

Comments on EXAM/9.33 Climate Response

Interested Party: Cllr Jon Atkey

Interested Party Reference Number: [REDACTED]

Relevant Representation: RR-0914

Applicant's response: EXAM/9.33 Climate Response

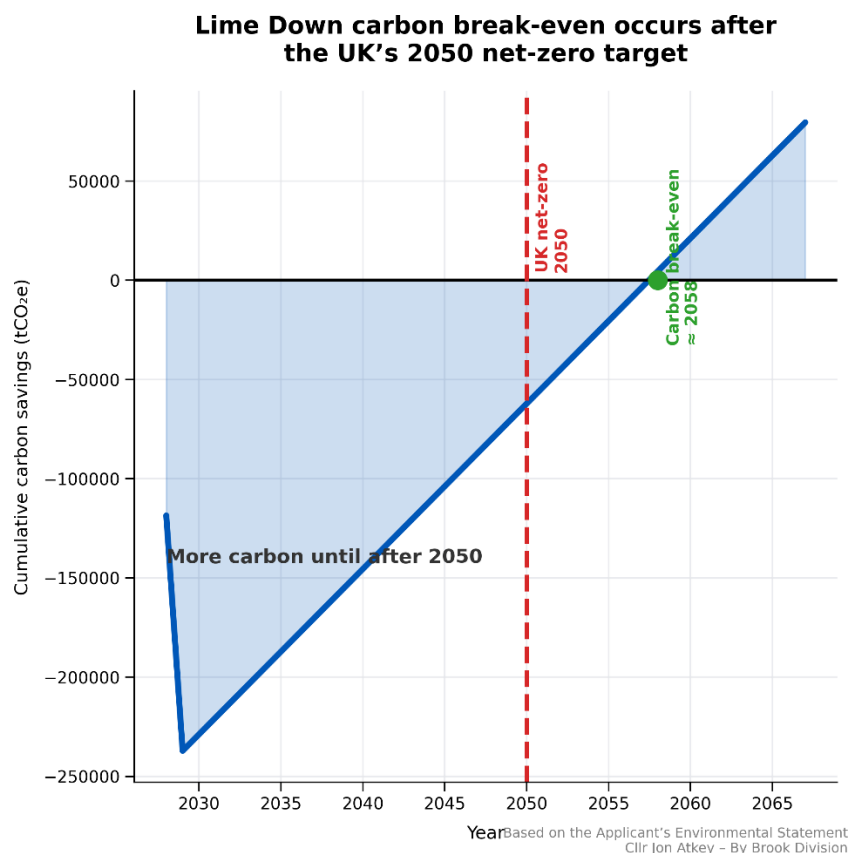
I have reviewed the Applicant's Climate Response (EXAM/9.33). This appears to be the response promised in EXAM/9.23 to points CJA-001, CJA-002 and CJA-006, which arose from my written submission on the Applicant's response to RR0914.

Carbon Break-Even

The Applicant now addresses my carbon break-even point. However, I do not consider that it shows my conclusion to be wrong.

The Applicant summarises my position as being that, using the Applicant's own figures, carbon break-even is not reached until around 2058, meaning the Scheme remains a net contributor to atmospheric carbon beyond the UK's 2050 net-zero target.

The infographic below illustrates the timing of carbon break-even using the Applicant's own figures.



The Applicant does not provide an alternative break-even date, identify an error in the calculation, or show that break-even is achieved before 2050. Instead, it argues that carbon payback is not an appropriate measure of significance.

That is a different argument.

The Applicant may be correct that carbon payback should not be the sole measure of significance. However, it does not follow that it is irrelevant. The timing of emissions and benefits is plainly relevant to the planning balance. A scheme whose benefits depend on many decades of future operation cannot automatically be treated in the same way as a scheme whose benefits arise much earlier.

Other Assessments

It is also noteworthy that other reviewers of the Applicant's climate assessment have estimated even later carbon payback periods. The University of Derby and the review commissioned by Wiltshire Council are summarised by the Applicant as suggesting break-even dates between approximately 2062 and 2079, depending on the methodology used.

The Applicant does not seek to demonstrate that those conclusions are wrong either. Rather, it argues that carbon payback is not an appropriate metric. The issue in dispute is therefore not the timing of break-even, but the weight that should be attached to it.

Timing of Benefits

It is reasonable for the Examining Authority to consider how much weight should be given to climate benefits that depend on decades of future operation, particularly when many of the Scheme's adverse effects would arise immediately.

This is reinforced by the Applicant's own sensitivity testing, which shows that reducing the operational life of the Scheme from 60 years to 40 years reduces the claimed net greenhouse gas benefit from 253,839 tCO₂e to just 14,256 tCO₂e. This demonstrates how dependent the claimed climate benefit is on very long-term assumptions.

The Wider Issue

While EXAM/9.33 responds to the carbon break-even aspects of CJA-001, CJA-002 and CJA-006, it does not address the wider point behind those submissions.

Carbon accounting has never been my principal concern. It is that the Examination has been presented with a series of separate technical responses to individual impacts, without a convincing assessment of whether their cumulative effect results in an acceptable planning balance.

The Applicant has responded to individual issues, including carbon break-even. The broader concern about the accumulation of harm and the overall planning balance remains insufficiently addressed.

Planning Balance

More broadly, my principal concern remains planning balance.

Throughout the examination, the Applicant has addressed landscape, heritage, agriculture, ecology, transport and climate change as separate topics. The question for the Examining Authority is whether their combined effect is acceptable in this location.

My concern, as set out in earlier submissions, is the accumulation of harm. Individual impacts may be capable of mitigation or justification when considered separately, but the planning judgement must consider their cumulative effect.

The issue is not whether each impact can be justified in isolation. It is whether the overall result represents an acceptable outcome for this rural landscape and its communities.

The Applicant has provided responses on individual topics. What remains largely unaddressed is the cumulative planning balance.

Conclusion

The central question for the Examination remains the same as that raised in my oral submission:

When the full scale of harm is weighed against what this scheme actually delivers, is it worth it in this place?

The Applicant has not yet demonstrated that the benefits of the Scheme outweigh the accumulation of harms identified throughout this examination.