Land Adjacent To Reclamation Pond Within The North Tees Services Corridor
11/1766/FUL	Construction of rail link from existing Seal Sands branch line, into Vopak Terminal Teesside site, and construction of sidings, to facilitate the loading of petrol and diesel	Full	12/07/2011	Approved	06/10/2011	Decided	Vopak Terminal Teesside Limited Seaton Carew Road Port Clarence Middlesbrough TS2 1UA
11/1172/FUL	Application for installation of pre fabricated steel building as a gate house	Full	13/05/2011	Approved	20/07/2011	Decided	Ineos Nitriles UK Ltd Seal Sands Middlesbrough TS2 1TX
11/0943/FUL	Construction of approximately 580 metres of a 20 inch natural gas pipeline and a 3 inch monoethylene glycol pipeline as shown in drawing 795570/P/012. This change is due to a revision of the previous permitted route which received planning permission on 2nd June 2010 ref no:10/0410/EIS	Full	20/04/2011	Approved	21/06/2011	Decided	Land South Of Simon Storage/ Pipe Corridor Seal Sands Stockton On Tees
09/3057/FUL	Erection of an advanced bioethanol production plant and refinery (phase A)	Full	18/12/2009	Approved	18/03/2010	Decided	INEOS Nitrile Seaton Carew Road Port Clarence Middlesbrough TS2 1TX

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Reference	Proposal	Application Type	Submission Date	Decision	Decision Date	Status	Site Address
08/0630/FUL	Erection of steel pipeline to carry bio-ethanol	Full	12/03/2008	Approved	04/06/2008	Decided	Seal Sands Storage Limited Seaton Carew Road Port Clarence Middlesbrough TS2 1UB
07/2126/FUL	Application under Section 36 of the Electricity Act 1989 for consent to construct a 800MW combined heat and power plant	Electricity Act 1989	13/07/2007	Approved	22/04/2009	Decided	Norsea Pipelines Limited Teesside Operations Seal Sands Middlesbrough TS2 1UH
07/2120/FUL	Installation of buried gas pipeline to export natural gas to the national transmission system and supply the proposed combined heat and power plant	Full	12/07/2007	Approved	07/08/2008	Decided	Norsea Pipelines Limited Teesside Operations Seal Sands Middlesbrough TS2 1UH
07/0585/FUL	Single storey switch room extension to side of workshop	Full	20/02/2007	Approved	27/04/2007	Decided	B A S F Co Hertel Seaton Carew Road Port Clarence Middlesbrough TS2 1TX
06/1281/FUL	Erection of additional bulk chemical storage tanks	Full	25/04/2006	Approved	17/10/2006	Decided	Seal Sands Storage Limited Seal Sands Road Port Clarence Middlesbrough TS2 1UB
06/0293/FUL	Erection of new single storey gatehouse	Full	31/01/2006	Approved	24/03/2006	Decided	Dow Chemicals Co Ltd Seal Sands Middlesbrough TS2 1DY
06/0069/FUL	Erection of new compressor house	Full	09/01/2006	Approved	03/03/2006	Decided	Dow Chemicals Seal Sands Road TS2 1UD
05/3205/FUL	Retrospective permission for the erection of sub contractor portacabin	Full	16/11/2005	Approved	21/12/2005	Decided	B A S F Seaton Carew Road Port Clarence Middlesbrough TS2 1TX
03/0540/P	CONSTRUCTION OF A SODIUM AMIDE STORE	Full	06/03/2003	Approved	30/04/2003	Decided	Seal Sands Chemicals Seal Sands

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Reference	Proposal	Application Type	Submission Date	Decision	Decision Date	Status	Site Address
02/1527/P	ERECTION OF 25 M HIGH STEEL TELECOMMUNICATIONS MONOPOLE TO ACCOMODATE 3 NO. 4 STACK ANTENNAE AND ASSOCIATED RADIO EQUIPMENT CABIN LOCATED AT GROUND LEVEL	Full	23/07/2002	Approved	23/07/2002	Decided	Basf Seal Sands Billingham
01/1736/P	ERECTION OF OFF-GAS OXIDATION PLANT TO REDUCE SITE VOC EMISSIONS	Full	27/09/2001	Approved	26/11/2001	Decided	Basf Seal Sands Billingham
01/0457/P	INSTALLATION OF NEW HIGH PURITY WATER TREATMENT PLANT AND ASSOCIATED PIPEWORKS	Full	20/03/2001	Approved	18/06/2001	Decided	Huntsman Petrochemicals Aromatic 1 Complex North Tees Works Port Clarence Billingham
00/1950/P	EXTENSION TO EXISTING PRODUCT TREATMENT FACILITY	Full	01/12/2000	Approved	06/02/2001	Decided	Basf Seal Sands
00/1951/P	CONSTRUCTION OF STORAGE FACILITY FOR HYDROGEN CYANIDE AND MANUFACTURING FACILITY FOR ACETONE CYANOHYDRIN INCLUDING FEED AND PRODUCT PIPELINES	Full	01/12/2000	Approved	24/01/2001	Decided	Basf (Block C17) Seal Sands
00/1788/P	TRAINING SCHOOL PROVISION OF NEW ENTRANCE CANOPY AND EXTERNAL ALTERATIONS TO PROVIDE VISITORS RECEPTION SUITE,	Full	01/11/2000	Approved	13/12/2000	Decided	B A S F Seaton Carew Road Port Clarence Middlesbrough TS2 1TX

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Reference	Proposal	Application Type	Submission Date	Decision	Decision Date	Status	Site Address
	CONFERENCING CENTRE AND						
00/1726/P	EXTENSION TO EXISTING CAR PARK TO PROVIDE AN ADDITIONAL 180 CAR PARKING SPACES	Full	19/10/2000	Approved	11/12/2000	Decided	Basf Seal Sands Billingham
00/1608/P	ERECTION OF A STORAGE BUILDING	Full	27/09/2000	Approved	20/11/2000	Decided	Aromatics Complex North Tees Site Port Clarence
00/1605/P	CONSTRUCTION OF 6NO. STORAGE VESSELS WITH BUND & PUMP SLAB	Full	27/09/2000	Approved	20/11/2000	Decided	Vopak Terminal Teesside Ltd Formerly Tees Storage Seal Sands
00/1269/P	ERECTION OF TEMPORARY OFFICE ACCOMMODATION	Full	31/07/2000	Approved	02/10/2000	Decided	Dow Chemicals Seal Sands Billingham
00/0776/P	RETROSPECTIVE APPLICATION FOR TEMPORARY OFFICE ACCOMMODATION	Full	10/05/2000	Approved	05/07/2000	Decided	Basf Seal Sands
00/0740/P	CONSTRUCTION OF EFFLUENT TRANSFER PIPELINE	Full	04/05/2000	Approved	02/06/2000	Decided	Conoco Phillips Petroleum Company North / South Access Road Seal Sands Middlesbrough TS2 1UH
99/0997/P	CONSTRUCTION OF NEW CHEMICAL PLANT TO CONVERT EXISTING BY-PRODUCT INTO SYNTHETIC FUEL GAS	Full	28/06/1999	Approved	08/09/1999	Decided	Basf Seal Sands Billingham

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Reference	Proposal	Application Type	Submission Date	Decision	Decision Date	Status	Site Address
99/0612/P	ERECTION OF 4NO TEMPORARY TRAINING BUILDINGS	Full	26/04/1999	Approved	08/07/1999	Decided	Basf Seal Sands Billingham
98/1297/P	CONSTRUCTION OF A NEW CHEMICAL PLANT TO PURIFY CRUDE ACETONITRILE	Full	07/08/1998	Approved	30/09/1998	Decided	Basf Seal Sands
98/0446/P	ERECTION OF SINGLE STOREY OFFICE ACCOMMODATION	Full	12/03/1998	Approved	05/05/1998	Decided	Basf Seal Sands
97/2165/P	EXTENSION TO EXISTING UTILITIES CONTROL ROOM	Full	17/12/1997	Approved	28/01/1998	Decided	Basf Plc Seal Sands
97/1960/P	INSTALLATION OF GAS PIPELINE BETWEEN BRITISH GAS TRANSCO COMPOUND AT AMOCO CATS SITE AND PHILLIPS PETROLEUM SITE	Full	07/11/1997	Approved	10/12/1997	Decided	Conoco Phillips Petroleum Company North / South Access Road Seal Sands Middlesbrough TS2 1UH
97/1785/P	EXTENSION TO EXISTING OFFICE BUILDING	Full	08/10/1997	Approved	04/12/1997	Decided	Basf Seal Sands
97/1433/P	CONSTRUCTION OF 2NO 5654 CUBIC METRES STORAGE TANKS FOR THE RECEIPT AND DISTRIBUTION OF LOW FLASH HYDRO CARBONS/CHEMICALS	Full	11/08/1997	Approved	03/10/1997	Decided	Seal Sands Storage Ltd Seal Sand Billingham
97/0693/P	SITING OF PORTABLE TOILET UNIT	Full	21/04/1997	Approved	04/06/1997	Decided	Basf Seal Sands

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Reference	Proposal	Application Type	Submission Date	Decision	Decision Date	Status	Site Address
96/2077/P	ERECTION OF ADDITIONAL STORAGE FACILITIES FOR SODIUM CYANIDE SODIUM HYDROXIDE AND CHELATES.	Full	18/12/1996	Approved	07/02/1997	Decided	Hampshire Chemical Ltd Seal Sands Middlesbrough TS2 1U
96/1091/P	ERECTION OF SINGLE EXTENSION TO AMENITY BUILDING	Full	01/07/1996	Approved	14/08/1996	Decided	Basf Seal Sands
96/0988/P	ERECTION OF SATELLITE ANTENNA	Full	13/06/1996	Approved	26/07/1996	Decided	Basf Seal Sands Billingham
96/0981/P	ERECTION OF NEW PROCESS BUILDING AND TANK FARM AND EXTENSION TO EXISTING MCC BUILDING	Full	12/06/1996	Approved	02/08/1996	Decided	Hampshire Chemicals Seal Sands Billingham
96/0818/P	ERECTION OF PORCH TO EXISTING LINK CORRIDOR	Full	20/05/1996	Approved	14/06/1996	Decided	Hampshire Chemicals Seal Sands Billingham
95/1714/P	ERECTION OF A CHEMICAL PROCESS PLANT FOR THE PRODUCTION, DRYING AND PACKAGING OF SODIUM PROPIONATE	Full	12/10/1995	Approved	15/12/1995	Decided	Block C200 B.A.S.F Plc Seal Sands
95/1147/P	ERECTION OF 50 TONNE VESSEL, ASSOCIATED PLATFORMS/HOUSING AND COOLING TOWER	Full	30/06/1995	Approved	01/09/1995	Decided	Hampshire Chemicals Limited Seal Sands
92/1500/P	ERECTION OF SINGLE STOREY EXTENSION TO BPH OPERATIONS CENTRE	Full	29/07/1992	Approved	02/10/1992	Decided	Basf, Seal Sands, PO Box 62, Middlesbrough
92/0682/P	INSTALLATION OF PIPELINE IN RIVER TEES TUNNEL	Full	14/04/1992	Approved	30/06/1992	Decided	Land Between Ici Wilton And Tees Storage, Seal Sands

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Reference	Proposal	Application Type	Submission Date	Decision	Decision Date	Status	Site Address
92/0284/P	CONSTRUCTION OF ACCESS ROAD	Full	14/02/1992	Approved	06/03/1992	Decided	Seal Sands
91/1749/P	CONSTRUCTION OF ACCESS ROAD	Full	27/08/1991	Approved	15/11/1991	Decided	Seal Sands, Middlesbrough
91/1651/P	ERECTION OF LPG STORAGE TANKS AND PIPELINE TO EXISTING JETTY	Full	08/08/1991	Approved	11/10/1991	Decided	Seal Sands Storage, Seal Sands
91/0572/P	EXTENSION TO BY-PRODUCTS HANDLING CONTROL BUILDING	Full	03/04/1991	Approved	24/05/1991	Decided	Basf, Seal Sands, Middlesbrough
91/0183/P	EXTENSION TO OFFICES	Full	01/02/1991	Approved	08/03/1991	Decided	W.R.Grace, Seal Sands, Middlesbrough
91/0097/P	CREATION OF ADDITIONAL CAR PARK	Full	21/01/1991	Approved	15/02/1991	Decided	Basf Site, Seal Sands
90/2628/P	GAS TERMINAL FACILITY	Full	06/12/1990	Approved	08/01/1991	Decided	Seal Sands Middlesbrough Cleveland
90/2490/P	CONSTRUCTION OF A PIPELINE	Full	14/11/1990	Approved	25/01/1991	Decided	Between Billingham/Wilton
90/1858/P	INSTALLATION OF FIRE WATER STORAGE TANKS AND EFFLUENT TREATMENT PLANT	Full	06/08/1990	Approved	21/09/1990	Decided	W.R.Grace, Seal Sands
90/1711/P	EXTENSION TO EXISTING OFFICE BLOCK	Full	18/07/1990	Approved	31/08/1990	Decided	W.R.Grace, Seal Sands

Reference	Proposal	Application Type	Submission Date	Decision	Decision Date	Status	Site Address
90/1424/P	ALTERATIONS TO ENTRANCE FOYER	Full	31/05/1990	Approved	20/07/1990	Decided	Basf, Seal Sands, Middlesbrough, Cleveland

Table B-5 Relevant RCBC Applications - Pre 1 October 2015

Reference	Proposal	Application Type	Submission Date	Decision	Decision Date	Status	Site Address
R/2007/1135/FFM	ERECTION OF AN IMPORT CENTRE AND ASSOCIATED FACILITIES, GROUND WORKS AND LANDSCAPING	Full	19/11/2007	Approved	20/03/2008	Decided	PROJECT SUN LAND TO THE EAST OF D ROAD TEESPORT TS6 6UE
R/2004/1456/FF	ERECTION OF A CONFERENCE CENTRE	Full	25/11/2004	Approved	28/02/2005	Decided	B O C LTD, TEES DOCK ROAD, GRANGETOWN, TS6 7RT
R/2004/1048/FF	ERECTION OF ANAEROBIC TREATMENT PLANT TO ACCOMMODATE NEW WASTE STREAM	Full	01/09/2004	Approved	15/11/2004	Decided	BRANSANDS RSTC AND ETW, TEES DOCK ROAD, REDCAR, TS6 6UE
R/2001/0516/FF	PROVISION OF AN ULTRA-VIOLET DISINFECTION PROCESS PLANT	Full	03/07/2001	Approved	11/09/2001	Decided	BRAN SANDS, TEES DOCK ROAD, SOUTH BANK, TS6 6UE
R/2000/0302/FF	CONSTRUCTION, INSTALLATION AND USE OF 100MM NOMINAL BORE PIPELINE TO CONVEY ARGON	Full	05/05/2000	Approved	06/06/2000	Decided	LAND AT, TEES DOCK ROAD, TEESPORT, GRANGETOWN

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Reference	Proposal	Application Type	Submission Date	Decision	Decision Date	Status	Site Address
R/2000/0301/FF	CONSTRUCTION OF A NEW PIPELINE FOR TRANSFER OF EFFLUENT	Full	04/05/2000	Approved	11/07/2000	Decided	FROM SEAL SANDS TO, BRAN SANDS TREATMENT WORKS, REDCAR
R/1999/0676/FF	ERECTION OF SEWAGE PUMPING STATION INCLUDING ABOVE GROUND BUILDING AND ASSOCIATED CONTRACTORS COMPOUND	Full	28/09/1999	Approved	12/11/1999	Decided	LAND ADJACENT TO, BRAN SANDS EFFLUENT T W, AND B O C, REDCAR
R/1999/0217/FF	CONSTRUCTION, INSTALLATION AND USE OF 2 NO. 250MM NB PIPELINES TO CONVEY GASEOUS OXYGEN AND NITROGEN SEPARATELY	Full	25/03/1999	Approved	17/05/1999	Decided	LAND AT TEES DOCK, TEESPORT AND UNDER RIVER TEES, TEESSIDE.,
R/1998/0535/FF	USE OF LAND AS CONSTRUCTION DEPOT INCLUDING STORAGE/RECYCLING OF EXCAVATED MATERIALS	Full	17/08/1998	Approved	15/10/1998	Decided	TEES OFFSHORE BASE, DOCKSIDE ROAD, SOUTH BANK.
R/1998/0395/FF	INSTALLATION OF SOUTH BANK COKE OVENS MAIN (AMENDED SCHEME)	Full	03/07/1998	Approved	17/08/1998	Decided	TEES DOCK ROAD, SOUTH OF THE BRAN SANDS ACCESS ROAD, GRANGETOWN.

Table B-6 STBC Hazardous Substances Consent applications - Pre 1 October 2015

Reference	Proposal	Application Type	Submission Date	Decision	Decision Date	Status	Site Address
14/2678/VHC	Vary existing Hazardous Substance Consent to include for the storage of 30,000 tonnes of extremely flammable substances	Variation of Hazardous Substance Consent	08/10/2014	Approved	08/10/2014	Decided	Vopak Terminal Teesside Limited Seal Sands Road Seal Sands Middlesbrough TS2 1UA
13/1231/VHC	Application to vary planning approval - 12/2074/HAZ - Hazard Substance Consent to store liquid oxygen in bulk tanks, and oxygen and hydrogen in mobile trailers to allow change in orientation of LOX tanks	Variation of Hazardous Substance Consent	22/05/2013	Approved	19/07/2013	Decided	Land Of Huntsman Drive Billingham TS2 1SD
12/2074/HAZ	Hazardous Substance Consent to store liquid oxygen in bulk tanks, and oxygen and hydrogen in mobile trailers	Hazardous Substance Consent	29/08/2012	Approved	14/01/2013	Decided	Tees Valley Energy from Waste Site 2 Huntsman Drive Seal Sands Middlesbrough TS2 1UE
09/1238/VHC	Variation of Hazardous Substance Consent to increase the amount of Substances Dangerous for the Environment stored from the current limit of 20,000 tonnes to 100,000 tonnes	Variation of Hazardous Substance Consent	26/05/2009	Approved	11/11/2009	Decided	Vopak Terminal Teesside Limited Seaton Carew Road Port Clarence Middlesbrough TS2 1UA
09/1239/HAZ	Hazardous Substance Consent to store up to 100,000 tonnes of automotive petrol and other petroleum spirits as defined under part A32 of Schedule 1 of the Planning (Hazardous Substances) Regulations 1992	Hazardous Substance Consent	26/05/2009	Approved	26/11/2009	Decided	Vopak Terminal Teesside Limited Seaton Carew Road Port Clarence Middlesbrough TS2 1UA
07/2281/HAZ	Hazardous substance consent for the storage and use of fuel oil	Hazardous Substances Consent	27/07/2007	Approved	08/08/2008	Decided	ConocoPhillips Petroleum Company Seal Sands Middlesbrough TS2 1UH

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Reference	Proposal	Application Type	Submission Date	Decision	Decision Date	Status	Site Address
	in a combined heat and power plant						
07/1086/HAZ	Variation of Hazardous Substances Consent to increase the current storage of methanol from 25,000 tonnes to 50,000 tonnes	Hazardous Substances Consent	10/04/2007	Approved	30/07/2007	Decided	Vopak Terminal Teesside Limited Seaton Carew Road Port Clarence Middlesbrough TS2 1UA
05/0605/HAZ	Variation of Hazardous Substance Consent to include the storage of substances below the qualifying quantities and category 10 ii substances used in a new product application.	Hazardous Substances Consent	25/02/2005	Approved	07/06/2005	Decided	Dow Chemical Co. Ltd Seal Sands Middlesbrough
03/1098/H	VARIATION OF HAZARDOUS SUBSTANCE CONSENT FOR THE CONTINUATION USE FOR ACQUIRED INVENTORIES OF HYDROGEN, LGP, FLAMMABLE GASES AND LIQUIDS	Variation of Hazardous Substance Consent	30/02/2003	Approved	02/07/2003	Decided	Huntsman Petrochemicals (UK) Limited North Tees Site Huntsman Drive Port Clarence
01/0138/H	HAZARDOUS SUBSTANCE CONSENT APPLICATION FOR THE STORAGE OF ACETONE CYNOHYDRIN	Hazardous Substances Consent	26/01/2001	Approved	01/06/2001	Decided	Basf Seal Sands
01/0126/H	HAZARDOUS SUBSTANCE CONSENT FOR THE STORAGE OF ACETONE CYANOHYDRIN	Hazardous Substances Consent	24/01/2001	Approved	13/07/2001	Decided	Vopak Seal Sands Billingham
99/1652/H	DEEMED HAZARDOUS SUBSTANCE CONSENT FOR THE CONTINUED STORAGE OF VARIOUS HAZARDOUS SUBSTANCES	Deemed Hazardous Substance Consent	20/10/1999	Approved	02/11/1999	Decided	Basf Seal Sands Billingham

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Reference	Proposal	Application Type	Submission Date	Decision	Decision Date	Status	Site Address
99/1627/H	DEEMED HAZARDOUS SUBSTANCE CONSENT FOR THE CONTINUED STORAGE OF VARIOUS HAZARDOUS SUBSTANCES	Deemed Hazardous Substance Consent	19/10/1999	Approved	02/11/1999	Decided	Huntsman Ici North Tees Site Seaton Road Port Clarence Billingham
99/1621/H	DEEMED HAZARDOUS SUBSTANCE CONSENT FOR THE CONTINUED STORAGE OF HAZARDOUS SUBSTANCES	Deemed Hazardous Substance Consent	19/10/1999	Approved	02/11/1999	Decided	Dow Chemical Company Limited Seaton Carew Road Port Clarence Middlesbrough TS2 1UD
99/1555/H	DEEMED CONSENT FOR THE CONTINUED STORAGE OF VARIOUS HAZARDOUS SUBSTANCES	Deemed Hazardous Substance Consent	04/10/1999	Approved	02/11/1999	Decided	Tees Storage Seal Sands
99/1110/H	HAZARDOUS SUBSTANCE CONSENT FOR THE PURIFICATION AND STORAGE OF ACETONITRILE	Hazardous Substance Consent	13/07/1999	Approved	08/09/1999	Decided	Basf Seals Sands Billingham TS2 1UD
99/0795/H	HAZARDOUS SUBSTANCE CONSENT FOR STORAGE OF ACETONITRILE IN ABOVE GROUND TANK	Hazardous Substance Consent	28/05/1999	Approved	21/07/1999	Decided	Tees Storage Seal Sands
95/1992/H	HAZARDOUS SUBSTANCES CONSENT FOR A NEW UNIT PROCESSING FLAMMABLE SUBSTANCES	Hazardous Substance Consent	07/12/1995	Approved	12/01/1996	Decided	Ici North Tees Works Port Clarence
93/0903/H	APPLICATION FOR STORAGE AND HANDLING OF HAZARDOUS SUBSTANCE (ACRYLONITRILE 120 000 TONNES)	Hazardous Substance Consent	04/05/1993	Approved	18/06/1993	Decided	Tees Storage, Seal Sands, Cleveland
92/2290/H	DEEMED HAZARDOUS SUBSTANCE CONSENT FOR ACRYLONITRILE AMMONIA	Hazardous Substance Consent	25/11/1992	Approved	12/12/1992	Decided	Basf, Seal Sands

Reference	Proposal	Application Type	Submission Date	Decision	Decision Date	Status	Site Address
	HYDROGEN CYANIDE AND PROPYLENE						
92/2012/H	DEEMED HAZARDOUS SUBSTANCE CONSENT FOR 1.2 DIBROMEOTHANE AND ENTRY NOS. 69 AND 71	Hazardous Substances Consent	08/10/1992	Approved	12/12/1992	Decided	Tees Storage Company, Seal Sands, Stockton
92/1689/H	DEEMED HAZARDOUS SUBSTANCES CONSENT (TO BE REVOKED - REPLACED BY 17/0258/HAZ)	Hazardous Substances Consent	19/08/1992	Approved	12/12/1992	Decided	Seal Sands Storage, Middlesbrough

Table B-7 RCBC Hazardous Substances Consent applications - Pre 1 October 2015

Reference	Proposal	Application Type	Submission Date	Decision	Decision Date	Status	Site Address
R/2011/0208/HD	APPLICATION FOR HAZARDOUS SUBSTANCES CONSENT	Hazardous Substances Consent	01/04/2011	Approved	14/02/2014	Decided	SAHAVIRIYA STEEL INDUSTRIES UK LTD
R/2011/0212/HD	APPLICATION FOR HAZARDOUS SUBSTANCES CONSENT	Hazardous Substances Consent	01/04/2011	Approved	14/02/2014	Decided	LACKENBY SITE TEESSIDE WORKS REDCAR
L/1992/0916/HD	HAZARDOUS SUBSTANCES REGULATIONS - DEEMED CONSENT CLAIM FOR HYDROGEN, LIQUID OXYGEN AND L.P.G.	Hazardous Substances Consent	06/11/1992	Approved	04/12/1992	Decided	B O C LIMITED TEES DOCK ROAD GRANGETOWN



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