

12 August 2025

**For the attention of Farhan Mostafa**  
Secretary of State for Energy Security and Net Zero c/o  
Head of Planning  
Department for Energy Security and Net Zero  
1 Victoria Street  
London  
SW1H 0ET

By email: [Farhan.Mostafa@energysecurity.gov.uk](mailto:Farhan.Mostafa@energysecurity.gov.uk)

Dear Mr Mostafa

**LGF Projects Limited**

**LIGHTHOUSE GREEN FUELS PROJECT, LAND AT SEAL SANDS (FORMER INEOS NITRILES SITE), STOCKTON-ON-TEES, TEESSIDE, TS2 1TX**

**REQUEST FOR A DIRECTION FROM THE SECRETARY OF STATE UNDER SECTION 35 OF THE PLANNING ACT 2008 RELATING TO THE LIGHTHOUSE GREEN FUELS PROJECT**

**LGF Projects Limited** (hereafter referred to as the 'Applicant'), hereby request a Section 35 direction be made by the Secretary of State ('SoS') for the Department of Energy Security and Net Zero ('DESNZ') for the Lighthouse Green Fuels Sustainable Aviation Fuel production project (the 'Project') to be treated as a development of national significance under the Planning Act 2008.

This request appends the following to facilitate understanding of the Project:

- a draft Section 35 direction (Appendix 1); and
- a plan showing the indicative order limits boundary (Appendix 2).

**1 Overview**

- 1.1 The Applicant is proposing to apply for development consent pursuant to Section 37 'Applications for orders granting development consent' of the Planning Act 2008 from the Secretary of State for DESNZ to allow it to construct, operate and maintain the relevant elements of the Project on land at the former INEOS Nitriles site in Seal Sands, Stockton-on-Tees, Teesside (the 'Site'). The current Site boundary is shown in Appendix 1.
- 1.2 The Project is to enable the manufacture and distribution of second generation Sustainable Aviation Fuel (SAF) to be used primarily to help the UK meet its carbon reduction targets for aviation and help fulfil the UK Government's SAF Mandate of 10% of aviation fuel being SAF by 2030.

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- 1.3 The Project will utilise sustainably sourced biomass feedstock compliant with the SAF Mandate requirements and delivered predominantly by marine transport to manufacture SAF and renewable naphtha for distribution to customers for blending into aviation fuel and other applications. The Project is being designed to achieve an output capacity of approximately 135,000 tonnes per year of SAF, which would make it the largest SAF production facility in the UK. The selection of sustainably sourced biomass as the primary feedstock has been made due to the reliability and homogeneity of this feedstock supply and its conformity with the SAF Mandate. The possibility of using other SAF Mandate compliant feedstocks will remain under consideration (for example, processed waste feedstock).
- 1.4 It is proposed that the application for development consent will include those aspects that constitute a project of national significance and any necessary associated development (as defined under Section 115 of the Planning Act).
- 1.5 For the avoidance of doubt, this Section 35 direction request is a new request made to the Secretary of State for a proposed SAF production facility to be developed at the former INEOS Nitriles site on Teesside. The Applicant is aware that a previous Section 35 direction was issued to a company in the same group (Lighthouse Green Fuels Limited) by the SoS for Business, Energy & Industrial Strategy ('BEIS') on 25 October 2022 and varied by the SoS for Energy Security and Net Zero on 23 April 2024 both in relation to a Lighthouse Green Fuels SAF project that was proposed on another site in Teesside ('the Previous Section 35 Project'). The Previous Section 35 Project is no longer being pursued and no application for development consent for the Previous Section 35 Project will come forward.
- 1.6 The Applicant asks that the SoS treats this submission as a 'qualifying request' (as defined in Section 35ZA (11) of the Planning Act 2008). As required, this submission outlines, as required by that sub-section:
- the development to which the request relates;
  - how the conditions in Section 35(2)(a) and (b) are met; and
  - that no applications for consent or authorisations listed in Section 33 'Effect of requirement for development consent on other consent regimes' (1) or (2) have been made in relation to the development to which this request relates.

## **2 Need for the Project**

- 2.1 The need for the Project is critical. The UK Government has introduced a Sustainable Aviation Fuel (SAF) mandate equivalent to at least 10% (around 1.2 million tonnes) of jet fuel to be made from sustainable sources by 2030. These measures are formalised through the Renewable Transport Fuel Obligations (Sustainable Aviation Fuel) Order 2024. The UK SAF mandate is intended to secure and grow UK SAF demand and complement ongoing work to kick-start a domestic SAF

industry; this Project would therefore be able to deliver a significant contribution to meeting that aim.

- 2.2 The alignment of the Project with Government objectives demonstrates the urgent need for the Project and the securing of consent via the Development Consent Order (DCO) regime. The Applicant wishes to maintain progress in developing the Project in order to facilitate meeting the Government and aviation industry 2030 targets as set out in the SAF Mandate. The DCO process, with its clear timescales and certainty, is vital in ensuring that the Project can be delivered.

### **3 Project Description**

- 3.1 The Project includes the following elements:
- 3.2 **Feedstock reception and storage.** The feedstock will predominantly be delivered by ship and offloaded at a new quay to be constructed at the Site. There will also be feedstock storage facilities at the Site.
- 3.3 **Feedstock pre-treatment.** The feedstock will need to be thermally treated before use, which will be carried out on Site and also potentially off-site by suppliers. The thermal treatment homogenises the feedstock to optimise gasification;
- 3.4 **SAF production.** This comprises gasification of the feedstock into a syngas. The syngas is then cleaned for conversion to long-chain hydrocarbon waxes and other light hydrocarbon liquid products in a Fischer-Tropsch (FT) Reactor and subsequently refined; and
- 3.5 **Product processing, storage and export.** SAF and renewable naphtha will be tested and quality checked before being transferred to bulk liquid storage on Site and/or off-site via pipelines. Products will then be transferred to loading facilities for export.
- 3.6 To support the SAF production activities, a number of ancillary or associated operations are required (which are expected to be included in the DCO as associated development under section 115 or ancillary matters under section 120(3):
- 3.7 A new quay will be developed on the river Tees to facilitate construction of the plant, feedstock importation to Site and potentially also export of finished product. This quay will be contiguous to and form part of the Site. The new quay will replace two smaller redundant quays in the same location;
- 3.8 Electricity and steam are required for the Project. To minimise the carbon intensity of the produced SAF, the electricity and steam should be delivered by low carbon sources. Therefore, it is proposed that these will primarily be supplied through an on-site biomass-fired Combined Heat and Power (CHP) plant. It is proposed that this CHP plant will have an electrical output capacity of up to

approximately 200MWe, with additional steam production, and therefore is a Nationally Significant Infrastructure Project ('NSIP') in its own right as it surpasses the 50MW threshold for generating stations defined in section 15 of the Planning Act 2008. This activity is therefore not included in the Section 35 direction request, though it will be included in the DCO application given its direct relationship to the main development;

- 3.9 Installation of pipelines for utilities including for the supply of raw water, potable water, natural gas, oxygen and nitrogen to the process. Natural gas will be required during plant start-up and as auxiliary fuel for some processes during operation;
- 3.10 Installation of pipelines for export of finished product to marine or rail loading infrastructure;
- 3.11 Installation of new and repurposing of existing pipeline(s) including for off-site process wastewater treatment and discharge;
- 3.12 Installation or modification of electricity connection(s) to provide electricity to the Site;
- 3.13 Installation of an on-site Air Separation Unit (ASU) for provision of oxygen and nitrogen to the process;
- 3.14 Feedstock, intermediates and product bulk storage;
- 3.15 Ancillary matters in accordance with s120(3) of the Planning Act 2008.

## **4 The Site**

- 4.1 The proposed Site for the Project is a predominantly brownfield site formerly used as a chemical production facility with associated power station, located on Seal Sands in the administrative area of Stockton-on-Tees Borough Council ('STBC') north of the River Tees on Teesside. Some utility connections will extend south of the River Tees into the administrative area of Redcar and Cleveland Borough Council ('RCBC').
- 4.2 This Site has been carefully chosen by the Applicant due to its suitability, size and proximity to necessary infrastructure required to support the SAF production, notably access to the River Tees for construction and operational logistics, proximity to the Northern Endurance Partnership (NEP) carbon dioxide transport and storage infrastructure for a potential future connection and proximity to rail and marine facilities for export of finished product.
- 4.3 While the use of sustainably sourced biomass and low carbon on-site electricity generation means that the produced SAF would meet the SAF Mandate requirements, a potential future connection to NEP carbon capture infrastructure could mean that lower carbon or even negative carbon SAF could be produced in the future.

- 4.4 The anticipated Order Limits for the Project i.e., the 'Site', are indicatively shown in Appendix 2 which represents an area of 220 hectares. The locations of the various plant operations and structures on Site are the subject of on-going environmental and technical studies and it is envisaged that these will be refined and confirmed in advance of an application for development consent being submitted.

## **5 Justification for Section 35 Direction Request**

- 5.1 The Project Need is set out in Section 2 above.
- 5.2 With the exception of the associated biomass-fired CHP Plant, no elements of the Project fall under the listed activities in Section 14 of the Planning Act 2008 and therefore the SAF production facility is not defined as a project of national significance under the current wording of the Act. The proposed CHP Plant is associated development to the SAF production facility based on Department for Communities and Local Government (DCLG) Guidance, and not the other way round, since the CHP Plant is functionally subordinate to the principal development.
- 5.3 As the Project would be the largest second generation SAF production facility in the UK and as there is a clear national need for domestic SAF production in order to meet the Government targets and SAF Mandate, it is considered that the Project is of national significance based on its intended purpose, nature and size.
- 5.4 As established in the Section 35 direction for Previous Section 35 Project, this Project lies within the field of energy given that the product from the process is a low carbon fuel primarily for use in jet engines to displace the use of fossil fuels. The Project will be wholly in England and within the territorial waters of England as required by Sections 35 (2)b) and 35 (3)a) of the Planning Act.
- 5.5 The Applicant confirms that no application for consent or authorisation mentioned in Section 33(1) or (2) of the Planning Act has been made by it in relation to the elements of the Project to which this request relates.
- 5.6 It is therefore considered that the relevant conditions are met for the Project to be considered as a Nationally Significant Project and this request for a direction is therefore made as a "qualifying request" under Section 35 of the Planning Act.
- 5.7 The Applicant is confident that commercial agreement for the land requirements for the Project including easements and rights can be obtained from third parties, including through the use of appropriate protective provisions. However, the option of using targeted compulsory acquisition powers needs to be available to make sure that the Project is deliverable and investable.
- 5.8 In addition, the Project requires work to develop a new quay which in turn will require a marine licence from the Marine Management Organisation and other associated consents. This means

that, with a DCO being required for the linked development of the CHP plant in in any case, multiple different consents would be required from multiple regulators and host authorities to deliver the integral project. A fragmented approach to consenting introduces significant risk and cost to the deliverability and viability of the Project, compared to a DCO that encompasses the planning powers for the project described above and a deemed marine licence.

- 5.9 It is recognised that the Planning Act 2008 was introduced to facilitate and expedite the delivery of complex, nationally significant projects, such as this Project. If a direction is given by the Secretary of State that this Project requires development consent, this would assist the Applicant to deliver the Project with more certainty, supporting the Government's ambitions and Mandate for domestically produced low-carbon SAF to be available to help decarbonize the aviation sector.

## **6 Summary**

- 6.1 The Applicant is seeking a direction from the Secretary of State to confirm that the Project constitutes development for which development consent is required, in accordance with the provisions of the Planning Act 2008.
- 6.2 This letter represents a 'Qualifying Request' under Section 35 of the Planning Act 2008. The Project is within the field of energy and would be wholly within England. The Project is also of national significance by virtue of its size, scale and complexity and in terms of how it would support key Government objectives, strategies and policies for decarbonising the aviation sector.
- 6.3 We would be grateful if you would confirm safe receipt of this letter. Please do not hesitate to contact us if you require any further information in relation to the Project.

Yours sincerely,



Noaman Al Adhami  
**LGF Projects Limited**

**Appendix 1**  
**Draft Section 35 Direction**

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**DIRECTION BY THE SECRETARY OF STATE FOR ENERGY SECURITY AND NET ZERO (“THE SECRETARY OF STATE”) UNDER SECTION 35 AND SECTION 233 OF THE PLANNING ACT 2008 RELATING TO THE LIGHTHOUSE GREEN FUELS PROJECT**

1. By letter to the Secretary of State received on [ ] 2025 (“the s35 Direction Request”), LGF Projects Limited (“the Applicant”) formally requested that the Secretary of State exercise the power vested in him under section 35(1) and 233(2) of the Planning Act 2008 (“the Act”) to direct that the proposed Lighthouse Green Fuels Project (“the Proposed Development”) as set out in the s35 Direction Request be treated as development for which development consent under the Act is required.
2. In its Request, the Applicant advises that the Proposed Development includes 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 s35 Direction Request.
3. Additionally, it is proposed that linked development of 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 which 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” and is therefore excluded from the s35 Direction Request.
4. The Secretary of State is satisfied that—
  - The Proposed Development is in the field of energy;
  - The Proposed Development will be wholly within England and waters adjacent to England up to the seaward limits of the territorial sea and the Renewable Energy Zone when completed;
  - Other than the linked development of the CHP plant, 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 powers in section 35(1) and 233 of the Act; and
  - The Applicant’s s35 Direction Request constitutes a “qualifying request” in accordance with section 35ZA(11) of the Act.



5. The Secretary of State notes that the purpose of the Proposed Development is to produce Sustainable Aviation Fuel to be blended and used in the aviation industry as an alternative to fossil-fuel derived kerosene fuel and thereby to support the UK Government 2030 SAF Mandate. The naphtha produced in the process will be used off-site for sustainable chemical production or energy generation.
6. Having considered the details of the Applicant's proposals as set out in the s35 Direction Request, the Secretary of State concludes that the Proposed Development is nationally significant; the reasons for this are included in the Annex below.
7. The Secretary of State considers that if the details of the Proposed Development change before the Applicant submits 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.
8. The Secretary of State has taken the decision within the conditions as required by sections 35A(2) and (5) of the Act, and issues this Direction accordingly under sections 35(1), 35ZA, and 233 of the Act.
- 9. The Secretary of State therefore considers that the Proposed Development is to be treated as development for which development consent is required.**
10. The Secretary of State further directs in accordance with sections 35ZA(3)(b) and (5) of the Act that an application for a consent or authorisation mentioned in section 33(1) or (2) of the Act or similar to that described in the s35 Direction Request made to the Secretary of State for Energy Security and Net Zero by LGF Projects Limited on [ ] for the Proposed Development is to be treated as a proposed application for which development consent is required.
11. 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

[John Wheadon]

[Head of Energy Infrastructure Planning]

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

[ ] 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—

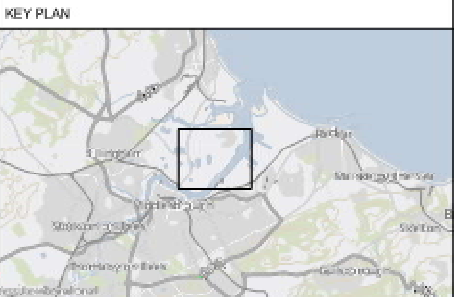
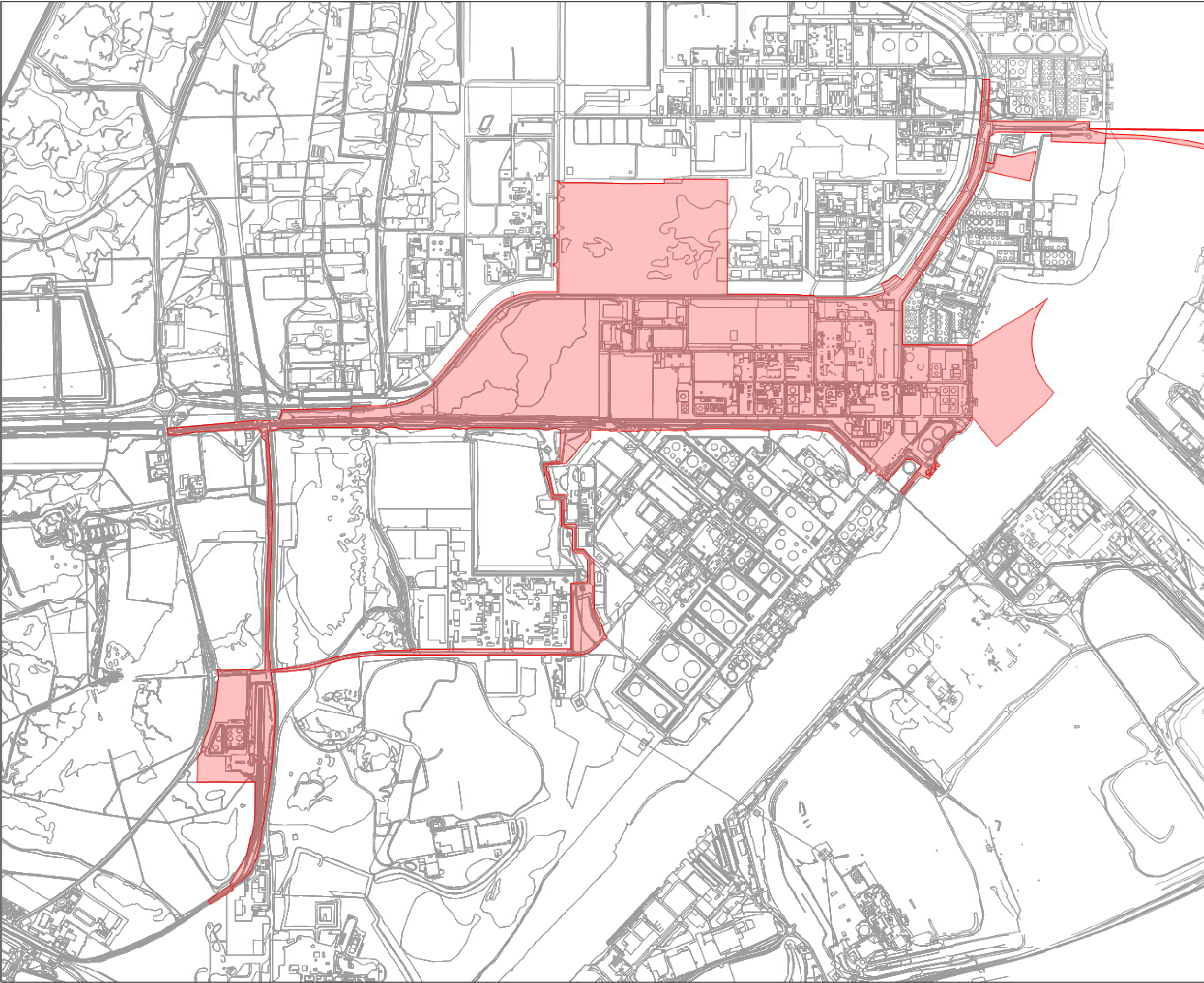
- The Proposed Development will use sustainably sourced biomass which it will convert into energy and energy vectors;
- The Proposed Development will produce the following energy products from gasification and related processes:
  - 1) Sustainable Aviation Fuel (SAF) synthetic paraffinic kerosene (FT-SPK), 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 1<sup>st</sup> 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 GHG 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 2**  
**Figure 1: Indicative Order Limits Boundary**

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INDICATIVE ORDER LIMITS BOUNDARY

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Client

Designer  
**Ardent**

Project  
LIGHTHOUSE GREEN FUELS PROJECT

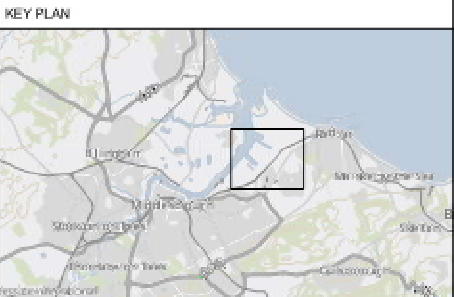
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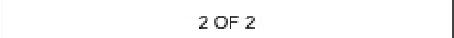
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INDICATIVE ORDER LIMITS BOUNDARY

2 OF 2

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