Uffcott Farm

Application for the erection of permanent equestrian worker's accommodation including a critical overnight observation stable

EQUINE STATEMENT

December 2023

1. INTRODUCTION

1.1 This document is a supporting equine statement to erect permanent equine worker's accommodation (including a critical care stable) at Uffcott Farm, Uffcott, Swindon, Wiltshire.

2. THE HOLDING

2.1 Windmill Stud is an equestrian holding, consisting of approximately 30 acres of grazing land, stables, all-weather arena, lunge pen and horse walker.

2.2 The business enterprise trades Windmill Stud Ltd and comprises of a stud, breeding, producing and competing event horses, as well as rehabilitation of injured horses.

2.3 The self-contained yards are occupied by professional event riders and a showjumper, all of whom produce and compete top level eventers and show jumpers, as well as breeding horses – including top level stallions.

Relevant Planning History

2.4 Planning permission was granted in 2014 for the change of use of an existing building from agriculture to equestrian and the construction of an outdoor arena. In addition, the Council approved a new access, horse walker and lunge pen.

2.5 The stabling, outdoor arena, access, horse walker and lunge pen have all been constructed and in use since completion in 2015.

2.6 The Council approved an equestrian manager's dwelling on site in 2018.

Relevant planning history is summarised below:

- Ref: 14/07148/FUL Land at Uffcott Farm. Change of use of an existing agricultural barns and land to equestrian use and construction of a sand school. Approved September 2014.
- Ref: 15/03383 Uffcott Farm. Lunge pen, horse walker and new access. Approved June 2015.
- 18/00045/OUT Manager's dwelling and home office. Approved January 2018.
- 18/07990/REM Reserved matters pursuant to 18/00045/OUT
- 20/05019/FUL Erection of an equestrian workers dwelling

3. THE SITE & THE EQUESTRIAN ENTERPRISE

3.1 Windmill Stud has been and continues to be a very successful equestrian base for upper-level competition, breeding and rehabilitation horses since it's construction in 2015.

3.2 The yard has produced and hosted top level event horses and showjumpers, including 5* Luhmuhlen winner Charly van ter Heiden and his rider Mollie Summerland, as well as 4* and 5* and hopefully Olympic bound horses under rider Julia Norman, and up and coming 4* rider Melissa Joannides.

3.3 A significant need for further essential worker accommodation has grown over the years, especially with each self-contained yard having their own responsibilities for caring for their high-value, vulnerable competition horses.

3.4 During episodes of high-risk colic, 24-hour care for particularly sick or injured horses, or in-foal mares nearing their due dates, many horses have had to be transported to vets or other studs in order to have sufficient onsite overnight care, or members of staff sometimes having to sleep in stables to care for these special cases – Julia is often away competing abroad or elsewhere in the country, leaving a significant gap in onsite overnight care.

3.5 With 3 self-contained professional yards, there has risen a need for 3 self-contained accommodation for specialist workers for each of these yards, to provide the required 24 hour care for these horses.

3.6 The established equestrian enterprise currently consists of:

- Self-contained stable barns
- Competing top level international horses, aiming for 5*, World & Olympic Games
- Breeding of event horses;
- Producing and eventing young horses to sell;
- Full-livery and training of competition horses for clients;
- Care of injured, recovering, and rehabilitation horses,
- Liveried gypsy ponies over the winter.

3.7 The area of land directly associated with the equestrian unit at Uffcott farm now amounts to 11ha (27 acres).

3.8 The equestrian barns at Uffcott provides for 5 foaling boxes, 35 stables plus tack room, feed store and hay and straw storage. Other facilities include an outdoor arena, lunge ring and horse-walker with extensive hacking across the farm.

3.9 Labour for the equestrian unit is provided by Julia and a groom, as well as 3 other full time riders and their staff, with some additional assistance from farm staff in providing forage and bedding as required.

3.10 Uffcott Farm is an excellent location for such an equestrian centre. There is a concentration of event riders and racehorse trainers in the Wiltshire area, and as a result there is also a concentration of specialist veterinary, dental and physiotherapy expertise in the area.

3.11 There are 40+ horses and foals on the holding at any one time (excluding the 50+ gypsy ponies, over-wintered in barns, grazing throughout the summer).

3.12 The key enterprises are described below, but there is an inherent overlap between the enterprises.

3.13 **Brood Mares.** There are a minimum of four broodmares, owned by Windmill Stud, with each mare annually producing foals. These are high quality, proven competition horses. These mares will be stabled in the run-up to and following foaling, so that each mare can be carefully monitored. At present, the mares are having to be sent away to other studs for foaling due to the lack of onsite accommodation, and Julia needing to be away a lot during the breeding season as this clashes with the competition season, thus there is a need for further onsite accommodation for a specialist stud worker, as well as onsite staff to care for the other horses out of hours.

3.14 **Foaling-down Services.** It is very expensive to provide all the monitoring equipment for a foaling box, and requires a skilled horseman to know when to assist a foaling. Julia will offer a foaling-down service for those locally who have brood mares and want to produce foals, but do not have the expertise or facilities to foal at home. Julia will be providing her and her staff's expertise and skills to clients. It is expected that 6 – 8 mares will be foaled down annually (in addition to the four owned, as described above). The budgets allow for these to be kept at grass then stabled for the few weeks either side of and during foaling. Onsite accommodation is needed so that a specialist stud worker could be onsite for 24 hour supervision and care.

3.15 **Weaning Service.** Newly weaned horses are brought to Windmill Stud and kept for 6 – 8 weeks during which time they are given early handling training, trained on the lead rein and generally taught to be handled. About 5 – 7 young horses are weaned per year. Some of these then stay longer term on grass livery on the farm.

3.16 **Producing, Eventing and Selling.** The business or clients buy in about 3nr 3 – 4 year olds each year, training them for 2 – 3 years, for sale at around 5 - 6 years old as eventers, having been evented at competitions for up to two years previously.

3.17 **Breaking and Schooling Service.** Older horses with good potential for eventing are backed and trained. This takes 5 – 6 months. About 3nr such horses are accommodated per year. These are high quality horses with good eventing potential and their owners sometimes then ride themselves or sell on at the end of the training process.

3.18 **Competition Livery.** An important part of Julia's business is developing the skills and experience of event horses. Competition livery horses are those on full livery which Julia looks after, schools and trains, exercises and gets fit, and has competed herself. Owners visit infrequently. There are around 5nr horses on this arrangement at any one time.

3.19 **Rehabilitation.** Injured and recuperating competition horses and racehorses are taken in for rest, treatment, recovery, and returning to fitness. Length of stay varies depending on each individual horse's injuries, but around 5nr horses are in rehabilitation at any one time.

3.20 **Yard Rental.** Stables are rented to other professional event and showjump riders. Rent includes use of facilities (arena, walker, lunge pen, etc), and out of hours monitoring and security – but this element has become unsustainable to provide solely from Julia, due to her young family and commitments to competing abroad and elsewhere in the country.

3.21 Any emergencies with the eventers' horses (e.g. colic, injury, etc) could be dealt with by their own onsite staff, should accommodation onsite be granted under this application.

3.22 Onsite staff would be able to detect and respond to emergencies. Julia or onsite staff would then be able to take emergency action and notify the person (owner) or, if necessary, vets be called out to attend medical or life threatening emergencies.

3.23 The executive summary of the British Horse Industry Confederation's '*Strategy for the Horse Industry in England and Wales'* has eight interlinked aims as the key to achieving the overall purpose of the Strategy. Of particular note is Aim 4: concerned with *'Raising equestrian skills, training and standards',* Aim 7: '*Encourage sporting excellence'.* .

3.24 It is clear that the applicant's business is raising the skill levels of her clients and the provision of an outdoor arena and ample hacking ground enables clients/tenants to improve their equestrian skills for dressage, show jumping and eventing. The enterprise also benefits the local economy by using farriers to shoe the horses, purchasing horse feed from local feed merchants and using a local veterinary practice, as well as employing grooms and specialist staff.

Summary

3.25 The following numbers of horses and other animals are on the holding over the year and at any one time.

Table 1: Summary of Horse and Animal Numbers

Animal	At any one time	Throughput over year (if different)
Own mares (and foals)	**4+ (4+ foals)**	
Mares for foaling down	**1 - 2**	**5 – 10**
Youngsters (1-3yrs)	**4 - 6**	
Producing (3-6yrs)	**5 - 10**	
Weaning	**1 - 3**	**5 - 7**
Breaking and training	**1 – 3**	
Competition Livery	**5 – 10**	
Event Yard Rental	**30**	
Gypsy Horses	**50**	

4 THE POLICY FRAMEWORK

National Policy

4.1 In March 2012 the National Planning Policy Framework (NPPF) replaced most national policy statements and guidance, including Planning Policy Statement 7 (PPS7), *Sustainable Development in Rural Areas*.

4.2 Under the heading "Supporting a Prosperous Rural Economy, paragraph 28 of the NPPF states that: "**Planning policies should support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development…**" . Paragraph 28 provides not only support for agricultural and land-based rural businesses (which must include equestrian businesses), but it requires local plans (and, it must follow, planning decisions) to "**promote the development and diversification of agricultural and other land-based rural businesses".**

4.3 The use of the work "promote" is deliberate. It is used in bullets 2 (agricultural and land-based businesses, as above) and 4 (retention and development of local services and community facilities in villages). It is clear that Government wishes such business to be able to develop.

4.4 In respect of new dwellings in the countryside, paragraph 55 notes that they should be avoided "**unless there are special circumstances such as the essential need for a rural worker to live permanently at or near their place of work in the countryside".**

4.5 Attention is drawn to the decision of the High Court in the case of Embleton Parish Council and Ainsley v Northumberland County Council and Gastor (2013). At paragraph 44 HHJ Behrens stated that **"I do not accept that the NPPF requires that the proposal is economically viable…. The NPPF test simply requires judgement of whether the proposed agricultural enterprise has an essential need for a worker to be there or near there"**.

Development Plan

4.6 The Wiltshire Core Strategy Development Plan Document was adopted in January 2015.

4.7 Core Policy 48 is concerned with supporting rural life and where dwellings are required to meet the employment needs of rural areas states: **"Proposals for accommodation to meet the needs of employment essential to the countryside should be supported by functional and financial evidence".** And at paragraph 6.62 states: "**Residential development will not normally be permitted in the countryside unless it meets the requirements of Core Policy 44 (rural exceptions sites). However, additional dwellings may be justified in certain circumstances when they are required in the**

interests of supporting rural employment, for example in association with equestrian activities when worker accommodation is needed onsite".

Temporary Dwelling Requirement

4.8 The NPPF does not make any mention of the need to provide temporary accommodation for the first three years of new enterprises. It must be assumed that Government revoked that policy for deliberate and sensible reasons.

4.9 Therefore there is no temporary dwelling policy in the NPPF paragraph 55.

4.10 There is no implied temporary dwelling policy in the NPPF paragraph 55.

4.11 There is no temporary dwelling test, actual or implied, in the Local Plan.

4.12 Further, this is not a need associated with a new enterprise. The need is also associated with the existing breeding and eventing, competition livery horses, tenant stables and their / their clients' horses and the gypsy horse enterprises, and the proposed siting of the essential worker accomodation meets the needs of those enterprises. Julia already provides competition and rehabilitation livery, and breeds, produces and events valuable event horses, so the proposals are an evolution and development of an existing business, not an entirely new business.

5. ESSENTIAL NEED APPRAISAL

5.1 Policy is set out in the Framework. In respect of new essential workers' dwellings, paragraph 55 makes clear that these can be provided where there is an essential need.

5.2 The key consideration under the Framework under paragraph 55 is whether there is an essential need for a worker to be resident on site.

5.3 In this case there is. The farm currently has the following horses to be cared for:

- 12nr owned horses (plus 4nr foals due Summer 2024);
- 4nr client owned horses;
- 50nr gypsy horses;
- 30nr tenant horses (these fall under the responsibility of the tenants, hence the need for onsite accommodation). Onsite accommodation is also needed for Julia's full time member of staff.

5.4 The equine enterprise is well established and is continuing with its development and expansion as part of the applicant's farm diversification. The applicant needs onsite accommodation for equestrian workers to meet the needs of the business and top level equestrian tenants, and the high value horses on site. The internal layout of the barns at Uffcott provides 40nr stables.

5.5 Under the Animal Welfare Act 2006 it is an offence to cause unnecessary suffering to any animal. The Act also contains a Duty of Care to animals which means that anyone responsible for an animal must take reasonable steps to make sure the animal's needs and its welfare are met. The overall responsibility or "duty of care" for animal welfare for all the horses stabled at Uffcott Farm lies with Julia Norman – this is too large a number for one person to sustainably care for sole-handedly out of hours, with self-contained tenants' yards where the responsibility needs to lie with the tenants', or their staff in order to meet the needs of their businesses and the horses under their care.

5.6 In 2002 the equine industry and welfare organisations produced guidelines for the welfare of all horses, ponies and donkeys (The Equine Industry Welfare Guidelines Compendium for Horse, Ponies and Donkeys produced by the National Equine Welfare Council) which was revised in 2005. This refers to the availability of staff and states at paragraph 4 that: "**Sufficient staff must be provided at all times to ensure proper, regular and timely attention to all horses held***".*

5.7 An equine enterprise such as that at Uffcott Farm that provides for a wide range of equine activities (full livery, teaching and training of competition horses, a foaling down unit, a weaning service and rehabilitation unit) for a large number of horses stabled or in grass paddocks clearly requires 24-hour supervision for the following reasons:

- the close supervision, management and daily requirements of livery horses either boxed in stables or in grass paddocks;
- the nutrient requirements for individual horses on full and part livery;
- the strict intense exercise and training routine for individual competition livery horses;
- the provision of security for valuable horses and youngsters from theft or malicious attack;
- dealing with unforeseen emergencies;
- the close supervision of brood mares at foaling;
- the care of horses undergoing rehabilitation (returning from injury).

5.8 At Foaling each mare has had to be sent away to studs due to there not being sufficient members of staff on site, with Julia needing to be away competing a lot during the competition season, which clashes with the breeding season. Staff accommodation will allow mares to foal at Windmill Stud, and they will be fitted with a heat sensor which can detect increases in heart rate and sweat levels, and sends a warning signal to the manager or specialist staff. In addition the foaling boxes will be fitted with cameras linked via CCTV to monitors in the proposed staff accommodation at Uffcott Farm. Despite this technology, the manager or specialist staff still have to be very vigilant and observe progress. CCTV only acts as a management aid. The same applies to seriously injured horses - for example, a stallion whom had to be cross tied and checked every 4 hours through the night for a period of 3 months. This highlighted the essential requirement for staff accommodation.

5.9 A mare can stop foaling if disturbed. This can be especially problematic for any client horse in for contract foaling, where the mare is not particularly familiar with the equine manager. The manager or specialist staff will have made particular efforts to become familiar with the mare in the few weeks running up to foaling (the very reason client's in-foal mares spend two weeks stabled on-site prior to foaling). CCTV is helpful in detecting any disturbance and will alert the manager to the onset of second stage labour. The manager will have been monitoring the CCTV screens on at least an hourly basis for up to 48 hours prior to labour commencing, and for intervals of no more than 20 minutes when there are signs that labour is about to start. The manager can then move to the foaling box and remain there throughout foaling, assisting if needed.

5.10 Horses should be inspected frequently for signs of illness, distress or injury, and equine establishments have a duty of care to ensure that there is a rapid diagnosis and treatment of injury, disease or infestation. That duty of care lies with the Julia Norman, but needs to be shared with additional site, hence the need for onsite staff accommodation.

5.11 Unforeseen incidents can cover a wide range of situations, from dealing with emergencies such as a horse cast in its box or a horse with colic, to damage to the stables and associated buildings from the horses, severe weather conditions or fire. A rapid response is required to ensure the welfare of stabled horses.

5.12 It is our view that there is an essential need for specialist staff to be resident on site at Uffcott Farm to provide the necessary management and supervision to ensure the welfare needs of the horses is not compromised. Workers living some distance away from the site are unable to provide the same level of care and scrutiny, and the numbers, value and vulnerability of the horses on site requires specialist staff to be on site. The veterinary surgeon in the letter which is contained in the Business Plan May 2015 states: *"… a centre such as this for rehabilitation, stud and producing valuable competition horses would need an on-site presence to have 24 hour cover……"*

5.13 With such substantial numbers of horses on the holding, there will be an essential need for multiple onsite specialist staff.

5.14 There is also an essential need to live on site for this to operate properly in terms of both security and perception, for each self-contained yard. Some of the horses being cared for will be very valuable. Owners are not prepared to send horses to a yard where there is not sufficient onsite specialist staff. They would be concerned, that the safety and welfare of their horses could not be met. Having sufficient resident workers, prominently located (in terms of their dwelling being obvious to any entering with either good or bad intent), is an essential component of the successful functioning of this equestrian unit.

5.15 Overall there is and will be an essential, year-round need for experienced and skilled workers to be resident on the holding.

5.16 There are already 40+ horses, with 4nr foals due in the summer, cared for by the business. Individual responsibility falls to each individual professional yard. This level of horses alone generates an essential need for a resident worker for each yard. This need will only increase as the quality of horses onsite grows, and the foaling down of horses can continue.

6 OTHER DWELLINGS, SITING, ETC

6.1 A key consideration must be whether the existing dwelling(s) can meet the needs of the holding and the enterprises. In this case they cannot. There is the onsite mamager's dwelling, but due to the scale, vulnerability and number of horses on site, it is not sustainable for one person to be responsible for all the horses on site. Due to the success of her competition horses, and aims towards World and Olympic Games, Julia is now away competing for a significant amount of time, so there is a need for her groom to live on site to provide sufficient care for her horses, and the same goes for her tenants and their staff.

6.2 There are no dwellings close to the buildings and at a distance that the key people needed onsite could properly monitor animal welfare.

6.2 Against the policy in the Framework I therefore conclude:
(i) there is an essential need for workers to live permanently at their place of work in the countryside;
(ii) and no other dwelling does or could meet that need.

6.3 The proposed accomodation would be sited close to the stable accommodation in order to meet the welfare needs of the equestrian enterprise. A critical care stable would also be incorporated within the building design.

6.4 The continued success of the applicant's equestrian enterprise is dependent on worker accommodation on site. This provides clients and tenants with the confidence that their valuable horses are provided with a 24 hour presence and supervision and the animal's welfare is not compromised. The proposed permanent accomodation provides the necessary accommodation to meet these needs and ensure that the welfare requirements of the horses on site are not compromised.

6.5 The proposal is compliant with National and Local Planning Policy.

7 Financial Sustainability

7.1 The NPPF deals with the concept of sustainable development at a strategic rather than at an individual enterprise level. In terms of economic development, it is concerned with contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation (paragraph 7 of the NPPF). This does not translate easily into a simple approach to appraise small-scale rural development proposals for permanent dwellings.

7.2 In this context we consider any assessment of economic sustainability as the ability of the business/enterprise to utilize its resources which allows it to function properly; it has to have the ability to stay in business. It has to have sufficient funds available to fund its day-to-day trading (cash flow), it has to be profitable in order to reinvest within the business or show a reasonable return on the capital invested. No business can be economically viable if over the medium to long term its expenditure exceeds income. These three aspects are essential to sound business planning.

7.3 At paragraph 28 the NPPF states that planning policies should support the sustainable growth and expansion of all types of business and enterprise in rural areas; promote the development and diversification of agriculture and other land-based rural businesses.

7.4 The applicant's equestrian enterprise is well-established (8+ years on this site itself, having been run from an alternative location prior to the construction of this yard).

7.5 The business is already profitable and sustainable and clearly capable of covering all its costs to include interest on capital invested, a full-time labour input and build costs. Tenants renting the self-contained yards are well established businesses, Mollie Summerland and Karen Niklasson themselves have been based at the yard for years already. This in itself proves their businesses/enterprises are sustainable, and very successful.

7.6 The enterprise is capable of covering all its costs and interest on investment (as it has already demonstrated having continued to flourish since the initial construction investment of the yard and its facilities, and recoups a sufficient return (profit) to cover the full-time labour input.

7.7 It is our view that the proposal to erect rural workers' accommodation at Uffcott Farm is compliant with paragraph 28 of the NPPF in that the existing equestrian business is well-established, economically sound and has proved to be financially sustainable in a rural area. The provision of the existing enterprise with sufficient staff accommodation will retain existing and sustain future employment in the rural area and support other rural businesses.

8. CONCLUSIONS

8.1 The NPPF requires local planning authorities to **promote** the economic growth and development and diversification of land based rural businesses.

8.2 The applicant has run a successful business at Windmill Stud for the past 8+ years, as have her tenants. Top level, 5* winners have been produced from this base, with aims to produce horses for the next World Games and the LA Olympics in 2028 in fruition.

8.3 The yard already provides high level equine services and facilities for clients which includes a specialist rehabilitation treatment facility, with the aim to provide a foaling down service through the provision of sufficient onsite accommodation for specialist stud workers, increase the quality of competition horses trained for clients and continue to provide a high end professional training base for other event and showjump riders. The yard already houses top quality stallions being produced for breeding purposes, as well as upper-level competition stallions.

8.4 There are no other dwellings that can meet the essential need for staff accommodation onsite.

8.5 The existing enterprise is well-established and financially sound. The provision of sufficient staff accommodation will enable the business and tenant's business to be sustainable, and to continue to flourish and produce top quality competition horses

9. SUMMARY

9.1 The applicant is already operating a high-class equestrian business at Windmill Stud. There is a need to house specialist staff onsite to meet the needs of the Applicant's horses and her tenents horses, which are high value, top quality competition horses, thanks to Julia and her tenants' success at producing and competing at national and international eventing and showjumping competitions.

9.2 The business currently consists of:

- stud breeding from their own mares;
- developing horses from youngsters to competition horses;
- offering full competition livery to owners;
- offering schooling services to owners;
- offering self-contained professional yards to tenants.

9.3 Upon completion of the staff accommodation, this will allow Julia's competition horses and breeding stock to flourish under the expert care of her full-time member of staff, as well as for her tenants' horses to flourish, under the expert care of their staff. This will allow for the continued production of top-level event and show jumpers at 5*, World and Olympic Games level. As well as the above, additional services will be enabled:

- foaling-down service for Julia's own and other horse owners (at present this is having to be outsourced due to the lack of onsite specialist staff).

9.4 Onsite staff accommodation is required in order to provide an essential residential presence to meet the needs of the onsite horses.

9.5 Against the requirements of the NPPF Paragraph 55 the proposal is compliant in that:

(i) there is a proven essential need for a worker to be resident to provide appropriate levels of supervision and ensure the welfare of all horses on site is not compromised.

9.6 Overall therefore, the proposal accords fully with the policy in the NPPF and the Wiltshire Core Strategy Development Plan Document.