

18 May 2022

Planning West Team
East Devon District Council
Blackdown House
Border Road
Heathpark Industrial Estate
Honiton
EX14 1EJ

Our Ref: 416.06679.00006

Dear Planning West Team

RE: GORST ENERGY – INCREASED RENEWABLE ENERGY PRODUCTION: RESUBMISION OF APPLICATIONS 21/2374/VAR AND 21/2375/VAR

Please find enclosed a resubmission of the planning applications on behalf of our client, Gorst Energy, to increase renewable energy generation at its Anaerobic Digestion (AD) facility in Clyst St. Mary.

The Planning Statements submitted with the applications explain the reason for withdrawal of the previous applications in consultation with your Environmental Health Officer. They also provide detail around additional noise management controls which should give you confidence around improved environmental controls at the site.

Gorst recognises that it needs to do all it can to be a good neighbour and support the local community. It continues to invest large sums of capex to try and achieve this. However, it asks that the application be viewed in the context of current UK and global matters that are also having a serious impact on the wider community of East Devon and Exeter. Gorst passionately believe that AD has an important part to play in the following areas:

Fuel poverty – The UK is currently going through significant inflationary pressures which will impact on the welfare of large numbers of people across the country. Fuel bills are at record levels and it is likely that from Autumn 2022 some people will be forced to choose between heating their homes and buying food. The Gorst AD facility generates renewable gas at a largely fixed price which is well below the current market price and helps protects consumers against current market fluctuations.

Environmental – In 2019, East Devon District Council signed up to the Devon Climate Change Declaration. The proposed increased output from the AD facility would contribute green, low carbon energy and further support the achievement of the UK Government's target in the Climate Change Act to achieve 'net zero' carbon emissions by 2050. The latest report issued by the UN's Intergovernmental Panel on Climate Change (IPCC) on 9 August 2021 was referred to by the UN as "a code red for humanity".

Carbon footprint – The AD facility currently saves 3,387 tonnes of CO₂ per annum. At the increased level of production this would become 6,774 tonnes of CO₂ per annum. This is

equivalent to taking 1,500 cars off the road or is equivalent to 1.2% of the total carbon footprint of Exeter.

- **Energy self-sufficiency** – The Russian invasion of Ukraine has brought into sharp focus how reliant Europe and the UK is on imported gas. The UK currently imports 52% of its gas from overseas, predominantly from Norway. Europe has identified gas from AD as a key part of moving away from Russian gas and towards local energy production, since unlike other renewable technologies it produces gas rather than electricity.
- **Organic fertiliser** – The reduction of trade with Russia has meant that many artificial fertilisers now have a restricted supply into the UK. This has resulted in the price of artificial fertiliser rising from circa £230 per tonne to +£750 per tonne. Prices are expected to rise further next year. The result of this will be that many farmers will either face hardship by growing crops at a loss or will not grow certain crops leading to a shortage of some foods. AD facilities produce a high-quality organic fertiliser that replaces the need for artificial fertiliser. Gorst protects its agricultural partners by supplying them with the organic fertiliser produced at the AD plant; this is used not only on crop used to supply the AD facility but also on crops for the wider food chain.
- **Support to the local economy** - The proposed increase in throughput at the AD facility would strengthen the contribution that it makes to the local economy to £4m per year (currently £3 million). This money goes directly into companies providing jobs and services in the local area. This enhances the circular economy within East Devon with regard to the key objectives of keeping products and materials in use; regenerating natural systems, and eliminating waste and pollution.
- **Research and Development** – Gorst enjoys a number of ties with academic studies in Exeter which are identifying further ways to enhance environmental savings. These studies include hydrogen, fertiliser production and using waste heat to make a more sustainable UK shellfish industry. These projects have the ability to further enhance the green credentials of East Devon and Exeter and to help it transition to a net zero region.

We believe that the proposed development meets all regulatory requirements and amenity objectives for the area, and is fully compliant with local and national planning policy. We trust that that its potential for making an immediate contribution to energy resilience, addressing fuel poverty, sustainable farming and the rural economy should lead to a swift and positive decision.

If you would like any further information on any of these issues we would be pleased to assist.

Gorst is part of the Ixora Group <https://ixoraenergy.co.uk/> who were winner of the Sustainability category at this year's Exeter Living Awards and the subject of recent media attention regarding its manufacture of 'homegrown' gas supplies <https://www.bbc.co.uk/news/av/uk-england-devon-60993420>.

Yours sincerely

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p.p.

Anne Dugdale MRTPI
Technical Director
Enc: Planning Application Documents