Submission ID: SD6E92D42

As requested at the Open Floor Hearing OFH1 on 21 April 2026, I submit herewith the detail of my calculations that arrived at a carbon break-even point of 2058.
I also submit a copy of my Oral Representation made on the day.
Cllr Jon Atkey
Ref: [redacted]

Sir,

My name is Jon Atkey. I am the Wiltshire Councillor for By Brook division, speaking on behalf of residents of Hullavington, Grittleton and other By Brook communities who would be so badly affected if this scheme were ever to go ahead.

My Relevant Representation is responded to by the Applicant at **Table 4.34**, beginning on **page 1399**. In the time available I want to focus on just one essential point, drawing on two aspects of my submission to explain it.

That point is simple: **when the full *scale* of harm is weighed against what this scheme actually delivers, it is not worth it in this place**.

The accumulation of harm

My original representation set out a **wide and interconnected range** of impacts –

- landscape harm,
- industrialisation of a deeply rural area,
- effects on amenity and wellbeing,
- safety concerns,
- and long-term resilience.

The Applicant does not deny these impacts. They acknowledge them and seek to justify them.

The BESS as illustrative of wider impacts

One element of the scheme, the proposed Battery Energy Storage System, illustrates the issue clearly. I refer to it not because it is unique, but because it is emblematic of the proposal as a whole.

In responding to me, the Applicant accepts that the BESS carries real risk:

- fire,
- emergency response,
- and potential environmental consequences.

They rely on outline management plans and future approvals to address that risk.

That does not negate the concern. It confirms that local communities are being asked to accept a substantial industrial hazard in a rural setting, for decades,

with the consequences of any failure borne locally. And it sits alongside many other harms already identified and accepted as significant.

What justifies the harm?

So the question that matters, and that residents keep asking, is this: **what is all this harm for?**

The Applicant's answer is climate benefit. That is the foundation on which their case rests.

Carbon break-even and timing

As an accountant by profession, I'm very familiar with **break-even analysis**, so I approached this in a straightforward and transparent way – using **only the Applicant's own figures** from their Environmental Statement. On that basis, **carbon break-even is not reached until 2058**!

That's more than 30 years away – and well beyond the UK's legally binding net-zero target of 2050.

Until then, the scheme is a **net contributor** to atmospheric carbon because of the very substantial emissions in its early years. In their response to Wiltshire Council, the Applicant suggests[1] that break-even is not a helpful concept. With respect, timing is ***critical***. Emissions released in the 2020s and 2030s cannot, meaningfully, be justified by savings that ***may*** arise decades later, beyond the period when national policy says emissions must already be at zero.

The planning balance

This leaves a very stark planning balance.

On one side are **real, immediate and enduring harms:**

- to landscape,
- to communities,
- to amenity, and
- through risks that require active management for generations.

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[1] Applicant's Response to Relevant Representations (Part 1), Document Ref. EN010168-000906-9.1, Table WC-064 (Climate Change Consideration), paragraph responding to Wiltshire Council section 7.6–7.7, where the Applicant states: "it is not considered that a 'break-even' date is a useful measure of the scheme's beneficial effect."

On the other side is a **theoretical carbon benefit** – which, on the Applicant's own evidence, doesn't materialise until ***long after*** the net-zero deadline has passed.

When those two sides are weighed together, the justification **simply does not hold**.

- The harms are certain and long-lasting.
- The claimed benefits are delayed to the point of being practically meaningless.

Sir, Madam, this is not a marginal proposal affecting a marginal place. It would fundamentally alter communities I represent. When you ask the most basic question – *is this worth it?* – the Applicant's **own figures** point to a clear answer.

Thank you for listening.

Lime Down Solar carbon break-even analysis - Cllr Jon Atkey - [redacted]

Calculated April 2026

		Emissions				Savings		
Year	Year ending	Construction GHG emissions tCO2e	Table 7-26 Operational tCO2e	Decommissioning tCO2e	Total emissions tCO2e	(Applicant's max assumed) tCO2e	Net emissions/ (savings) tCO2e	Cumulatinve emissions/ (savings) tCO2e
0	2027							
1	2028	118,575			118,575		118,575	118,575
2	2029	118,575			118,575		118,575	237,149
3	2030		11,450		11,450	19,783	(8,333)	228,816
4	2031		11,450		11,450	19,783	(8,333)	220,483
5	2032		11,450		11,450	19,783	(8,333)	212,150
6	2033		11,450		11,450	19,783	(8,333)	203,816
7	2034		11,450		11,450	19,783	(8,333)	195,483
8	2035		11,450		11,450	19,783	(8,333)	187,150
9	2036		11,450		11,450	19,783	(8,333)	178,817
10	2037		11,450		11,450	19,783	(8,333)	170,484
11	2038		11,450		11,450	19,783	(8,333)	162,151
12	2039		11,450		11,450	19,783	(8,333)	153,817
13	2040		11,450		11,450	19,783	(8,333)	145,484
14	2041		11,450		11,450	19,783	(8,333)	137,151
15	2042		11,450		11,450	19,783	(8,333)	128,818
16	2043		11,450		11,450	19,783	(8,333)	120,485
17	2044		11,450		11,450	19,783	(8,333)	112,152
18	2045		11,450		11,450	19,783	(8,333)	103,818
19	2046		11,450		11,450	19,783	(8,333)	95,485
20	2047		11,450		11,450	19,783	(8,333)	87,152
21	2048		11,450		11,450	19,783	(8,333)	78,819
22	2049		11,450		11,450	19,783	(8,333)	70,486
23	2050		11,450		11,450	19,783	(8,333)	62,153
24	2051		11,450		11,450	19,783	(8,333)	53,819
25	2052		11,450		11,450	19,783	(8,333)	45,486
26	2053		11,450		11,450	19,783	(8,333)	37,153
27	2054		11,450		11,450	19,783	(8,333)	28,820
28	2055		11,450		11,450	19,783	(8,333)	20,487
29	2056		11,450		11,450	19,783	(8,333)	12,154
30	2057		11,450		11,450	19,783	(8,333)	3,820
31	2058		11,450		11,450	19,783	(8,333)	(4,513)
32	2059		11,450		11,450	19,783	(8,333)	(12,846)
33	2060		11,450		11,450	19,783	(8,333)	(21,179)
34	2061		11,450		11,450	19,783	(8,333)	(29,512)
35	2062		11,450		11,450	19,783	(8,333)	(37,845)
36	2063		11,450		11,450	19,783	(8,333)	(46,179)
37	2064		11,450		11,450	19,783	(8,333)	(54,512)
38	2065		11,450		11,450	19,783	(8,333)	(62,845)
39	2066		11,450		11,450	19,783	(8,333)	(71,178)

40	2067		11,450		11,450	19,783	(8,333)	(79,511)
41	2068		11,450		11,450	19,783	(8,333)	(87,844)
42	2069		11,450		11,450	19,783	(8,333)	(96,178)
43	2070		11,450		11,450	19,783	(8,333)	(104,511)
44	2071		11,450		11,450	19,783	(8,333)	(112,844)
45	2072		11,450		11,450	19,783	(8,333)	(121,177)
46	2073		11,450		11,450	19,783	(8,333)	(129,510)
47	2074		11,450		11,450	19,783	(8,333)	(137,844)
48	2075		11,450		11,450	19,783	(8,333)	(146,177)
49	2076		11,450		11,450	19,783	(8,333)	(154,510)
50	2077		11,450		11,450	19,783	(8,333)	(162,843)
51	2078		11,450		11,450	19,783	(8,333)	(171,176)
52	2079		11,450		11,450	19,783	(8,333)	(179,509)
53	2080		11,450		11,450	19,783	(8,333)	(187,843)
54	2081		11,450		11,450	19,783	(8,333)	(196,176)
55	2082		11,450		11,450	19,783	(8,333)	(204,509)
56	2083		11,450		11,450	19,783	(8,333)	(212,842)
57	2084		11,450		11,450	19,783	(8,333)	(221,175)
58	2085		11,450		11,450	19,783	(8,333)	(229,508)
59	2086		11,450		11,450	19,783	(8,333)	(237,842)
60	2087		11,450		11,450	19,783	(8,333)	(246,175)
61	2088		11,450		11,450	19,783	(8,333)	(254,508)
62	2089		11,450		11,450	19,783	(8,333)	(262,841)
63	2090			4,501	4,501		4,501	(258,340)
64	2091			4,501	4,501		4,501	(253,839)
	Totals	**237,149**	**686,989**	**9,002**	**933,140**	**1,186,979**	**(253,839)**	

Source: Applicant's Environmental Statement Volume 1, Chapter 7: Climate Change APP/6.1

Reference	**Item**	**Amount tCO2e**
Table 7-22	Construction GHG emissions	237,149
Table 7-26	Operational GHG emissions	686,989
Table 7-27	Decommissioning GHG emissions	9,002
	Total emissions from above	**933,140**
Para 7.10.96	Minimum net saving over 60 years	218,611
Minimum gross saving = Total emissions - min net saving		**1,151,751**
Para 7.10.96	Maximum net saving over 60 years	253,839
Maximum gross saving = Total emissions - max net saving		**1,186,979**

Notes and assumptions:

1 This is a "best case" analysis using the Applicant's estimates. The Applicant's Environmental Statement does not set out a clear or explicit carbon break-even analysis. Relevant data are dispersed across multiple tables and paragraphs, and key assumptions are not drawn together in a way that allows the point of cumulative emissions offset to be readily identified. This analysis therefore derives a break-even position using the Applicant's published figures. In the absence of a transparent break-even assessment by the Applicant, uncertainty remains as to whether - under alternative reasonable assumptions relating to panel type, replacement cycles, degradation and grid carbon intensity - the Scheme would achieve carbon break-even within its operational lifetime.

2 The Applicant quantifies construction-phase greenhouse gas emissions in Table 7-22 of the Environmental Statement (ES Volume 1, Chapter 7). While these emissions are presented as a small proportion of total UK emissions, national carbon budgets represent finite, legally binding limits. Construction emissions occur upfront and in full, at a time when the UK is required to achieve steep reductions in emissions to remain within current and forthcoming carbon budgets. The Applicant's response does not explain how these emissions are compatible with the increasingly constrained carbon budget framework, nor how they are accounted for alongside other major infrastructure projects drawing on the same limited national allowance.

3 Assumed that 2 year Construction phase ends during 2029. (Source: Heading before para 7.9.3)

4 This analysis assumes the maximum net saving of 253,839 tCO2e for fixed panels. However, the applicant has applied for a mix of tracker panels and fixed panels. If approved and using their figures, this would delay break-even by up to a further 2 years.

5 Assumed that Applicant's net savings figures at para 7.10.96 are net of ALL emissions, including those from construction and decommissioning phases. If not, then gross savings would be correspondingly higher and carbon break-even would occur much later.