

Submission ID: SCD23C54C

As Wiltshire Councillor for the By Brook Division, this is my representation in response to the Applicant's Response to my original Relevant Representation Ref: [REDACTED], which I made on behalf of the By Brook communities I represent.

Written Representation in Response to the Applicant's Response to RR-0914

Interested Party: Cllr Jon Atkey

Interested Party Reference Number: [REDACTED]

Relevant Representation: [REDACTED]

Applicant's response: Table 4-34, EN010168-000906-9.1

1. Scope of this response

This submission is confined to responding to the Applicant's response to my Relevant Representation (RR-0914). I am not raising new objections. My purpose is to explain why, in my view, the Applicant's response does not properly or substantively address the points I originally made.

My original representation was concerned with the scale, location and cumulative impact of the proposal on a settled rural landscape and the communities that live there. That remains my position.

2. Fragmentation of what was a planning balance argument

My RR-0914 was not a series of isolated technical points. It set out a clear planning balance argument – that the proposal represents a very large industrial development imposed on a landscape of villages and hamlets, fields, hedgerows, footpaths and bridleways, with profound consequences for how that place is experienced over decades.

The Applicant's response breaks these concerns down into separate topic areas and addresses them individually, largely through assertions about mitigation. In doing so, it avoids grappling with the combined effect of the proposal on place and community, which was the essence of my representation. In several instances, the response appears carefully framed so as to avoid answering the point actually raised, replacing it with more general reassurance.

3. Nature of the place and magnitude of change

A central issue in my RR-0914 was the mismatch between the scale of the proposed development and the character of the area.

This is not a vast, empty or previously industrialised landscape. It is a living landscape of villages and hamlets, fields, hedgerows, footpaths and bridleways, forming the everyday setting for the people who live there.

The Applicant's response does not engage with the reality that the proposal would fundamentally transform the character of the area, turning what is currently a patchwork rural landscape into the setting for a large industrial complex for much of a human lifetime. References to planting and long-term management do not answer that point – they simply assume the acceptability of the change. This is not mitigation of harm, but acceptance of the permanent industrialisation of what is currently a settled rural landscape.

4. Grid distance and scale driven by commercial viability

My original representation raised concerns about the **extent and spread of infrastructure** required. The Applicant's response confirms that the site's distance from the grid necessitates extensive additional works.

This matters because it shows that the scale and reach of the development are being driven by the need to make the project commercially viable, rather than by what the landscape and surrounding communities can reasonably accommodate. The response treats this as a neutral engineering consideration, but its effects are spatial, visual and experiential, and were part of the harm I identified.

5. Carbon benefits relied on by the Applicant

Although carbon emissions were not a central plank of my original representation, the Applicant has chosen to rely on claimed carbon benefits as a way of justifying or outweighing the harms I described. It is therefore reasonable for me to respond to that reliance.

At the Open House Forum, I used the Applicant's own figures and deliberately took a favourable view of them, in order to illustrate the earliest point at which any claimed benefits might begin to offset the initial impacts. Even on that basis, any benefits are heavily back-loaded.

More importantly, the information provided by the Applicant is not sufficiently robust or complete to support confidence in the outcome being relied upon. Where an Applicant seeks to justify significant and long-lasting harm by reference to carbon benefit, it is reasonable to expect that benefit to be demonstrated with clarity and certainty. In my view, that has not been done.

The Applicant has not yet had the opportunity to respond to my oral representation, but nothing in their written response to [REDACTED] demonstrates that carbon considerations outweigh or neutralise the place-based harms I originally raised.

More broadly, where the Applicant seeks to rely on carbon benefit as part of the justification for the scheme, it is reasonable to consider how the proposal uses a finite carbon budget. In the absence of clear and timely net benefit, there is a real question as to whether the level and timing of emissions associated with the scheme represent a justified or proportionate use of that budget.

6. Reliance on future detail

Across several topics, the Applicant's response depends on matters being resolved at a later stage, through outline or subsequent detailed plans. This includes landscape mitigation and aspects of long-term management.

My original representation raised concerns about the level of harm and uncertainty associated with the proposal. The Applicant's response relies heavily on matters being addressed at a later stage, but does not explain why it is acceptable to proceed on that basis in this case.

That concern has not been addressed in substance.

7. Conclusion

For these reasons, I do not consider that the Applicant's response adequately addresses my Relevant Representation. It does not engage with the planning balance I set out, nor does it convincingly demonstrate that the scale and impacts of the proposal are appropriate for this location.

Nothing in the Applicant's response alters the conclusions I reached in [REDACTED]