



READING
AGRICULTURAL
CONSULTANTS

Your Ref: DC/25/0883
Our Ref: 10836-kt

27 October 2025

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For the attention of Ms Kate Turner

Horsham District Council

Albery House
Springfield Road
Horsham
West Sussex
RH12 2GB

Dear Ms Turner,

Site: **Ghyll House Farm, Limekiln Farm, Broadwater Lane, Copsale, West Sussex, RH13 6QW.**

Application: **DC/25/0883**

Proposal: **Erection of a temporary workers dwelling for security, stud and equine rehabilitation. To include change of use to the land to the south of Limekiln Wood from agricultural to mixed use agricultural and equestrian, including change of use of the existing barn.**

Thank you for your instruction dated 31 July 2025 requesting Reading Agricultural Consultants Ltd (RAC) comments on the above planning application.

In preparing this desk-top response I have had regard to the Design and Access Statement (dated September 2025), the Need for Rural Accommodation (dated May 2025) and the applicant's Business Plan (dated September 2025), the associated plans and application form.

I have not visited the site nor had any contact with the applicant in preparing this response.

RAC previously appraised an earlier application (DC/22/1272) for the Creation of an equine rehabilitation centre, incorporating erection of a stable block containing six stables and creation of a sandschool. Erection of a barn building to provide storage for agricultural machinery, rainwater purification plant and hay (RAC ref 9651-kt dated 23 August 2022) and concluded:

"Overall, RAC consider that on balance the applicant's proposal to erect a stable building, storage building and sand school to facilitate an equine rehabilitation centre is compliant with Policy 29 of the Horsham District Planning Framework. However it is recommended that the Council seek further details of the proposed rehabilitation and livery business that is to operate from the site together with improvements in the design of the storage building."

Further comments were provided in appraisal (RAC ref 9651-kt2 dated 28 September 2022) following a redesign of the proposed storage building and concluded:



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"Overall, RAC considers that the applicant's amended design of the proposed building is appropriate for the intended storage of machinery and hay bales at Limekiln Farm."

The application was withdrawn on 17 March 2023 due to the water neutrality requirements.

A further application (DC/23/1325) for the Construction of a stable block with associated storage and staff room facilities. Construction of machinery/hay storage barn and a water borehole plant room. Construction of a sand school was approved on 12 August 2024. RAC provided an appraisal for this application (RAC ref 10423-kt dated 23 May 2024) and concluded:

"Overall, RAC consider that on balance the applicant's proposal to erect a stable building, storage building and sand school to facilitate an equine rehabilitation centre is compliant with Policy 29 of the Horsham District Planning Framework. However, it is recommended that the Council seek further details of the applicant's proposed rehabilitation and livery business that is to operate from the site in order to ensure that there are sufficient equine facilities for all of the proposed disciplines."

Background

1. The applicant, Mrs Stephanie Newell (formerly Miss Price), owns 4.71 hectares (11.6 acres) of grassland, known as Limekiln Farm, which is accessed from Broadwater Lane via a 0.6 mile track which the applicant has a Right of Way over. It is understood that this track is also a public right of way footpath and bridleway.
2. The submission plans include a further 5.54 hectares (13.68 acres) of land, known as Oakleigh Farm. It is unknown if this land is owned or rented by the applicant. This application proposes the change of use to allow this land and building to be used for mixed agricultural and equestrian purposes.
3. The application site, and proposed siting of the temporary dwelling is adjacent to the land at Limekiln Farm which is owned by the applicant and benefits from the permission granted under DC/23/1325 for the stable block, machinery/hay storage barn and sand school.
4. The applicant is developing an equine rehabilitation and stud yard at the site, in addition to having up to eight adult breeding alpacas at stud.
5. It is detailed in the Business Plan that the applicant currently has 3 owned broodmares in foal and 2 livery broodmares in foal all due to foal in 2026 and some alpacas kept on the application site and Limekiln Farm.
6. The Business Plan details that with full occupancy there will be 25 horses on site which will relate to:
 - 6 horses stabled (assumed rehabilitation);
 - 5 broodmares;
 - 10 track livery; and
 - 4 retired horses.
7. The applicant intends to offer post operative rehabilitation care and full livery alongside a track livery system which will be used by horses and ponies with Equine Metabolic Syndrome (EMS), laminitis and other health issues requiring controlled body weight.
8. The applicant intends to offer Artificial Insemination (AI) with their own stallion and third party owned stallions. The AI will be available to visiting mares alongside their own mares.

9. The Business Plan details that the applicant currently works alongside her husband in their flooring company but it understood she will transition to working full time in the equestrian rehabilitation and breeding business.
10. The application form details that the applicant lives in Rustington which is located 20.4 miles from the application site. It is unknown where the applicant currently resides and how often she is travelling to site to meet the needs of any horses or alpacas currently on site.

Proposal

11. The application before the Council proposes the change of use of the land and barn to allow mixed agricultural and equestrian use by the applicant and the temporary siting of a mobile home.
12. The temporary dwelling measures 15m x 6m and comprises living /kitchen/dining area, office, store, utility, two bedrooms and a bathroom.
13. It will provide accommodation for the applicant, Mrs Stephanie Newell, and her partner and as such it will be occupied by a rural worker.

Relevant Planning Policies

14. National planning policy guidance for development in the countryside is set out in the National Planning Policy Framework (NPPF) updated in December 2024.
15. Paragraph 11 of the NPPF sets out the core land-use planning principles that should be adopted and these expressly include:
 - A presumption in favour of sustainable development;
 - Positively seek opportunities to meet the development needs of the area and be sufficiently flexible to adapt to rapid change;
 - Provide for objectively assessed needs for housing and other uses;
 - Approving development proposals that accord with an up-to-date development plan without delay; and,
 - Where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission.
16. Section 4 requires that decision makers:
 - should approach decisions on proposed development in a positive and creative way; work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area;
 - seek to approve applications for sustainable development where possible.
17. Paragraph 82 et seq deals with housing in the countryside and notes;

In rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs...

To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services...
18. However, paragraph 84 maintains the presumption against isolated new dwellings in the countryside unless they are essential, noting;

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 majority control of a farm business, to live permanently at or near their place of work in the countryside..."*

19. Section 6 of the NPPF is concerned with 'Building a strong, competitive economy' and at paragraph 85 it notes:
"planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt..."

20. At paragraph 88 'Supporting a prosperous rural economy' it notes:
"Planning policies and decisions should enable:

- a) *The sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings;*
- b) *The development and diversification of agricultural and other land-based businesses;..."*

21. Planning Practice Guidance titled 'Housing Needs of Different Groups' (July 2019) provides some guidance relevant to paragraph 80 of the NPPF in the section 'How can the need for isolated homes in the countryside for essential rural workers be assessed'?

22. These include:

- *Evidence of the necessity for a rural worker to live at or in close proximity to their place of work to ensure the effective operation of agricultural, forestry or similar land-based rural enterprise (for instance where farm animals or agricultural processes require on-site attendance 24 hours a day and where otherwise there would be a risk to human or animal health or from crime, or to deal quickly with emergencies that could cause serious loss of crops or products);*
- *The degree to which there is confidence that the enterprise will remain viable for the foreseeable future;*
- *Whether the provision of an additional dwelling on site is essential for the continued viability of a farming business through the farm succession process;*

23. Policy 10 of the Horsham District Planning Framework looks at rural economic development and states:
"Sustainable rural economic development and enterprise within the district will be encouraged in order to generate local employment opportunities and economic, social and environmental benefits for local communities.
In the countryside, development which maintains the quality and character of the area, whilst sustaining its varied and productive social and economic activity will be supported in principle. Any development should be appropriate to the countryside location and must:

1. *contribute to the diverse and sustainable farming enterprises within the district or, in the case of other countryside-based enterprises and activities, contribute to the wider rural economy and/or promote recreation in, and the enjoyment of the countryside; and either*
 - a. *be contained wherever possible within suitably located buildings which are appropriate for conversion or, in the case of an established rural industrial estate, within the existing boundaries of the estate; or*
 - b. *result in substantial environmental improvement and reduce the impact on the countryside particularly if there are exceptional cases where new or replacement buildings are involved. New buildings or development in the rural area will be acceptable provided that it supports sustainable economic growth towards balanced living and working communities and criteria a) has been considered first."*

24. Policy 20 considers rural workers' accommodation and states that:
"Outside the defined built-up area new housing for rural workers will be supported provided that:

1. there is a functional need for the dwelling and the occupation of the dwelling is to support the established business use.
2. evidence is submitted to demonstrate the viability of the rural business for which the housing is required.”

25. Policy 26 deals with countryside protection and enhancement and states that:

“Outside built-up area boundaries, the rural character and undeveloped nature of the countryside will be protected against inappropriate development. Any proposal must be essential to its countryside location, and in addition meet one of the following criteria:

1. support the needs of agriculture or forestry;
2. enable the extraction of minerals or the disposal of waste;
3. provide for quiet informal recreational use; or,
4. enable the sustainable development of rural areas.

In addition, proposals must be of a scale appropriate to its countryside character and location. Development will be considered acceptable where it does not lead, either individually or cumulatively, to a significant increase in the overall level of activity in the countryside, and protects, and/or conserves, and/or enhances, the key features and characteristics of the landscape character area in which it is located, including:

1. the development pattern of the area, its historical and ecological qualities, tranquillity and sensitivity to change;
2. the pattern of woodlands, fields, hedgerows, trees, waterbodies and other features; and
3. the landform of the area.”

26. Paragraph 9.22 indicates that equestrian related development is important to the rural economy of the District and that development of this nature needs to be of high quality and appropriate to its location.

27. Policy 29 is concerned with ‘Equestrian Development’ and states:

“Development for equestrian related development will be supported provided that:

1. *It can be demonstrated that the re-use of existing buildings on site for related equestrian use is not appropriate; before new or replacement buildings are considered.*
2. *The proposal would be appropriate in scale and level of activity, and be in keeping with its location and surroundings, and where possible is well related to existing buildings;*
3. *The proposal should where possible be well related to a bridleway network”.*

Appraisal

28. The primary test set out in the NPPF and Local Plan Policy 20 is an assessment as to whether it is essential for a rural worker to live at, or near, their place of work. In this case, the applicant intends to develop an equine breeding enterprise alongside the existing equestrian rehabilitation and alpaca breeding enterprises which have been detailed since the first application at Limekiln Farm (DC/22/1272).

29. The applicant considers that a rural dwelling on site is essential in order to maintain the appropriate level of management and supervision of the horses and to ensure that animal welfare obligations are met.

30. There is a legal responsibility under the Animal Welfare Act 2006 to ensure that all animals are kept in a manner which accords them freedom from thirst, hunger and malnutrition; appropriate comfort and shelter, the prevention or rapid diagnosis and treatment of injury, disease or infestation; freedom from fear; and freedom to display most normal patterns of behaviour. The issue of security is also acknowledged to be an increasing problem.

31. 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 for Duty of Care for animal welfare will lie with Stephanie Newell, the applicant.

32. In 2005 the equestrian industry and welfare organisations produced revised guidelines on 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). This refers to the availability of staff and states that: "*Sufficient staff must be provided at all times to ensure proper, regular and timely attention to all horses held.*" This document has been updated with the Third Edition 2009 and with regard to 'Duty of Care' this notes: "*The most significant single influence on the welfare of the horse is the care and management given by the owner or keeper of that horse. They should be able to meet the welfare needs of their horse and be capable of safeguarding them under all foreseeable circumstances.*"

33. An assessment of the essential need for a rural worker to live at or near their place of work requires:

- an evaluation of the risks involved;
- the frequency and type of out-of-hours emergency that might arise;
- the scale and loss that could be incurred should that emergency situation occur;
- the potential for an on-site worker to identify the problem; and
- the ability of that resident worker to rectify the problem.

34. In the case of the applicant's developing equine enterprise at the application site, the essential needs could arise from:

- the close supervision, management and daily nutrient requirements of horses either boxed in stables or in paddocks, which includes late evening checks;
- the regular inspection of horses whether stabled or at grass for signs of disease or distress and to rectify the problem promptly;
- the close supervision of horses receiving rehabilitation treatment;
- close monitoring of brood mares at foaling and potentially at covering with a stallion, or as is the applicant's proposal using artificial insemination;
- the close supervision of mares about to foal and potentially during foaling;
- the close supervision and round the clock supervision of any alpaca breeding stock before, at and immediately after birth;
- alpacas have an average gestation period of 345 days but it can vary from 330 to 370 days which require more attention prior to birthing than other livestock;
- the provision of security for horses from theft or malicious attack;
- dealing with unforeseen emergencies such as a horse cast in its box, or a horse with colic, or abnormal weather conditions which can cause distress to horses, or a fire.

35. Horses are valuable animals, and vulnerable to theft and occasionally to inexplicable violent attacks. Security is therefore particularly important for equine businesses.

36. The labour requirements for the applicant's equestrian enterprise can be calculated using Standard Man Days (SMD) data from the Equine Business Guide 2022 (8th Edition). For each full-time worker, the SMD equivalent is 278 days.

37. RAC would note that there is no standard data for horses receiving rehabilitation treatment and as such RAC's calculation has been based on an eventing horse which is one of the most labour intensive disciplines and would be comparable to the increased labour element for

horses on a rehabilitation programme. In addition, there is no standard data for track livery horses and as such RAC's calculation has been based on Part Livery which is referred to in the Business Plan.

38. Based on the horse numbers proposed within the Business Plan the labour requirements for the applicant's breeding and rehabilitation enterprise can be calculated as follows:

Horse	SMDs	Size	Total SMDs
Broodmares	76	5	380
Rehabilitation	129	6	774
Part Livery (including retirement horses)	38	14	532
Total			1,686
50% reduction for 21+ horses			843
Total			843
Full-time workers @ 278 SMDs			3.03

39. RAC considers that there is a justified essential need for a full-time rural worker to be on site to provide 24-hour supervision in order to support the equine training rehabilitation enterprise of this scale and nature and ensure the horses welfare is not compromised.

40. RAC would note that currently the applicant appears to be working alone and it is considered the number of horses on site and would require additional labour and support. It is noted also that the two livery broodmares may not be on site all year round and therefore the labour requirement could reduce slightly.

41. The Business Plan details freelance staff will be employed 5 days a week for 5 hours each day but no further labour costs are accounted for.

Financial Sustainability

42. The NPPF deals with the concept of sustainable development at a strategic rather than an individual enterprise level. In terms of economic development, it is concerned with contributing to and 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.

43. In this context RAC considers any assessment of economic sustainability as the ability of the business/enterprise to utilise its resources which allows it to function properly; it has to have the ability and necessary funds available to stay in business.

44. RAC considers that in order for any business to demonstrate viability, it should be generating profits sufficient to cover all costs, provide a return on the capital invested, realistically reward any unpaid labour (usually at least equivalent to the national minimum wage); and provide for the build cost of the proposed dwelling.

45. The Business Plan provides details of the expected gross profit when the site is fully occupied with 25 horses but does not include projections for each of the three years leading up to the point when the applicant anticipates that the equine business will be fully operational. RAC would have expected to have seen a 3-year business forecast with financial projections.

46. For note in this application, the notional return to land is equivalent to £1,537.5 (10.25 ha of owned land at £150/ha – assuming Oakleigh Farm is owned), the notional charge for a full-time worker at minimum wage is £25,600 and sensitivity analysis for £100,000 invested would see a return of £2,500.

47. The applicant's Business Plan demonstrates that the business when operating at full occupancy with 25 horses could meet all notional costs as detailed above. However, RAC as

noted above would recommend that the Council seek some further details on financial projections for each of the two years before the applicant reaches full occupancy.

48. RAC would note that if the Council were minded to approve the planning application for a temporary rural worker's dwelling then the applicant's business plan and developing equine enterprise would be thoroughly tested over the next three years.

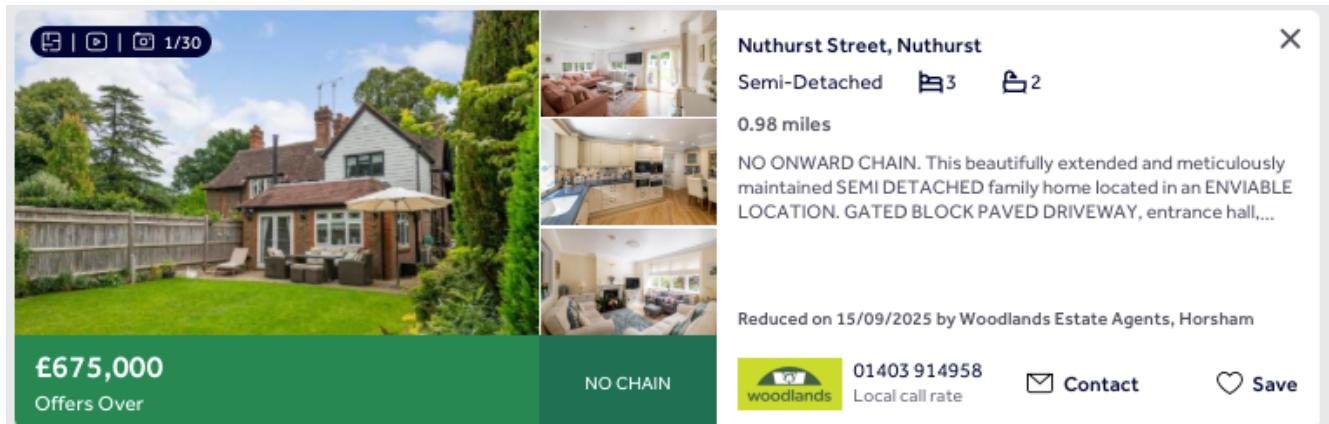
49. However, the applicant needs to be aware that if approval were to be granted for a temporary dwelling, then full financial information and detailed equine business accounts would be required at the end of the three year period if an application for a permanent dwelling for a rural worker is submitted.

50. This information would be fully scrutinised and the applicant's equine business will have to have demonstrated that it is profitable, financially viable and sustainable.

51. In the event that at the end of the three year time period the applicant's equine business was not proven to be viable, the Council would have the authority to have the temporary dwelling removed and the land restored to its original condition.

Other Dwellings

52. A search of Rightmove on 24 October 2025 displays 14 properties for sale within 1 mile of the application site postcode (RH13 6QW) with the closest being located in Nuthurst which RAC would consider beyond the affordability of a rural worker and beyond sight and sound of the horses kept on site.



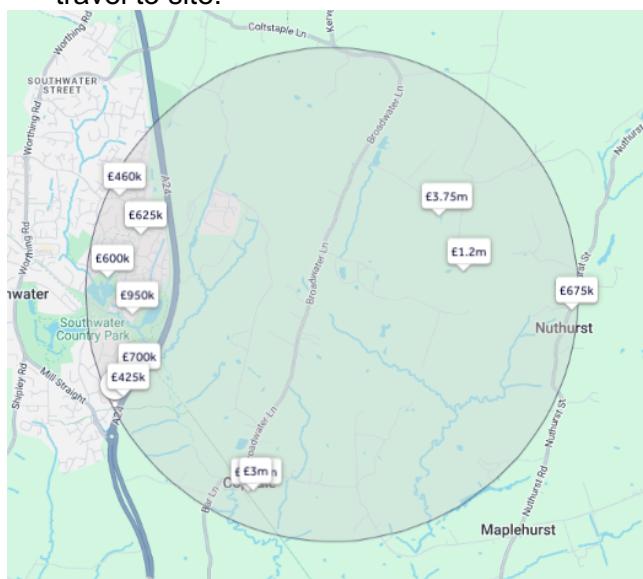
Nuthurst Street, Nuthurst
Semi-Detached 3 2
0.98 miles
NO ONWARD CHAIN. This beautifully extended and meticulously maintained SEMI DETACHED family home located in an ENVIALE LOCATION. GATED BLOCK PAVED DRIVEWAY, entrance hall,...

£675,000
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53. In addition, RAC would note that many of the properties within one mile of the application site are located in Southwater which is accessed via the A24 and would require further time to travel to site.



Conclusion

54. The applicant proposes the temporary siting of a mobile home for a period of three years.
55. The proposed dwelling would be occupied by a full-time rural worker, being Mrs Stephanie Newell, who provides the daily management, supervision and care for all horses and alpacas on site.
56. The mobile home is proposed to be sited next to the stable block. It will meet the proposed essential needs of the enterprise and ensure that the welfare of all horses kept on the holding is not compromised.
57. The applicant has provided a financial forecast which is based on the 100% occupancy stabling of visiting mares and horses undergoing rehabilitation, and track livery. The financial sustainability of the business will be tested after the three-year temporary permission. The figures used in the above financial forecast appear reasonable and planned on a sound financial basis however RAC suggests that the Council request more detailed projections for the two years leading up to full equine occupancy.
58. RAC is not aware of any other residential dwellings in the immediate locality that are suitable and available and would meet the identified essential need.
59. RAC considers that the proposal for the temporary siting of a rural worker's dwelling at the application site is compliant with national and local planning policy.

I hope these comments are helpful.

Yours sincerely

Olivia Wojniak