

Our Ref: LF/24055_04

2 June 2025

Mr T Rea
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Dear Mr Rea

Third Party Objection

Change of use of land to equestrian and erection of stables and covered manege) at Land At Church Wood, Three Houses Lane, Codicote, Hertfordshire. 24/01042/FP

We write on behalf of the Three Houses Lane Action Group in response to the above planning application. We have been instructed to review and provide comment on the proposed change of use and associated structures.

Upon review we were surprised to find that the application was valid, as the submission fails to accord with the requirements set out in the Council's validation matrix, let alone the national validation requirements.

The application submission lacks the following information to enable the Authority to make any meaningful and substantive decision on any key material considerations such that the application should either be invalidated or refused:

- Proposed Elevations (3D plan does not include all elevations)
- Existing Block Plan
- Proposed Floor Plans, annotating proposed uses.
- Parking Plan
- Planning Statement

It is worth highlighting that the 3D plan submitted is entitled 'New Office'.

Steven Barker

Director
MA (Cantab) MA

Liz Fitzgerald

Managing Director
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Development within the Green Belt

The Applicant has provided no planning statement, however, the Design and Access Statement concludes that the site is grey belt and does not contribute positively to the Green Belt.

Whilst the site may not contribute strongly to the three purposes that enable land to constitute grey belt, NPPF paragraph 155 requires the assessment to go further. It requires the site to be in a sustainable location and for there to be a demonstrable need for the proposed use. Neither of these factors have been addressed by the Applicant as it is demonstrated that access to the site is available by private vehicles only.

The Applicant proceeds to advise that the proposed use is an appropriate use in the Green Belt. NPPF paragraph 154b does advise that the change of use of land and construction of associated buildings in association with outdoor recreation is not inappropriate in the Green Belt, as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within.

Horsiculture in the Green Belt can be an appropriate use, but the key element is whether the proposal seeks to preserve the openness of the Green Belt.

As set out in the NPPG, openness comprises spatial, visual and functional elements. The proposal seeks to introduce a large new building into the Green Belt which will have a significant impact on the openness of the Green Belt from a spatial and visual perspective. It does not seek to preserve the openness of the Green Belt in any manner.

The Applicant has endeavoured to justify the facilities by providing what they consider to be precedent images of maneges in Codicote. No addresses have been provided, but what is evident from Figure 4 and 6 is that the maneges shown are uncovered and associated with established residential uses, they are not located in an isolated location and are associated with adjacent development.

Figure 5 is not even a manege but the footings for the now complete Bradley Springs re-development.

Neither of the precedent images have stables directly adjacent or attached to the manege further reducing their massing. The precedent examples show a change in surface material and likely a barred fence enclosing space, thus having very limited impact on the openness of the Green Belt.

This proposed development will have a height somewhere between 6-9.5m (not possible to confirm as you cannot scale properly from the plans), with a stable building of 788sqm and a manege of 1148sqm. This is vast and will have a significant impact on the openness of the Green Belt in spatial and visual terms.

It is worth highlighting that there is no yard area shown, so it is not clear where manure will be stored or fresh hay etc. There is the potential for additional hardstanding to be required.

The functional impact cannot be reasonably assessed as there is a lack of information provided with the application. The lack of a floor plan means that the scale of the stables is unknown, there is no clear indication of the number of stalls the block will hold and therefore the number of people likely to be visiting the site on a daily basis. It is noted that 2FTE employees are stated on the application form, but this does not address the function of the site and owners visiting or whether the site is to be used for horse riding lessons etc. The application simply lacks detail.

Even without information pertaining to the nature of or extent of movements associated with the proposed use, it is clear that this will be a material increase in the number of movements into and out of the site that will undermine and not preserve the openness of the Green Belt.

Accordingly, the proposed development is inappropriate development within the Green Belt and is required to demonstrate '*very special circumstances*'.

As there is no supporting evidence, the application has not demonstrated '*very special circumstances*'.

The proposal is therefore contrary to Local Plan policy SP5 and the NPPF.

Sustainability and Transport

There can be no debate, the site is in an unsustainable location. The site is not accessible by any alternative modes of transport, the nearest train stations are Hitchin or Knebworth, and neither are within walking distance of the site. The only way to access the site is via the private car.

The application form confirms that there is no parking proposed on site, but that 2 FTE members of staff will be employed. There is no indication on the nature of the proposed use, whether people will visit for riding lessons or if it is just stabling for private individuals. Either way, there will be multiple people on site at various times and there is no provision for parking or parking and turning of horse boxes.

This will lead to parking on the access road or on Three Houses Lane itself, even with the potential for horse boxes to need to reverse into the site to get horses out of trailers. Given the width of Three Houses Lane and shared use of the access, this is detrimental to highway safety.

The application fails to demonstrate that this is sustainable development and that there will be no detrimental impact on highway safety. The proposal is therefore contrary to Local Plan policies SP1, SP6, T1 and T2 and the NPPF.

Impact on the Character and Appearance of the Area.

The site is located in a rural location where the agricultural buildings have been nestled into the wooded setting. With their agricultural use, the buildings have always been largely assimilated with their adjacent agricultural use. The introduction of this building will have a significant impact on the character and appearance of the area.

The size of the stable building proposed is vast and fails to have regard to the nature or form of any of the lawful buildings on the site. It is more than double the size of the largest barn on the wider site (Barn 3). The 3D plan does not include any indication of materials and the application form says there are no materials proposed to be used.

This area (red and blue land) was a small part of a wider agricultural holding that comprised arable land and 3 modest agricultural buildings, with the unauthorised buildings having been expanded, external storage across land and now a much larger stable and manege on the remainder of the land, the impact on the rural character and appearance of this site is overwhelming.

Even if the wider site (blue land) had remained in agricultural use, the size and form of this building alone, on this pocket of agricultural land is disproportionate and therefore detrimental to the rural character of the area.

The impact on this rural idyll is detrimental to the character and appearance of the area, contrary to Local Plan policies SP9, D1 and NE2 and the NPPF.

Biodiversity Net Gain

It is noted that the BNG report indicates that a 14.5% increase in habitat units will be delivered as part of the application through the provision of modified grassland and other neutral grassland. What the application does not address is how this is to be delivered and preserved for 30 years when it is being grazed by horses.

This needs to be addressed as part of this application, or measures sought for off-site mitigation.

Other Matters

Whilst the site is not located within a flood zone, the lane regularly has sitting water at its edges and within the roadside ditches. The use of the site for agricultural purposes has never necessitated the need for extensive hard surfacing and specific

foul and surface water provisions. As a stable building with 2FTE staff, there will need to be welfare provisions that will require foul water provision, and the introduction of the building will require surface water drainage.

This needs to be addressed up front as the implications of adding services to this site need to be fully considered to ensure that service runs are not placed through the protected woodland.

Conclusions

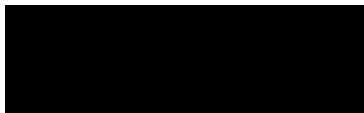
The content of the application is distinctly lacking in information to enable any meaningful assessment to be made on key areas and as such should be refused.

It is inappropriate development within the Green Belt in an unsustainable location. The scale is overwhelming compared to the wider site and will significantly harm the character and appearance of the area, whilst there is no storage or parking areas proposed that will in turn likely lead to an impact on highway safety.

We respectfully request that the application is refused.

If we can be of any further assistance, please do not hesitate to contact me.

Yours sincerely



LIZ FITZGERALD
Managing Director