



Lighthouse Green Fuels

Development Consent Order

Land at Seal Sands, Stockton-On-Tees, Teesside, TS2 1TX

LGF Projects Limited

EN0110025

Programme Document

December 2025

Revision History

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1 Introduction

- 1.1.1 This Programme Document has been prepared on behalf of LGF Projects Limited (the 'Applicant'); a company wholly owned by the Alfanar Group and relates to a proposed application (the 'Application') for a Development Consent Order (a 'DCO'), that is to be submitted to the Secretary of State (the 'SoS') for Energy Security and Net Zero ('DESNZ'), under Section 37 of the 'Planning Act 2008' (the 'PA 2008') in July 2026.
- 1.1.2 The Application will seek a DCO for the Lighthouse Green Fuels Project (the 'Project') on land at Seal Sands, Stockton-on-Tees, Teesside within the administrative areas of Stockton-on-Tees Borough Council ('STBC') and Redcar and Cleveland Borough Council ('RCBC'), together the host authorities.
- 1.1.3 The Project is anticipated to be the UK's first commercial scale second generation sustainable aviation fuel ('SAF') production facility and would comprise the following key 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;
 - biomass fired Combined Heat and Power (CHP) Plant,
- 1.1.4 To support the Sustainable Aviation Fuel (SAF) production activities, a number of ancillary or associated operations are required, including:
- quayside with ship loading/offloading infrastructure;
 - supporting infrastructure and utility connections.

- 1.1.5 The location of the Project is shown on Figure 1.1. The area within this boundary is defined as ‘the Site’ and the development located there is defined as ‘the Proposed Development’.
- 1.1.6 Lighthouse Green Fuels Limited, another company wholly owned by Alfanar Group, was promoting a project for a proposed SAF facility at a site off Huntsman Drive, Seal Sands.
- 1.1.7 Alfanar has since made changes to the proposals, including moving the site location to Seal Sands Road. As such, a new DCO application is now being pursued and the previous application for the site off Huntsman Drive is no longer being pursued.
- 1.1.8 The Government guidance titled ‘Planning Act 2008: Pre-application stage for Nationally Significant Infrastructure Projects’, states that the pre-application process for Nationally Significant Infrastructure Projects (‘NSIP’) is applicant-led and to deliver a good pre-application process, including effective engagement and a well-prepared application, applicants should put together a Programme Document at the outset of the pre-application stage for submission to PINS.
- 1.1.9 The guidance also states the Programme Document will enable all those engaged in the pre-application process, particularly statutory consultees, to understand the timescales and ensure their contribution is programmed into the pre-application stage at the most effective point. It will also assist the Applicant in managing the preparation and subsequent submission of the application documents for consideration by PINS at the acceptance stage.
- 1.1.10 While the Programme Document is not a statutory requirement the guidance states that it should include:
- The background to the project including an explanation of the Planning Act 2008 process and why the applicant is required to apply for development consent and a brief summary of the policy context.
 - A statement confirming the pre-application tier service that the applicant has subscribed to and commentary on the supplementary components listed in the annex to the Pre-application Prospectus the applicant intends to develop.
 - the date the applicant intends to submit their application;
 - a comprehensive timetable of the applicant’s pre-application process, the main events with dates and milestones demonstrating how the pre-application process will be completed (using the maximum target of 2 years as a benchmark);

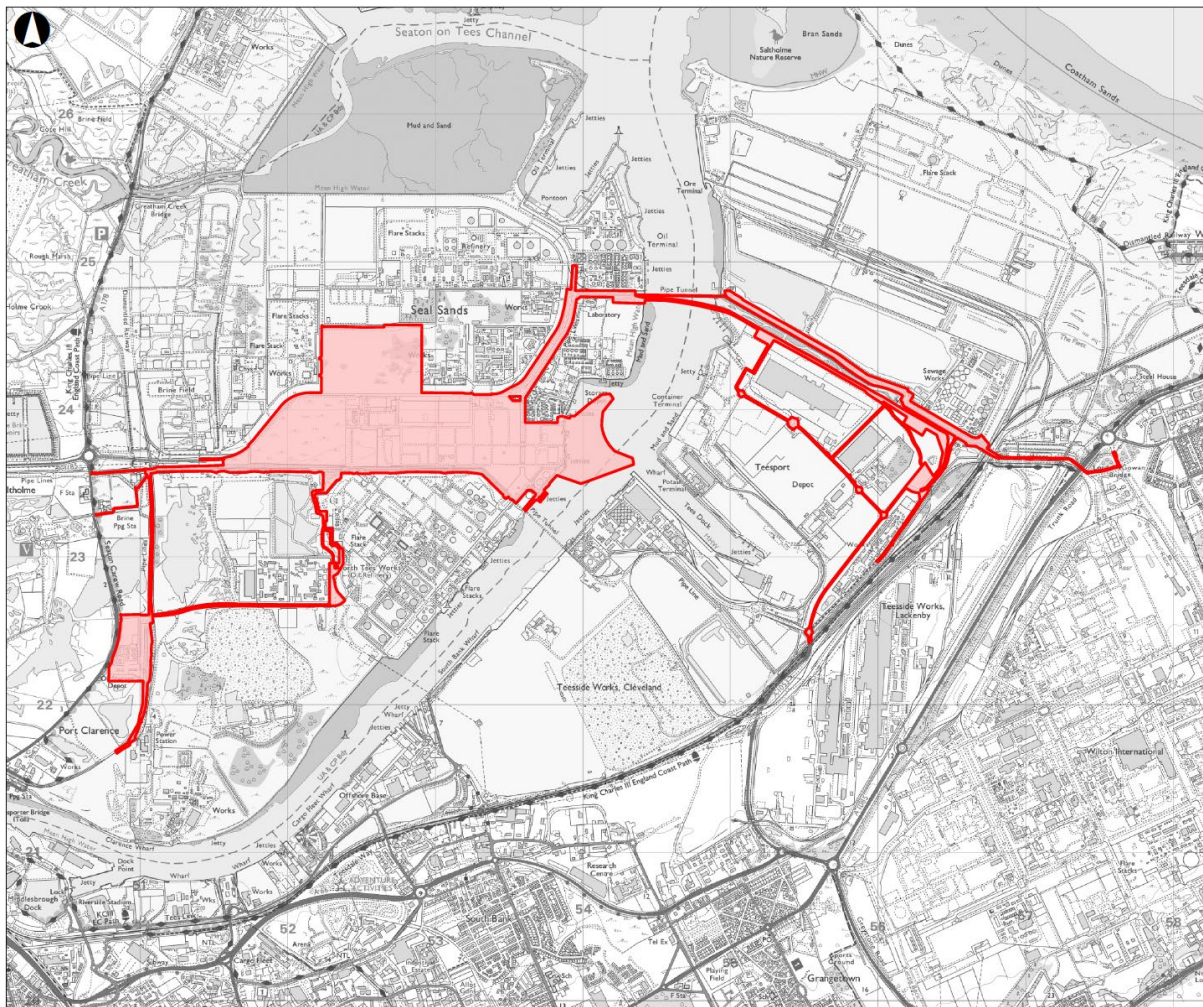
- the Applicant's view on the main issues for resolution and activities they will undertake to address those;
- the Applicant's proposals for engaging with statutory consultees and local authorities during the pre-application period and any intended financial support agreements, such as Planning Performance Agreements (PPAs);
- the Applicant's identification of key risks to achievement of the pre-application stage and the process by which these risks are tracked and managed; and
- It is expected that the Applicant will host and maintain the agreed Programme Document on its website and update it as necessary during the pre-application stage to publicise completion of significant stages and demonstrate progress in preparation of the application.

1.1.11 This Programme Document is, therefore, structured as follows:

- Section 2 Describes the background to the Proposed Development.
- Section 3 confirms the pre-application tier service that the Applicant has subscribed to and the supplementary components it intends to produce.
- Section 4 Sets out the timetable for the Applicant's pre-application process, including key dates/milestones and the anticipated submission date for the application.
- Section 5 Sets out the main issues for resolution during the pre-application stage, including the activities that will be undertaken to address those issues and also identifies potential risks to the achievement of the pre-application stage.
- Section 6 Sets out the Applicant's proposals for pre-application engagement with stakeholders.

1.1.12 The Programme Document has been published on the Applicant's website <https://www.lighthousegreenfuels.co.uk/> and will be updated periodically during the pre-application stage.

Figure 1.1 Location of the Proposed Development



2 Background to the Project

- 2.1.1 The Applicant received a Direction dated 8 September 2025 from the Secretary of State under Sections 35(1) and 35ZA of the Planning Act 2008 that the Proposed Development, except for the biomass fired CHP Plant, should be treated as development for which development consent is required. Accordingly the Proposed Development constitutes development for which the Applicant will apply for development consent, in accordance with the provisions of the Planning Act 2008.
- 2.1.2 The Section 35 Direction states amongst other things, “the Proposed Development sits within one of qualifying infrastructure fields (...) (energy)”, and that the Proposed Development, “is nationally significant”. It therefore follows that NPS for Energy – Overarching National Policy Statement for energy (EN-1), and other energy NPSs, are of importance and relevance to the determination under Section 105 of the PA 2008.
- 2.1.3 The biomass fired CHP Plant will have an electrical output capacity of up to 200MWe, with additional steam production, and therefore is a NSIP in its own right as it surpasses the 50MW threshold for generating stations defined in section 15 of the PA 2008. This activity was therefore not included in the Section 35 direction request, though it will form part of the DCO application as it linked but functionally subordinate to the principal development, the SAF Production Facility. The energy NPSs, including NPS for Energy – Overarching National Policy Statement for energy (EN-1) and NPS for Renewable Energy Infrastructure (EN-3), have direct effect upon this element of the Proposed Development and therefore Section 104 of the PA 2008 is the decision-making framework for this element of the Proposed Development.
- 2.1.4 NPS for natural gas supply infrastructure and gas and oil pipelines (EN-4) and NPS for Electricity Networks Infrastructure (EN-5) are considered to possess relevance in relation to the determination of pipeline and electrical connection elements, respectively, of the Proposed Development.
- 2.1.5 Further description of the policy that is relevant to the Proposed Development is described in the Preliminary Environmental Information Report (PEIR) provided as part of the statutory consultation and will also be described in the documents submitted in support of the DCO Application including the Planning Statement.
- 2.1.6 A number of elements of the Proposed Development involve works within the UK Marine Area, under the tidal River Tees. The relevant marine policy documents include the UK Marine Policy Statement and its accompanying guidance and the “North East Inshore and North East Offshore Marine Plan.

2.1.7 The policy which is relevant to SAF includes:

- Clean Growth Strategy (October 2017, updated April 2018)
- The Ten Point Plan for a Green Industrial Revolution (November 2020);
- Industrial Decarbonisation Strategy (March 2021);
- Jet Zero Strategy (July 2022, updated August 2022);
- Sustainable Aviation Fuel (SAF) Mandate (December 2024).

2.1.8 The recent energy and climate change legislation and policy that are relevant include:

- The Climate Change Act 2008 (2050 Target Amendment) Order (June 2019)
- The Energy White Paper (December 2020);
- Industrial Decarbonisation Strategy (March 2021)
- Net Zero Strategy: Build Back Greener (October 2021, updated April 2022);
- Biomass Policy Statement (November 2021)
- Powering Up Britain (March 2023, updated April 2023);
- Biomass Strategy (August 2023);
- The Second National Infrastructure Assessment (October 2023); and
- Clean Power 2030 Action Plan (December 2024).

2.1.9 The relevant Development Plan Documents (DPDs) for the Proposed Development Site are therefore as follows:

- Stockton-on-Tees Borough Council Local Plan (adopted January 2019)
- Stockton-on-Tees Borough Council Local Plan Policies Map (adopted 30 January 2019)
- Redcar & and Cleveland Local Plan (adopted May 2018)
- Redcar & and Cleveland Local Plan: Policies Map (adopted May 2018) and,
- The Tees Valley Joint Minerals and Waste DPDs (adopted September 2011)

- 2.1.10** The other consents and licences that are, or may be, required under other legislation for the construction and operation of the Proposed Development are identified in the PEIR. A schedule of the other consents and licenses required will be submitted as part of the DCO Application.

3 The Planning Inspectorate's pre-application service

- 3.1.1 The Applicant carefully considered the service tier required for the project, factoring the need for timely consenting and the level of support required from the Planning Inspectorate. The Applicant concluded that it did not foresee a need for a facilitator role of the Planning Inspectorate. As such, the Applicant requested the standard service tier in support of the request for an Inception Meeting and the Planning Inspectorate confirmed that it will provide this service following the Inception meeting on 15 September 2025.
- 3.1.2 The Applicant intends to confirm if any supplementary pre-application components may be produced, following completion of the statutory consultation in January 2026. Such supplementary components may offer eligibility to fast track procedure under the prospectus, but under the standard service, are not eligible for support from Planning Inspectorate.

4 Pre-application process timetable

- 4.1.1 Table 2.1 sets out the estimated timetable for the Applicant's pre-application stage and sets out anticipated milestone dates for key project stages including the anticipated submission date for the DCO application
- 4.1.2 Table 2.1 may be updated or detail added as part of subsequent revisions to the Programme Document as timescales are refined during the DCO pre-application stage.

Table 2.1 Pre-application process timetable

Project state	Date of milestone
Inception meeting with PINS	15 September 2025 (Milestone passed)
Submission of EIA Scoping Request	31 October 2025 (Milestone passed)
Receipt of Scoping Response	11 November 2025 (Milestone passed)
Consultation with host local authorities on draft Statement of Community Consultation ('SoCC')	16 September 2025 (Milestone passed)
Statutory Consultation period	December 2 2025 to 13 January 2026
Preparation of DCO application documents including draft Development Consent Order, plans, compulsory acquisition information, the Environmental Statement and other reports.	February 2026 to July 2026
Consultation with host local authorities on draft Adequacy of Consultation Milestone ('AoCM') document	March 2026
Submission of Adequacy of Consultation Milestone to PINS	April 2026
DCO application Submission	July 2026

- 4.1.3 During the pre-application stage, the Applicant proposes to arrange project update meetings with the Planning Inspectorate at the following points:
- A short time after the end of the statutory consultation period, in February 2026
 - Around two months prior to the proposed submission of the DCO Application in May 2026.

5 Main Issues and Risks

5.1 Main Issues for resolution

- 5.1.1 Table 3.1 sets out the Applicant's current view of the main issues to be addressed in the application, and what activities are being taken to address these issues. The main issues at the end of the pre-application stage will be described in a 'potential main issues for examination' document submitted in support of the DCO application.

Table 3.1 Main risks identified by the Applicant

Risks	Management of Risks
Biodiversity - The potential for areas of designated and non-designated habitats and ecological species to be directly impacted by construction works and operations.	Further assessments will be undertaken in the ES to define these once further ecological and noise surveys are completed and as further details are available on exact locations for construction works, construction methods and types of plant and equipment to be used. Appropriate avoidance and/or mitigation measures will be included. Ongoing engagement with the relevant stakeholders up to the submission of the application will take place.
Marine works	Works in the marine environment (Tees Estuary) are required, necessitating environmental impact assessment. Agreement of methodologies with the relevant statutory nature conservation bodies will be sought in order that it may be evidenced within the DCO application.
Third party agreements along connection corridors	The corridors necessarily connect to or pass through a range of land uses where statutory undertakers and utilities/operators have interests and where extant or expected DCO projects are located. Engagement will be held with the main stakeholders from an early point in the pre application stage to seek agreements regarding access to and rights over land, and protective provisions.
Consultation messaging needs to differentiate between this project and a previous iteration of the SAF project at another Site in Teesside	Early engagement has commenced with key stakeholders to clearly explain the difference between the projects. A clear and consistent approach to

Risks	Management of Risks
	communicating the distinction between this project and the previous SAF project will be embedded within the SoCC and used in all consultation material.
Lack of information regarding the final form of the implementation of Biodiversity net gain (BNG) for NSIPs.	The Applicant is engaging in early discussions with stakeholders to prepare for the implementation of BNG and monitoring the Department for Environment, Food & Rural Affairs's consultation on BNG implementation.
Changes to policy relevant to the Project such as NSIP reform proposed as part of the Planning and Infrastructure Bill	The Applicant stays informed about policy developments and is engaged with policymakers. The Applicant has developed a contingency plan within its programme that can accommodate changes to policy that impact the preparation of the DCO Application.

5.2 Risks to achievement of Pre-Application stage as identified by the Applicant

5.2.1 Table 3.2 sets out the risks, identified by the Applicant to achieving the milestone dates set out in Table 2.1.

Table 3.2 Risks to achievement of Pre-Application stage

Risks	Management of Risks
Additional/further surveys being identified which cause delays to the programme and submission	Ongoing engagement with key stakeholders to reduce the potential for additional survey requirements
Delays in reaching agreement with statutory nature bodies regarding methodologies	Ongoing engagement with key stakeholders
Design changes to the Proposed Scheme that cause delays to the programme and submission	Ensuring that in-house design work is suitably progressed to provide a high degree of certainty around the draft project parameters and draft order limits at application preparation stages.
Delay to the programme caused by carrying out further targeted consultation.	The Applicant has carried out a thorough review of the consultation recipients against legislative requirements and guidance informed by discussion with stakeholders to reduce the risk of later identifying further consultees.

Risks	Management of Risks
	The engineering design of the proposed development is well progressed and the Applicant has a strong understanding of the land required for the application to reduce the likelihood of carrying out further consultation.
Land acquisition or access rights negotiations not being sufficiently advanced	Comprehensive and strategic approach to ongoing engagement and negotiations with affected landowners

6 Stakeholder Engagement

6.1 Engagement with Statutory bodies

6.1.1 The Applicant has commenced re-engagement with key stakeholders and initiated engagement with key stakeholders not previously relevant to the previous iteration of the SAF project. Introductory meetings with technical stakeholders have been held with the Environment Agency (August 2025), Marine Management Organisation (August 2025) and Natural England (August 2025). These meetings involved a short briefing on this project and any comments from the consultees in advance of scoping.

6.2 Engagement with local authorities

6.2.1 Initial engagement on the application includes meeting with PINS, the host authorities (Stockton-on-Tees Borough Council (STBC) and Redcar & Cleveland Borough Council (RCBC)) and key stakeholders.

6.2.2 Meetings with the two host authorities were held in August 2025, these involved a short briefing on this project and any comments from the consultees in advance of scoping. They also represented an introduction to our proposed approach to consultation with stakeholders and the public, ahead of formal consultation on the SoCC.

6.2.3 An update meeting was held with the host authorities in November 2025 to present the proposed statutory consultation methods and review of EIA Scoping comments.

6.2.4 A briefing meeting has been requested with ward members and leaderships teams within the authorities.

6.2.5 The Applicant does not believe that a planning performance agreement is sought by any local authority.