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SUPPORTING A RENEWABLE FUTURE

Mr Aaron Lau
Planning Service
Haringey Council
Level 6
River Park House
225 High Road
Wood Green
N22 8HQ

26 February 2016

REF: HGY/2015/1321

Dear Mr Lau,

On 22nd January 2016 UK Power Reserve met with Haringey Council to discuss discharging planning conditions 3 and 5 to HGY/2015/1321: Erection of a small scale electricity generation plant in individual sound proof containers at Mowlem Trading Estate, Leeside Road, London, N17 0QJ which was granted planning permission on 18th December 2015. In light of this discussion UKPR wishes to submit the following to discharge these conditions.

Condition 3

Condition 3 of this decision states

"Prior to the commencement of the development, full details of the future proofing measures to enable an off-site connection to an area wide Decentralised Energy network should be submitted to and approved in writing by the Local Planning Authority. This shall include details and locations of the 'punch points' through the main plant room wall to the public highway (with drawings/ schematics) and that there is easy and safeguarded access from the public highway to these punch points for a buried heat main.

Reason: To ensure that the completed development is future proofed to enable connection to an area wide decentralised energy network to comply with Policies 5.5 and 5.6 of the London Plan 2015 and policies SP0 and SP4 of the Haringey Local Plan 2013."

The UKPR License as a National Grid Short Term Operating Reserve (STOR) facility does not allow us to utilise the site for alternative purposes. As set out in the Design and Access Statement and discussed by email dated 9 September 2015 between Clive Fagg and Anthony Traub, the primary purpose of the development is to provide stand by generation to National Grid during times of energy network stress. In addition we note that it was also a condition in the previous application, HGY/2014/2638 granted consent on 19 November 2014, that we were not to use the site for CHP purposes.

Condition 3 requires UKPR to submit future proofing measures to enable an off-site connection to an area wide Decentralised Energy Network (DEN); however there are certain issues with this:

1. If UKPR were to export electricity to the DEN, this would invalidate the STOR contracts which are specifically to satisfy demand from National Grid.
2. Planning Condition 6 requires that the generating station should not exceed 1500 operating hours in any annual period. This is approximately 17% of the potential operating hours in any year which would render the capital cost of installing equipment to supply heat to the DEN to not be viable, based on the revenue which could be generated.
3. The STOR contracts have a duration of 15 years so there should be no need to futureproof.
4. In order to operate a DEN, the operator needs to have the status of an ESCO (Energy Supply Company), and as per the ruling of the European Court of Justice in March 2008, ESCOs can no longer supply domestic customers which the DEN would prioritise.

In light of the above, UKPR would advise that we have carefully considered how we could satisfy Condition 3, but we conclude, due to the contract commitments of this type of development imposed by National Grid, it would not be possible to operate this plant as a STOR and DEN and therefore would no longer satisfy the primary objective of the planning permission.

Condition 5

Condition 5 states:

"No development hereby approved shall commence until details of the gas fuelled generators have been submitted to, and approved in writing by the Local Planning Authority. Details shall include, but not limited to, evidence that demonstrate that the units to be installed comply with the Medium Combustion Plant Directive -NO2 Limit.

Reason: To maintain air quality in accordance with saved UDP 2006 policy ENV7 and London Plan 2015 policy 7.14."

The data provide in Appendix A to this letter shows the NOx emissions for the engine are 50mg/Nm3 at 5% oxygen which equates to 92.7mg/Nm3 at 15% oxygen (as per the measure of oxygen referred to in the MCPD).

Given that our engines will:

i. be put in operation prior to 20 December 2018 and, as such, will be considered 'existing combustion plant' under Article 3(6) of the MCPD; and

ii. be natural gas with a rated thermal input of less than 5MW,

The NOx limit which will be applicable to our engines, as per Article 6(2), will be that which is found in Annex 2, Part 1, Table 3 such being, 190mg/Nm3 at 15% oxygen. Our engines will therefore be compliant with the applicable NOx limit in the MCPD.

We hope that the above provides Haringey Council with sufficient information to enable the discharge of planning conditions 3 and 5 of planning permission HGY/2015/1321. Should you require anything further or require clarification please do not hesitate to contact either myself or Clive Fagg, UKPR Planning Manager to discuss.

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Yours sincerely



Mr Sean Greany
UK Power Reserve Limited

Enc. Appendix A: Cummins Generator Set Data Sheet (Model 2000 GQNC)