

NEWHOUSE FARM

Flaunden, Hemel Hempstead, Hertfordshire.
HP3 0PJ

For Ms E Palmer
Planning Department
Dacorum Borough Council
Civic Centre
Marlowes
Hemel Hempstead
HP1 1HH

3 April 2016.

Dear Ms Palmer,

Flaunden House Stables application 4/03481/15/MFA and additional information and plans sought by the Development Control Committee.

Further to my earlier correspondence I have prepared for the British Horse Society Hertfordshire Committee an assessment of the information in the report and drawings as indicated above to be considered by your Committee on Thursday 7 April and forward this copy for your attention.

I apologise for the delay in sending this to you caused in part by my absence plus the late notice we received via third parties that additional information had been provided by the applicant.

A summary is provided below with more detail and data in the attached Appendix A formatted to align with item 5a of the Development Control Committee agenda to be considered at the meeting.

Summary

We note a form of agreement appears to be available to refurbish and redesign the stables and yard buildings to retain a commercial livery business on the site and land, although there remains a need for additional facilities to replace those lost by the proposed conversion of the commercial barns to domestic dwellings.

There are many examples which show the applicant appears not to have taken the necessary knowledgeable professional advice about the design requirements and necessary facilities of a viable commercial livery business. There are also examples within the proposal and the additional plans and information that are simply not practical and would make it unworkable. For example:

- (i) It would be impossible to load or unload horses from the trailers in the design locations.
- (ii) Changing the design to having the towing vehicle nose in to load and unload horses on site roads with public access creates a potential significant danger and puts at risk the welfare and safety of the horses, employees and potentially any residents or visitors.
- (iii) Other proposals in the plans create additional risks unlikely to satisfy Fire or Health and Safety standards for an equestrian commercial enterprise. *See appendix 2.0 and 4.4.*

(iv) The current proposed design with a lack of basic support facilities for the horse or rider and not even a W/C, wash basin or changing area is unlikely to attract horse or pony owners to consider stabling their animals on this site.

It would therefore be very unfortunate if the Committee were to recommend approval at this stage and we suggest they refuse the amendment and request the applicant to submit a new proposal having first sought professional knowledgeable advice as DEFRA and others strongly recommend.

The earlier offer made by the British Horse Society to provide you and or your colleagues with advice on equestrian issues remains, although we feel very strongly that a professional knowledgeable designer would be a good first step for this applicant to consider. It would be helpful to all if they were also able at the same time to provide a business plan and ideally an outline management plan.

Please feel free to contact the British Horse Society should you require advice on equestrian welfare or associated aspects for this or any other application.

Yours sincerely

John M Rugg
BHS Gold Member

Attachment – Page 1 & 2. of Appendix A

Copies: BHS Hertfordshire Committee (Lynn Myland and Rhoda Harrison)
BHS East of England Regional Development Manager (Janet Holmes)
Flaunden Parish Council

APPENDIX A

To letter dated 3 April 2016 addressed to Dacorum Borough Council, Planning Dept.

Flaunden House Stables application 4/03481/15/MFA and additional information and plans sought by the Development Control Committee.

The following reference documents were consulted when making an assessment of the above planning application plans, additional information and proposals:

HM Govt – Fire Safety Risk Assessment for Animal Premises and Stables

DEFRA - Keeping farmed animals – guidance information about horses kept for both agricultural and other business but non-agricultural purposes – e.g. in livery stables.

National Equine Welfare Council - Equine Welfare Guidelines for Horses, Ponies and Donkeys

Health & Safety Executive – Welfare at Work – Guidance for Employers for Welfare at Work

British Horse Society – Livery Yard Approval Criteria

General

The following information and data is presented in the same format as items to be considered on index item 5a of the Development Control Committee Agenda for 7 April 2016.

It is important to highlight some major issues in the amended proposals and plans that create an unacceptable risk and contravene or fail to recognise regulatory requirements or recommendations for Health and Safety and Fire Risk as can be found below in para 2.0 4.1 4.3 & 4.4

No provision is indicated on the application for the storage and management of waste. No muck heap is shown and other environmental issues such as in 1.2 below will need to be addressed.

1.0 Water

The fact that the applicant's advisor refers to a "metal horse basin" to describe a horse trough appears to reinforce the view of a lack of professional knowledge of equestrian requirements as is also evidenced by throughout the proposal.

1.1 The provision of exterior wall mounted taps at the traditional U configuration 12 stable block and the wooden building with four internal pony boxes satisfies the requirement to be able to fill water buckets for each of the stables in order that the horses and ponies have continual access to drinking water when inside (see *Defra Guidelines*).

1.2 Metal horse troughs outside stables are often used these days to soak hay in nets prior to feeding to horses. We assume the leachate pollutants from this process if undertaken would be dealt with in line with ***Defra Guidelines - disposal of hay soaking residues***.

2.0 Hay and Feed storage

The RICS surveyor, Ms Laura Macqueen, reported the "small stable block providing four pony sized loose boxes" is a wooden construction with a wooden store/tack room.

The application suggests this attached store will be used solely for hay storage.

It is unlikely that this proposal will satisfy the requirements of either the “2007 Fire Safety Risk Assessment for animal premises and stables” nor the “Government’s equine strategy for animal welfare arrangements, from fire”. See also 4.4 below.

We recommend the applicant provides alternative storage for combustible materials and seeks advice on this and other fire safety aspects from Hertfordshire Fire and Rescue Services.

2.1 No clear indication is provided as to where hard feed and supplements will be stored – it is advisable they are kept in a building with metal vermin proof bins.

Tack Room

3.1 It appears sensible to use the space previously allocated to the manager’s office as a tack room and storage for first aid and medicines. There is no indication on the plans of a sink for washing and cleaning of tack and equipment; **presumably this can be provided?**

We assume the manager will also dedicate part of his/her domestic premises for office use and record keeping (**legislation includes horse passport records and other documents**).

3.3 **It is important for a livery yard to have facilities to store and dry horse rugs.**

Most horses will have a minimum of two rugs in use at any one time and whilst dry rugs can be folded and stored on shelves the wet rugs will need a suitable area and methods to hang them whilst they dry. **There will be insufficient space in the proposed tack room.**

(see NEWC Code of Practice)

3.4 It is important the applicant provides adequate and safe storage of all tack and associated equipment as there is an increasing problem with the theft of such equipment. **It is strongly recommended contact is made with Hertfordshire Police Rural Crime Unit on this issue.**

Car and Horse Trailer Parking

4.1 Plans 15.149.97.600 & 15.149.001 indicate car parking provision for 12 motor cars.

It would appear that 7 are reserved for Livery yard staff and clients and 5 reserved for use by potential residential occupants of the Coach House and Barn 1.

4.2 In addition four parked motor vehicles coupled to horse trailers are shown located in bays where the application states it is proposed to temporarily load and unload horses or ponies.

Three occupy the current grassed area in the centre of the U shape stable block and are backed up to a fence and one in the narrow yard alongside the single door to the wooden building with four internal pony stables and backed up the door to the proposed hay store.

4.3 It is apparent that the designer of this temporary loading and unloading arrangement is unaware that horse trailers have a ramp at the rear to load and discharge horses although some trailers have side ramps to unload. **It is impossible to load horses in either of the proposed locations with this vehicle**

configuration with the trailers backed up to a fence or wall or to unload horses using the rear ramp.

4.4 The proposal to temporarily park, unload or load horses or ponies (or hay) from vehicles in a small narrow yard outside the wooden building with four internal pony loose boxes thereby blocking the single door exit to the stables **is a potentially very dangerous practice.**

Fire and Safety legislation and HSE recommendations require that a safe evacuation route be available at all times for horses and staff. This is not only required in case of fire but also in case a horse or pony panics and or bolts and attempts to escape from the building.

4.5 The design of the horse loading and unloading areas will have to be revisited (see 4.6).

It is important the risk and safety issues are assessed and proposals made to provide an alternative safe working area to ensure the safety of the horses, employees, clients and any residents or visitors (particularly children that may be resident or visiting the site).

4.6 The outline dimensions of the motor vehicle and trailer on the plans seem to be smaller than one would expect plus the turning radius used on the drawings appear to be insufficient for a close coupled two wheel horse trailer and motor vehicle that will likely be at least 8.8 metres long and possibly 10.8 meters.

In addition the rear ramp when lowered extends the overall length by a further 1.5 metres. A clear area of about 3 meters is required behind the ramp to provide sufficient room for the horse to stand and walk towards the ramp, enabling it to be led into the trailer.

Note: horses should only be loaded or unloaded in a trailer coupled to a towing vehicle.

Grazing Land

5.1 The site has approx. 16 acres of suitable grazing land and the applicant confirms this will be tied to equestrian use through a section 106 agreement

There appears to be some confusion regarding the ideal versus acceptable grazing land and hopefully the following will be helpful for the officers and members:

5.2 An extract from page 9 of the Officers report quotes:

“As a general rule, each horse requires approximately 0.5 – 1.0 hectares (or **1.25 to 2.5 acres**) of grazing of a suitable quality if no supplementary feeding is being provided (Code of Practice for the Welfare of Horses, Ponies, Donkeys and their Hybrids 2009:3)”

5.3 For clarification horses stabled at a livery yard are usually turned out for exercising for some of the day and when brought back in to the stable will be fed supplementary feed (hay).

5.4 The Code then goes on to suggest “A smaller area may be adequate where a horse is principally housed and grazing areas are used only for occasional turnout”.

5.5 Whereas the earlier versions of the code were more prescriptive and stated “a minimum ratio of one horse per half acre is generally accepted”.

This was the case in previous years when over 30 horses were kept at livery at this yard.

5.6 Ideally, irrespective of the number of horses kept on the yard we wish to see the existing horse walker retained as this greatly assists the exercise regime in spells of bad weather and protects the sward and pasture surface.