

The Lighthouse Green Fuels Order

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Abbreviations

Acronym	In Full / Term
ASU	Air Separation Unit
BAT	Best Available Techniques
BAT-AEELs	BAT-associated energy efficiency levels
CCR	Carbon Capture Readiness
CHP	Combined Heat and Power
CO ₂	Carbon dioxide
DCO	Development Consent Order
DTI	Department for Trade and Industry
ES	Environmental Statement
IED	Industrial Emissions Directive
km	kilometre
LCP	Large Combustion Plant
LGF	Lighthouse Green Fuels
MW	Megawatts
MWe	Megawatts electrical
NEP	Northern Endurance Partnership
NPS	National Policy Statement
PCCU	Post-Combustion Carbon Capture Unit
PINS	Planning Inspectorate
RCBC	Redcar and Cleveland Borough Council
SAF	Sustainable Aviation Fuel
SoS	Secretary of State
STBC	Stockton-on-Tees Borough Council
WI BATC	Waste Incineration BAT Conclusions
WRA	Wood Recyclers' Association

Executive Summary

- 1.1.1 This **Combined Heat and Power (CHP) Statement (Application Document Ref. 7.4)** provides an overview of the CHP aspect of the Proposed Development and its intended use within the Proposed Development, and demonstrates compliance with the relevant requirements regarding CHP of the Overarching National Policy Statement for energy (EN-1), 2025 (NPS EN-1) [Ref 1] and the National Policy Statement for renewable energy infrastructure (EN-3), 2025 (NPS EN-3) [Ref 2].
- 1.1.2 This report provides an overview of the CHP proposals included in the Application as required by both NPS EN-1 and NPS EN-3 in Sections 3 and 4, confirming that the facility is able to maximise the use of steam generated on-site with no viable possibility of export off-site to third parties. It also considers how this remains applicable to both current and potential future needs in Section 5.
- 1.1.3 Further, demonstration of compliance with relevant steam utilisation efficiency requirements under The Environmental Permitting (England and Wales) Regulations 2016 [Ref 6] is provided in Section 4.

2 Introduction

2.1 Overview

- 2.1.1 This **Combined Heat and Power (CHP) Statement (Application Document Ref. 7.4)** has been prepared by Ove Arup and Partners Limited (Arup) on behalf of LGF Projects Limited (the Applicant), to support an application (the Application) seeking development consent for the construction, operation, maintenance and decommissioning of the Lighthouse Green Fuels (LGF) project (the Proposed Development) on land within the administrative boundaries of Stockton-on-Tees Borough Council (STBC) and Redcar and Cleveland Borough Council (RCBC).
- 2.1.2 The Order limits for the Proposed Development are made up of the Main Site and Wider Site, together 'the Site'. A more detailed description of the Site is set out at section 2.4.
- 2.1.3 The Application has been submitted to the Planning Inspectorate (PINS), and the decision whether to grant a Development Consent Order (DCO) will be made by the Secretary of State (SoS) for Energy Security and Net Zero pursuant to the Planning Act 2008 (the PA 2008) [Ref 4].
- 2.1.4 The Proposed Development comprises a commercial-scale second generation Sustainable Aviation Fuel (SAF) production facility and associated infrastructure.

2.2 The Applicant

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

2.3 Overview of the Proposed Development

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

Table 2.1 Works Description Summaries

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

Work No. 14	Access works and private street improvements
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- 2.3.4 In addition a range of associated development, both specified and unspecified, is proposed in relation to the above.
- 2.3.5 The new quay on the River Tees (**Work No. 6**) will allow delivery of modular plant and construction materials by ship during construction and biomass and waste wood feedstock during operation, reducing reliance on road transport. Feedstock will be stored (**Work No. 3**) then pre-treated at the Main Site and processed into SAF through gasification and gas-to-liquids processes (**Work No.1**).
- 2.3.6 To support operations, the Proposed Development will include a biomass and waste wood-fired CHP plant (**Work No. 2**) with an electrical output capacity of up to 200 megawatts electrical (MWe), providing a low-carbon energy supply for the SAF process. Cooling infrastructure (**Work No. 4**) will be required for the SAF process and the CHP plant. Connections will provide electricity for start-up and to maintain ancillary site supplies (**Work No. 7**), natural gas for start-up and as auxiliary fuel for some processes during operation (**Work No. 8**), and oxygen and nitrogen which will either be delivered to the Site via pipelines or produced by a new ASU in the Main Site (**Work No. 9A or 9B** respectively). Waste materials, including off-specification materials will be exported from the Main Site by road. Finished products (SAF, and a secondary product of the process, renewable naphtha) will be transferred via pipeline(s) (**Work No. 11A**) to local marine loading facilities for marine export or export by road. CO₂ from the acid gas removal unit in Work No. 1B will be exported via pipeline (**Work No. 11B or Work No. 11C**) subject to a suitable agreement to connect to one of two proximate AGIs in the NEP project.
- 2.3.7 The Proposed Development will also include replacement and new wastewater pipeline connection works (**Work No. 10**), surface water drainage systems (**Work No. 12**) and access and street improvements (**Work No. 14**). Space within the Wider Site is identified for temporary construction and laydown and space within the Main Site identified for permanent laydown and storage areas (**Work No. 13**).
- 2.3.8 The preliminary layout of the Proposed Development is shown on **Indicative General Arrangement Plan (Application Document Ref. 2.5.1)** and **Indicative General Arrangement Isometric (Application Document Ref. 2.5.2)**.
- 2.4 [The Site](#)
- 2.4.1 The Site location and boundary (which is also known as the 'Order limits') are shown on **Site Location Plan (Application Document Ref. 2.1)**. The

Site is located in Teesside on land to the north and south of the River Tees with connection corridors crossing the Tees.

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

2.5 The DCO Process

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

- 2.5.4 The SoS for Energy Security and Net Zero issued a direction under Section 35 of the PA 2008 [Ref 4] on 08 September 2025 to confirm that the Specified Elements of the Proposed Development, together with any matters/ development associated with them, should be treated as development for which development consent under the PA 2008 is required.
- 2.5.5 The CHP plant (**Work No. 2**) surpasses the 50 Megawatt (MW) threshold for generating stations defined in Section 15 of the PA 2008 and is therefore a NSIP in its own right.
- 2.5.6 An application for development consent for the Proposed Development has been submitted to PINS acting on behalf of the SoS. Subject to the Application being accepted, PINS will then examine it and make a recommendation to the SoS who will then decide whether to grant a DCO.
- 2.5.7 The application for development consent for the Proposed Development supersedes a previous application that was being progressed by Lighthouse Green Fuels Limited centred on a site off Huntsman Drive in Seal Sands, TS2 1TT (PINS ref. EN010150). Statutory consultation on that application took place between 16 May 2024 and 20 June 2024. As shown on the PINS website¹, that application is discontinued.

2.6 The Purpose and Structure of this Document

- 2.6.1 This document provides an overview of the CHP aspect of the Proposed Development and its intended use within the Proposed Development, and demonstrates compliance with the relevant requirements regarding CHP of the Overarching National Policy Statement for energy (EN-1), 2025 (NPS EN-1) [Ref 1] and the National Policy Statement for renewable energy infrastructure (EN-3), 2025 (NPS EN-3) [Ref 2].
- 2.6.2 There is no legislative requirement to provide this document, however, the Applicant considers the detail to be useful background as to why the CHP plant is included in the Proposed Development and how the relevant NPS policies have been met.
- 2.6.3 This document is structured as follows:
- Section 3 sets out the requirement of NPS EN-1 and NPS EN-3 with regards to this document;
 - Section 4 describes the proposed CHP plant that forms part of the Proposed Development; and
 - Section 5 describes the potential future demands on the CHP plant.

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

- 2.6.4 This report provides an overview of the CHP proposals included in the Application as required by both NPS EN-1 and NPS EN-3, confirming that the facility is able to maximise the use of steam generated on-site with no viable possibility of export off-site to third parties. It also considers how this remains applicable to both current and potential future needs.
- 2.6.5 Further, demonstration of compliance with relevant steam utilisation efficiency requirements under The Environmental Permitting (England and Wales) Regulations 2016 [Ref 6] is provided in Section 4.

3 Requirements of NPS EN-1 and NPS EN-3

- 3.1.1 Section 4.8 Consideration of Combined Heat and Power (CHP) of NPS EN-1 [Ref 1] states (at paragraph 4.8.8):

“Guidance issued by the then Department for Trade and Industry (DTI) in 2006 will apply to any application to develop a thermal generating station under the Planning Act 2008. Applications for thermal stations must either include CHP proposals or contain evidence demonstrating that the possibilities for CHP have been fully explored to inform the Secretary of State’s consideration of the application.”

- 3.1.2 Paragraph 2.7.16 of EN-3 [Ref 2] in the section entitled ‘Combined heat and power (CHP)’ also refers to the above relevant section of NPS EN-1 in terms of the applicable guidance to CHP:

“Guidance on CHP is set out in Section 4.8 of EN-1, which sets out the requirements on applicants either to include CHP or to present evidence in the application that the possibilities for CHP have been fully explored.”

- 3.1.3 Whilst the Proposed Development is not a thermal generating station application within the meaning of the NPS (and therefore the DTI guidance [Ref 3] does not apply), the LGF facility will include a CHP plant from the outset for the express and sole purpose of providing the required nature and amount of steam, heat and electricity for the operation of the SAF manufacturing facility. It is therefore different from the thermal generating stations anticipated in the energy NPSs, which typically export electricity to the grid or to a defined user, but have residual steam/heat arisings. Policy expects to influence both site selection and design of thermal generating stations, so that beneficial use may be made for the residual steam/heat arisings in the local area.

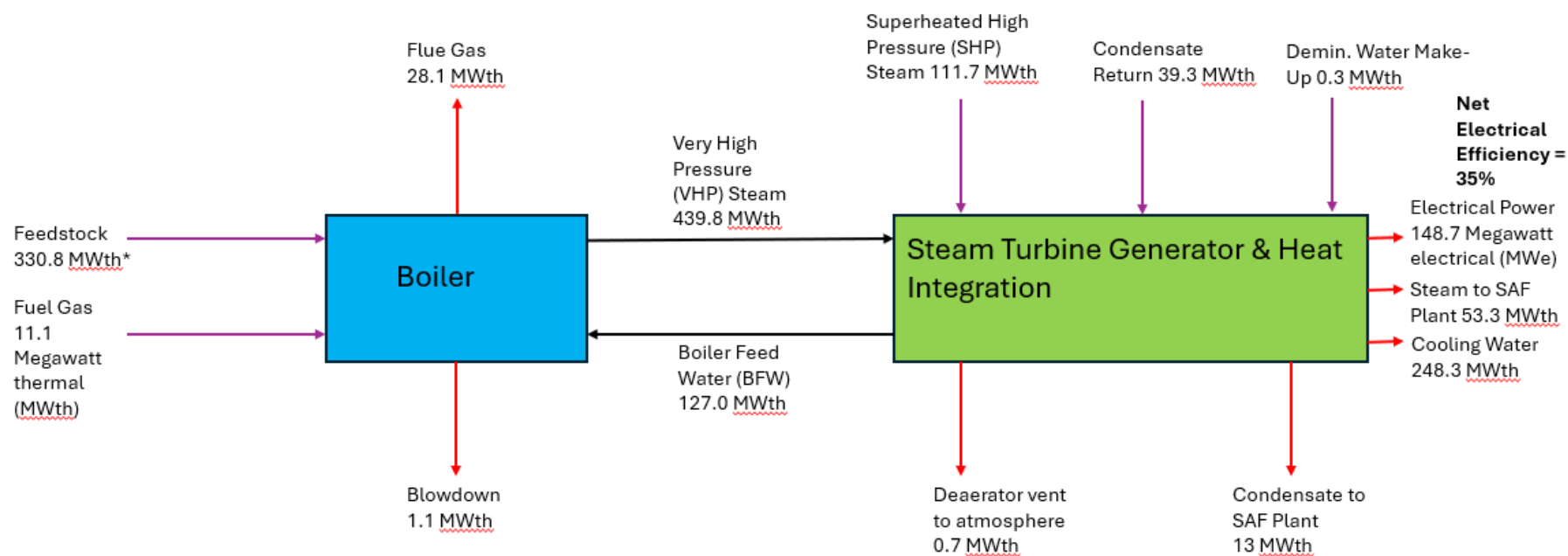
- 3.1.4 Policy 4.8.9 of NPS EN-1 states *“In developing proposals for new thermal generating stations, applicants should consider both the **current and future** opportunities for CHP from the start, and it should be adopted as a criterion when considering locations for a project.”* This is complied with, as current and future opportunities have been considered from the outset as this document demonstrates; the CHP plant has been deliberately sited adjacent to the SAF production facility to provide that steam and heat as well as electricity.

- 3.1.5 Paragraph 4.8.14 of NPS EN-1 states *“CHP may require additional space than for a non-CHP generating station. It is possible that this might conflict with space required for a generating station to be Carbon Capture Readiness (CCR), as set out in Section 4.9. The material provided by applicants should therefore explain how the development can both be ready to provide CHP in the future, and also be CCR, or set out any constraints (for example space restrictions) which would prevent this.”* As explained in Section 5, as well as allowing space for the CHP plant, the Site allows space for a potential Post-Combustion Carbon Capture Unit (PCCU) in future.
- 3.1.6 Paragraph 4.8.13 of NPS EN-1 states *“Utilisation of useful heat that displaces conventional heat generation from fossil fuel sources is to be encouraged and substantial weight will be given to applications incorporating CHP.”* The Proposed Development incorporates a CHP plant.
- 3.1.7 Paragraph 4.8.17 of NPS EN-1 stipulates the Secretary of State should not give development consent *“unless satisfied the applicant has provided appropriate evidence that CHP is included, or that the opportunities for CHP have been fully explored”*. As such, the Proposed Development is in compliance with the CHP requirements of NPS EN-1 and NPS EN-3 as the Proposed Development includes a CHP plant, as Work No. 2².

² Note also that as the LGF facility will include CHP from the outset, there is no requirement for the environmental permit application to include a “CHP readiness report” as per Insert 1 (Page 2) of “CHP Ready Guidance for Combustion and Energy from Waste Power Plants” (Environment Agency, 2013) (the ‘CHP-R Guidance’) [Ref 5]

4 Proposed CHP Plant

- 4.1.1 The LGF facility will include a CHP plant that will provide both electricity (up to 200MWe output) and steam to the SAF production facility.
- 4.1.2 The primary purpose of the CHP plant (as demonstrated in terms of the proportion of utilisation of steam generated – see Inset 4.1) will be the provision of electricity to the SAF production facility.
- 4.1.3 With regards to steam provision to the SAF production facility it is important to note that certain process units within the SAF production facility also generate steam which can be beneficially used in the SAF production process. However, it is expected that there will be times when that process steam is not sufficient to meet demand. There is also expected to be additional site demand for steam as and when any carbon capture unit is installed on the SAF production facility (outside the scope of this DCO application and described further in Section 5). All steam generated by the CHP plant will either be utilised to enable electricity generation for the facility or to provide steam for the facility and thus there is no steam consistently available for export to third parties. The design basis is shown in Inset 4.1.
- 4.1.4 At times when the SAF generated steam is unable to meet the process demand the necessary steam will be provided from the CHP plant whilst also maintaining the electricity requirements via increased thermal input to the CHP plant if required. This contingency function is a critical component of the CHP plant to prevent unnecessary and costly shutdowns should SAF generated steam production be interrupted. As such, the CHP plant has been sized to meet this site requirement; any potential supply/commercial agreements with third party potential off takers would not be possible without increasing the size and output of the CHP plant as its availability could not be guaranteed i.e. if guarantees were provided then it would jeopardize the resilience outlined above that it provides.



*Equivalent to 69.81 tonnes/hour of Biomass; 8,000 operational hours per year = 558,480 tonnes per year (TPY) i.e. circa. 0.5 Million TPY

Inset 4.1 CHP process inputs and outputs

- 4.1.5 The Proposed Development will be subject to the operational requirements of the environmental permit (issued under The Environmental Permitting (England and Wales) Regulations 2016 [Ref 6]) and so it will also need to meet the requirements of the relevant Best Available Techniques (BAT), including meeting BAT energy efficiency levels for the CHP plant.
- 4.1.6 The CHP plant will be fuelled by both waste wood (Grade C waste wood as defined under the Wood Recyclers' Association (WRA) grading system [Ref 7] which is classed as "non-hazardous waste" under the Industrial Emissions Directive (IED) 2010 [Ref 8]) and biomass. As such, both the Large Combustion Plant (LCP) BAT Conclusions (LCP BATC) [Ref 9] (as >50MWth input) and the Waste Incineration BAT Conclusions (WI BATC) [Ref 10] are relevant.
- 4.1.7 Both BATCs include BAT-associated energy efficiency levels (BAT-AEELs) that need to be achieved for the CHP (Table 8 of LCP BATC [Ref 9] for "solid biomass" and Table 2 of WI BATC [Ref 10] for "other non-hazardous waste"). These include electrical efficiency BAT-AEELs and total fuel utilisation/energy efficiency BAT-AEELs.
- 4.1.8 LCP BATC states "*In the case of CHP units, **only one of the two BAT-AEELs 'Net electrical efficiency' or 'Net total fuel utilisation' applies, depending on the CHP unit design (i.e. either more oriented towards electricity generation or towards heat generation)***".
- 4.1.9 As the primary purpose of the CHP is the provision of electricity to the SAF production facility then the 'Net electrical efficiency' BAT-AEEL is therefore applicable i.e. 33.5% to 38% for a "New Unit". The WI BATC BAT-AEEL is less strict e.g. 25-35% and as such the stricter LCP BATC is used.
- 4.1.10 As can be seen from Inset 4.1 which presents the design case³ for the CHP, the net electrical efficiency of the CHP will be 35% and so is above the 33.5% BAT-AEEL minimum requirement.

³ The LCP BAT Reference Document (LCP BREF) [Ref 11] states that "An energy efficiency level associated with the best available techniques (BAT-AEEL) refers to the ratio between the combustion unit's net energy output(s) and the combustion unit's fuel/feedstock energy input at actual unit design".

5 Future CHP Requirements

- 5.1.1 As can be seen from Inset 4.1, the design case for the CHP will result in electricity generation of 148.7 MWe which will meet the electricity requirements of the LGF facility as well as providing a further 53.3 MWth of steam for use in the SAF production facility. The CHP is capable of providing further steam production and up to 200 MWe of electricity via increased thermal input. This provides contingency should requirements further to the design case be required during operation, such as the additional case outlined below.
- 5.1.2 In future, CO₂ from the CHP plant and thermal pre-treatment of feedstock may be sent to a PCCU and directed to the Northern Endurance Partnership (NEP) CO₂ Gathering Network pipeline for transport and permanent storage should a connection become available. This would result in the Proposed Development achieving even greater negative carbon emissions and further reducing the carbon intensity of the final SAF Product. Development of a PCCU does not form part of the Proposed Development, is not considered in the EIA and would be developed under separate consent. However, that PCCU will require additional steam to be provided and the CHP plant is designed to be able to provide that steam.
- 5.1.3 Paragraph 4.8.9 of NPS EN-1 states that *“In developing proposals for new thermal generating stations, applicants should consider both the **current and future opportunities for CHP from the start, and it should be adopted as a criterion when considering locations for a project.**”* The potential future availability of the NEP pipeline was an important component of the location selection for the Proposed Development as described in **Chapter 6: Alternatives (ES Volume I, Application Document Ref. 6.1)**.
- 5.1.4 Finally – paragraph 4.8.14 of NPS EN-1 states *“CHP may require additional space than for a non-CHP generating station. It is possible that this might conflict with space required for a generating station to be Carbon Capture Readiness (CCR), as set out in Section 4.9. The material provided by applicants should therefore explain how the development can both be ready to provide CHP in the future, and also be CCR, or set out any constraints (for example space restrictions) which would prevent this.”*

- 5.1.5 The CCR requirements have now been replaced by decarbonisation readiness and included in The Environmental Permitting (England and Wales) Regulations 2016 (EPR) [Ref 6]. 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 the 'Decarbonisation readiness in environmental permit applications guidance' (2026) [Ref 12].
- 5.1.6 Sufficient space has been left within the Proposed Development footprint to allow for future retrofit of carbon capture technology to the CHP Plant, should the NEP connection become viable. The consenting of any carbon capture retrofit to the CHP Plant would be undertaken outside the current DCO. However, the space left will meet the Decarbonisation Readiness requirements of the environmental permit.
- 5.1.7 There will therefore be no conflict with space for the CHP generating station at the LGF facility that will also be Decarbonisation ready as described above.

References

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- Ref 3 Department for Trade Industry (DTI) (2006) Guidance on background information to accompany notifications under Section 14(1) of The Energy Act 1976 and applications under Section 36 of The Electricity Act 1989b Available online: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/43594/Power_station_proposals_-_guidance_2006.pdf [Accessed August 2026].
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- Ref 5 Environment Agency (2013) CHP Ready Guidance for Combustion and Energy from Waste Power. Available online: <https://www.gov.uk/government/publications/energy-efficiency-for-combustion-and-energy-from-waste-power-plants> [Accessed August 2026].
- Ref 6 UK Government (2016) The Environmental Permitting (England and Wales) Regulations 2016. Available online: <https://www.legislation.gov.uk/uksi/2016/1154/contents> [Accessed August 2026].
- Ref 7 Wood Recyclers' Association (WRA) WRA (2025) Grades of Waste Wood. Available online: <https://woodrecyclers.org/wp-content/uploads/WRA-Grades-of-Waste-Wood-August-25.pdf> [Accessed August 2026].
- Ref 8 Official Journal of the European Union (2010) Directive 2010/75/EU of the European Parliament and of the Council of 24 November 2010 on industrial emissions (integrated pollution prevention and control) (IED). Available online: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32010L0075> [Accessed August 2026].
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Parliament and of the Council, for large combustion plants (LCP BATC). Available online: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32021D2326> [Accessed August 2026].

- Ref 10 Official Journal of the European Union (2019) COMMISSION IMPLEMENTING DECISION (EU) 2019/2010 of 12 November 2019 establishing the best available techniques (BAT) conclusions, under Directive 2010/75/EU of the European Parliament and of the Council, for waste incineration (WI BATC). Available online: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32019D2010> [Accessed August 2026].
- Ref 11 European Commission (2017) JRC Science for Policy Report Best Available Techniques (BAT) Reference Document for Large Combustion Plants (LCP BREF). Available online: <https://bureau-industrial-transformation.jrc.ec.europa.eu/reference/large-combustion-plants-0> [Accessed August 2026].
- Ref 12 Environment Agency (2026) Decarbonisation readiness in environmental permit applications guidance. Available online: <https://www.gov.uk/government/publications/decarbonisation-readiness-in-environmental-permit-applications/decarbonisation-readiness-in-environmental-permit-applications> [Accessed August 2026].



www.lighthousegreenfuels.co.uk

