

APPLICANT COVER SHEET

- Project name: **Stanlow Hydrogen Ready Combined Heat and Power Project**
- Applicant name: **EET Fuels**
- Planning Inspectorate case reference: **EN0110007**
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1. Introduction

This Pre-Application Programme Document has been prepared by WSP on behalf of their client, Essar Energy Transition (EET) Fuels (the “Applicant”). This Programme Document aims to set out details of the project and the Applicant’s anticipated timescales during the Development Consent Order (DCO) process. This is an update of the initial Programme Document, issued on the 6th September 2024 and introduced at the Inception Meeting held with the Planning Inspectorate (PINS) on 11th September 2024 and will be updated during the course of the application.

2. Background to the Project

EET Fuels owns Stanlow Manufacturing Complex (SMC) located at Ellesmere port, in northwest England. It is the UK’s second largest refinery, producing over 16% of the UK’s transport fuels and feedstocks for the chemical and pharmaceutical supply chains.

The refinery is currently equipped with six boilers with steam turbines to generate steam and power, which were built more than 50 years ago and suffer high maintenance costs and poor availability. EET Fuels intends to build a new Hydrogen Ready Combined Heat and Power (CHP) project to cater to the upcoming decarbonisation energy demands.

The project is a crucial enabler for the SMC’s decarbonisation. It provides an opportunity for EET to decarbonise its existing fuel use at the SMC by replacing its existing fossil-fuelled steam and electricity production facilities with others capable of burning 100% hydrogen but commissioned and operated with various gaseous fossil based fuels until hydrogen becomes available at the site.

At the same time, by producing low carbon steam and power more efficiently, the CHP will reduce overall site energy intensity and facilitate a longer-term roadmap of electrification projects. The proposed technology is multifuel (H₂ ready) turbines, with hydrogen ready Heat Recovery Steam Generators (HRSGs). Hydrogen readiness in this case means hydrogen (H₂) capable burners and nitrogen oxides (NO_x) abatement. This allows the CHP to produce power on a large scale, whilst generating steam at 100 bar gauge pressure (barg) from waste heat.

The CHP project will be delivered in two phases. CHP **Phase 1** was submitted to Cheshire West and Chester Council (CWaC) under the Town and Country Planning Act (TCPA) 1990 in December 2025. **Phase 1** comprises three modules each with a power generation capacity of 16.5MW, which totals 49.5MW. As such, it is below the DCO threshold of 50MW and could be submitted as a TCPA application. It is expected that TCPA consent will be granted prior to the submission of the DCO and that Phase 1 would be delivered ahead of **Phase 2**.

CHP **Phase 2** is the next stage of the overall CHP project. It will have a generating station capacity that exceeds 50MW, so consent for this part of the CHP project is sought via a DCO application.

The two parts of the projects will share some common infrastructure but can be delivered separately and operated independently of each other. **Phase 2** is not dependent upon the delivery of **Phase 1**.

The proposed development will also enable the retirement of ageing infrastructure and technology including boilers and power generation equipment, which will be retired in stages as **Phase 1 and Phase 2** become operational.

CHP Phase 2 Project Description

The CHP **Phase 2** project will produce a total installed electrical output capacity of up to 560MW and be designed to achieve a firm operating power output of 200MW with a high degree of availability and redundancy.

The Principal Generating Infrastructure will comprise the following.

- **Gas Turbine (GT) modules:** Up to five modular GT units, each one comprising one hydrogen ready GT producing up to 20MW and one heat-recovery steam generator (up to 2000 tonnes per day 100 Barg steam). Units will be compliant with Best Available Techniques Reference (BATC/BREF) requirements for nitrogen oxide (NO_x) emissions with all fuels, including hydrogen.
- **Heat Recovery Steam Generators (HRSGs):** Up to five HRSGs, each sized to efficiently recover heat from its associated gas turbine (GT) and produce a range of steam and heat outputs, including Very High Pressure (VHP) steam, Low Pressure (LP) steam, and hot water/cold water heating using recovered waste flue gas heat.
- **HRSG stacks:** Up to two HRSG stacks, which provide the discharge points for treated combustion gases following passage through the HRSGs and associated emissions control equipment.
- **Steam Turbine Generators (STGs):** Up to six Steam Turbine Units, with a total maximum capacity of 240MW. Each unit will comprise a high-pressure steam turbine with steam extraction points to maximise plant efficiency. The total maximum electrical capacity of the STGs will be up to 240 MW.

The Proposed Development may also include back-up/supporting power as follows:

- 120MW of reciprocating gas engines; and
- 100MW of Battery Energy Storage System (BESS).

The back-up and supporting generation infrastructure will support the provision of a stable and resilient electrical network for users, helping to manage changes in electrical load, respond to network disturbances and maintain continuity of supply.

Operation of the reciprocating gas engines will be subject to the applicable BAT requirements and associated operating limitations.

Associated Components

Installation of the key components will be accompanied by the following as part of the Proposed Development:

- Up to three multifuel fired package boilers with steam raising capacity of up to 4,500 tonnes per day each;
- Steam Interconnection to EET Fuels steam system;
- Hybrid Cooling Tower or Air-Cooled Condenser to support the combined cycle operation;
- Closed Circuit Water Cooler;
- up to 5 x deaerators and up to 10 x Boiler Feedwater Pumps;
- chemical storage including capacity for an additional (2 x 95 tonnes) of ammonia;
- chemical injection packages;
- modularised structural pipe racks;
- modularised E-House (Substations) and Local Electrical Room (LER);
- Associated utilities (including gas mains, water pipes, telecoms cables, electrical cables and drainage) as well as private wire routing to connect the CHP plot to the back-up/supporting generation and to the edge of SMC for local customers. Services may be conveyed above, below or at surface.
- temporary construction laydown area;
- temporary contractors welfare cabins and parking; and
- other ancillary infrastructure required to facilitate construction and operation.

The Proposed Development has been designed to operate flexibly under a range of scenarios and therefore is expected to remain in operation producing low carbon dispatchable power.

A figure showing the Order Limits that was submitted with the Scoping Report for the CHP **Phase 2** project is provided below at Figure 1. This represents the maximum spatial limit of the development areas as defined at the Scoping stage. This is being refined and will be presented as a revised Order Limits when the DCO application is submitted to PINS in 2027.



Figure 1: Scoping Order Limits

3. The Planning Inspectorate's pre-application service

The proposed development is pursued under the 'Standard' level of service from PINS on the basis that all land is owned by a singular landowner, without the need for compulsory acquisition powers and the Applicant considers that all key risks can be mitigated.

The application can be assessed against a recently updated Energy National Policy Statement (NPS) and the government's Ten Point Plan for a Green Industrial Revolution¹. Whilst the Applicant accepts that the proposal utilises hydrogen, which involves the use of relatively new technology, the CHP technology is not new, and the application proposals are not otherwise deemed to be overly complex or sensitively sited being largely within the footprint of the existing refinery facility. The proposal would operate under the Control of Major Accident Hazards (COMAH) regime currently in place on the site.

4. The pre-application programme

Table 1: Consenting programme

Task Name	Proposed Period
PINS Inception meeting September 2024	September 2024 (Complete)

¹ [The ten point plan for a green industrial revolution - GOV.UK](https://www.gov.uk/government/policies/industrial-revolution)

Initial assessments and design development

Complete

Prepare EIA Scoping Report	April 2026 – September 2026 (Complete)
Submission of EIA Scoping Report	September 2026 (Complete)
Prepare Environmental Statement (ES)	October 2026 – March 2027
Environmental Statement Completion	May 2027
Pre-submission Engagement and Consultation	April 2026 – May 2027
Public Consultation	Late 2026
Prepare Consultation Report	January 2027 – March 2027
Prepare draft DCO	October 2026 – February 2027
Prepare DCO Application Form	October 2026 – January 2027
Prepare DCO Plans (Site Location Plan, Indicative Site Layout Plans, Land Plans, Works Plans, Access/Right of Way Plans, GA Plans, Indicative Elevation and Section Plans, Engineering Drawings, Environmental Features Plans and Landscape/Environmental Mitigation Plans)	October 2026 – January 2027
Preparation of other documents (Outline CoCP, Mitigation Schedule, Outline Lighting and Outline Drainage Strategies, Outline Landscape and Ecological Management Plan, Dust Management Plan, BNG Assessment and Flood Risk Assessment)	October 2026 – January 2027
Preparation of Information to Inform Habitats Regulations Assessment Report (if required)	October 2026 – January 2027
Submission of DCO	June 2027
DCO Acceptance	June 2027 – July 2027
DCO Pre-examination	June 2027 – September 2027
DCO Examination	September 2027 – March 2028
DCO Approval	September 2028
Post-Decision: Discharge of Requirements (estimated)	September 2028 – December 2028
Prepare Environmental Permit Variation Application	December 2024 – January 2027
Environmental Permit Variation Application Submission	January 2027

5. Main issues for resolution

The Scoping Report sets out the relevant issues, and the approach to assessment and impact mitigation. This was submitted to PINS on 2nd September 2026 and should be read in conjunction with this document. The key environmental and consenting risks, alongside proposed mitigation where relevant are outlined below.

Table 2: Main issues for resolution

Environmental topic	Issue summary	Proposed mitigation
Air quality	The Proposed Development is located within, or immediately adjacent to, the Thornton-le-Moors Air Quality Management Area (AQMA No. 4), which was designated due to historic sulphur dioxide (SO ₂) exceedances. The project will emit dust, vehicle emissions, and process combustion emissions, which could impact human and ecological receptors.	The project will incorporate design measures to control and reduce emissions to air. Activity within the SMC will need to ensure that the correct permitting is obtained from the Environment Agency for the operation of the new CHP at the site, and ensure all works comply with the legal SO ₂ , NO _x and PM ₁₀ emission limits in place at this location.
Noise and vibration	Noise and vibration is likely to occur during the construction and operation of the project that may be perceptible to sensitive human and ecological receptors.	An outline Code of Construction Practice and an Operational Noise Management Plan will limit working hours, control equipment specifications and methodologies, and introduce acoustic screening where necessary. Noise monitoring may also be implemented if necessary.
Biodiversity (European designated sites)	The River Mersey Special Protected Area (SPA) and Ramsar site is located approximately 0.7km north of the Site. The SPA is designated for a variety of birds including Annex I over-wintering and migratory birds.	Under the Conservation of Habitats and Species Regulations 2017 (as amended), the Applicant will be required to demonstrate that there is no significant adverse impact on the integrity of the European designated sites and that there is adequate mitigation in place for protected species.
Biodiversity (nationally designated sites)	The Site is located within SSSI Impact Risk Zones for the River Mersey SSSI, which is designated for wildfowl and wading birds.	Impacts from atmospheric emission deposition, noise, and aquatic pollution will be assessed. Measures to control emissions and accidental pollution events will be implemented and monitoring

requirements may be explored with PINS where necessary.

Biodiversity (bats)	Some existing buildings within the SMC are due to be demolished as part of the construction activities. This could disturb or remove habitat for bats. A Preliminary Risk Assessment (PRA) has been undertaken for buildings on the Site in both 2024 and 2026. The 2026 Preliminary Bat Roost Assessment (PBRA) assessed the building as having negligible suitability to support roosting bats.	Additional surveys will be required and the status and potential effects upon roosting bats will be a consideration in the Ecological Impact Assessment. If a roost is confirmed within a building to be demolished, then the Applicant will need to apply for a derogation licence from Natural England to ensure that all works comply with The Conservation of Habitats and Species Regulations 2017. A bat licence can only be applied for once permission for the proposed development has been granted.
Biodiversity (protected terrestrial species)	Woodland scrub with potential to support badger exists in proximity to the SMC. Construction and operational noise may disturb this protected species. Recent surveys have identified that the Site itself provides limited suitability to support badger, although areas of woodland in the northern and eastern extent of the Site may be suitable for sett building and foraging.	Where features of habitats supporting protected species cannot be entirely avoided and protected, and potential effects are predicted on legally protected species, the assessment will outline where relevant derogation licensing i.e. NE licences are required to implement mitigation measures.
Biodiversity (protected aquatic species)	There are water bodies that traverse the SMC including Thornton Brook, Gale Brook (a tributary to the Goway River), and the Goway Brook. Activities during the construction phase could impact on protected aquatic species such as water vole through disturbance from lighting and noise. Water vole are known to be present within the wider area (e.g. in sections of Gale Brook beyond the limits of the SMC) but surveys to date have their likely absence from water bodies within the SMC and that on-site aquatic	Aquatic habitats are subject to survey to assess for the presence of protected species. If necessary, due to the hydrological connectivity between relevant water bodies, water vole surveys would need to be conducted between March and September, with a second survey visit potentially required within this time frame if the watercourse has suitability to support otter/water vole.

	habitats are largely unsuitable for water vole.	
Biodiversity (woodland)	There is an area of deciduous woodland located to the south of the Site and to the east of Pool Lane. Potential impacts from air emission deposition and habitat disturbance and removal will be assessed. No parcels of ancient woodland have been recorded within 1km of the Site.	The suitability of woodland habitat for supporting protected species will be assessed, supported by relevant Ground Level Tree Assessment surveys. Impacts to species and habitats will be mitigated through appropriate use of buffer zones, pre-work checks, presence of an ecological clerk of works during vegetation clearance, diurnal and seasonal timing of works as appropriate, implementation of noise and dust suppression measures, and the use of sensitive lighting where night time works are necessary.
Biodiversity Net Gain (BNG)	From November 2026, 10% Biodiversity Net Gain (BNG) is a mandatory requirement for Nationally Significant Infrastructure Projects (NSIPs) consented through the DCO regime, as set out in the Environment Act 2021.	The principles of BNG with regard to habitat compensation and enhancement will be applied and a BNG assessment is being undertaken.
Flood risk	The north-eastern end of the site is located within an area of Flood Zone 3 (High Probability) and Flood Zone 2 (Medium Probability). The remainder of the site is located within Flood Zone 1 (Low Probability).	The Applicant will need to ensure a Flood Risk Assessment is completed in compliance with the Environment Agency's and CWaC requirements.
Cumulative effects	Inter-project and intra-project effects will be considered, with reference to a 'long list' of other developments that will be agreed with PINS.	Mitigations will relate to the nature of the other developments and the cumulative impacts identified, which have not yet been defined.

ENVIRONMENTAL PERMITTING

The site is currently regulated under Environmental Permit (EPR) number EPR/FP3139FN.

An EPR variation is required to incorporate the proposed hydrogen ready CHP projects at the SMC. The CHP will have the ability to be fired on hydrogen, natural gas and / or refinery fuel gas to allow the other site projects to be installed and transition to decarbonisation complete.

6. Engaging with statutory bodies and communities

The Applicant intends to hold a public consultation, including key stakeholder briefings and two community drop-in events, undertaken over a period of four weeks. A dedicated project website is due to be launched in September 2026 to provide an overview of key information for stakeholders and consultees.

An indicative list of key consultees has been set out below.

CONSULTEES

- The Health and Safety Executive
- Natural England
- National Highways
- Historic England
- Cheshire Fire & Rescue Service
- Cheshire Constabulary
- Relevant Parish Councils
- Member of Parliament
- Relevant Local Ward Councillors
- The Environment Agency
- The Highways Authority
- The Gas and Electricity Markets Authority
- The Water Services Regulation Authority
- Relevant Statutory undertakers

Introductory briefings were held in 2026 to give relevant stakeholders an overview of the project and an estimated timeline for DCO submission. Online meetings were held with the Environment Agency, Natural England, Health and Safety Executive, and National Highways. Historic England did not attend an online introduction briefing but were provided with a project overview via email.

Table 3: Consultee engagement schedule

Consultee	Briefing Date	Format of Briefing
Health and Safety Executive	01/04/2026	Online Meeting
Historic England	08/04/2026	Email Briefing
National Highways	21/05/2026	Online Meeting

LAND INTERESTS

The Applicant owns the majority of the affected land though several land interests have been identified within the current Order Limits. The Applicant will engage with these parties as appropriate through the relevant mechanisms as the project progresses.

7. Engaging with local authorities

LOCAL AUTHORITIES

- CWaC (host authority)

Ongoing engagement and discussion have taken place during the project developments since an introductory briefing with CWaC in March 2024. A PPA is currently being finalised to ensure consistent engagement and discussion from Scoping submission to determination of the DCO. Recurring monthly meetings are expected to be delivered as part of the PPA. It is expected that a principal areas of disagreement summary statement will be produced by CWaC.

Engagement will also take place with neighbouring authorities where relevant, including Wirral Borough Council.