

Planning Statement

Land to the west of The Street,
Preston St Mary, CO10 9NG

STATEMENT WRITTEN BY:

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1. INTRODUCTION

- 1.1 This Application has been prepared on behalf of the Applicant and seeks advice in connection with the following proposed development:

"Erection of stable block, menage, horse walker and temporary rural worker's dwelling together with associated hardstanding and landscaping"

Report Structure

- 1.2 Section 2 of this Statement provides a description of the Site and surrounding area; section 3 provides a summary of the relevant planning history; section 4 describes the proposed development; section 5 outlines the planning policy context; section 6 details the commercial purpose of the development; section 7 sets out the planning assessment; and section 8 provides a conclusion.

2. SITE AND SURROUNDINGS

- 2.1 The Site is situated in a rural location just outside the settlement boundary of the village of Preston St Mary and has historically been used as arable land as part of the former owner's larger agricultural unit.
- 2.2 The Site is surrounded to the east, north and south by intensively farmed arable fields whilst to the south are a cluster of dwellings that run adjacent to the public highway known as Whelp Street.
- 2.3 The Site benefits from a right of way over the eastern field so as to provide access on to the public highway known as the Street.

Figure 1: Site and right of way (approximate area shaded red)



- 2.4 The Site is located in Flood Zone 1 (lowest probability of flooding) and is not subject to any heritage designations. However there are three heritage assets to the south of the Site (see Figure 2) which are within 200m of the proposed buildings.

- 2.5 The Applicant's proposed landscaping scheme submitted with this application demonstrates how these heritage assets will not be impacted by the proposed development.

Figure 2: Heritage Map Extract - Proposed development denoted by 



- 2.6 Permission was granted in 2011 and 2015 for conversion of the area of land immediately to the west of the site (see Figure 3) to be changed to equestrian use¹ and for the erection of a menage².

¹ B/11/00992

² B/15/01212

Figure 3: *Equestrian permission to west of Site*



3. PLANNING HISTORY

3.1 There is no relevant planning history to this Site.

4. PROPOSED DEVELOPMENT

4.1 This application seeks planning permission for the following development:

"Erection of stable block, menage, horse walker and rural worker's dwelling together with associated hardstanding and landscaping"

4.2 The Applicants are committed to delivering a scheme which fulfils the principles of high-quality design set out within local and national policy. This is reflected in the accompanying plans which reflect a commitment to delivering a high-quality scheme.

4.3 The development (equestrian and residential) will all be concentrated to the northern edge of the Site, close to the mature tree line, forming a natural border with the continuation into open countryside to the north.

Figure 4: *Mature tree line along northern and western boundary (right and rear of image)*



- 4.4 The development's location here also provides a high degree of separation from the heritage assets to the south.

Figure 5: Residential dwellings to the south including heritage assets



- 4.5 The equestrian development itself whilst undeniably significant in terms of floor space will have a limited impact on the rural area given that all proposed buildings will be kept to single storey.
- 4.6 Both the stables and mobile home will be clad in timber to provide a proposal that is sympathetic to the rural surroundings. The extra earth from the development will be used to create a bund around the perimeter of the stable block and mobile home.
- 4.7 The Applicants have provided a landscaping scheme to demonstrate how the proposed bund will provide a strong enhancement to the surrounding area as well as eventually enhancing the ecology of the area by providing a further connected wildlife corridor.

- 4.8 The Applicant has shown on the proposed plans a manure trailer which will be collected once a week by local farming contractors and which will ultimately be used as natural fertiliser on the local arable fields. The Applicant does not intend to spread manure or any other contaminant on the Site.
- 4.9 To the south of the buildings are the grazing fields for the horses which will benefit from wooden post and rail fencing.
- 4.10 The horse walker and menage provide important facilities to keep the horses within the Applicants care exercised and healthy.

5. PLANNING POLICY FRAMEWORK

- 5.1 In line with Section 38(6) of the Planning and Compulsory Purchase Act 2004, Planning Applications should be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 5.2 In this instance the Development Plan consists of the Babergh and Mid Suffolk Joint Local Plan. Part 1 of the Joint Local Plan was adopted in November 2023 and supersedes the majority of policies in the Babergh Local Plan 2006.
- 5.3 Material considerations include the National Planning Policy Framework (2023) (the "NPPF"); National Planning Practice Guidance; and the emerging Joint Local Plan.
- 5.4 The most relevant policies from the documents highlighted above are summarised below:

National Planning Policy Framework (2021)

- 5.5 Paragraph 11 – Plans and decisions should apply a presumption in favour of sustainable development.
- 5.6 Paragraph 38 – Planning decisions should be approached in a positive and creative way. Decision makers at every level should seek to approve applications for sustainable development where possible.
- 5.7 Paragraph 80 - Planning policies and decisions should avoid the development of isolated homes in the countryside unless there is an essential need for a rural worker
- 5.8 Paragraph 81 - Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development
- 5.9 Paragraph 84 - Planning policies and decisions should enable a) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings; b) the development and diversification of agricultural and other land-based rural

businesses; c) sustainable rural tourism and leisure developments which respect the character of the countryside.

Development Plan

- 5.10 SP03 – Sustainable Location of New Development
- 5.11 SP05 – Employment Land
- 5.12 LP05 – Rural Worker Dwellings
- 5.13 LP09 – Supporting a prosperous rural economy
- 5.14 LP15 – Environmental Protection and Conservation
- 5.15 LP16 – Biodiversity & Geodiversity
- 5.16 LP17 – Landscape
- 5.17 LP19 – Historic Environment
- 5.18 LP20 – Equestrian or similar other Animal Land Based Uses
- 5.19 LP23 – Sustainable Construction and Design
- 5.20 LP24 – Design and Residential Amenity
- 5.21 LP29 – Safe, sustainable and Active Transport

6. COMMERCIAL PURPOSE OF DEVELOPMENT

- 6.1 The Applicant (Sally) is a highly regarded equestrian professional, having worked in the equestrian industry for over the last decade.
- 6.2 As a result of Sally's reputation within the equestrian industry, the Applicants have been approached by various clients, to foal down their mares. Both the mares (and the foals they will produce) have the potential to be highly valuable.
- 6.3 The accompanying letters of support evidence that the Applicant's will need to demonstrate that they have appropriate facilities that can provide a high level of care to the mares and foals which can only be satisfied through the construction of onsite accommodation and a new purpose built stable block.
- 6.4 The risks that can occur in the foaling process should it go unsupervised are affirmed by the accompanying letter by Mr Lees a veterinary surgeon with experience of in excess of 40 years'.
- 6.5 The financial projections indicated at Appendix 1 provides evidence that this is a viable business that would provide the Applicants with a significant income stream.
- 6.6 The initial intention is for mares in the middle stages of their pregnancy (approximately 6 months) to be transported to the Site. The gestation period of a foal is typically around 12 months however a foaling window of around 40 days is fairly typical. The mares will therefore enter an intensive observation period from around the 10 month period which is likely to last for around 2 months until the foal is born, with a further 24 hour observation period usually lasting for around a further 3-4 weeks after the foal is born.
- 6.7 Once the mare has delivered the foal, the Applicants will undertake the necessary checks to ensure the foal can stand, it is able to suck milk and that the mare has discharged her placenta which if not discharged within 24 hours will need emergency veterinary intervention.
- 6.8 The Applicants will then be responsible for the mare and foal up until the time of weaning which will be around 6 months (assuming the foal is fit and at a healthy weight).

- 6.9 The foal will then be retained on site for a further 1-2 months to recover from weaning process before they are transported from the Site.
- 6.10 At any one time there will be approximately 6 pregnant mares on site throughout the year. The mares may be on the Site for a continuous number of years if they are to foal down each year or may be on the Site for just one foaling season.
- 6.11 Mares that will be retained on Site for consecutive foaling seasons will have to briefly leave the site (for 1 – 2 weeks) to be inseminated before they are brought back to the Site.
- 6.12 The intention is for all foals to be weaned and transported from the Site around 4 months prior to any mares foaling down in the next foaling cycle.
- 6.13 As set out in the business plan a flat fee of £200 per week will be charged regardless of the stage at which the mare is at in the foaling cycle. A profit (before salaries) of £150 per week per mare is envisaged which provides an **annual profit of £46,800.**

7. PLANNING ASSESSMENT

- 7.1 Planning law requires decisions to be taken in accordance with the adopted Development Plan unless material considerations indicate otherwise. National planning policy is also a significant material consideration that must be taken into account in the determination of this application.
- 7.2 The proposal seeks the development of an equestrian facility and mobile home for use by a rural worker. The application site is in a semi-isolated location in the countryside.
- 7.3 Policy SP03 takes a positive approach to new development that reflects the presumption in favour of sustainable development as set out in the NPPF. Policy SP03 seeks to secure development that improves the economic, social and environmental conditions in the Babergh District.
- 7.4 There are two interconnected elements of this application, this being 1) the equestrian facility and 2) the temporary dwelling.

Equestrian Facility

- 7.5 The proposal concerns the change of use of agricultural land to equestrian use with the introduction of stables, horse walker, menage, storage and hard standing. As set out in Section 2 above, land adjacent to the Site was previously approved by the Council for equestrian development.
- 7.6 Policy LP15 has some limited weight which has been addressed below.
- 7.7 Policy LP15 advises against the loss of Best and Most Versatile Agricultural Land – “BMVAL” (it is understood that the Development Plan does not designate the Site as BMVAL). The Site has now been sold so its impact on the viability of the farming business it was previously a part of is no longer relevant.
- 7.8 As set out in Section 4, the Applicant is committed to providing a tree planting scheme which will arguably enhance the landscape and certainly enhance biodiversity compared to the current use which has to date experienced intensive farming which renders no ecological value.
- 7.9 The majority of the Site will be put back to grass with a rotational grazing system being deployed so as no part of the land is over grazed.
- 7.10 Policy LP20 sets out considerations for equestrian development which are explored below:
- *Prioritise existing buildings:* There are no existing buildings or structures on Site.
 - *Suitable design:* The design has been kept in a modest rural theme with single storey structures, wooden cladding and the use of earth bunds and soft landscaping to shield the development.
 - *Noise / odour:* It is isn't considered that odour or noise will be an issue. Manure will be transported weekly from the Site.
 - *BMVAL:* The Site is not designated as BMVAL

Proposed Dwelling

7.11 The Development Plan at Policy LP05 provides considerations for rural worker dwellings. There is also Planning Practice Guidance in respect of Paragraph 80 of the NPPF³ which provides five conditions that it suggests may be relevant when applying (what is now) Paragraph 80.

7.12 The NPPF and Policy LP05 criteria are broadly similar and are explored below.

Criteria 1: Necessity

7.13 As set out in Section 6, the Applicants propose to start a business foaling down high performance horses. The letter of support provided by Mr Lees MRCVS demonstrates that it is critical that a 24 hour presence is maintained whilst mares are due to foal / foaling or have recently foaled.

7.14 Unlike other livestock such as sheep, foaling is a quick process which often requires timely intervention to ensure the wellbeing of both the mare and the foal.

7.15 Given the high value of the mares and foals on site, the mares will benefit from the latest foaling monitoring technology which provides advanced warning when the mare is due to foal based on the mare's heart rate, position and temperature. Whilst such technology is extremely useful it often has false alarms (which need to be attended to) and usually only gives the Applicant no more than a 5 -10 minute warning that the mare is foaling.

7.16 CCTV will be in place in the stables, whilst CCTV is also useful if the foaling alarm technology is triggered, when a physical inspection of the mare is essential as CCTV analysis alone will not identify whether the alarm was providing a false reading.

7.17 As set out by Mr Lees it is crucial that someone is on site to assist with the foaling as should the foal become breached and left unattended, the chances of both the mare and foal being lost are extremely high. Attendance is necessary in a matter of minutes as opposed to hours.

³ Paragraph: 010 Reference ID: 67-010-20190722

7.18 Equestrian breeding is a major industry in the Suffolk area given the proximity of Newmarket which is very much renowned for producing some of the most successful race horses in history. It has been demonstrated in a number of applications across the District that horse breeding is a time critical business where 24 hour supervision is not just necessary but fundamental to the operation of any business. With this in mind the need for a dwelling on site is a necessity.

Criteria 2: Viability

7.19 The profit forecast at Appendix 1 demonstrates that the business will make a profit from Year 1. The proposal will employ both the Applicant and one further person.

7.20 The profits generated from the business demonstrate that the proposal will be able to pay an average of £15 p/h based on the forecasts at Appendix 1.

7.21 The evidence submitted by the Applicants show there is a high demand for their services and that they are not just reliant on a single customer. Given the Site's proximity to Newmarket, they are in a prime location to receive mares from a number of different clients.

7.22 In any event, the proposed dwelling will be temporary during which the Applicants will be given the chance to demonstrate the viability of the proposal without a permanent dwelling being permitted. The Applicant proposes three years in accordance with emerging Policy LP05

Criteria 3: Essential need for viability

- 7.23 Criteria 3 in this instance is materially similar to Criteria 1 above and as such the assessment made at Criteria 1 is repeated here. The provision of a dwelling is crucial to the viability of the business.

Criteria 4: Alternative Accommodation

- 7.24 The Site is currently undeveloped and as such there are no suitable facilities to convert or use as residential.

Criteria 5: Temporary Dwelling

- 7.25 The Applicant accepts that this is a new business and as such the Council would be right to test the business by granting temporary permission in the first instance.

Criteria 6: Highways

- 7.26 The proposal will not intensify the current access beyond its current agricultural use and will therefore not impact highway safety.

8. CONCLUSION

- 8.1 This Statement has been prepared in support of a planning application for an equestrian development and rural worker's dwelling.
- 8.2 Paragraph 38 of the NPPF encourages a positive and creative approach to decision making and we hope that the above statement has effectively demonstrated that the proposal is compliant with local and national policy.
- 8.3 This is an opportunity for the Council to support a local and rural business, which has the potential to provide outstanding performance horse and local employment opportunities in one of Suffolks most internationally recognised industries.
- 8.4 This Statement sets out the planning rationale that underpins the proposed development and demonstrates its acceptability in planning terms.

Appendix 1: Profit Forecast

Foaling Service Profit Forecast

Physical assumptions

Income:

- Livery charge: £200 per week per horse

Expenditure:

- Average stay: Continuous
- Number of horses: Three
- Hard feed usage: £15 per week per horse (including with foal at foot)
- Hay usage: £10 per week per horse (including with foal at foot)
- Bedding: £10 per week per horse (including with foal at foot)
- Miscellaneous: £15

Gross Margin per horse per week: £150

Explanation

On the basis that there will be a continual livery of 6 horses for foaling down producing an income of £200 per horse per week, the gross margin from each horse per week is forecast to be £150.

This provides a provisional forecast of approximately £3600 profit per month or £43,200 per year which is sufficient to support a full and part time employee on site.

Employed Hours

It is envisaged that the Applicant will spend on average 40 hours a week. These hours will fluctuate depending on the time of year and the foaling cycle. For instance during foaling period the applicant may be required to spend around 60 hours a week working but then once foaling time has ended and the mares and foals are out at grass the time will likely reduce down to 20 hours a week.

The Applicant will also employ someone part time for 20 hours a week. This gives combined weekly hours of on average 60 hours which provides an hourly rate of £15 p/h