

Interested Party: Cllr Jon Atkey, Wiltshire Councillor for By Brook

Relevant Representation: [REDACTED]

Final Written Representation, 16 October 2026

1. The Central Issue

Throughout this examination, the Applicant has provided detailed responses on individual topics including landscape, heritage, agriculture, ecology, transport and climate change.

However, the key question is not whether each impact can be explained, mitigated or justified individually. It is whether the cumulative effect of those impacts is acceptable when balanced against the benefits claimed for the Scheme.

As the examination has progressed, the extent of the Scheme's impacts has become clearer.

2. The Scale of Harm

The hearings and written submissions have reinforced concerns about the effect on rural communities, the local road network, public rights of way, landscape character, community facilities and the loss of agricultural land.

For example, evidence heard during the examination has highlighted the proposed use of Norton Road near Hullavington. This is a road that local residents have long regarded as requiring safety improvements. Yet the Scheme would introduce levels of construction traffic that are wholly out of keeping with the character and function of the route, affecting residents, walkers, cyclists and users of nearby public rights of way.

Importantly, this is not a short-term or occasional impact. The additional HGV traffic would continue throughout the planned two-year construction period, fundamentally changing the experience of using the route for an extended period and undermining efforts to encourage active travel and improve road safety.

This is not an isolated issue. It is one example of a wider pattern of impacts that would be experienced across the locality for a prolonged period.

3. Climate Benefit and Timing

My earlier submissions focused on the timing of the Scheme's claimed climate benefits. Since then, the wider context has become, if anything, more compelling. The scientific consensus continues to point towards the urgent need to reduce greenhouse gas emissions as rapidly as possible. The challenge is not simply to reduce emissions eventually, but to reduce them during the critical decades ahead.

Using the Applicant's own figures, carbon break-even is not reached until after the UK's legally binding 2050 net-zero target date. Other reviewers of the Applicant's assessment have estimated even later break-even dates.

The Applicant's response has not demonstrated that those conclusions are incorrect. Instead, it argues that carbon payback is not an appropriate measure of significance.

Whether or not that argument is accepted, the timing of climate benefits remains relevant. A scheme relied upon to justify substantial and lasting impacts should be expected to deliver corresponding benefits within a timeframe that is meaningful to the challenge it seeks to address.

The issue is not whether the Scheme may eventually deliver carbon benefits. The issue is that, on the Applicant's own evidence, those benefits arise only after the period in which they are most needed.

Climate benefit is therefore part of the planning balance. It cannot be viewed in isolation from the timing of those benefits, nor from the harms that would arise immediately if the Scheme proceeds.

The same principle applies to energy security. Any benefits to energy security must be weighed alongside other strategic interests, including food production and the loss of productive agricultural land resulting from development on this scale.

4. Planning Balance

Taken together, the examination has identified significant impacts on landscape, rural character, agricultural land, local communities, road safety, rights of way and community infrastructure.

The Applicant has sought to justify those impacts by reference to the benefits of the Scheme. However, the Examination must ultimately determine whether those benefits are sufficient to outweigh the accumulation of harms that have been identified.

That remains the central issue.

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 demonstrated that the benefits of the Scheme outweigh the accumulation of harms identified throughout this examination.

Cllr Jon Atkey

Wiltshire Councillor for By Brook

16 October 2026