



Noaman Al Adhami
Lighthouse Green Fuels Limited
By email only: noaman.aladhami@alfanar.com

23 April 2024

Dear Noaman Al Adhami,

LIGHTHOUSE GREEN FUELS PROJECT

REQUEST TO VARY THE DIRECTION BY THE SECRETARY OF STATE UNDER SECTION 35 AND SECTION 233(2) OF THE PLANNING ACT 2008 (AS AMENDED) DATED 25 OCTOBER 2022

1. Thank you for your email and letter received 27 March 2024, in which you set out the rationale for your request to vary the section 35 Direction given by the Secretary of State dated 25 October 2022.
2. Your letter noted that, because of front-end engineering design processes, several refinements to the Proposed Development have occurred without changing its purpose, and you therefore consider you require a variation to the existing Direction. You have noted that:

“The key difference between the existing direction and this request is that the Project no longer has a 150MW CCGT generating station. Instead, the Project is relying on importing electricity via the grid, and is making use of its existing up to 49.9MW TV1 generating station, and a new up to 49.9MW auxiliary boiler and associated generating equipment”.

“The variation to the existing direction is sought to ensure that the SAF [sustainable aviation fuel] facility (which includes generating capacity of up to 49.9MW owing to the auxiliary boiler) is able to use the DCO process given its national significance.”

“Following the refinements, the proposed Project Site has extended from 75 Hectares (185 acres) to approximately 274.5 hectares (678.3 acres) in area.”

3. The Secretary of State notes the table provided at paragraph 5.3 of your letter which provides a summary of the changes to each element of the Proposed Development, and the summary of changes to the Operational Processes at section 6.
4. The Secretary of State notes that a draft varied Direction was provided at Schedule 2 of your letter. The Secretary of State notes that the draft varied Direction sets out the changes to the elements of the Proposed Development, as well as the change to the post-production uses of naphtha as a by-product of the SAF production process.
5. The Secretary of State notes that the key difference as stated by the Applicant is that the project no longer has a 150MW CCGT generating station. The Secretary of State notes that the 25 October 2022 Direction stated the following:

The Secretary of State notes that the Proposed Development forms part of a wider proposal, with the wider proposal including a

Combined Cycle Gas Turbine (“CCGT”) plant with a capacity of 150MW.

6. The Secretary of State notes that the original Direction did not include the CCGT plant as an element within the definition of the Proposed Development, but rather noted the Proposed Development and the CCGT plant were two parts of a wider proposal. The Secretary of State further notes that the reasons for directing the Proposed Development are not reliant on the provision of the previously proposed 150MW CCGT plant, and the reasons provided for directing the Proposed Development in continue to apply even with the removal of the CCGT plant from the wider proposal.
7. Having reviewed how the different elements of the Proposed Development have changed, the Secretary of State sees no material difference that would lead her to reach a different conclusion on the question of whether or not the Proposed Development should be directed in under the Planning Act 2008.
8. In considering the request to vary the original section 35 Direction, the Secretary of State has also considered whether the requirements in sections 35 and 35ZA of the Planning Act 2008 have been met. The Secretary of State is satisfied that the request to vary is a ‘qualifying request’ in accordance with section 35ZA(11). The Secretary of State is further satisfied that the Proposed Development is within one of the qualifying infrastructure fields listed in section 35(2)(a)(i) (energy); will be wholly in England; and does not fall within the existing definition of a “nationally significant infrastructure project”. This position and the reasoning set out in the Annex to the Direction have not changed in substance since the original request was made, though the wording has now been altered in the varied Direction.
9. The Secretary of State is content to vary the Direction to reflect the latest position in terms of the elements of the proposal. The Secretary of State has therefore varied the Direction, incorporating most of the revisions proposed by the Applicant, as well as some other amendments. However, the Secretary of State has omitted proposed revisions regarding the overarching National Policy Statement for Energy and a statement regarding the consultation undertaken in relation to the proposal.
10. The Secretary of State has therefore varied the Direction in accordance with section 35 and 233(2) of the Planning Act 2008. The varied Direction is included alongside this letter and will be published on gov.uk in due course, alongside your request to vary the Direction.

Yours sincerely



John Wheadon
Head of Planning
Energy Infrastructure Planning Delivery