EXPERT APPRAISAL

RETENTION OF SINGLE STOREY EQUESTRIAN STORAGE

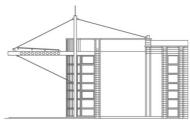
Warren Wood Manor, Hornbeam Lane, Essendon, Herts.

December 2016

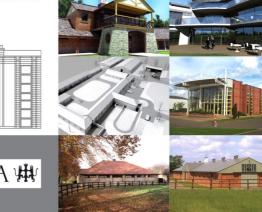
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Chartered Architects and Planning Consultants specialising in equestrian projects

1. INTRODUCTION

- 1.1. KWA Architects (Cambridge) Ltd has been appointed by Welwyn Hatfield District Council to review the Supporting Statement provided as part of application 6/2016/1953/FULL for 'Retention of single Storey Equestrian Storage Barn' at Warren Wood Manor, Hornbeam Lane, Essendon, Herts.
- 1.2. KWA Architects (Cambridge) Ltd specialises in equestrian architecture and planning. Practice Principle Keith Warth established the business in 1996 but has worked in the industry for over 30 years. He has written two books on the subject of Equestrian Architecture and is recognised as an expert in the field.
- 1.3. The report is written and prepared by Meghan Bonner BA (Hons) MSc MRTPI who specialises in rural planning in particular for equestrian developments.
- 1.4. KWA Architects has been provided with copies of the relevant planning application documents relating to 6/2016/1953/FULL alongside a copy of drawing 541-06 which is understood to be the approved ground floor plan for the Stable Block on the site and drawing 703/100 which is understood to be the as built first floor plan for the approved Stable Block on site.
- 1.5. It is understood that originally the Stable Block was designed in the 1990s and granted permission in 2001. It is understood that although construction work on the Stable Block commenced in 2004, the building was not completed until recently.

2. BACKGROUND

- 2.1. The Planning History for the site is set out below:
 - i. S6/1998/129/AG Barn for general storage purposes in connection with the agricultural use of the land Determined no objection and no further details required 09 Mar 1998.
 - ii. S6/1999/372/FP Change of use of land to equestrian with associated ménage, rides and landscaping approved 09 Aug 1999.
 - iii. S6/1999/993/FP 24 timber loose boxes on concrete bases for equestrian use refused 04 Jan 2000. Reported to PCC 06 Apr 2000 when enforcement authorised.
 - iv. S6/2000/1492/FP Erection of 20 box stable building refused 05 Jan 2001 but approved after appeal lodged against non-determination within 8 weeks.
 - v. S6/2009/2556/MA Change of use to equestrian with associated manège, rides and landscaping Granted conditionally on 21 January 2010.
 - vi. S6/2009/2574/FP Erection of new dwelling, three bay garage block, garden store together with retention and alteration of the existing stables, landscaping and all other ancillary works, following demolition of partially constructed dwelling, adjoining stables and garage blocks Granted conditionally in January 2010.
 - vii. S6/2012/2656/S73B Time extension of planning permission S6/2009/2574/FP (Erection of new dwelling, three bay garage block, garden store together with retention and alteration of the existing stables, landscaping and all other ancillary works.

- Following demolition of partially constructed dwelling, adjoining stables and garage blocks Granted conditionally in March 2013.
- viii. ENF/2015/0004 Operational development/MCOU Open enforcement investigations relating to the erection of 24 floodlights on 8 poles around manège, use of site for commercial livery, use of stables for residential purposes and importation of waste.
- ix. S6/2015/1105/FP Retention of single storey storage barn, open Horse Walker and associated fencing. Refused August 2016.
- x. S6/2015/1106/FP Retention of parking area for cars and horseboxes, horse holding area and manège area with associated fencing and lighting. Refused August 2016.
- xi. S6/2015/1107/FP- Retention of modified land levels and further land remodelling to agreed contours. Refused August 2016.

5. PLANNING POLICY

- 5.1. The site falls within the Metropolitan Green Belt where planning policy specifies that new buildings must be considered inappropriate unless very special circumstances exist or unless they fall under exception criteria such as 'appropriate' buildings for sport and recreation.
- 5.2. Welwyn Hatfield District Council has requested an independent assessment of whether the Supporting Statement sets out a genuine need for an essential facility and if so whether the facility is the minimum size required.
- 5.3. KWA Architects has not been appointed to conduct a planning policy review, however, in assessing the need and appropriateness of the development it is essential to have regard to relevant Green Belt planning policy. The relevant policy documents are considered to be:
 - i. Welwyn Hatfield District Plan policies GBSP1 and RA21.
 - ii. Welwyn Hatfield District Council's Supplementary Design Guidance
 - iii. National Planning Policy Framework (NPPF)

6. THE PROPOSAL

- 6.1. The planning application is for retrospective planning permission for a Hay and Storage Barn
- 6.2. The Storage Barn is approximately 12m in length and 6m in width with a minimum eaves height of 2.4m and a minimum ridge height of around 4m according to the Supporting Statement.
- 6.3. It is open fronted and divided equally into a storage area for manège sand and dry storage including feed, bedding and equipment and a hay storage area.

The Need

- 6.4. The Supporting Statement states that the building was erected to store hay and bedding for the horses kept in the adjoining Stable Block, surfacing for the adjacent manège along with tractors and equipment needed to tend to the land.
- 6.5. The Supporting Statement indicates that the straw and hay cannot be accommodated in the Stable Block because there is no access for a mechanical load lifter and the large size of modern bales prevents them being manually lifted.
- 6.6. The Supporting Statement claims that as a result hay and bedding has had to be kept outside under tarpaulin which has degenerated the materials and that management of the hay under tarpaulin had been both messy and difficult in the winter months.
- 6.7. The Supporting Statement sets out the need for proper maintenance of the yard to avoid diseases, pests, dust and clutter. It also sets out the need to avoid fire risk and reduce dust as a reason for providing separate storage.
- 6.8. The Supporting Statement claims there are no other suitable buildings which can be used to store the machinery.

The Scale

- 6.9. The Supporting Statement states there are 18 horses kept on site.
- 6.10. The Supporting Statement claims two-three bays of the Storage Barn are needed to store the hay bales and that the remaining bays will provide storage for the other essentials. This is supported by calculations presented in Appendix B written by Jim Powell a Farm consultant from JSP Management Ltd (JSP).

Green Belt

- 6.11. The Supporting Statement states that the building should be supported because it amounts to small scale facilities for outdoor sport and recreation and meets Green Belt exception criteria.
- 6.12. The Supporting Statement claims that because of its proximity to the Stable Block and its scale in comparison to the Stable Block that it meets the test to preserve the openness of the Green Belt and does not therefore amount to encroachment.

7. APPRAISAL

The Need

- 7.1. Hay, feed and bedding (be it straw or shavings) are required to provide appropriate care for the wellbeing of a stabled horse.
- 7.2. If hay, feed or bedding becomes damp it can very quickly become mouldy which, if used, can lead to spores in the stable environment. In turn, when inhaled, these spores can significantly affect a horses' respiratory output which not only affects a horse's health and well-being but also its performance. For this reason, outdoor storage of hay, feed and bedding with a simple tarpaulin is not appropriate and could very easily lead to the degeneration of stored hay, feed or bedding and consequently could affect the health of the horses stabled on site.
- 7.3. Similarly, hay, feed and bedding all attract vermin which can nest, urinate and defecate therein. This can easily spread diseases and it is essential that the risk of vermin accessing hay, feed and bedding is reduced wherever possible. The primary means of achieving this is through appropriate onsite storage and management of the storage provision.
- 7.4. It is therefore our view that the principle of appropriate storage and management of hay, bedding and feed is essential to an equestrian operation. This is reflected in the British Horse Society's Approval Criteria and Inspections Guide for Livery Yards which is applicable to most equestrian premises. It clearly states that a Feed Room and Hay Storage area is essential on an equestrian yard in particular for vermin control. In principle, the applicant's claim that onsite storage is required in order to meet an essential functional need to appropriately store and manage hay, feed and bedding is therefore accepted.
- 7.5. Similarly, the storage of manège surfacing outside is likely to lead to its deterioration. However, unlike hay, feed and bedding storage, manège surfacing is not required on a daily basis for the welfare of the horses kept on site. Whilst it is important to ensure that the manège surfacing is regularly topped up, it would be more usual practice for this to be delivered as a bulk load and spread directly on to the manège as and when needed (i.e. annually or bi-annually) rather than stored on site. If there are areas of the manège which are prone to becoming boggy and require more regular topping up this would suggest a drainage issue with the manège rather than a surfacing issue and should be investigated. It is therefore our view that the storage of manège surfacing within the Proposed Storage Barn is not essential to the operation of the on site activity.
- 7.6. The applicant states that the storage of machinery to tend to the land is essential. With 13ha of land and just 16 horses, the land will need to be appropriately tended to including grass cutting, spraying and hedgerow and tree management etc. It is not unusual for equestrian operations of this size to own their machinery in order to allow them to tend to the land appropriately all year around. It is accepted that the machinery required to carry out these operations, is large, valuable and also vulnerable to the elements. It is therefore not unusual to provide undercover storage for the machinery reasonably required to tend to the land in order to prolong the life of it. On balance, it is therefore our view that the proposed storage of machinery within the Storage Barn can be considered essential to the operation of the facility.
- 7.7. It is widely accepted that stable yards do create an increased fire risk. The storage of hay, bedding and machinery all create potential fire hazards and we would agree with arguments presented in the Supporting Statement that it is best practice to provide a

separate building for the storage of hay, bedding and machinery wherever possible, particularly when designing a new equestrian yard. However, contrary to JSP's comments in Appendix B of the Supporting Statement there are many yards which continue to incorporate integrated hay, bedding and feed storage for functional, financial, historic or other reasons. Whilst it is functionally preferable to have a separate Storage Barn, appropriate management processes and fire safety systems can be implemented on yards which have internal storage to reduce the fire risk. We therefore cannot concur with JSP's claim that it is 'never' acceptable to have internal storage but it is acknowledged that it is functionally preferable.

7.8. The Supporting Statement indicates that the separate storage area is required 'to minimise labour in handling the materials' however, this appears to be a claim made in comparison to the provision of no onsite storage and not in comparison to other alternatives. For example, integrated storage - where both handling the materials and accessing the horses to feed them would be easier than with a separate storage area.

Scale

- 7.9. In Appendix B, JSP provides calculations relating to the scale of the hay bales, the ability to stack them and the need to provide two months supply of hay. Paragraph 4.3 of the JSP report states that 4m x 4.8m of floor space is required to provide the storage space for the required hay These calculations are considered to be both reasonable and acceptable for the proper functioning of an equestrian development.
- 7.10. Over and above this there is also a need to provide storage for bedding and hard feed as well as under cover machinery storage. The storage of manège surfacing is not considered essential and therefore overall the Storage Barn provides slightly more storage space than is deemed absolutely essential to the operation of the yard. However, on balance it is considered to be reasonably sized given the needs of the activities taking place on site.
- 7.11. One area of concern within the JSP report is that it is noted that the JSP report includes photographs of the Storage Barn in use which also appears to show that there is continued external storage of what appears to be bedding. Good practice would see this avoided and it is concerning that even with an additional building, appropriate storage management is not being achieved on the site. As noted above, the scale of the Storage Barn overall is considered to meet the storage needs of the activities taking place on site, therefore, there should be no further reason to continue storing items outside.

The Green Belt - appropriateness test

6.12. Whilst it has been established there is an in-principle need for a storage facility for at least some of the materials referred to in the Supporting Statement and that the scale of the storage area proposed is appropriate to the needs of the yard, the Green Belt test requires that any new building is 'appropriate for outdoor sport, [or] outdoor recreation'. The NPPF also requires that any new buildings which fall under this category do not conflict with the purposes of including land within the Green Belt; one such criteria is 'to assist in safeguarding the countryside from encroachment'. As such, the test of whether a building is appropriate in the Green Belt is not simply where there is an in-principle need but it must also consider whether this need could be met without encroaching on the Green Belt.

- 6.13. On reviewing the approved plan 541-06 which provides the internal layout to the ground floor of the Stable Block and As Built drawing 703/100 showing the first floor internal layout, it is clear that the Stable Block has been designed and built with <u>significant</u> storage. There are two very large Hay Stores set out on the first floor with a further Feed and Hay store provided on the ground floor which benefits from its own dedicated access via a set of double doors.
- 6.14. The Supporting Statement and appendices A and B claim that the approved large Hay Stores on the first floor of the Stable Block cannot be accessed as there are no appropriate openings and a mechanical load lifter is required to manoeuvre these. This claim is accepted although it is extremely surprising that anyone with any knowledge of equestrian operations would design, apply for planning permission or build a Stable Block with essential hay storage on the first floor without any appropriate access. It also means that large areas of the first floor of the building have no functional use.
- 6.15. Despite this, a review of the Stable Block plans confirm that even though the Stable Block does not currently provide suitable access to the first floor storage areas for storing hay and bedding, there is more than sufficient floor space provided within the building as a whole to meet the storage and functional needs for the proper management of 16 horses.
- 6.16. Paragraph 4.3 of the JSP report states that 4m x 4.8m of floor space is required to provide the storage space for the required hay. The ground floor Feed and Hay Store shown on approved plan 541-06 provides more space than this and could therefore reasonably accommodate the 16 bales of hay required for functional purposes. The double doors mean it could also be accessed with appropriate manoeuvring machinery.
- 6.17. Over and above this, there is also an essential need to accommodate bedding (straw and/or shavings), hard feed and to provide undercover space for the machinery. The Supporting Statement as well as appendices A and B confirm there is no available space for this to be accommodated within the existing Stable Barn:
 - i. In Appendices A The Stable Manager sets out the uses of individual rooms within the stable block. This does not seem to correspond with approved plan 541-06. However, it is noted that rooms referred to are tack room, an office and a rug room all of which could feasibly be relocated to the first floor where the Hay Storage areas are not in use, to provide more storage space on the ground floor.
 - ii. Similarly, in Appendix B JSP refer to five storage rooms comprising tack room, locker room, storage area, compound fee and medication storage area and office. The report claims that individually these rooms are not large enough to accommodate the required level of storage and the rooms are essential for operational purposes. Whilst not necessarily ideal, it would be functionally possible to relocate these facilities to the first floor in the hay storage areas to provide the required storage space on the ground floor. In combination the spaces would provide more than sufficient onsite storage as originally intended through the approved plans for the Stable Block.
- 6.18. The JSP report also refers to the lack of airflow preventing the original storage areas from being utilised. It is accepted that airflow is important to appropriate storage management and that this may well have been an issue for the first floor hay storage areas, but this would not prevent these areas of the building being used for alternative

- purposes such as office, tack rooms etc to allow the floor space on the ground floor to be used more productively.
- 6.19. A review of drawings 541-06 suggests that simple internal remodelling of the building could provide more than sufficient space internally for the required storage. One such option is set out below:
 - Convert the south eastern wing (comprising the Feed and Hay Store, Loose Box 1, 2, 15 and 16 as well as the Blankets store and associated access) to an internal storage area providing an additional storage area that is very similar in size to the separate Storage Barn and which could be partitioned off from the rest of the building to reduce fire risk and the creation of dust. This would benefit from two access points which would be accessible by machinery for both manoeuvring purposes and machinery storage purposes.
 - This would result in the loss of four stables which would need to be provided elsewhere within the Stable Block:
 - Loose Box 14 and the adjacent Tack room could be remodelled to provide two reasonable size stables. As could Loose Box 11 and its adjacent Tack Room and Loose Box 4 and the Office. This would provide three additional stables. The Tack Rooms and Office could reasonably be relocated to the first floor in the disused Hay Storage areas.
 - The Stall Reps Room could be converted to a stable and the functional use relocated to the first floor as per the Tack Rooms or similarly Loose Box 7 or 8 and the Blanket Store could be remodelled in the same way. This would provide the fourth stable lost as a result of the new storage area.
 - 6.20. The above is one example of how the Stable Block could be remodelled to meet storage requirements on site. It is considered that there are many ways in which this could be achieved. As such, it is our view that although there is an essential need for storage on site, we do not consider that the Storage Barn meets the appropriateness test because there are functional alternatives within the existing floor space which could meet the need without further encroaching into the Green Belt.

7. CONCLUSION

- 7.1. It is our view that the Supporting Statement has demonstrated that appropriate storage of feed, bedding and machinery is essential on an equestrian development not least from a functional perspective but most importantly from a health and safety and welfare perspective; to avoid illness arising from dirty, damp or vermin-ridden hay and bedding and to reduce the risk of contact between horses and machinery. Where the storage serves a building which provides for outdoor sport and recreation, in this instance equestrianism, it must therefore be concluded that in principle the provision of storage amounts to an essential and appropriate facility for outdoor sport and recreation.
- 7.2. The scale of the storage facilities required as set out in the Supporting Statement is considered both suitable and reasonable to meet the needs of the 16 horses stabled on site.

- 7.3. However, the provision of the separate Storage Barn is not considered to be essential. Although a separate Storage Barn may be desirable from a fire risk perspective, integrated storage continues to be provided on many equestrian yards as fire risk and keeping the stables dust free can be appropriately managed. In our view, it is not essential to the operation of a yard for the storage to be separate.
- 7.4. Furthermore, the provision of a Storage Barn to meet the identified need in the Green Belt, can only be considered appropriate and meeting Green Belt tests where there is no other provision serving the same outdoor sport and recreation facility. In this instance, the approved and as built drawings demonstrate significant provision of storage and ancillary rooms, far in excess of what would normally be considered essential for the functioning of a private equestrian premise of this size. Whilst the Supporting Statement claims the significant storage areas on the first floor cannot be utilised as there is no available access, this space could reasonably be used for alternative purposes to allow the ground floor area to provide the required storage.
- 7.5. As such, it is our view that there is more than sufficient floor space within the existing Stable Block to provide the required level of storage, although it is accepted this will require internal remodelling and perhaps revised access to the Stable Block.
- 7.6. Green Belt policy restricts new development to that which is appropriate, preserves the openness and does not conflict with the purposes of including land within it. Although it is recognised that there is an essential need for storage in principle and that this has been demonstrated within the Supporting Statement, as the storage could reasonably be accommodated within the existing Stable Block, it is not considered that the separate Storage Barn itself can be considered appropriate in this instance.
- 7.7. Should the LPA be minded to approve the application, we would strongly recommend that there is a condition tied to the permission which requires the demolition of the building if it is no longer required for storage purposes associated with the equestrian use on site.