

Holt Parish Council – Objection

Holt Parish Council (HPC) objects to this application and does so with increasing concern at the incremental development of this Green Belt site where no genuine farmstead exists.

The site comprises a small holding of approximately 7 acres containing two large agricultural barns. The proposal seeks to introduce an intensive indoor calf rearing enterprise alongside a substantial four-bedroom dwelling with double garage.

This is not materially different from the scheme refused by Wiltshire Council (WC) in December 2025. It remains an attempt to secure a permanent dwelling in open countryside ahead of an agricultural enterprise that does not currently operate on the site and for which there remains no clear evidence of essential need, no certainty of delivery and no supporting infrastructure.

HPC is supportive of genuine rural business and diversification as agricultural development forms part of the wider landscape in our parish. However, HPC raises concerns regarding the reliability of the submitted information and unresolved highways impacts for this application in addition to the failure to satisfactorily address all three previous reasons for refusal.

Refusal Reason 1 – Failure to demonstrate essential need.

This application fails at the first fundamental policy test: no essential need for a permanent rural worker dwelling has been demonstrated. HPC considers each of the following points to be material to the determination of this application:

- **No robust agricultural appraisal provided.**
The submission refers only to a summary, preventing proper scrutiny of functional and financial need as required by WC local validation checklist.
- **Premature permanent dwelling.**
National guidance is clear that new enterprises should be tested through a temporary dwelling to assess whether the enterprise becomes genuinely established, viable and requires a permanent on-site presence. The proposal instead seeks to bypass this step and move directly to a permanent dwelling without that evidence base.
- **Alternative accommodation existed.**
HPC is aware that a two-bedroom cottage has been available to rent immediately adjacent to the site, at a comparable distance to the barns as the proposed dwelling, for several months, undermining the essential need case.
<https://www.onthemarket.com/details/18351704/>.
- **Enterprise not established.**
There is no functioning calf rearing operation on site or livestock grazing. The proposal relies on future intentions rather than an existing need.
- **Not a genuine farmstead.**
The site remains a single field with two barns, one originally only approved for hay storage and now used for an agricultural contracting business.
- **No supporting infrastructure.**
While this is an application for a permanent dwelling there are no submitted documents to demonstrate how feed storage, waste handling or operational space would be accommodated.
- **Lack of control over land.**
Key elements of the enterprise rely on land held under licence or short-term agreement according to the application, which cannot justify a permanent dwelling for a secure, long-term agricultural need.

- **Dwelling is disproportionate.**

A four-bedroom house with double garage goes materially beyond what would be expected for a rural worker and instead reflects a market-style dwelling.

- **Section 106 cannot create need.**

A planning obligation cannot create or justify an essential need where one has not been demonstrated through robust evidence and compliance with Green Belt policy.

The proposal fails to demonstrate a robust, evidence-based functional and financial need for a permanent rural worker dwelling in the Green Belt. A similar proposal under PL/2022/09147 on a nearby site in the greenbelt was refused in 2021. The proposal was for a dwelling to support a calf rearing enterprise in a single agricultural barn in a single field. The Inspector dismissed the subsequent appeal - APP/Y3940/W/23/3327751. The essential need test for this proposal is not satisfied, and the development is therefore contrary to CP48 and paragraph 84 of the NPPF.

Refusal Reason 2 – Green Belt harm

The proposal remains inappropriate development in the Green Belt and fails to demonstrate very special circumstances. HPC considers each of the following points to be material to the determination of this application:

- **Dwelling remains the primary harm.**

Repositioning and landscaping do not alter the fundamental issue: a new permanent dwelling in open countryside.

- **No meaningful change from refused scheme.**

The revised layout does not overcome the previous refusal.

- **Not integrated into a farmstead.**

The proposal is not physically or visually integrated into an existing farmstead. It is not sited adjacent to the barns, is not in close proximity to the cottages at Forewoods Common and is not within the same visual context as the CPW Cereal Factory, contrary to submitted statements.

- **Cumulative impact.**

The site has been incrementally developed over time, eroding openness. The introduction of a permanent dwelling would significantly intensify the use of the site.

The proposal causes harm to the openness and character of the Green Belt with no very special circumstances. It remains contrary to CP51 and NPPF paragraphs 142, 153 and 154.

Refusal Reason 3 – Insufficient ecological evidence.

The ecological concerns identified in the previous refusal remain unresolved.

- **Insufficient survey work.**

A Preliminary Ecological Appraisal is not sufficient to rule out impacts on the SAC based on a single seasonal survey and without full bat activity surveys.

- **Within buffer zone of the Bath and Bradford on Avon Bats SAC.**

The legal test requires certainty beyond reasonable scientific doubt that there will be no adverse effect.

- **Introduction of residential activity.**

Lighting, vehicle movement and domestic activity introduce new disturbance into a currently dark rural environment.

- **PEA confirms risk.**

The report acknowledges that the introduction of artificial lighting may result in

disturbance. This reinforces, rather than resolves, the concerns raised in the original refusal.

Insufficient ecological evidence has been provided to rule out adverse effects on the SAC. The proposal therefore remains contrary to the Habitats Regulations, NPPF and CP50.

While all three refusal reasons remain and as set out above, have not been overcome by this resubmission, HPC also identifies further material concerns, including highways assessment of operational impacts, the inaccuracy within the submitted documents and plans which provide additional grounds for refusal.

Highways and access

HPC strongly supports the Highway Authority's request for a tracking analysis. Where the justification for the dwelling is wholly dependent on a calf-rearing enterprise, it is essential that safe and suitable access for that level of agricultural activity is clearly demonstrated.

- **Tracking analysis required.**
Safe access for agricultural vehicles has not been demonstrated.
- **No realistic transport assessment.**
The level of activity associated with calf rearing is not properly assessed – deliveries, staff access, veterinary visits and waste removal.
- **Intensification of use.**
Vehicle movements would increase significantly compared to existing use.
- **Local highway constraints.**
The B3105 is a busy commuter route. The nearby Forewoods Common junction of the B3107 and B3105 is heavily used and under stress when nearby roads are flooded.

Until a tracking analysis and appropriate supporting evidence are provided and assessed, it cannot be concluded that the site can be safely accessed for the calf rearing business which generates the need for the permanent dwelling. The proposal therefore conflicts with CP60, CP61 and paragraph 118 of the NPPF.

Inaccuracy and reliability of submitted information

HPC has identified a number of clear inconsistencies between the application form, plans and supporting documents, which raises significant concerns of the overall narrative presented to justify this development.

This is of particular concern given the established planning history of the site, where inaccuracies in submitted plans and deviations from approved drawings have previously been identified and, in some cases, only addressed through subsequent applications (see Appendix A).

- **Retail Park reference.**
The Planning Statement includes reference to potential "retail park" use, raising sincere concern about future intentions and is contrary to the application which is presented as a modest agricultural worker's dwelling justified by essential need for a calf-rearing enterprise.
- **Conflicting plans and narrative.**
The number, size and position of buildings are not accurately shown in plans or described in the narrative presented in documents.
- **Reliance on future intentions.**
The proposal relies heavily on future intentions and personal circumstances, including the

establishment of the enterprise and changes in employment. These are not matters that can be secured through the planning system and therefore cannot be relied upon.

- **Incorrect application responses.**

Multiple answers in the application form are demonstrably wrong. For example...

Question	Form Answer	Reality from Plans/Statements
Does the proposed development require any materials to be used externally?	No	Yes Proposal is a new 4-bed house + double garage + domestic parking/turning. New stone walls, slate roof, UPVC windows/doors are also specified.
Are there trees or hedges on the proposed development site? And/or: Are there trees or hedges on land adjacent to the proposed development site that could influence the development or might be important part of the local landscape character?	No	Yes It is Green Belt land with Lower Bradford Woods adjacent to the site. Existing hedgerows/bunds/woodland cited for screening; new planting proposed.
Are there any existing employees on the site or will the proposed development increase or decrease the number of employees	No	Yes Claims established business + new enterprise (partner + 7-15 seasonal staff).
Does the site have any existing vehicle parking spaces, or will the proposed development add/remove any parking spaces?	No	Yes Proposal is a new 4-bed house + double garage + domestic parking/turning.
Protected and priority species Designated sites, important habitats or biodiversity features	No	This was Refusal Reason 3 so answer should be Yes.

There is a clear disconnect between the submitted narrative and the reality of the proposal. HPC considers that these discrepancies significantly undermine the weight that can be given to the application. These concerns are not isolated to the current submission but reflect a consistent pattern of inaccuracies and retrospective regularisation across multiple applications, as evidenced in our appendix.

Planning history and cumulative impact

HPC would like it on record that this application is not a stand-alone proposal and must be considered as part of an ongoing pattern of development with applications that are not reliable. HPC submits an appendix from the previous application detailing the planning history for the land within the ownership boundary, not just the development boundary for this proposal, as shown on the location plan. In summary our appendix details:

- **Barns built exceed permitted size and use.**

Barn for hay and straw only is now used for machinery as an agricultural business, exceeds permitted size and does not feature on the location plan or revised proposed block plan. The applicant for that barn is the one for this application.

- **Repeated issue on this site.**

Similar concerns have been raised in previous applications along with development not built to approved permission.

- **Undermines farmstead claim.**

The asserted relationship between dwelling and buildings cannot be verified.

- **Incremental intensification.**

The site has evolved from open field to a developed agricultural contracting business.

- **Erosion of openness.**

Each application adds further built form and activity.

- **HPC concern of cumulative impact**

Planning and Justification statement refers to potential “retail park” use to “optimise the potential of the site in line with para. 135 (b) and (e).”

This pattern of incremental development is a material consideration and reinforces the need to assess the cumulative impact of development on the openness and purpose of the Green Belt.

In this context, the proposed introduction of a permanent residential dwelling represents a further and significant step in that process, rather than a justified response to an established and functioning agricultural need.

Conclusion

At its core, this is a proposal for a permanent dwelling in the Green Belt first, with an agricultural justification that remains unproven and yet to be demonstrated on the ground.

In summary, the proposal:

- Fails to demonstrate essential need (CP48, NPPF 84)
- Is inappropriate development in the Green Belt with no very special circumstances
- Fails to provide sufficient ecological evidence.
- Raises unresolved highways concerns.
- Relies on inconsistent and unreliable information.

HPC strongly disputes the suggestion that this site represents a coherent farmstead. It remains a small Green Belt field with agricultural buildings and no established need for a dwelling.

The introduction of a large two-storey dwelling and domestic curtilage in this elevated and sensitive location would erode the rural character of the Avon valley and contribute to the gradual domestication of the Green Belt contrary to CP48, CP51 and CP57.

HPC therefore requests that Wiltshire Council refuse this application, consistent with its decision of December 2025.