

Lighthouse Green Fuels

Development Consent Order

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

LGF Projects Limited

EN0110025

Programme Document

August 2026



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; and
 - biomass and waste wood 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 UK 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 In July 2026 the UK Government published updated guidance to accompany the changes to the infrastructure planning system introduced by The Planning and Infrastructure Act 2025 (Commencement No. 4 and Transitional Provisions) Regulations 2026 which came into force on 24 July 2026.

1.1.12 The July 2026 UK Government guidance 'Planning Act 2008: Guidance on preparing an application: Part 1 - Pre-application steps' ('the 2026 guidance') states, in relation to programme information:

7.3 [...]to ensure that all participants in the process are clear about the expectations of them, particularly the intended timetable for the pre-application period, applicants are encouraged to prepare an outline document containing key programme information. It is recommended that this covers the main milestones and what and when input from key statutory bodies will be required such as:

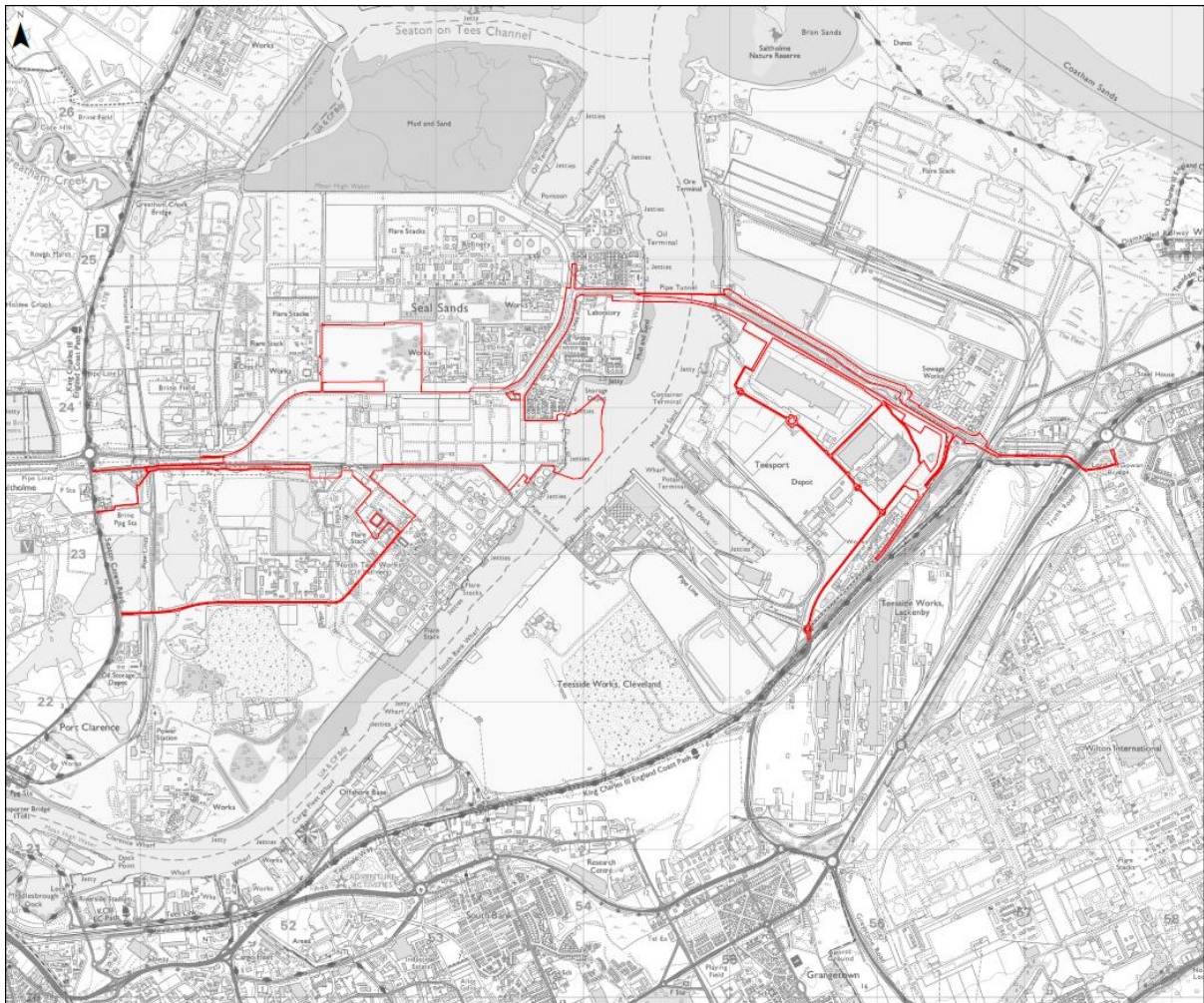
- *the target date the applicant intends to submit their application*
- *the main events with dates and milestones demonstrating how the pre-application process will be carried out*
- *the applicant's view on the main issues it considers the proposed development may give rise to and activities they will undertake to address those and how it proposes to track risks*
- *the applicant's proposals for engaging with statutory bodies/undertakers, local authorities and communities during the pre-application period*

7.4 Applicants are encouraged to meet the Planning Inspectorate at the start of the pre-application period (see paragraph 7.5) and to share their

proposed programme for discussion at the meeting. Applicants are then encouraged to publish and circulate programme information to relevant organisations and bodies, as appropriate, so they are informed of the proposed development and their role in preparing the application at the earliest opportunity. It will be helpful if applicants keep the Planning Inspectorate informed during their pre-application process, such as how the main milestones set out in the programme are being met.

- 1.1.13 The Applicant has had regard to the 2026 guidance and does not consider there to be a need to amend the structure of its Programme Document.
- 1.1.14 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.
- 1.1.15 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. This represents the fourth version of the Programme Document and is anticipated to be the last version prior to submission of the DCO Application.

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 SoS under Sections 35(1) and 35ZA of the PA 2008 that the Proposed Development, except for the biomass and waste wood 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 PA 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 National Policy Statement (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 and waste wood 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.
- 2.1.4 The full name and status of the NPSs relevant to the Proposed Development are as follows:
- a. NPS for Energy – Overarching National Policy Statement for Energy (EN-1) ;
 - b. NPS for Renewable Energy Infrastructure (EN-3);
 - c. NPS for Natural Gas Supply Infrastructure and Gas and Oil Pipelines (EN-4); and
 - d. NPS for Electricity Networks Infrastructure (EN-5).

- 2.1.5 The versions of NPSs EN-1, EN-3 and EN-5 in force at the time of this application came into force on 6 January 2026. The NPS EN-4 in force at the time of this application came into force on 17 January 2024.
- 2.1.6 EN-1 and EN-3 have direct effect upon the CHP 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.
- 2.1.7 The S35 Direction 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 NPS EN-1 states that EN-1, in conjunction with any relevant technology specific NPS, will be the primary policy for SoS decision making on projects in the field of energy for which a direction has been given under section 35. Paragraph 3.2.14 of EN-1 confirms that were a energy infrastructure project benefits from a Section 35 direction any application for development consent would need to be considered in accordance with NPS EN-1. It therefore follows that EN-1, and potentially other energy NPSs, are of importance and relevance to the determination under Section 105 of the PA 2008.
- 2.1.8 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”.
- 2.1.9 Sections 104 and 105 of the PA 2008 state the SoS must have regard to any other matters the SoS thinks are both “important and relevant”. In the case of the Proposed Development, the Applicant considers that the NPPF and various UK Government energy and climate change policies
- 2.1.10 The UK Government 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).
- 2.1.11 The recent UK Government 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).

2.1.12 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 & Cleveland Local Plan (adopted May 2018)
- Redcar & Cleveland Local Plan: Policies Map (adopted May 2018) and,
- The Tees Valley Joint Minerals and Waste DPDs (adopted September 2011)

2.1.13 A detailed description of the policy that is relevant to the Proposed Development will be provided in the documents submitted in support of the DCO Application including the Planning Statement.

2.1.14 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 (PINS). The Applicant concluded that it did not foresee a need for a facilitator role of PINS. As such, the Applicant requested the standard service tier in support of the request for an Inception Meeting and PINS confirmed that it will provide this service following the Inception meeting on 15 September 2025.
- 3.1.2 The Applicant intends to produce three supplementary pre-application components, with a view to a smoother and faster post submission stage, namely the Policy Compliance and Accordance tables document, , the Design Approach Document and a Public Sector Equality Duty Statement .

4 Pre-application process timetable

- 4.1.1 Table 4.1 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 4.1 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 4.1 Pre-application process timetable

Project state	Date of milestone
Inception meeting with PINS	15 September 2025 (Milestone passed)
Submission of Environmental Impact Assessment (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 (Milestone passed)
Preparation of DCO application documents including draft Development Consent Order, plans, compulsory acquisition information, the ES and other reports.	February 2026 to July 2026
Consultation with host local authorities on draft Adequacy of Consultation Milestone ('AoCM') document	March 2026 (Milestone passed)
Submission of Adequacy of Consultation Milestone to PINS	6 May 2026 (Milestone passed)
Additional Targeted Consultation Period	April 13 to May 13 2026 (Milestone passed)
Submission of draft documents to PINS for review	26 May 2026 (Milestone passed)
Update meeting with PINS to discuss draft document feedback	w/c 27 July 2026 (Milestone passed)
DCO application Submission	w/c 14 September 2026

- 4.1.3 During the pre-application stage, the Applicant has held or proposes to arrange project update meetings with PINS at the following points:
- A short time after the end of the statutory consultation period, in March 2026. This meeting took place on 5 March 2026.

- Prior to the proposed submission of the DCO Application and following the receipt of comments on the draft documents in July 2026.

5 Main Issues and Risks

5.1 Main Issues for resolution

- 5.1.1 Table 5.1 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 5.1 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 and for residual biodiversity effects.	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 EIA. 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.
Application of Biodiversity net gain (BNG) for NSIPs.	Following confirmation that BNG is only mandatory for DCO applications

Risks	Management of Risks
	submitted to PINS after 2 November 2026 the Applicant and confirmation of the methodologies and metric associated, the Applicant has adopted a position of no net loss in line with the national policy statement and has reflected the latest methodologies and metric in the DCO application.
Changes to policy relevant to the Project such as NSIP reform proposed as part of the Planning and Infrastructure Act 2025	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 5.2 sets out the risks, identified by the Applicant to achieving the milestone dates set out in Table 2.1.

Table 5.2 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 agree the approach for any additional survey requirements. Surveys and analysis have been expedited to seek to enable results to be available in time to be incorporated into the application.
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.
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. Additional meetings with technical stakeholders post-consultation are ongoing.

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. A further update meeting was held with the host authorities in April 2026 to present the targeted consultation and discuss DCO Requirement discharge procedure. A meeting was held with the host authorities in July 2026 to discuss the findings of the transport assessment and the DCO Requirements.

6.2.4 An offer of a briefing was issued to senior councillors in STBC and RCBC, as well as the elected ward members for the proposed site ahead of the statutory consultation. A briefing meeting with the leader and Chief Executive of RCBC on 12 December 2025.

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

6.2.6 The Applicant consulted the host authorities and neighbouring local authorities in December 2025 as part of the statutory consultation, the targeted consultation and for views on the adequacy of consultation to support the development of the AoCM Report. Responses from both host authorities have been reviewed.

