

Response to Colin Godfrey

The following statement is issued in response to a comment shared to the Wiltshire Council planning portal on 14/09/2023 (Comment Number – WC-23-09-279636) by Mr Colin Godfrey. Acorn Bioenergy appreciates Mr Godfrey's consideration of the planning application PL/2023/03359 and welcomes the opportunity to respond to the points raised.

Response to Public Consultation 07/08/23

1.1

Acorn's Carbon Calculator, from which the expected carbon intensity of the Ashton Keynes site has been generated, has been developed in line with the relevant UK government legislation and guidance. The facility will operate in compliance with the sustainability criteria under the Non-Domestic Renewable Heat Incentive Regulations (RHI)¹. These sustainability criteria are set out in the 'RHI Sustainability Guidance'².

As such, the methodology adopted for carbon intensity calculations is the methodology set out in Schedule 2A of the RHI Regulations. It refers to Part C of Annex 5 of the Renewable Energy Directive (RED) and includes some specific modifications to the methodology specified in the RED to tailor its applicability to the RHI and specific regulatory and policy context of the United Kingdom.

With regard to the latest methodology for calculating CO₂ emission impacts published by BEIS, the use of this methodology would actually improve this project's performance with regard to carbon emissions. Under this methodology, Acorn would be awarded additional carbon credits for the use of manure, improvement of soil carbon, etc., which would overall reduce even further the carbon intensity of the biomethane produced from the project.

1.2

The figure of 67.59 gCO₂e/MJ originates from the 4th version of the list of standard values issued by BioGrace. BioGrace is the source of most of the standard values used in the RHI Guidance³. Acorn have used this figure to ensure alignment with the RHI Guidance.

1.4

CCUS will be deployed at this site. The biogas produced at the plant, passes through a biogas upgrading unit where methane is separated from other molecules. The 'Offgas' rejected from the biogas upgrading unit during the upgrading process, is rich in carbon dioxide and is sent to a separate CO₂ upgrading unit where it is liquefied and loaded onto trailers to be utilised or sequestered. It is intended for biogenic CO₂

¹ <http://www.legislation.gov.uk/all?title=renewable%20heat%20incentive>

² www.ofgem.gov.uk/ndrhi-guidance

³ https://www.ofgem.gov.uk/sites/default/files/docs/2021/04/sustainability_self-reporting_guidance_final_2021.pdf



produced at this site to be sent to industry to replace fossil-derived CO₂. The associated business plan has been validated by Acorn and its investors, as well as third-party experts.

1.6

Due to the nature of operations at the site and the proximity of the site itself to sensitive receptors including SSSIs, the proposed site does not meet the screening criteria for a EA standard rules permit. As such, Acorn Bioenergy will be applying for a bespoke permit. The requirements for a bespoke permit indicate that a further level of analysis is required, in order to ensure a lack of ecological impact.

1.7

Mr Godfrey highlights the EA's advice for bespoke permit application and points out that it is advisable for permit applications to run concurrently with planning applications. Acorn Bioenergy have engaged in pre-consultation with the agency for this project (Reference number - EPR/KP3523PP/A001). Acorn has been in communication with the EA and is collaborating with the agency to ensure that all aspects of our proposed development and our technological choices will protect the local environment in accordance with Best Available Technology guidance.

1.8

The statement made regarding decommissioning in the response was a suggested potential planning condition which is thought to be indicative of the type of condition that Wiltshire Council may choose to impose on the planning application. The purpose of which would be to ensure that satisfactory decommissioning conditions are established.

1.9

The site will operate in accordance with all relevant regulations including for example Hazardous Substances Consent, DSEAR, COMAH and HAZOP.

Applicant's Transport Technical Note v1.0

2.1

Wiltshire Council (WC) Highway Development Control is the acting Local Highway Authority for this application. Acorn has engaged with WC in order to establish and mitigate against the impact of any site-related traffic. As of 25th September 2023, WC have lifted their holding objection and have recommended a number of conditions which pertain to the construction and operational phases of the site.

Acorn trust that WC take a holistic approach when examining the traffic related impacts of this development, considering both the local and a wider impact of traffic and working in collaboration with



National Highways to ensure that the impact of traffic on roads outwith WC's direct boundary is mitigated against.

2.2

With regard to the width of the roads surrounding the development, Acorn again trusts that WC have considered the condition and suitability of the roads as part of their consideration of the traffic impact of the plant.

2.3

The distribution of an interested feedstock parties plan indicates the rough location of potential feedstock providers who may be interested in supplying the plant. The areas highlighted on the map fall within the 10-mile feedstock boundary of the site. It is important to note that this 10-mile boundary is self-imposed. This radius has been implemented to ensure that Acorn's agricultural feedstocks comply with the RHI requirements for reporting of carbon emissions associated with AD feedstock. In addition, this feedstock boundary works to ensure that local agricultural businesses are supported by the development of the plant through the creation of feedstock provision opportunities whilst also ensuring that the vehicle movements are localised to the areas immediately surrounding the plant.

2.4

Acorn Bioenergy uses a number of criteria against which potential sites are considered in order to ascertain the feasibility of successful site development and operation. In identifying areas suitable for AD plants, Acorn prioritises the ability to procure feedstock locally to the proposed site. The Acorn AD sites require crop and grass silages alongside agricultural wastes and residues for input into the plant. The 'Distribution of Interested Feedstock Counterparties' plan outlines the distribution of interested feedstock counterparties within a 10-mile radius of the site. Acorn believes that there is sufficient agricultural and waste feedstock available within this area to adequately sustain the operations of the plant.

4th October 2023

