

Justification Report

ON THE NEED FOR STAFF ACCOMMODATION

AT WINDMILL STUD

INTRODUCTION

This report has been produced in order to provide further information and justification for staff accommodation at Windmill Stud, Uffcott.

This outline application is for a single building to provide a critical care/isolation stable and 3 self-contained staff accommodation units.

The Applicant, Julia Norman, has been running the business known as Windmill Stud Ltd since 2015, having ridden at top level for many years previously.

Windmill Stud consists of 40 stables (plus overflow boxes and youngster/broodmare pens), outdoor arena, horse-walker, lunge pen and wash bays.

Julia Norman runs her eventing yard in one of the barns of 10 stables (plus overflow boxes and younger/broodmare pens) with 3 other professional riders running their independent businesses in self-contained barns onsite. These riders are: Mollie Summerland, Melissa Joannides and Karen Niklasson.

This report is to provide further information and justification for the essential need for onsite staff accommodation for each professional yard.

BACKGROUND INFORMATION

Julia Norman is a 5* International Event Rider, competing at the top level aiming for World Games and the Olympics, as well as Badminton, Burghey and Young Horse Championships. Julia breeds and produces top quality horses, as well as taking in rehabilitation horses, competition and sales liveries. Julia has a growing team of breeding stock – including broodmares, young homebreds and a young stallion.

Mollie Summerland is a 5* International Event rider, who has won at 5* level and competed for Team GB at International level. Mollie produces her own and clients' competition horses, as well as some rehabilitation and sales horses. Mollie also has 2 top quality breeding stallions.

Karen Niklasson has evented at 5* International level, and now showjumps at International level. She also breeds and produces upper-level event and showjump horses.

Melissa Joannides is a 4* International Event rider, aiming for 5* in the next few months, producing top level competition horses, as well as sales or schooling livery horses.

In addition to the 43nr stabled horses at Windmill Stud, there are up to 20-25 youngstock or broodmares on site, with approximately 50nr additional broodmares, youngstock and stallions grazing the fields on the farm along the Marlborough Downs. Julia Norman and her staff monitor and carry out daily checks of these horses.

Julia Norman owns and runs Windmill Stud, with the other 3 professional riders renting each self-contained barn of ten stables each, sharing the facilities (arena, walker, lunge pen and wash bays).

Although all the riders and horses share the facilities, each yard is run independently with their own staff responsible for their rider's horses.

BUILDINGS AND FIXED EQUIPMENT

The following buildings and fixed equipment are available for use by the business:

- 43 permanent stables
- 40 x 60 arena
- 20m lunge pen
- 6 horse walker
- Youngster / broodmare pens
- Youngster / broodmare barn
- 4 tack rooms
- 1 WC/washing room
- 4 feed/rug rooms
- 3 Wash bays

At the time of writing, stock levels are as follows:

Julia Norman: 10 stabled competition/livery/rehab horses, 3 foals, 4 broodmares, 4 youngstock and 1 young stallion. 18nr client's broodmares and youngstock are being kept on site until weather is dry enough to turnout for the summer. There are also an additional approx. 50nr client's horses grazing on the farm, who are monitored by Julia and her staff daily.

Karen Niklasson: 8 stabled competition horses;

Mollie Summerland: 10 stabled competition/rehabilitation/sales horses;

Melissa Joanides: 14 stabled competition/sales/schooling livery horses.

LABOUR

Julia Norman's Yard: 2 full-time members of staff, and 3-4 part time. Equates to 3 full time.

Mollie Summerland's Yard: 2 full-time members of staff, and 1-2 part time. Equates to 3 full time.

Karen Niklasson's Yard: 3 full-time members of staff, and 2-3 part time. Equates to 4 full time.

Melissa Joannides' Yard: 2 full-time members of staff, and 4 part time. Equates to 4 full time.

The combination of yard staff would equate to 14nr full-time members of staff.

LAND AND TENURE

At Windmill Stud there is approximately 25 acres of land owned and available to the business. Additional grazing land for youngstock is rented from Weir Farm.

THE HORSE INDUSTRY

Industry Facts and Figures

The Strategy for the Horse Industry in England and Wales (The Strategy)1, published in December 2005, was prepared by the British Horse Industry Confederation (BHIC) in partnership with the Department for Environment Food and Rural Affairs (DEFRA), the Department for Culture Media and Sport (DCMS) and the Welsh Assembly.

In its Ministerial Foreword, it states that:

Government recognises the major contribution which the horse industry makes to the economy, and the important role that horses play in the lives of so many people in both cities and rural areas across England and Wales.

The Strategy gives some estimates of horse industry figures:

- Its gross output is £3.4 billion;
- It employs up to 250,000 people directly and indirectly;
- 2.4 million people ride;
- 11 million people have some interest in the horse industry, and 5 million an active interest; and
- The horse population is at least 600,000 and could total nearly 1 million.

BRITISH EQUESTRIAN FEDERATION (BEF)

The BEF was set up as the senior co-ordinating body for the British Horse Society and the British Show Jumping Association. Affiliated to the Federation Equestre Internationale (FEI), the BEF represents the sports of Show Jumping, Eventing, Dressage, Horse Driving Trials, Endurance, Vaulting, and Reining. The BEF plays an important role in representing the common interests of its member bodies to organisations such as the British Olympic Association, Sports Aid Foundation, and a number of others. The BEF's vision is *"More people, better horses, better places, more medals'*

The BEF published the 'Facilities Strategy for Equestrian Sport and Recreation'2 (the Facilities Strategy) in May 2006. Under the heading of Planning, The Facilities Strategy states that:

The BEF, in particular through the British Horse Society, Association of British Riding Schools, alongside the Department of Environment, Food and Rural Affairs and the Office of the Deputy Prime Minister will work to:

Urge Local Authorities to take a more sympathetic view towards criteria for equine development.

- *Actively support and lobby for any application considered to be of regional/national significance that has stemmed from this strategy*
- *Ensure that all of the above issues are considered within regional, county and local plans.*

Both the Strategy for The Horse Industry in England and Wales and the Facilities Strategy are important material considerations to the determination of planning applications and appeals for equine workers' dwellings and have been cited as such by Inspectors in appeal decisions such as Grasslands Equestrian Centre (APP/JO540/A/05/1183752). Given Government's current position on economic uses, and particularly to the encouragement of vibrant rural businesses, it is contended that these documents now carry more weight under the National Planning Policy Framework.

More recently, the BEF have published 'Better Facilities' Facilities Strategy and Delivery Plan 2013 – 2017. This strategy is focused on sustaining and improving facilities throughout the country, by replacing entirely or renovating them. Through the Whole Sport Plan, the BEF has identified a range of initiatives, which are designed to sustain and increase participation, but in order to facilitate this, high quality training facilities must be implemented to allow riders to achieve their potential.

CODE OF PRACTICE FOR WELFARE OF HORSES, PONIES, DONKEYS & THEIR HYBRIDS

This Code of Practice published by Defra in December 2009 is recognised as being material to a planning application such as this. It states:

The Animal Welfare Act 2006 requires you to ensure that any horse, pony, donkey or mule for which you are responsible, whether on a permanent or temporary basis is protected from pain, suffering, injury and disease.

PLANNING POLICY CONTEXT

THE DEVELOPMENT PLAN

Windmill Stud lies in a rural area outside of any development boundary.

Section 38 of the Planning and Compulsory Purchase Act 2004 requires that planning applications are determined in accordance with the development plan, unless material considerations indicate otherwise.

SPORT ENGLAND

Sport England is the government agency responsible for building the foundations of sporting success, by creating a world-leading community sport system of clubs, coaches, facilities and volunteers. They want to create a vibrant sporting culture working in partnership with national governing bodies, the HE/FE sector, local government and community organisations.

UK Sport's 2021-2031 strategy "Powering Success Inspiring Impact" is underpinned by 3 core ambitions:

- Keep winning and win well
- Grow a thriving sporting system
- Inspire positive change

Sport England states that it is committed to working closely with local authorities as they are the main providers of local facilities and opportunities. Riding is one of a number of sports recognised by Sport England.

The Sport England Active People Survey shows that Equestrianism is the thirteenth largest participation sport in England. This highlights that equestrian sport is an area where the BEF initiatives can be implemented successfully, such as those to improve participation and standards of riding, which is being done through the continuing development of equestrian facilities, horses and riders such as those at Windmill Stud.

NATIONAL PLANNING POLICY FRAMEWORK

The National Planning Policy Framework published in March 2012 replaced PPGs and PPSs and of most relevance to this development, PPS1, PPG2 and PPS7. The National Planning Policy Framework is a material planning consideration.

The thrust of the NPPF is sustainable development. Under the heading 'The presumption in favour of sustainable development' the NPPF states that for decision taking this means:

- approving development proposals that accord with the development plan without delay; and
- where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless:
- any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or
- specific policies in the Framework indicate development should be restricted

Having regard to the nature of the equine business the following sections of the NPPF are of particular relevance:

Section 1: 'Building a strong, competitive economy' - paragraph 18 states that the Government is committed to securing economic growth in order to create jobs and prosperity…… It states at paragraph 19 that the Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth. It states that planning should operate to encourage and not act as an impediment to sustainable growth. Therefore significant weight should be placed on the need to support economic growth through the planning system.

Section 3: 'Supporting a prosperous rural economy' - at paragraph 28 the Government's support for the economy is reiterated and specific advice is given for rural areas. It states that planning policies should support economic growth in rural areas. To promote a strong rural economy local and neighbourhood plans should amongst other criteria:

- Support sustainable growth and enterprise of all types of business and enterprise in rural areas through conversion of existing buildings and well designed new buildings;
- Promote the development and diversification of agricultural and other land-based rural businesses;
- Support sustainable rural tourism and leisure developments that benefit businesses in rural areas, communities and visitors, and which respect the character of the countryside. This should include supporting the provision and expansion of tourist and visitor facilities in appropriate locations where identified needs are not met by existing facilities in rural service centres;

Windmill Stud contributes directly and indirectly to the rural economy by utilising the services of a number of local businesses including:

- Veterinary surgeons
- Riding Instructors
- Equine physiotherapists & chiropractors
- Equine dentists
- Saddle fitters
- Farriers
- Bedding suppliers

- Local farmers supplying hay, straw & haylage & re-seeding
- Horse transport companies
- Local builders
- Fencing contractors and suppliers
- Feed suppliers
- Tack shops
- Farm machinery suppliers and repair specialists
- Building and timber merchants

Section 6: 'Delivering a wide choice of high quality homes' – Paragraph 55 states that to promote sustainable development in rural areas, local planning authorities should avoid new isolated homes in the countryside unless there are special circumstances; which includes the essential need for a rural worker to live permanently at or near their place of work in the countryside.

The introduction of paragraph 55, without any stipulation of what constitutes an 'essential need' is clearly a more flexible and less prescriptive test than those which previously formed part of Annex A to PPS7. In my experience, Inspectors accept that the NPPF is much more flexible in encouraging the economic, social and environmental factors that were not mentioned in PPS7.

In an appeal decision7 [APP/B3438/A/12/2173544] against the decision of Staffordshire Moorlands District Council, the inspector made it very clear that PPS7 had been cancelled and as such was of no consequence. She stated in paragraphs 29 and 33:

29. The Council does not query the viability of the established enterprise in the context of criterion B of local plan policy H8. The Council's objection to the size of the residential accommodation proposed appears to be solely rooted in the former Annex A to PPS7 that has been replaced by the Framework, as (subject to my observation at paragraph 33) it is not a factor specifically addressed by the criteria of policy H8. The residential accommodation proposed is for highly skilled workers (quite possibly with a number of children) capable of commanding appreciable salaries and good terms and conditions that could include tied accommodation. Moreover, the Framework is silent on the matter of the size of agricultural workers' dwellings. I therefore see no basis in current policy for sustaining that objection.

33. For these reasons, and given the intentions of national policy as it now stands, I do not consider the size of the proposed accommodation, including the office, to be inappropriate to the needs it would serve. There would be no conflict with the intentions of such policy or indeed the intentions of either local plan policy E4 concerning agricultural development or local plan policy H8, which does not explicitly address ***the size of agricultural workers' dwellings****. I am conscious that the Council suggested at the hearing that criterion D (satisfaction of other planning considerations) encompasses size as previously addressed by the Annex A to PPS7 but, as this is no longer applicable, the argument is in my view a tenuous one.*

Although the paragraphs above relate to the size of the development, the message is clear that PPS7 Annex A should no longer carry any weight in planning decisions.

The Hanrox Meadows appeal [for the use of a stable building as a rural workers' dwelling in the Green Belt] makes it clear that the tests that were based on advice in PPS7 no longer applies. Inspector Nigel Harrison stated in para. 26 of his decision letter that *Annex A no longer applies and it is now necessary to decide on a case by case basis which factors need to be taken into account, and given weight to... He goes on to say that ...nevertheless it is still necessary to establish whether an essential need can be demonstrated. To do this I need to consider whether it is essential for the proper running of the enterprise for a worker to live on site and be readily available at most times; and to be satisfied that the enterprise is viable and likely to be sustained.*

As set out above, PPS7 has been revoked and there is no Annex A test to meet. However, for any other accommodation in the area to be considered, it needs to be both suitable and available for occupation by the worker(s) concerned. Having regard to the specific functional need at the application site, for a dwelling to be considered suitable, it should be sited within close proximity of the buildings used to accommodate the horses and ideally with views of the paddocks within which the horses are normally turned out. It also needs views of the site entrance in order to monitor anyone entering or exiting the property. This particular proposal also needs a critical care / isolation stable separate from the main stable buildings. This is detailed further in a separate supporting st

The main reason for local authorities (and Inspectors) allowing dwellings for agricultural and equine workers is one of welfare. If a dwelling in the locality is for sale at the time of the application, it does not automatically transpire that it will meet the welfare needs of the horses on site; which is the main reason for most rural dwellings being sought and approved.

Planning applications and appeals must be determined in accordance with the development plan, unless material considerations dictate otherwise. It has long been accepted that a previous appeal decision is capable of being a material consideration. However, unlike case law, there is no doctrine of 'binding precedent' which applies to planning decisions (whether at the application or appeal stage). The reason why previous appeal decisions are material considerations is because it is important to ensure consistency in decision making; "like cases should be decided in a like manner so that there is consistency in the appellate process" (Lord Justice Mann, page 145, North Wiltshire District Council v Secretary of State of the Environment and Clover (1993) 65 P & CR 137).

The Middlington Farm appeal clearly sets out the reasons why at a livery yard it is essential for a worker to be living on site and not 1.5 miles away as the appellant did in that case. A more recent case, and one which is similar to this case in many ways is the Medstead appeal dated 19th June 2012 (APP/M1710/A/12/2169350). In paragraphs 11-16 assessing the issue of remote monitoring, the Inspector accepts that CCTV is not a feasible replacement for human presence on a site with 20 stabled horses.

THE ESSENTIAL NEED FOR ON SITE ACCOMMODATION

The essential need for a dwelling to serve an equine business is normally determined by the scale and type of enterprises operated and the systems employed. An essential need is more likely to exist where circumstances requiring the prompt attention of a skilled worker could occur outside of normal working hours. The following paragraphs demonstrate that there are special circumstances in this case as to why on-site supervision is essential for the wellbeing of the animals on site and therefore for the long-term success of the business – and why it is essential each business has its own on-site member of skilled, experienced staff.

The keeping, breeding and rearing of horses does in principle generate a functional need for the on-site residential presence of a skilled equine worker for a stud and yard of this scale. The principle has been accepted in numerous appeals in relation to not only stud farms but also livery yards where there may be no broodmares at all.

Whilst the action of foaling is an extremely critical period for the health and welfare of mare and foal, an essential functional need is also generated throughout the year in the keeping of top level competition horses, rehabilitation horses, stallions, broodmares, foals and other youngstock for the reasons set out below.

Horses are unpredictable, they all react differently to different situations. It is particularly those situations that are unpredictable that give rise to the need for twenty-four-hour supervision. It is particularly necessary at night, out of 'normal' working hours when there is no-one else around, for someone of suitable experience to determine and deal with emergency situations.

In this particular case, it should be noted that each separate yard is run independently, by separate teams of staff. Each yard runs under its own system, and has its own high value, vulnerable horses who require expert care, from experienced staff who know each horse individually. Knowing each individual horse and their normal behaviours, and signs of a horse being unwell, is invaluable.

Little things can cause horses, both young and old, to react violently to some situations. For example, a sudden thunder-storm can cause groups of horses to gallop in blind panic through fences. Numerous emergency situations have occurred at Windmill Stud, where the prompt attention of experienced, knowledgeable staff has saved a horse from death or serious injury.

Dogs can and will chase horses. Again, although this would normally occur during the daylight hours, it may not necessarily happen in 'normal working hours'. It would not be unusual for a horse to damage itself seriously by galloping into a fence, or trying to jump out. Dog worrying and panic during thunder-storms can also cause mares to abort.

Horses can easily become cast, or 'stuck' on their backs, more often when stabled, but can happen when a horse lies down or rolls in the field too close to a wall, hedge or fence. It cannot be predicted when a horse is to become cast. There are no signs or symptoms, it just

happens. This is a potentially fatal emergency situation and needs rapid human intervention. Two people or more are usually required to physically rope the legs (the legs may be thrashing around) and pull the horse over to right itself.

Prompt attention is essential, and having a member of staff on site per yard allows prompt detection, and having yard managers/grooms on site would mean a number of people can be called upon urgently out of hours, to help physically pull the cast horse up, for example. Injury to a person is always a risk in this scenario, for example a horse could kick out whilst struggling to get back up, so it is critical a person has assistance in this type of emergency. This is an example of many incidents which require more than one experienced person, and very promptly.

Life threatening injuries can occur when horses are left undetected when cast. The noise of legs and hooves banging against solid walls made by a stabled horse when cast would be heard in the night if there was someone living close to the stables and staff were able to do regular night checks without having to commute to the site.

Kicks and cuts happen on a regular basis when groups of horses are kept together, but these injuries are not predictable and can happen at any time of the day or night. Multiple incidents have happened where horses have incurred sudden injuries requiring immediate veterinary assistance. Recently, one of the in-foal broodmares had a serious, unpredictable injury to her foot, involving a serious, life threatening bleed from cut artery and deep cut down to the joint – this injury being picked up quickly, and the prompt actions of experienced staff, allowed the horse to be taken quickly to the vets for surgery, and the remainder of her bandage changes and treatment has been carried out back at Windmill Stud, resulting in successful recovering, and the unborn foal still looking healthy on scans.

Horses with colic need treating fast, a horse with colic will usually recover if treated early enough but the likelihood of it having to be destroyed increases rapidly with every hour that treatment is delayed. The noise of legs and hooves banging against solid walls made by a stabled horse with colic or when cast could be heard at night by onsite staff, and these experienced grooms would then be able to give the sick horses their immediate attention. Only a month ago, a horse was displaying signs of colic in one of the yards during the day, and a number of staff had to take turns to commute to site by car throughout the night to check on the horse regularly, ready to call the vet or take the horse to the vet practice if things deteriorated.

Night checks have also allowed staff to hear a distressed horse, and found with signs of colic requiring immediate veterinary attention. In a similar situation another horse was found with a bad case colic, so the applicant drove the horse to Lambourn Valley Equine vets where it made a full recovery, and returned to 5* level eventing later that year. Undetected, and without intervention, this condition would very likely have been fatal.

Another example of the need for onsite accommodation was when a highly valuable stallion with a shoulder fracture needed cross-tying for 3 months to prevent him from lying down

and potentially causing the fracture to break. He needed to be released, head lowered and offered water every 2 hours. A groom slept in the stable in order to provide this level of care - onsite accommodation was desperately needed to provide better working conditions.

Fires can and do happen in stable yards. Evacuating stabled horses at an early stage is essential, obviously to prevent them being burned to death, but also to prevent future problems. Again, a member of staff per yard would be essential in this sort of emergency situation.

In general terms, a good stockman living on site will often notice subtle behavioural changes that often mean that either something is wrong, or that something out of the ordinary is about to happen. Again, this highlights the importance of an experienced groom being on site to monitor their own horses, in their own yard, where they would pick up on abnormal behaviours or signs of an unwell horse.

Some conditions whilst not predictable, will be expected after foaling and will usually only exhibit themselves as an emergency situation if not detected early enough to treat effectively. A case of colic on the other hand, injuries in the field during thunder storms and dog worrying, acute infections, cuts and kicks and horses becoming cast are all totally unpredictable and can happen to young horses, old horses, day or night, with little or no warning, and can become life threatening very quickly. In cases such as this it is essential for the welfare of the horse to have someone who knows the horses well (who works with them on a daily basis) around during the summer evenings when horses are out grazing, and overnight when horses are stabled in order to be aware of these subtle changes in behaviour which if detected early can be the difference between life and death.

Someone living close to the horses, and able to see them grazing from their dwelling for example, will often detect such an emergency as there is usually abnormal behaviour exhibited by the horses or horses involved. This behavioural change may be subtle though, and can often only be detected when horses are monitored on a constant basis, and particularly out of 'normal' working hours. For example, when watching grazing horses whilst doing the washing up at the kitchen window, subtle behavioural changes are more easily detected than when the stockman is out with the horses and around the yard.

Equally, living on site, makes it much easier for staff to walk to the stables and carry out out of hours checks as part of their routine, increasing regularity of checks if any horses are raising any concerns. It is essential that staff are on site so they do not need to commute to and from site to provide this level of care. Again, it should be noted, that each yard has its own specialist experienced team in charge of the horses under their care. With the numbers of high value, vulnerable horses within each yard, separate members of onsite staff is essential to each business and the horses in their care.

PERMANENT NEED

The NPPF is clear in terms of encouraging the development and diversification of land-based businesses but cautions that in order to justify a new isolated dwelling the need for it must be essential and permanent (NPPF paragraph 55).

The applicant has been operating the business for such a long period of time, with long term tenants occupying each yard. The yard has been in full occupancy since it was first setup, and often holds a waitlist.

This demonstrates that the need has met the permanency test.

OTHER ACCOMMODATION

For any other accommodation in the area to be considered, it needs to be both suitable and available for occupation by the worker(s) concerned. Having regard to the specific functional need at Windmill Stud, for a dwelling to be considered suitable, it should be sited within close proximity of the buildings used to accommodate the horses and ideally with views of the paddocks within which the horses are normally turned out, and the entrance. In addition, the critical care/isolation stable does need to be sited separately from the stables. Further, more detailed justification for the siting has been provided in a separate report. The proposed dwelling units are sited in an appropriate place given the functional requirement.

CCTV is a useful management tool for monitoring foaling mares on stud farms but it is not a realistic alternative to on-site supervision in this case.

Most Inspectors agree that to meet an established functional need for a supervisory dwelling the key worker needs to be readily available on site (as opposed to in a nearby village or town) to meet the functional need. This is in case animals require essential care at short/urgent notice and to deal quickly with emergencies that could otherwise cause serious loss. Furthermore, CCTV cannot be monitored 24 hours a day.

In the appeal APP/L1765/A/08/2075184 (Midlington Farm, Droxford, Winchester, Hampshire) at paragraphs 10 and 11 of his decision the Inspector stated:

10. The appellant and his wife live some 1.5 miles from the livery yard, whilst the yard manager lives 8 miles away. This is an unsatisfactory situation in terms of the welfare and wellbeing of the horses. At the hearing I was provided with a statement by the appellant's veterinary surgeon, Mr W B Cartmell, BVSc, MRCVS. This refers to current animal welfare legislation and recommendations. Mr Cartmell addresses the suggestion that such on-site supervision could be dealt with by the installation of CCTV cameras. He points to the fact that the images from such cameras would need to be monitored 24 hours a day and that reliance upon CCTV cameras would be unlikely to prevent allegations of criminality by reference to the requirements of the Animal Welfare Act 2006.

11. I agree that there is a need for on-site supervision and that the keeping of 19 full/part-time liveries at Midlington Farm provides a functional need for a person to live on site. I have therefore concluded that the requirements of Criterion (ii) of Policy CE20 are met. I agree it is improbable that the dwelling occupied by the appellant and his wife or any of the properties in nearby Droxford would be likely to meet the required level of on-site supervision, a matter that was discussed at the hearing. Likewise, the requirements of Paragraph 3 (i) (iv) to Annex A of PPS 7 would also be met.

For a business of the size at the application site, the main differences between being on site as opposed to a short distance away are:

- the time taken in the act of having to get dressed at night, start a car up and drive to site (rather than run out at any time of night in pyjamas to be in the stables in seconds) could be the difference between life and death;
- the added difficulties of getting to site in adverse weather conditions such as that experienced in recent winters;
- the inability to hear anything wrong;
- the physical impossibility for the manager to work a long day, return to site for evening checks and then stay awake to watch CCTV footage all night;
- CCTV cameras are able to cover the horses when stabled but it would be impossible to cover all of the grazing area at the application site as the cameras are not able pick up more than a specific pinpoint;
- it is one thing getting out of bed and checking horses in stables or in fields in the night when living on site, it is completely another having to dress, get the car out and drive to the site;
- it is physically possible to check animals frequently at night when living on site but far more exhausting and perhaps not sustainable to do so if living even half a mile off site and this would inevitably have a negative effect on the business.
- It is also important to note that each yard is self-contained and independent from each other. A member of staff is independently needed per yard, and that on-site person would be someone who works daily with these horses, knowing them individually and able to notice abnormal behaviour or issues and act on them quickly.

CONCLUSION

The applicant's case is clear that it is essential for a member of staff per yard to live on site in order to provide prompt, experienced and professional care to each yard's horses. There is no suitable alternative. It is essential to provide self-contained units, as each yard is run independently by separate teams of staff. Those members of staff desire their own space, kitchen and washing facilities. High level, experienced professionals are needed for each business, so appropriate accommodation is essential to retain such essential members of staff of this caliber.

The proposed development is required for the continued success of these equine businesses that are all well established and of a high professional standard. Each yard and business needs its own on-site accommodation in order to continue to provide the requisite welfare facilities for the stabled horses, as well as from a Health & Safety perspective, and to provide better working conditions for the highly experienced staff working at Windmill Stud.

The National Planning Policy Framework fully supports the assistance of small rural businesses to help them become more competitive and economically successful, thus assisting their suppliers and therefore enhancing the local economy.

The report above demonstrates that there is an essential need for a rural worker to live on site permanently for each of the yards/businesses, and that the proposal accords with the relevant sections of the National Planning Policy Framework, The Horse Industry Strategy for England and Wales and the Facilities Strategy; all of which are material to this planning determination.