

The following are the points made to TDC in relation to the Heathfield Gas Power Station planning application.

Arguing that this application does not require a Carbon assessment as required for by the Local Plan because it does not exceed 1,000 sq. m of development land is a piecemeal approach to implementing policy. Unfortunately, this is also what happens when other organisations with a narrow remit comment on planning applications. It is why the planning process itself is so flawed as it ignores the bigger picture (i.e. all policies), strategy and longer-term objectives.

It is also true that people/organisations with short term interests/objectives will always cherry-pick any planning policy from the NPPF downwards.

Luckily, TDC has S7 and other current policies it should be testing this application against. TDC needs to produce evidence that the additional CO2 emissions will be mitigated through reductions elsewhere or it openly admit that S7 is being ignored. The same applies to policies on well-being and clean air.

The following are suggestions to the areas of concern raised.

### **Purpose of this plant:**

There is no doubt that there is need for fast frequency and capacity response in Teignbridge, WPD have issued tenders for this and Heathfield is one of those areas. It is also true that a gas fired power plant can deliver both and is lower Carbon than an equivalent diesel-powered generator and quicker to do than network re-enforcement.

However, there are also examples of renewable/storage solutions of that size that can deliver the same functionality, all be it for shorter periods. The challenge for these remains the regulatory and taxation regime which commercially favours gas over renewables.

The question that should be asked is where/what is the WPD requirement for this additional capacity to justify the plant running 46% of the time (4,000 hrs per year).

TDC should also ask if there are restrictions on when and how long the plant would operate for, what happens if the 4,000 hrs/year are exceeded? How could this be enforced?

### **Emissions:**

My reading of the non-CO2 emissions does not suggest that these are all within the required limits, indeed the report implies secondary screening may be required and the developer would implement these. Given the proximity of residential properties and industrial sites (~350m and less), being just within the legal limits may be a misleading statement. After all the plant is near a major source of air pollution (the A38).

It appears that the exhaust gases with relatively high NOx content will be in line with the new, heavily used, cycling/walking bridge ~100m away!

TDC should ask for an air quality monitoring period near where people work/live/walk/cycle and at the shortest distance from the proposed site. This is to measure current pollution, so it can be added to the numbers quoted for the proposed power plant.

Although the developer does, 'vaguely', respond to the local plan's requirements on most things. The ones that is difficult to find are actual Carbon emissions. How can TDC measure the impact/contribution this plant will make to the overall Teignbridge Carbon emissions (S7) without this number. An estimate based on 46% operation is quite significant at ~ 0.25% of total Teignbridge

emissions. Therefore, unless there is a demonstrable purpose from above to justify this, it should not be permitted.

The question to ask is, what are the expected CO<sub>2</sub>e emissions per kWh electricity generated. Also what is the average operating output rate during the 4,000 hours per year of operation (or what is the total electrical energy generated per year)?

Maybe TDC should also start looking seriously at encouraging the development of Renewables/storage to supply the significant increase in energy demand likely for the district if it is to decarbonise by 2050.