



READING AGRICULTURAL CONSULTANTS

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Our Ref: 10617 - RD

08 January 2025

To whom it may concern

Site: Land at Little Acre, Northwood Road, Harefield, Middlesex, UB9 6PU
Proposal: Proposed retention of existing temporary mobile home, for a three-year period.

1. I have been instructed by Ryan Dent, the applicant, to provide comments on the essential need for the retention of the existing permitted rural worker's temporary dwelling (Ref: 70058/APP/2018/295 approved 11 March 2019) at Little Acre for a further three-year period.
2. I made a site visit to Little Acre on the 3 January 2025, where I met with the applicant. We discussed the applicant's business and I was able to view the equine facilities on site and the mobile home.
3. The existing temporary mobile home is occupied by Ryan Dent and his partner, Amber Young, and their daughter. Both Ryan and Amber work on the owned land holding.
4. Ryan Dent owns and trades as Little Acres Stables Ltd (Company Number: 15660854). The company was set up by Ryan Dent on 19 April 2024 and is concerned with 'Farm animal boarding and care'. The business is equine related and involves provision of a retirement livery for client's aged horses, rehabilitation of client horses following injury, foaling of client's broodmares, and breaking in of client's yearlings. In addition, the applicant has two owned horses on site.
5. Prior to the applicant's existing business, trading as Little Acres Stables Ltd, being set up, the applicant's equine business was part of his parent's Littlebourne Equestrian Centre, Littlebourne Farm, Northwood Road. This equine business is located across the road and is separate from Ryan Dent's business.
6. RAC has previously provided a supporting equestrian appraisal for the approved temporary dwelling at the application site (RAC Ref: 7688 – Little Acre dwelling dated 18/01/2018) and an additional letter of support (RAC Ref: 7688 dated 2018, Your Ref: 70058/APP/2018/295).
7. The applicant's land holding at Little Acres Stables comprises of 3.32 hectares (8.2 acres) of the applicant's owned land in addition to some small area of adjoining grassland owned by his parents. There are 10 existing permitted stables on site, in addition to 2 temporary stables on skids. The applicant's grassland comprises a number of turnout paddocks. There is also a permitted horse walker on site which is essential for the rehabilitation of horses under the care of the applicant.

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8. The current number of horses on site comprise of 7 horses, (5 owned by clients and 2 by the applicant) and a young, weaned foal from a client's broodmare that was foaled at Little Acres Stables in 2024. The number of horses on site fluctuates throughout the year, with a maximum of 12 horses being able to be accommodated on site.
9. RAC's previous appraisal for the permitted temporary dwelling (Ref:70058/APP/2018/295) located on site provided details of what are considered the essential needs of the equestrian enterprise for a person to be resident on site in order for the welfare of all the horses either stabled or grazing at Little Acre not to be compromised. It provided details of existing legislation- Animal Welfare Act 2006 and the 'Duty of Care' for those with responsibility for horse welfare at the application site which in this case is the applicant, Ryan Dent.
10. To summarise, the essential needs at Little Acre relate to the following:
 - (i) the close supervision, management and daily requirements of horses either boxed in stables or in paddocks;
 - (ii) the nutrient requirements for individual horses;
 - (iii) the exercise and training routine for individual horses, in particular those with specific needs;
 - (iv) the strict exercise and treatment of injured, aged, or horses undergoing rehabilitation;
 - (v) the provision of security for all horses on site from theft or malicious attack;
 - (i) dealing promptly with unforeseen emergencies.
11. The applicant's veterinary surgeon (Farr & Persey) continues to provide veterinary services and have provided further written submissions in support of the existing need and retention of the temporary dwelling at Little Acre.
12. It is of note that paragraph 84 of the NPPF (revised December 2024) notes: *"Planning policies and decisions should avoid the development of isolated homes in the countryside unless one or more of the following circumstances apply:*
 - a) *There is an essential need for a rural worker, including those taking a majority control of a farm business, to live permanently at or near their place of work in the countryside..."*
13. RAC would note that it is evident Ryan Dent, (the applicant) is providing the full-time labour requirement at Little Acres Stables with part-time assistance from his partner, Amber Young. They have been living on site in the existing temporary dwelling (Ref: 70058/APP/2018/295 mobile home originally permitted 2019) and continue to meet the management and essential needs of the horses on site and ensure that the welfare of horses is not compromised. RAC would note that it is the applicant's equestrian business that requires an essential on-site presence and not the needs of the individual.
14. The labour requirement for the management of the current number of horses at Little Acres Stables can be assessed using the Agro Business Consultants (ABC) Equine Business Guide (8th Edition – November 2022). This provides the amount of work need to care for a horse and is expressed as standard Man Days (SMD). A full-time labour unit is equivalent to 278 SMD.

RAC Table 1 Labour requirement

	SMD/animal	Nos of animals	Total SMD
Breaking/training	98	1	98

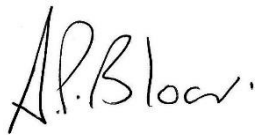
Brood Mares	76	1	76
Rehabilitation	98	4	392
Owned horses on livery	68	2	136
Total SMD			702
15% Management			105
Total SMD			807
Reduce by 30% (6-10 horses)			565
278 SMD = 1 labour unit			
Total labour requirement			2.03

15. Whilst the table above only provides a guide to the labour requirement at Little Acres Stables and taking into account economies of scale it is evident that there is a full-time requirement and a need for at least one equestrian worker at the application site. That full-time requirement is provided by the applicant who lives on site in the existing temporary dwelling.
16. RAC in its previous appraisal noted that there are very special circumstances for equestrian development in the Green Belt which were accepted by the Inspector in the Appeal Decision for a mobile home at Littlebourne Farm (APP/R5510/A/14/2222118). RAC considers this is applicable to the current application for retention of the temporary dwelling at Little Acres Stables in that the temporary dwelling provides the necessary management and supervision to be given to the horses.
17. RAC would further note that in the Officer's report for the original approval of the temporary dwelling at Little Acres Stables, it states in its summary: *"Although the proposal introduces an additional use on the site, which would be considered inappropriate development, the evidence submitted with the proposal provides very special circumstances to support the need for the development to provide appropriate care and security for the animals on site. Furthermore, it is not considered that the proposal would significantly increase the built up appearance of the site to the detriment to the openness of the Green Belt. Furthermore, it would not result in the loss of residential amenity"*.
18. The current application for the retention of the temporary dwelling for a further three-year period does not change any of the above comments.
19. RAC considers that the existing location of the temporary dwelling is within sight and sound of the stables and turn out paddocks.
20. The applicant's equine business, trading as Little Acres Stables Ltd, is in its first nine months of trading. Previously, the equine business was part of his parent's larger Littlebourne Equestrian Centre. The applicant's business is now separate from his parent's equestrian enterprise and permission for a further three years for the temporary dwelling at Little Acres Stables will allow the applicant to provide three years of accounts.
21. Financial figures for the first nine months of trading seen by RAC confirm that the applicant's equine business is expected to make a profit in its first full trading year and likely to make a profit in the following 2 years. RAC would note that if the Council were minded to approve a further three-year extension period for retention of the mobile home, any future submission for a permanent dwelling would require full and comprehensive financial accounts to be submitted which would be scrutinised to confirm that the applicant's equine business was viable, sustainable and likely to remain so.
22. RAC would comment that the applicant's equine business provides wider benefits to the local economy in that it uses the services of a veterinary surgeon, a farrier, a horse dentist, a local feed supplier, a local saddler and a local firm to wash and dry rug and horse blankets.

23. The existing single storey temporary dwelling has a total floor area of approximately 78m² with a maximum roof height of approximately 2.7m. RAC would consider this as a typical standard floor area for a temporary mobile home and would not consider it as excessive. RAC would note that permanent rural worker's dwellings can range in size from a total floor area of 120m² to one in excess of 200m².
24. In conclusion this is an application for a further period for the retention of an existing previously permitted temporary equestrian workers dwelling – mobile home, in order to allow the applicant's equine business to continue with its development and meet the management and welfare needs of the horses on site.

I trust these comments are helpful.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'A. Bloor'.

Alan Bloor