

Statement of Community Consultation

May 2024

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1. Introduction

1.1. Purpose of the document

- 1.1.1. Lighthouse Green Fuels Limited ('the Applicant') is preparing a Development Consent Order ('DCO') application under the Planning Act 2008 ('the Act') for a new advanced sustainable aviation fuel ('SAF') refinery located in Billingham, Stockton-on-Tees (herein referred to as 'the Project'). The DCO undertaker for the Project is Lighthouse Green Fuels Limited; a company wholly-owned by Alfanar.
- 1.1.2. This document is a Statement of Community Consultation ('SoCC'), which sets out how we intend to consult people ahead of our application for development consent for the Project.
- 1.1.3. The Applicant is required to secure a DCO in order to construct, operate and maintain the Project. This SoCC has been prepared in accordance with section 47(1) of the Act and Regulation 12 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 ('EIA Regulations').
- 1.1.4. In developing the SoCC, we consulted with and had regard to comments from the following Section 43(1) local planning authorities:
 - Stockton-on-Tees Borough Council; and
 - Redcar and Cleveland Borough Council.
- 1.1.5. The following local planning authorities and development corporations received the SoCC for information:
 - Hartlepool Borough Council;
 - Middlesbrough Council;
 - Middlesbrough Development Corporation;
 - Hartlepool Development Corporation; and
 - South Tees Development Corporation.

2. The planning process

- 2.1. Nationally Significant Infrastructure Projects (NSIPs)
- 2.1.1. Part 3 of the Act defines which projects constitute an NSIP. Once classed as an NSIP, development consent is required under Part 4 of the Act. The Project in its entirety does not automatically fall within the definition of an NSIP, as the projects associated to the main gasification facility do not fall under such a definition.
- 2.1.2. Therefore, on 7 October 2022, the Applicant formally requested a direction by the SoS for Business, Energy and Industrial Strategy (now the SoS for Energy Security and Net Zero), pursuant to Section 35(1) of the Act, that the proposed Project be treated as an NSIP, for which development consent is required.
- 2.1.3. The SoS, in his letter dated 25 October 2022, directed that the proposed Project should be considered a development of national significance and would require development consent.
- 2.1.4. Due to the evolving design of the Project, the Applicant submitted a request on 26 March 2024 for a variation to the existing direction from the SoS, pursuant to Section 35 of the Act, that Project be treated as an NSIP for which development consent is required. The SoS, in her letter dated 23 April 2024 (Appendix A), agreed to the request for a variation of the existing direction, and reconfirmed the Project should be considered a development of national significance and would require development consent.
- 2.1.5. Unlike planning applications pursuant to the Town and Country Planning Act 1990 ('TCPA'), DCO applications are required to be submitted to the Planning Inspectorate. The Applicant therefore intends to submit to the Planning Inspectorate an application for a DCO under Section 37 of the Act.
- 2.1.6. The Application will be examined by an inspector(s) appointed by the Planning Inspectorate – the independent body responsible for examining NSIPs – which would make a recommendation on the application to the SoS. The SoS will make the final decision on a DCO application.
- 2.1.7. Before submitting an application, the Act requires us to carry out consultation with people living in the vicinity of the land and prescribed stakeholders.

2.1.8. Consultation ensures that potential mitigation measures can be considered and, where appropriate, built into our designs before an application for development consent is submitted.

3. About Alfanar and Lighthouse Green Fuels

3.1. The developer - Lighthouse Green Fuels Limited

- 3.1.1. Lighthouse Green Fuels Ltd is a company wholly owned by Alfanar Global Development Company ('Alfanar'). Alfanar is a privately owned, global project development, manufacturing and engineering company, with headquarters in Riyadh, Saudi Arabia, and is delivering the Project in Billingham, UK. The company is primarily engaged in the manufacturing and trading of low, medium, and high-voltage electrical components and products. Additionally, Alfanar is developing a portfolio of conventional and renewable energy projects including wind, solar, water treatment, infrastructure, technical services, digital solutions, and electronics engineering.
- 3.1.2. With a global renewable power development portfolio of 1.75 GW, Alfanar's Global Development division has significantly contributed to the decarbonisation of the power sector.
- 3.1.3. Now the division is focused on decarbonising the transportation sector. This includes the 'hard-to-decarbonise' sectors such as aviation, marine and heavy goods vehicles. It currently has renewable fuels projects, including SAF projects, under development across the world.
- 3.1.4. Alfanar is conscious of its impact on the world and its Sustainability Policy comprises four sets of practices:
 - **environmental practices** adopting modern methodologies and processes to rationalise the use of resources and minimise negative environmental impacts, while urging suppliers and partners to fulfil environmental regulations.
 - **social practices** supporting social, cultural, and technological initiatives carried out by communities, and giving preference to solutions that aid their development.
 - governance practices maintaining accuracy, integrity, and transparency in all dealings with clients, partners, and employees, and respecting the privacy of their information.
 - economic practices anticipating, meeting, and exceeding the market needs by developing innovative and sustainable solutions and exploring possibility in the unexpected, while supporting development of local content.
- 3.1.5. Alfanar will be a key partner in realising the UK government's commitments to decarbonising the UK's aviation sector and achieving Net Zero (and 'Jet Zero') by 2050.

4. The Project

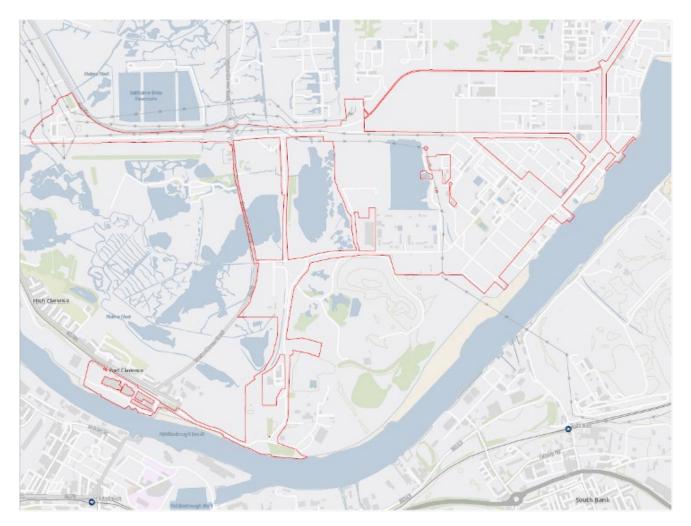
4.1. The proposed Project

- 4.1.1. The Project Site is located in Billingham, Stockton-on-Tees, UK.
- 4.1.2. The Project is expected to be the UK's first commercial scale SAF project, converting over 1 million tonnes of waste and/or waste biomass into over 175 million litres of advanced SAF and approximately 30 million litres of green naphtha each year.
- 4.1.3. This is equivalent to the fuel required for over 25,000 short-haul flights to Europe, or over 2,500 long-haul flights to destinations such as the Americas or Australia, per year.
- 4.1.4. It is also the equivalent of saving approximately 350,000 tonnes of carbon dioxide emissions per year compared with conventional aviation fuel.
- 4.1.5. With future plans to connect the Project into the local carbon capture and storage infrastructure, Net Zero Teesside, provided it is available and operating with permanent storage, this could increase to 750,000 tonnes of carbon dioxide emissions saved per year.
- 4.1.6. The Project is a key component in the UK government's Jet Zero aspirations, which will see the decarbonisation of the aviation sector by 2050, as outlined in the Department for Transport's 'Jet Zero Strategy: Delivering net zero aviation by 2050'.
- 4.1.7. Central to the Jet Zero Strategy is the commitment to have at least five SAF plants under construction in the UK by 2025. The production and uptake of SAF will also be supported by the introduction of a SAF mandate that aims to realise at least 10% of SAF (approximately 1.2 million tonnes) in the UK aviation fuel mix by 2030. The Project would be one of these five sites.
- 4.1.8. The Project will involve the development of a SAF plant, bulk liquid storage for SAF and naphtha, pipeline and cable connections and utility corridors, flares, heavy haul road, conveying corridors, rail terminal, marine transport infrastructure and associated development for construction and/or operational use.
- 4.1.9. Some preparation works at the Project Site will be undertaken under a separate planning consent to enable smooth delivery of the construction phase, including the demolition of existing infrastructure.

4.2. Order Limits

4.2.1. The land required for the Project is located within the administrative boundaries of Stockton-on-Tees Borough Council and Redcar and Cleveland Borough Council. This is shown in Figure 1 – Order Limits, shown across two plans below.

Figure 1 – Order Limits





4.3. Environmental Impact Assessment

- 4.3.1. The Project falls under the definition of 'Environmental Impact Assessment (EIA) development' under the <u>EIA Regulations 2017</u> and hence will require EIA. This means we must assess the likely significant environmental effects of our proposals and, where appropriate, implement mitigation measures that will prevent or reduce any significant adverse effects. We will report on the outcomes of this process in our full Environmental Statement, which we will submit as part of our DCO application.
- 4.3.2. A Preliminary Environmental Information Report ('PEIR') which contains preliminary environmental information on the likely significant effects of the project will be consulted upon as part of the statutory consultation. The PEIR will be available to view on the Project website and at in-person events during statutory consultation. We will seek your views on the information provided within this document.

5. Consultation and engagement approach

5.1 Aims, objectives, and values

- 5.1.1. The Applicant is committed to engaging and consulting with communities and stakeholders at an early stage of the Project, giving people the opportunity to provide feedback and insight at a formative stage ahead of more detailed design work being carried out. This commitment includes providing accessible information on the Project to help inform engagement and feedback from stakeholders.
- 5.1.2. The Applicant wants to ensure that the Project is listening and learning from the people that live in the area, as well as wider stakeholders.
- 5.1.3. The Applicant is committed to being a good, long-term neighbour in Billingham, and wants to ensure that it builds a facility that benefits the local area. The approach to engagement and consultation is to carry this out in two broad phases. This includes socialising the Project and ongoing engagement, which started in October 2023, followed by statutory consultation in Spring 2024.
- 5.1.4. The approach to consultation is guided by the requirements of the Act and Guidance from the Department for Communities and Local Government (now Department for Levelling Up, Housing and Communities).

5.2. Principles of engagement and consultation

5.2.1. In line with the requirements set out in the Act, along with the Planning Inspectorate's 'Guidance on the pre-application process' (2015),¹ the Applicant will be carrying out meaningful, statutory pre-application consultation and engagement with the local community in the vicinity of the proposed project, as well as landowners, businesses, parish councils, elected representatives, and wider stakeholders, where appropriate. In order to design and build the best possible project, the Applicant will go beyond the minimum requirements in the Act to ensure we seek the views of communities and wider stakeholders.

1

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/41 8009/150326 Pre-Application_Guidance.pdf

- 5.2.2. Our principles of engagement have also been set out in line with principles provided by the Cabinet Office (2018),² which recommend that consultation:
 - should be clear and concise;
 - should have a purpose;
 - should be informative;
 - is only part of a process of engagement;
 - should last for a proportionate amount of time;
 - should be targeted;
 - should take account of the groups being consulted;
 - should be agreed before publication; and
 - should facilitate scrutiny.
- 5.2.3. The Applicant has implemented a digital/in-person hybrid approach to consultation. Members of the public and other stakeholders can view the proposals online, and feedback can be provided through a dedicated website. The Applicant has also utilised non-digital methods to provide alternative means for consultees to engage with the consultation.
- 5.2.4. The Applicant has publicised the consultation to ensure that all relevant information is accessible and readily available to members of the public. This includes:
 - making copies of all consultation documents available including copies of the PEIR (and non-technical summary), consultation information booklet, and feedback questionnaire – both online and in person.
 - setting up a public information point containing hard copies of the consultation information booklet and feedback questionnaire, alongside envelopes to return feedback to the consultation via the post (at no cost, with a Freepost return envelope).
 - holding three face-to-face consultation events.
 - holding three online webinar consultation events.

2

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/69 1383/Consultation_Principles_1_.pdf

5.3. Early engagement and preparation of the SoCC

- 5.3.1. The Applicant has engaged with officers at Stockton-on-Tees Borough Council and Redcar and Cleveland Borough Council to discuss the Project's approach to consultation. This enabled officers to provide feedback on our approach, which is outlined in this SoCC.
- 5.3.2. In October 2023, the Applicant officially started socialising the Project and undertook a programme of additional engagement with members of the local community and key stakeholders to build awareness of the upcoming statutory consultation.
- 5.3.3. The initial engagement for project launch included:
 - launch of a project website including messaging and information about the Project and upcoming engagement activities. The website also includes contact details for people to get in touch with the Project, which can be found here: www.lighthousegreenfuels.co.uk.
 - **animation** an animation detailing the SAF production process is included on the Project website to explain a complex process in an accessible, visual way.
 - **media release** shared with local and regional publications to disseminate information about the Project among a wider audience beyond the consultation mailing zone. The media release includes information about the Project, next steps for engagement, and contact information for people to get in touch (also hosted on the Project website).
 - digital advert an advert with an impression (i.e. views) limit of 100,000 impressions, linking to the Project website, on *Teesside Live*. It is estimated that this impression count would run the advert for around four weeks.
 - offers to brief key stakeholders notably the constituency MP, closely neighbouring MPs, host local authorities, closely neighbouring local authorities, the Tees Valley Mayor, host and closely neighbouring parish councils. These briefings would provide background information on the Project and the consultation approach.

5.3.4. Objectives for the Project's early engagement included:

• establishing a dialogue between the Project and key stakeholders ahead of the formal statutory consultation;

- receiving early feedback on high-level information shared on the Project to feed into the consultation planning;
- understanding and mitigating any local issues ahead of the formal statutory consultation.
- 5.3.5. The Project proposals continued to develop following the period of initial engagement. This resulted in the Order Limits extending into Redcar and Cleveland Borough Council's local authority boundary, making it a host local authority.

6. Statutory consultation

6.1. When will the consultation take place?

- 6.1.1. The statutory consultation will commence on Thursday 16 May 2024 and close at 11:59pm on Thursday 20 June 2024. This is in excess of the statutory minimum periods required by the Act.
- 6.1.2. Held in accordance with Section 42 of the Act, this consultation provides an opportunity for us to present our Project proposals for formal response. More details on what we will be consulting on and how we propose to consult are included below.

6.2. What are we consulting on?

- 6.2.1. The aim of the pre-application consultation is to ensure that the community, landowners, stakeholders, and technical consultees have the opportunity to understand and influence our proposals.
- 6.2.2. The Applicant will be seeking feedback on all aspects of our plans for the Project. This will involve inviting comments on issues such as, but not limited to:
 - The need for the Project;
 - The Project Site, including indicative locations of equipment and infrastructure within this area;
 - Measures we are proposing to reduce the impacts associated with the Project, as detailed in the PEIR and NTS;
 - The consultation; and
 - Any other feedback and local issues or sensitivities of which we should be aware.

6.3. Who are we consulting?

6.3.1. Anyone who is interested in this Project is welcome to take part. The Applicant welcomes all views and will take them into account before the DCO application is submitted.

- 6.3.2. Under Section 47 of the Act, the Applicant has a duty to consult people living in the vicinity of the land, i.e. the local community.
- 6.3.3. In consultation with host local authorities, we have developed a primary consultation zone ('PCZ'), as shown in Figure 2 below, comprising a total of 1,456 addresses. The shaded blue area in Figure 2 shows the project's Order Limits, and the outer red line shows the edge of the PCZ.

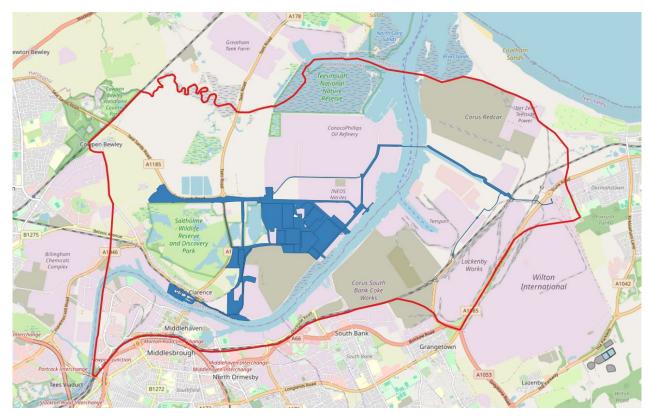


Figure 2 – Primary Consultation Zone (PCZ)

- 6.3.4. The PCZ was developed to be proportionate to the size and potential impact of the Project. In developing the zone we have considered:
 - existing natural and human geographic boundaries, such as main roads, railway lines and rivers;
 - capturing entire communities, rather than excluding small numbers of properties; and

- where we propose to undertake additional works to enable construction transport and equipment areas.
- 6.3.5. The PCZ has been identified based on the assessment of the site and local authority boundaries, which we believe is proportionate for the Project.
- 6.3.6. All homes and businesses within the PCZ will directly receive a newsletter in the post at the start of the statutory consultation period.
- 6.3.7. We recognise that people who live and work beyond the PCZ may have an interest in our proposals and may wish to participate in the statutory consultation. We are committed to making sure individuals, communities, and organisations are able to participate in the consultation and will raise awareness using a number of methods, such as advertising and press releases in the local media, and engagement with parish and town councils. See Section 6.5 Promoting the consultation for further details.
- 6.3.8. The Applicant will consult the following groups:
 - local authorities;
 - local residents and businesses within the vicinity of the Project;
 - landowners with interest in the Project;
 - parish councils;
 - community groups and faith communities;
 - environmental groups in the vicinity of the Project;
 - schools and colleges within the vicinity of the Project;
 - seldom-heard groups;
 - statutory consultees;
 - non-statutory consultees; and
 - members of parliament and local government.
- 6.3.9. A list of seldom-heard and hard-to-reach groups, and non-statutory stakeholder groups are included in Appendix B.

6.4. How are we consulting?

- 6.4.1. During statutory consultation, we will use a range of methods to ensure the consultation is inclusive and accessible for all stakeholder audiences. In addition to making information available online, we will host a series of webinars to provide a platform for people to speak with members of the Project team to help inform their consultation response.
- 6.4.2. Alongside the digital-first approach to consultation, non-digital methods will also be used to provide alternative means for consultees to engage with the Project. In-person consultation events are also planned to be held within the vicinity of the site during statutory consultation.
- 6.4.3. The following documents will be made available as part of the consultation:

Document	Detail
Consultation Newsletter	 A Consultation Newsletter will be prepared to provide a high-level overview of the Project, the consultation events, and how people can get involved. The newsletter will indicate where the relevant Project information can be found and publicises the consultation events, including locations, dates, and times. The newsletter would be sent to all addresses in the PCZ and stakeholders contacted at project launch, such as: Stockton-on-Tees Borough Council councillors and members Redcar and Cleveland Borough Council councillors and members leadership councillors and members in neighbouring authorities host and neighbouring parish and town councils the Mayor of Tees Valley Combined Authority host and neighbouring constituency MPs community and environmental groups, and faith communities hard-to-reach and seldom-heard groups.
Consultation Information Booklet	A Consultation Information Booklet will be published at the start of the consultation. It will provide the following information:

Table 1 – Statutory consultation documents

Document	Detail
Document	
	 a summary of the proposals we are consulting on details of how people can take part in the consultation information on the potential benefits and impacts of the Project
	 how we propose to mitigate any potential impacts how stakeholder feedback will be considered and used to influence and shape the proposals.
	Paper copies of the Consultation Information Booklet will be available at our consultation events, information point, and on request by post.
Feedback Questionnaire	A Feedback Questionnaire will be prepared to allow people to provide feedback on the proposals.
	Paper copies of the Feedback Questionnaire will be available at consultation events, the public information point, and via the post on request.
	The Feedback Questionnaire can be completed online via the Project website: <u>www.lighthousegreenfuels.co.uk</u> . It can also be returned to us at our consultation events, by email (<u>info@lgf.co.uk</u>) or by post (by writing 'FREEPOST LIGHTHOSUE GREEN FUELS') on a blank envelope (no stamp required).
Frequently Asked Questions (FAQs)	A set of FAQs are available on the Project website. Should feedback or enquiry themes emerge during the consultation, we will update the FAQs to reflect this.
	If an issue or question is not covered by the website FAQs, stakeholders can contact the project team over the phone, via email, or by Freepost.
Preliminary Environmental Information Report (PEIR) and non- technical summary (NTS)	The PEIR will contain a description of the Project, a preliminary assessment of the potentially significant environmental effects, and the initial strategies to mitigate adverse effects. The PEIR will be based on current information available, but the assessments will be developed once further detail is available and reported within the Environmental Statement submitted with the DCO application.
	A hard copy of the PEIR will be available on request for a charge of $\pounds 0.35$ per page to cover printing and posting costs. USBs containing a copy of the PEIR will be available on request free of charge.

Document	Detail
	A NTS of the PEIR will also be available for download from the Project website and in printed format on request, free of charge.
	Paper copies of the PEIR and the NTS will be available at our consultation events and information point for reference.
Technical documentation, including maps and plans for the Project	Maps and plans showing the extent of the Project will be made available online and in hard copy at consultation events, and on the Project website during and following the consultation period.
Materials in alternative formats	Upon request, all documents will be available in alternative accessible formats, such as braille, speaking text, large print, and alternative languages. All requests should be made to the Project by email – info@lgf.co.uk
Statement of Community Consultation (SoCC)	The SoCC document will be made available online as part of the consultation and as paper copies upon request.
	Paper copies of the SoCC will be available at our consultation events and information point for reference.

6.4.4. All statutory consultation documents will be available online, on the Project website, and in hard copy at no extra charge (except the PEIR, a hard copy of which can be requested for a charge of £0.35 per page to cover printing and posting costs). A USB containing all Project documentation can be requested free of charge through the community contact centre. Upon request, all documents will be available in alternative formats, such as braille, speaking text, and alternative languages.

6.5. Promoting the consultation

6.5.1. We will use a variety of methods to make people aware of the Project and advertise the consultation. These methods are outlined in Table 2.

Table 2 – Engagement methods

Method	Detail
Consultation Newsletter	All residents, local businesses, and communities within the PCZ will be notified of the start of statutory consultation through a Consultation Newsletter. The newsletter will also be issued by email to wider consultees, including community groups and hard-to-reach groups, listed in Appendix B.
	The Consultation Newsletter will provide an overview of the Project, the consultation events, and how stakeholders can provide feedback on the proposals or get in touch for more information.

Method	Detail
Press release	A local media press release would provide wider notification to local stakeholders of the consultation events, reaching stakeholders outside the consultation mailing zone. The press release would be briefed into local and regional media outlets.
Emails	Emails will be sent to stakeholders informing them of the statutory consultation, upcoming events, how to request further information, and how to feed back. The list of stakeholders is included in Appendix B.
	This will allow stakeholders to engage with the consultation and to share the consultation information among their networks, such as with local constituents or group members.
Project website	The Project website will be updated on the launch of the statutory consultation. This update would include details of consultation events, consultation materials, and information on how to feed back on the Project proposals. A more detailed set of Project information would also be included, with uploads of the technical documents listed in Table 1, and details of how printed copies of these documents can be requested to be sent via the post. This will allow stakeholders to engage fully with the consultation, either in person or online.
	The Consultation Newsletter would direct people to the Project website to access more information and find out how to raise queries with the Project team, and how to provide feedback on the proposals via an online feedback questionnaire or to send in a paper copy via the Freepost address.
Statutory notices and adverts	Statutory notices to publicise the consultation and the SoCC will be published, in accordance with Section 47 of the Act, as follows:
	 publicising the consultation – once in the London Gazette, a national newspaper and twice (across two successive weeks) in local circulating newspapers publicising the SoCC – once in local circulating newspapers.
Social media	We will promote the consultation on Project-related social media accounts. Consultation feedback will not be accepted through social media channels. Links to information about the consultation will be sent directly to key stakeholders to enable them to advertise and promote the consultation through their own online channels, including their websites, forums, and social media channels.
Information point	Hard copies of the Consultation Newsletter, Consultation Information Booklet and the Feedback Questionnaire will be available to take away from a local information point in Billingham.

Method	Detail
	 A copy of the SoCC, the PEIR and NTS will also be available to inspect at this location. We will check the stock of the consultation documentation at the information point throughout the consultation period. A USB containing all Project documentation can be requested free of charge through the community contact centre. The local information point is detailed below: Billingham Library, Kingsway, Billingham TS23 2LN (opening hours Mon-Tue 8:30am-7pm, Wed-Fri 8:30am-5pm, Sat 9:30am-4pm, Sun closed).
Site notices	Notices placed in publicly accessible locations within the Order Limits to notify of the consultation.
Face-to-face consultation events	Three face-to-face consultation events will take place during the statutory consultation.
	This includes two events in suitable community venues close to the Port Clarence area, where local people will be able to meet with the Project team face-to-face and view the consultation materials. It also includes an event in the wider community and high footfall area in Billingham. This dual approach will ensure we engage with communities closest to the Project, and with stakeholders and communities from a wider geographical area.
	 The locations for the face-to-face events are included below: Billingham Forum, Town Centre, The Causeway, Stockton-on- Tees, Billingham TS23 2LJ – Saturday 1 June 2024; 12pm to 5pm
	 High Clarence Primary School, Port Clarence Road, Middlesbrough TS2 1SY – Wednesday 5 June 2024; 3pm to 8pm Billingham Rugby Club, Greenwood Rd, Billingham, Stockton- on-Tees TS23 4BA – Thursday 6 June 2024; 10am to 5pm
Digital events	Three webinar events will be held during the statutory consultation for approximately one and a half hours each at varying times to ensure inclusivity and accessibility.
	The webinars will involve the Project team running through a presentation to explain the current Project proposals, the consultation materials, and how to provide feedback. This would be

Method	Detail	
	followed by a general question and answer session where attendees can raise questions. Feedback would be directed towards the feedback questionnaire on the Project website.	
	The locations for the online webinars are included below:	
	 Online webinar 1 - Tuesday 28 May 2024; 6:30pm to 8pm Online webinar 2 - Tuesday 4 June 2024; 10am to 11:30am Online webinar 3 - Wednesday 12 June 2024; 10am to 11:30am 	

6.6. Wider engagement

- 6.6.1. Ongoing engagement will be undertaken ahead of the launch of the consultation with relevant stakeholders, including local authorities, MPs, the Environment Agency, Natural England, Marine Management Organisation, Port Authority, Historic England (where possible), and with local interest groups, residents, and landowners who get in touch.
- 6.6.2. All relevant local and parish councils, elected members for the county and districts, and MPs will be contacted at the launch of the consultation and will be kept informed about the Project. They will also be encouraged to share information about the consultation with members of their constituencies or local communities.

6.7. Hard-to-reach groups

- 6.7.1. We will ensure that all engagement and consultation is inclusive, and we want to reach those who otherwise may not engage with us. Hard-to-reach groups are defined as being inaccessible to most traditional and conventional methods of consultation for any reason. To ensure that hard-to-reach groups are encouraged to get involved in the consultation, the materials will be prepared to be accessible and clear.
- 6.7.2. Consultation methods used to engage with these groups are set out in Table 3. We will continue to liaise with local organisations representing hard-to-reach and seldom-heard groups to ensure accessibility to the consultation and that materials can be made available in the appropriate formats.
- 6.7.3. A list of organisations representing hard-to-reach and local interest groups can be found in the consultee list in Appendix B. Table 3 details consultation and engagement approaches with hard-to-reach groups.

Table 3 – Hard-to-reach groups engagement approach

Hard-to-reach group	Engagement approach
The elderly	• Directly mailing the consultation newsletter to all stakeholders within the PCZ and providing details of how to access paper copies of other Project documents and to provide feedback by post.
	Options to engage through conventional communications channels including the Freepost address and Freephone information line.
	 Providing important information in both digital and non-digital formats, and providing alternate formats such as braille and large print (upon request).
	Engagement with community groups serving the elderly demographic group.
	• Providing paper copies of materials at an information point location along with contact details for the Project team, who will be able to provide further assistance and send information to those who are unable to access the material online.
	 In-person consultation events in accessible venues, with members of the team available to assist with completing feedback responses.
People with visual impairments	 Providing important information in both digital and non-digital formats, and providing alternate formats such as speaking text, braille and large print (upon request).
	• Option to send Project website text and/or materials included on the website in easy read format (upon request).
	 Providing telephone callbacks for stakeholders with further questions or those who would like to discuss the Project further with the Project team.
	 In-person consultation events with members of the team available to assist with completing feedback responses.
People with hearing impairments	• Directly mailing the consultation newsletter to all stakeholders within the PCZ and providing details of how to access paper copies of other Project documents and provide feedback by post.

Hard-to-reach group	Engagement approach	
	 Online engagement through the consultation website and webinars to negate the need for travel. 	
	• Providing important information in both digital and non-digital formats and providing alternate formats such as braille and large print (upon request).	
	 Providing British Sign Language signing at webinars (upon request). 	
People with limited mobility	 Directly mailing the consultation newsletter to all stakeholders within the PCZ and providing details of how to access paper copies of other Project documents and provide feedback by post. 	
	Accessible in-person consultation event venues.	
	• The consultation being fully accessible online, with all materials and events having digital versions (i.e. digital consultation booklet and webinars) to negate the need for travel.	
	• Providing important information in both digital and non-digital formats and providing alternate formats (upon request).	
	 Advertising the availability of telephone callbacks via the Freephone line, for stakeholders with further questions or who would like to discuss the Project further with the Project team. 	
Geographically isolated individuals or communities	 Directly mailing the consultation newsletter to all stakeholders within the PCZ and providing details of how to access paper copies of other Project documents and provide feedback by post. 	
	 Advertising the availability of telephone callbacks via the Freephone line, for stakeholders with further questions or who would like to discuss the Project further with the Project team. 	

6.8. Information channels

6.8.1. Information and enquiry channels will be available throughout the consultation for members of the community and other stakeholders to get in touch with the Project team, ask questions, request further information, or request printed copies of consultation materials and documents. These channels form the community contact centre, are detailed in Table 4 and will continue to be active throughout the preapplication period.

Method	Contact details	Hours of operation
Online	www.lighthousegreenfuels.co.uk	Available 24 hours a day
Email	info@lgf.co.uk	People can email 24 hours a day, with emails being monitored between 9am and 5:30pm on weekdays. We will aim to issue a response within ten working days of receipt of an email.
Freephone	0800 157 7346	The Project freephone line is staffed between 9am and 5:30pm on weekdays. We will call back anyone who leaves a message on the answerphone facility outside of these hours.
Freepost	FREEPOST LIGHTHOUSE GREEN FUELS	Should enquiries received via post require a response, this will be issued within ten working days of receipt of a letter. Urgent enquiries should be directed to the Project's email address.

Table 4 - Community contact centre information channels

7. Responding to consultation

7.1. How to respond to the consultation

7.1.1. Feedback to the consultation should be submitted in writing or online to the project by 11:59pm on Thursday 20 June 2024.

7.1.2. Consultation responses can be made in the following ways:

- **online** by completing the online feedback questionnaire, which can be accessed via the Project website: <u>www.lighthousegreenfuels.co.uk</u>
- at an in-person consultation event stakeholders attending a consultation event will be able to complete a paper copy of a feedback questionnaire at the event, or take a copy and Freepost envelope away to complete following the event and respond to the consultation by post.

Attendees will also be able to request a feedback questionnaire to be sent in the post, including a return Freepost envelope. Physical copies of the feedback questionnaire can be returned to the Project team via Freepost (using FREEPOST LIGHTHOUSE GREEN FUELS).

- **at an information point** details for requesting hard copies of feedback questionnaires can also be found at the local information point, outlined in Table 2.
- via a request at the community contact centre requests for paper copies of the feedback questionnaire can be made via the following community contact centre channels:
 - o Telephone: 0800 157 7346
 - o Email: info@lgf.co.uk
 - Post: FREEPOST LIGHTHOUSE GREEN FUELS (please note that no stamp is required).

7.2. How we will use consultation feedback

- 7.2.1. We will have regard to all comments received during the statutory consultation, as well as ongoing engagement with communities and stakeholders. All feedback is important to us and will help to influence the design of the Project.
- 7.2.2. The feedback received during statutory consultation will be reviewed and analysed to understand key themes and issues of importance from stakeholders.
- 7.2.3. A Consultation Report will be produced as part of our application for development consent, which will be submitted to the SoS for DESNZ. This document will set out how the feedback from the consultation has shaped and influenced the final proposals. All responses submitted during the statutory consultation will be responded to within the Consultation Report and included within the document with all personal details redacted. We will take reasonable care to comply with the requirements of the General Data Protection Regulation and the Planning Inspectorate's Privacy Policy.

8. Further consultation

8.1. The need for further consultation

8.1.1. If, following the statutory consultation, we consider it is necessary to undertake further targeted or supplementary consultation, this would be undertaken, so far as relevant and proportionate, in accordance with the principles and methods set out in this Statement of Community Consultation.

9. Other consultations in the area

9.1. Working with other local consultations

- 9.1.1. We will work closely with other organisations (such as the host local authorities) that are developing proposals in the area to ensure that the scope and context of the Project is clear in relation to the other consultations. This could include:
 - having headline information about the other consultations at our events or on the Project website;
 - seeking to avoid holding events or running advertisements and issuing press releases at the same time as other consultations, where practical; and
 - ensuring that any responses submitted to our statutory consultation that are intended for another consultation are passed on to the relevant community relations or consultation team.

10. Further information

10.1. Contact details

- 10.1.1. Please do not hesitate to get in touch if you would like to find out more information about the Project. You can get in contact with members of our community relations team using any of the communications methods listed below:
 - Telephone: 0800 157 7346
 - Email: info@lgf.co.uk
 - Post: FREEPOST LIGHTHOUSE GREEN FUELS (please note that no stamp is required).
- 10.1.2. Should you require any documents in large print, audio, or braille, then please contact us using the details provided. All graphs and maps this document are for illustrative purposes only.

Appendix A – Letter from the Secretary of State

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

- 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.
- 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."

- 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.
- 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.
- 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

Appendix B – Non-statutory consultee list

Community groups	
2nd Billingham Scout Group	Cleveland Kickboxing Club
8th Billingham Scout Group	Cowpen Bewley Residents Association
Ash Trees Academy	Hadrian Park Care Home
BCT Aspire	High Clarence Primary School
Bede Sixth Form College	High Grange Community Centre
Billingham Amateur Swimming Club	Low Grange Community Centre
Billingham and Stockton Borough Foodbank	Mavericks Netball Club
Billingham Angling Club	Monkseaton Community Hall
Billingham Baptist Church	North Billingham Methodist Church
Billingham Bowling Club	Northfields School & Sports College
Billingham Boxing Academy	Oadkene Primary School
Billingham Environmental Link Programme (BELP)	Old Billingham Community Centre
Billingham Family Hub	Our Lady of the Most Holy Rosary Catholic
	Academy
Billingham Forum	Pentland Primary School
Billingham Golf Club	Priors Mill Primary School
Billingham Karate Club	Priors Mill Primary School
Billingham Legacy Foundation	RBL – Billingham Branch
Billingham Marsh House Harriers Running Club	Roseberry Primary School
Billingham Rugby Club	RSPB Salthome Nature Reserve
Billingham Silver Band	St Columbia URC
Billingham South Primary School	St John the Evangelist Catholic Primary School
Billingham Spiritualist Church	St Joseph's Catholic Primary School
Billingham Stars Ice Hockey Club	St Michael's Catholic Academy
Billingham Synthonia Cricket Club	St Thomas of Canterbury
Billingham Team Parish	Synthonia Scouts
Billingham Tidy Up Group	Tees Valley Local Access Forum
Billingham Town Council	Teesmouth Bird Club
Billingham Town Football Club	The Church of Jesus Christ of Latter Day
	Saints
Bishopton PRU	Wolviston Court Community Centre
Hard to reach groups	
Age UK Teesside	MeSign
Catalyst Stockton	Tees Valley Rural Action
Corner House Youth Project	The Halcyon Centre
Hart Gables	The Special Educational Needs and Disabilities (SEND) and Inclusion Service

Industry groups and business landowners	
Air Products	Net Zero Teesside/Northern Endurance
	Partnership
Augean North Limited	Network Rail Infrastructure Limited
Augean PLC	North East & Yorkshire Net Zero Hub
BOC Gas & Gear	North East England Chamber of Commerce
CATS Terminal	North East England Climate Coalition
CF Fertilisers UK	North East LEP
Cleveland Fire Authority	North Tees Land Limited
ConocoPhillips/NorSea UK	North Tees Limited
Cory Brothers Shipping	North Tees Rail Limited
Crown Estate	Northern Gas Networks Limited
DB Cargo (UK) Limited	Northern Powerhouse Partnership
Durham University	Northumbrian Water Limited
Eco2	PD Teesport Limited
Elba Securities Limited	Port Clarence Energy Limited
Exolum Riverside	Port Clarence Logistics Limited
Exolum Seal Sands	px(TGPP) Ltd
Greenergy	Sabic NORTH TEES SITE
Halcyon Tankers Limited	Scott Bros. Environmental Services Limited
Industrial Chemicals Group Limited	Sembcorp Utilities (UK) Limited
Ineos Nitriles (UK) Limited	South Tees Development Corporation
Intertek Middlesbrough	Svitzer Marine Limited
KD Pharma	Tees Valley Enterprise Partnership
Kellas	Teesside Environmental Trust
KSC (Port Clarence) Ltd	Teesside International Airport
Legal & General Assurance (Pensions	Teesside University
Management) Limited	
Lianhetech	The Land Restoration Trust
Mitsubishi Chemical Methacrylates Billingham	Net Zero North East England
N+P Subcoal Production Teesside	Universal Coatings & Services Limited
National Grid PLC	Wilton Energy (Teesside) Limited
Navigator Terminals North Tees	Wilton Engineering
Navigator Terminals Seal Sands	