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Your Ref: 20/0777/FFU

Our Ref: 8989-dc

24 March 2021

For the attention of Mr D Carty

Surrey Heath Borough Council
Knoll Road
Camberley
Surrey
GU15 3HD

Dear Mr Carty,

Site: Burnside Nursery. Philpot Lane, Chobham GU24 8HE
Application: 20/0777/FFU
Proposal: Erection of a replacement dwelling and ancillary buildings comprising a stable and barn for purposes incidental to the enjoyment of the associated dwellinghouse following the demolition of existing agricultural workers' dwelling and nursery buildings

Thank you for your instruction dated 10 March 2021 requesting further comments from Reading Agricultural Consultants Ltd (RAC) on the above application following the submission of additional information by the Agent in an email to the Council dated 2 March 2021.

As part of this appraisal I have had regard to the Planning Statement produced by Fuller Long, the applicant's agent (dated August 2020), the revised plans and the application form.

In the appraisal of the initial documents submitted (RAC ref 8989 dated 7 January 2021) RAC concluded:

"If the stables are permitted and to be conditioned for private equestrian use only by the owner of Burnside Nursery, RAC considers the condition may no longer be appropriate. However, if any commercial equestrian activities are/were to take place at the application site, this would require both a justified essential need and demonstration that any commercial use is financially viable and sustainable to support a rural worker's dwelling.

RAC considers the provision of stables appropriate for the site, however it has concerns regarding the size of the proposed building and the inclusion of a kitchen area and two toilets for a private equestrian use when the applicant will live on site a short distance from the stables. In addition, RAC considers that the two proposed foaling boxes could be considered as part of the proposed block of four stables rather than having an additional two separate foaling boxes.

Whilst a storage building may be considered appropriate to serve the equestrian use, RAC does have concerns regarding the design of the storage building for its intended use for the safe and secure storage of machinery. RAC would recommend that the plans are revised to incorporate the machinery storage sections being fully clad and secured on the front elevation. In addition, RAC considers the hay storage area within the proposed building could be better designed to



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permit adequate ventilation throughout the stored hay bales. These amendments to the design would minimise the threat of theft of valuable machinery and reduce any possible fire risk from storage of warm hay bales.”

Background

1. The application site, known as Burnside Nursery, extends to 2.56 hectares (6.32 acres) with a 4/5 bedroom dwelling (187m²) on site and a range of buildings within a yard area with access to the site from Philpot Lane.
2. The Planning Statement notes there is 1.44 hectares (3.56 acres) of grazing land available at the application site.
3. The Nursery area comprises three double span metal frame glasshouses, a derelict wooden frame glasshouse, four cold frames and storage buildings. These are all in a dilapidated condition and whilst there are still electricity and water connections to the buildings, the oil fired boilers are no longer in working condition. It is understood the double span glasshouses have been on site for at least 20 years. Whilst some have the provision for ventilation, the pulley systems do not appear to be in working condition.
4. I was informed on the site visit that the applicant purchased the site in April 2018 through a private transaction following an unsuccessful marketing and auction campaign by the previous owner who used Romans Auctions. The Land Registry Title Register details that the applicant became the owner of the site on 15 August 2018.
5. It is unknown when the horticultural business at Burnside Nursery ceased trading.
6. The applicant has access to the rental of fields adjacent to the application site for an additional 1.41 hectares of grazing. The basis of this rental agreement is unknown. Including the rented fields and available grazing land at Burnside Nursery the horses will have access to a total 2.85 hectares.
7. In this application the applicant has amended the number of stables proposed from four loose boxes and two foaling boxes to three loose boxes and one foaling box. The agent has confirmed it is the applicant's intention to keep no more than four horses on site.
8. Since RAC's appraisal (dated 7 January 2021) the application has addressed the concerns of the availability of exercise for the horses, and the plans have been amended to include a 20m x 40m manège which RAC will comment on below.
9. The Planning Statement notes that the proposed stables will be used by four horses with the foaling boxes only used when required for foaling and unoccupied the remainder of the year.
10. The stable building will also incorporate a tack room, feed room and storage, kitchen/rest room, two toilets and lobby area. The Planning Statement details that the rest area and toilet facilities are for use by *'persons taking care of the horses'*.
11. The email from the Agent explains that the toilet and shower within the stable block will enable the applicant and his daughter to separate the equestrian use of the site away from the new dwelling. It is also detailed that when they are away from the site they ask friends to check and care for the horses and the facilities can be used by them rather than requiring access to the house.
12. The Planning Statement details that the equestrian activities will be for the private enjoyment of the applicant. There is no commercial element. This has been reiterated in the email dated 2 March 2021 to the Council which details that the applicant's daughter who will be stabling her horses at the site.

13. It is noted that the applicant's daughter competes at novice level in one-day events; keeps a semi-retired racehorse for hacking and has two retired broodmares which will be stabled and exercised on the site. It is the daughter's intention to breed horses on site as a hobby.
14. The machinery and hay barn provides storage for two horse boxes (plan 694-P-11-6 indicates it is a horse trailer and horse lorry), a tractor and implements owned by the applicant as well as an area measuring 71.2m² for hay storage.

Proposal

15. The application before the Council proposes the erection of a replacement dwelling with the removal of Condition 1ii of BGR7137 and the erection of ancillary buildings comprising an L shaped stable block and barn.
16. The replacement dwelling is two storey and comprises a lounge, kitchen, living room, utility and office on the ground floor and five bedrooms, bathroom and two en-suite bathrooms on the first floor. It is sited just south of the existing dwelling.
17. The stable block has been amended following RAC's comments (dated 7 January 2021) and now measures 20.6m on each length with a width of 4m and overhanging roof of 1.83m to the front. It is designed with timber cladding above a brick work plinth under a clay tile roof. The stables each have a stable door on the front elevations and stable window on the rear elevation and the kitchen and toilet areas and tack room and feed room each have a timber framed glazed window.
18. The barn is divided into three sections with the two outer sections having a lower roof line than the middle section. The barn has a total footprint of 244m².
19. The two lower sections provide an area for hay storage and tractor and implement storage. They have a ridge height of 4.94m and eaves height of 3.81m with an opening 6m wide and 3.4m high. Each section has a floor area of 70.58m².
20. The middle section provides storage for a horse lorry and horse trailer and has a ridge height of 5.94m and eaves height of 4.36m with an opening 8.52m wide and 4.14m high. It has a floor area of 95.74m².
21. The revised plans for the barn have addressed some of RACs concerns including the provision of ventilation grills, ridge vent tiles, doors and a lockable security barrier.
22. The plans do incorporate a 20m x 40m manège however the specification of the surface type and fence boundary for this have not been included in the revised plans.

Relevant Planning Policies

23. National planning policy guidance for development in the countryside is set out in the National Planning Policy Framework (NPPF) (revised 24 July 2018 and updated February 2019).
24. Section 4 of the NPPF is concerned with 'Decision Making' and at paragraph 38 notes:
"Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible."
25. At paragraph 55 it notes:

“Planning conditions should be kept to a minimum and only imposed where they are necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects.”

26. Section 5 of the NPPF is concerned with ‘Delivering a sufficient supply of homes’ and at paragraph 79 it notes:

“Planning policies and decisions should avoid the development of isolated homes in the countryside unless one or more of the following circumstances apply:

- a) there is an essential need for a rural worker, including those taking majority control of a farm business, to live permanently at or near their place of work in the countryside;...”*

27. New Planning Practice Guidance titled ‘Housing Needs of Different Groups’ (July 2019) provides some guidance relevant to paragraph 79 of the NPPF in the section ‘How can the need for isolated homes in the countryside for essential rural workers be assessed’?

These include:

- *“Evidence of the necessity for a rural worker to live at or in close proximity to their place of work to ensure the effective operation of agricultural, forestry or similar land-based rural enterprise (for instance where farm animals or agricultural processes require on-site attendance 24 hours a day and where otherwise there would be a risk to human or animal health or from crime, or to deal quickly with emergencies that could cause serious loss of crops or products);*
- *The degree to which there is confidence that the enterprise will remain viable for the foreseeable future;*
- *Whether the provision of an additional dwelling on site is essential for the continued viability of a farming business through the farm succession process;*
- *Whether the need could be met through improvements to existing accommodation on the site; providing such improvements are appropriate taking into account their scale, appearance and the local context; and*
- *In the case of new enterprises whether it is appropriate to consider granting permission for a temporary dwelling for a trial period.”*

It further notes that: *“Employment on an assembly or food packing line, or the need to accommodate seasonal workers, will generally not be sufficient to justify building isolated rural dwellings”*

28. Policy CP1 of the Surrey Heath Borough Adopted Core Strategy (February 2012) sets the Spatial Strategy for the Borough. It states:

“New development will be directed in accordance with the spatial strategy which provides the most sustainable approach to accommodating growth making the best use of infrastructure and services whilst respecting the character of the Borough...”

29. Supporting paragraph 5.6 states:

“inappropriate development within the Countryside will include proposals that cause harm to its intrinsic character and beauty, landscape diversity, heritage and wildlife. In considering proposals for development regard will be had to national guidance as appropriate.”

30. The national guidance referred to was PPG2 Green Belts, PPS4 Planning for Sustainable Economic Growth and PPS7 Sustainable Development in Rural Areas. These have been revoked and are replaced by the NPPF and NPPG.

31. Policy DM1 deals with the rural economy and states:

“within the countryside, including the Green Belt, the Borough Council will support farm diversification proposals and the re-use, adaptation or conversion of buildings for economic purposes where: -

- i. the agricultural diversification is subordinate to the primary agricultural use and gives priority to the re-use of an existing building(s);*
- ii. the existing building is appropriate in a rural location, is of permanent construction, structurally sound and capable of conversion without major alterations, adaptations or reconstruction to bring it into its desired use;*
- iii. the scale and use of any diversification or economic purposed including cumulative impact and any associated ancillary development does no conflict with wider countryside and Green Belt objectives.*

Where justified, replacement buildings for farm diversification or economic purposes in the countryside beyond the Green Belt will be supported where:

- iv. the building to be replaced is of a permanent construction and is currently or was last in use for non-residential purposes;*
- v. the replacement building would not be materially larger than the existing building;*
- vi. priority is given to siting the replacement building on previously developed land.”*

32. There are no specific Local Policies for the removal of agricultural occupancy conditions.

33. Policy DM3 deals with equestrian related development and states:

"Equestrian related development in the countryside and Green Belt will be supported provided that:

- i. in the first instance priority is given to the re-use of existing buildings for stabling, tack rooms, feed stores or any other ancillary use which requires a non-residential building; and*
- ii. where new buildings or ancillary development are justified these are well related to existing buildings and are small in scale; and*
- iii. where replacement buildings are justified, the replacement(s) are well related to existing buildings and are not materially larger than the building(s) to be replaced; and*
- iv. the overall size, siting and scale of development including any cumulative impact should not be harmful to the character and openness of the countryside of Green Belt."*

34. The supporting text in paragraph 6.23 continues to state:

"The Borough Council will seek to ensure that the scale of any equestrian related development, including cumulative impacts, is appropriate to its current or proposed operation, whether private facilities or commercial businesses. The Borough Council considers that equestrian related development should retain or maintain a compact form and will resist proposals which would lead to dispersed forms of development. As such the Borough Council will seek to ensure that any stabling and ancillary development is appropriately sited in order to maintain the open and rural character of the countryside and Green Belt."

Appraisal

Erection of Stable Block

35. The proposed stable block will be sited on the site of the existing dilapidated and redundant glass houses located to the south east of the proposed replacement dwelling. It will incorporate a paved courtyard to the south of the building and soft landscaping on the western and eastern elevations.

36. The Planning Statement notes that the applicant will stable four horses on the site. The email to the Council (dated 2 March 2021) confirms that the applicant's daughter will stable her

competition horse, semi-retired racehorse and two retired broodmares. It is the daughter's intention to eventually breed horses on site as a hobby; however it is unknown when she plans to begin the breeding programme.

37. The application plans have been amended to provide three stables and one foaling box which are of the appropriate size for their intended use, as recommended in the *DEFRA Code of Practice for the Welfare of Horses, Ponies, Donkeys and their Hybrids* (2009), which sets a minimum stable size for horses of 3.65m x 3.65m (13.3m²) and a minimum size for foaling boxes of 4.25m x 4.25m (18m²).
38. The two stables each measure 4m x 4m and one measures 5m x 4m and are considered an appropriate size for large horses.
39. The foaling box measures 5m x 4m. The width of the foaling box has increased by 1m since the original plans, and is considered a more appropriate size.
40. RAC considers that the amended plans for the stable block are appropriate for the number of horses to be stabled on site, with the foaling box providing year round stabling and being used as a foaling box as and when required.
41. RAC still has concerns that the rest area and toilet and shower facility of the building appears larger than is necessary for a small privately run equine yard with only four horses, particularly if the applicant is to be caring for his own horses as the dwelling is close by and can provide the facilities. However, it is accepted that such facilities are appropriate.
42. Overall, RAC considers that the stable block as amended is appropriate for the number of horses to be stabled on site and for the private equestrian use of the site.

Available Land

43. The application site has 1.44 hectares of grazing land and it is noted that the applicant has the potential to rent a further 1.41 hectares of grazing land adjacent to the application site.
44. The DEFRA Code of Practice details that as a general rule, each horse requires approximately 0.5-1.0 hectares of grazing if no supplementary feeding is being provided. The agent has confirmed that the applicant will purchase supplementary feed including hay, hard feeds and haylage which will be sourced from local suppliers.
45. The applicant's four horses could require up to 4 hectares of grazing if no stabling or supplementary feeding is provided. It is still unclear whether the number of horses will increase once the applicant's daughter starts breeding horses on site with retained yearlings and youngsters which could eventually increase the pressure on the availability of suitable grazing.
46. RAC accepts the principle that a smaller area of land may be adequate where the horse is mainly stabled with the occasional use of grazing in turn-out paddocks. It has been detailed that the horses will be turned out in the daytime and brought back in for stabling from 4pm onwards depending on the time of year and weather conditions.

Manège

47. Following RACs comments on the daily exercising of the horses stabled on site, the applicant has now revised the plans to include a 20m x 40m manège.
48. RAC have been consulted by Local Planning Authorities across the country to appraise applications for sand schools and those measuring 60m x 20m are considered a standard size suitable for private and commercial competition yards. This facility would provide adequate space for daily exercising and training for equestrian disciplines such as showjumping and dressage.

49. Generally, a 40m x 20m sand school is suitable for novice dressage, 60m x 20m for advanced dressage and a minimum width of 25m for show jumping.
50. The manège is to be sited to the rear of the stable block with gateway access from the yard area.
51. Overall, I consider the 20m x 40m manège is an appropriate facility for the purpose of exercising and training of the horses proposed to be stabled at Burnside Nursery.

Erection of Storage Building

52. The application proposes a building for the storage of hay and machinery associated with the horses to be stabled at Burnside Nursery.
53. The proposed building is to be divided into three sections with two sections providing storage for a horse lorry, horse trailer, tractor and hopper (RAC considers that the Planning Statement may mean that the hopper refers to a topper which would be more appropriate or possibly a feed hopper).
54. The proposed building is of similar construction to the stables – timber cladding above a brick plinth under a clay tiled roof.
55. It is generally accepted that the storage of machinery when left outside and open to the elements of weather can lead to deterioration and rusting of moving parts which can increase maintenance costs. Left in the open, machinery is also liable to theft. It is of note that there has been an increase in rural crime and in particular the theft of agricultural machinery is of concern to the police and insurers.
56. The Planning Statement notes this building is of typical design for an agricultural building, however RAC would consider a steel portal frame and clad building more appropriate and commonly used for agricultural storage for the machinery and a covered open fronted bay for hay storage.
57. RAC notes that the email from the Agent (dated 2 March 2021) details that the proposed design is more aesthetically pleasing whilst also being functional.
58. RAC considers the storage of agricultural machinery and the horse lorry and trailer an appropriate use of the proposed building and accepts the amount of storage space required as indicated on the submitted plans.
59. RAC previously raised concerns about the security of the machinery within the building with the open fronted sections. These concerns have been addressed through the inclusion of doors and security barrier in the building. RAC also notes that the main entrance to the property is via gates and there will be another lockable gateway into the yard area.
60. The section designated for hay storage will provide a total area of 211m³ for the storage of bales stacked to 3m high. Using building space requirements as identified in the Agricultural Budgeting and Costing Book (ABC) 91st Edition (November 2020) a tonne of hay requires 6-7m³ storage. Assuming the applicant purchases hay bales in bulk, the building will be able to provide storage for 30-35 tonnes of hay.
61. RAC accepts that the open fronted building permits air flow over the stored hay. RAC's concerns regarding ventilation have been address through the provision of ventilation grilles at low level and ridge vent tiles.
62. RAC considers that the principle of a storage building for an equestrian use on the site (if approved) is an appropriate use. The size is of an appropriate scale and the building as

designed with the inclusion of ventilation and security is considered to be appropriate and typical of storage buildings on small scale private equestrian units.

63. In addition, following RAC's concerns regarding the siting of the barn away from the stable block, the revised plans have located the building closer but maintaining a 25m distance from the stables to ensure safety from the hay being a fire hazard.

Conclusion

64. RAC considers the provision of stables appropriate for the site. The plans have been revised to reduce the number of stables to a total of four, one of which is suitable for use as a foaling box. The size and layout of the stables is commensurate with the land available and the number of horses to be kept on site.
65. RAC accepts the provision of a rest area, shower and toilet facility as being appropriate for the private use of the stables.
66. RAC accepts the provision of a 20m x 40m manège for the private use and exercising of horses stabled on site.
67. RAC considers that the amendments to the storage building through its revised siting, inclusion of ventilation and security barrier and doors are acceptable for the intended use of the safe and secure storage of hay and machinery on site.
68. Overall, RAC considers that the applicant's proposal (as revised) is in compliance with national and local planning policy.

I hope these comments are helpful.

Yours sincerely

Olivia Wojniak