



READING
AGRICULTURAL
CONSULTANTS

Your Ref: DC/25/2809
Our Ref: 11045-dh2

17 March 2026

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For the attention of Daniel Holmes

Horsham District Council
Albery House
Springfield Road
Horsham
West Sussex
RH12 2GB

Dear Mr Holmes,

Site: Land Known As Pinkhurst Stud, Pinkhurst Lane, Slinfold, West Sussex, RH13 0QR.
Application: DC/25/2809
Proposal: Sitting of a static caravan as a temporary rural workers dwelling (Retrospective).

Thank you for your instruction dated 24 February 2026 requesting Reading Agricultural Consultants Ltd (RAC) comments on the above planning application.

In preparing this desk-top response I have had regard to the Agricultural Justification Statement (undated) and Business Plan (undated) prepared by the applicant's agent, GvS Raven Estate Ltd, and the associated plans and application form.

RAC notes that the Agricultural Justification Statement (AJS) refers to cattle and water buffalo on the site however the Business Plan does not make any reference to these livestock enterprises. Instead, the Business Plan refers to pig breeding which was not mentioned in the AJS. RAC has based this appraisal on the livestock contained within the Business Plan.

RAC produced an appraisal dated 6 March 2026 (RAC ref 11045-dh) which concluded:

"The applicants propose the temporary siting of a mobile home for a period of three years.

The proposed dwelling would be occupied by a full-time rural worker, being Mr or Mrs Bell, who provide the daily management, supervision and care for all horses and livestock on site.

RAC considers there is not a justified essential need for a full-time worker to reside on site to meet the needs of the horses and livestock.

The applicants have provided a Business Plan with anticipated income and costs for the three year business plan. RAC suggests that the Council request a cashflow forecast with more detailed projections for the three years with evidence for the output and direct costs calculations.

RAC is not aware of any other residential dwellings in the immediate locality that are suitable and available and would meet the potential essential need.



Reading Agricultural Consultants Ltd

Registered Office as above

Company No. 3282982

Registered in England



RAC considers that the proposal for the temporary siting of a rural worker's dwelling at the application site is not compliant with national and local planning policy."

Further information has been provided to the Council by the agent in emails dated 10 March 2026 and 16 March 2026 following RAC's appraisal dated 6 March 2026 which address some of the queries raised by RAC and form part of this second RAC appraisal.

Background

1. The applicants, Mr and Mrs Bell, own the application site which extends to 2.58 hectares (6.39 acres) of grassland.
2. The AJ5 details that the applicants currently keep the following on site:
 - 3 broodmares (all in foal);
 - 3 youngstock in training;
 - 20 goats; and
 - 10 poultry
3. The email dated 16 March 2026 confirms the following current livestock and equine numbers on site:
 - 3 broodmares (two in foal);
 - 12 goats;
 - 20 ducks;
 - 6 quail;
 - 2 geese;
 - 60 chickens; and
 - 2 pigs
4. RAC does note that a slightly earlier email from the agent to the Council on 16 March 2025 detailed 25 chickens and a second email (dated the same day) details there are currently 60 chickens. RAC is unsure which number is correct.
5. The applicants intend to develop their equestrian breeding and livestock enterprises on site.
6. The Business Plan submitted with the application proposes that over a three year period the enterprises will increase to the following:
 - 3 broodmares foaling each year with foals being sold at 1 year old;
 - 14 goats (comprising 12 breeding does and 2 breeding bucks);
 - Poultry (unknown number);
 - 2 breeding sows; and
 - Breeding ewes (unknown number).
7. The Business Plan makes reference to a number of poultry as part of a smallholding extending to 3 acres which the applicants previously managed, however it is unknown if these numbers are proposed as part of this application – 300 laying hens, 20 ducks, 50 quails, and an unknown number of geese.
8. The email dated 16 March 2026 to the Council confirms the following proposed livestock and equine numbers:
 - 3 broodmares foaling each year;
 - 30 goats;
 - 50 ducks;
 - 30 quail;
 - 4-5 geese;

- 300 chickens;
 - 2 pigs; and
 - 10-15 store lambs purchased for finishing each year.
9. RAC would note that it has not been confirmed by the applicants or agent whether the sows will be farrowing once or twice each year and therefore the number of piglets for rearing and finishing are unknown.
10. The Business Plan also refers to diversified income through sale of manure and agricultural services but no additional details are provided.
11. It is understood that the mobile home is already situated on site and the email dated 10 March 2026 to the Council details that it is currently on site without permission and used for welfare purposes.

Proposal

12. The application before the Council proposes the retrospective temporary siting of a mobile home for a period of three years. The application description details that this is a retrospective application, however the application form details that the works have not started.
13. It will provide accommodation for the applicants, Mr and Mrs Bell, 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.”*

Appraisal

26. 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 applicants state they are re-establishing Pinkhurst Stud as a more active smallholding and are developing an equestrian breeding and mixed livestock enterprise.

27. The applicants consider that a rural dwelling on site is essential in order to maintain the appropriate level of management and supervision of the equines and livestock and to ensure that animal welfare obligations are met.

28. 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.

29. The Code of Practice for the Welfare of Laying Hens and Pullets (2018) notes that:

“Animals must be cared for by a sufficient number of staff who possess the appropriate ability, knowledge and professional competence” and

“Stockmanship is one of the most important influences on the welfare of laying hens. A good keeper will have a compassionate and humane attitude, will be able to anticipate and avoid many potential welfare problems and have the ability to identify those that do occur and respond promptly...”

30. 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."*

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 the applicants.
32. 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.
33. In the case of the applicants' re-establishment of the small holding and developing equestrian and livestock enterprises at the application site, the essential needs would arise from:
 - the general welfare and care of all livestock on the farm;
 - the management of free-range egg producing poultry and housing accommodation;
 - the general welfare and management of breeding stock where assistance may be required at birthing;
 - the general care and attention of the new born animal ensuring they have received adequate colostrum, again assistance may be required;
 - the regular inspection of livestock whether housed or at grass for signs of disease or distress and to rectify the problem promptly;
 - the close supervision, management, welfare, 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 mares about to foal and potentially during foaling and ensuring that the foal suckles its mother; and
 - 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.
34. The labour requirements for the applicants' mixed livestock enterprise can be calculated using Standard Work Days (SWD) data from the Agricultural Budgeting and Costing Book (November 2025) and the Equine Business Guide (2022). For each full-time worker, the SWD equivalent is 275 days.
35. Based on the livestock and equine numbers proposed within the Business Plan the labour requirements for the applicants' mixed livestock enterprise can be calculated as follows:

	SWDs	Current Size	Total SMDs	Year 3 Size	Total SMDs
Poultry (chickens, ducks, quail, geese)	0.006	88	0.52	384	2.3
Store Lambs	0.3	0	0	15	4.5
Goats	0.5	12	6	30	15
Sows	1.88	2	3.78	2	3.78
Rearing and Finishing Pigs	0.14	Unknown	0	Unknown	0
Broodmares	76	3	228	3	228
Foal (0-1yo)	35	0	0	3	105
Sub Total			238.3		358.58
Reduction for economies of scale			57		99.9
Sub Total			181.3		258.68
15% management and maintenance			27.19		38.80
Total			208.49		297.48
Full-time workers @ 275 SWDs			0.75		1.08

36. RAC considers that there could be an essential need relating to the equestrian breeding enterprise by the end of the three year Business Plan however it will be marginal and further information is still required regarding the sows and farrowing.

Financial Sustainability

37. 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.
38. 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.
39. 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.
40. The applicants' Business Plan provides details of the planned enterprises being production of eggs, goat breeding and stud services, equine breeding, store lamb finishing and pig breeding with progeny reared and finished.
41. From the projections provided, RAC is unable to conclude whether the business plan has been planned on a sound financial basis as the variable and fixed costs have not been fully considered and the income from livestock is unknown due to the livestock numbers for each year being unknown.
42. RAC recommended that the Council request cashflow projections for the three year period which will better demonstrate if the business will be viable by the end of the three year plan period and whether it can afford the notional costs detailed above.
43. No further details of annual cashflow projections across the three years have been provided in the emails to the Council and it is noted that there will be one less foal for sale in Year 1 than originally proposed in the Business Plan which will reduce the income by at least £3,500.

44. It is unknown how and why the income is anticipated to increase by £10,000 between Years 2 and 3 of the Business Plan.
45. RAC would note that minimum wage for a full-time worker is currently £26,860 per annum however this is increasing from 1 April 2026 to £27,960 per annum.
46. RAC would note that if the Council were minded to approve the planning application for a temporary rural worker's dwelling then the applicants' business plan and developing mixed livestock enterprises would be thoroughly tested over the next three years.
47. However, the applicants need to be aware that if approval were to be granted for a temporary dwelling, then full financial information and detailed farm 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.
48. This information would be fully scrutinised and the applicants' agricultural business will have to have demonstrated that it is profitable, financially viable and sustainable.
49. In the event that at the end of the three year time period the applicants' agricultural 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

50. A search of Rightmove on 16 March 2026 displays 4 properties for sale within ½ mile of the application site postcode (RH13 0QR) which RAC would consider beyond the affordability of a rural worker and beyond sight and sound of the horses and livestock kept on site.

The screenshot displays four property listings from Rightmove. Each listing includes a main image, a smaller inset image, the property address, type, bedrooms, bathrooms, distance from the application site, guide price, and contact information.

- Five Oaks Road, Slinfold, RH13**: Detached Bungalow, 4 bedrooms, 2 bathrooms, 0.26 miles. Guide price £850,000 - £875,000. Added on 21/02/2026 by Mansell McTaggart, Horsham.
- Five Oaks Road, Slinfold, RH13**: Detached, 4 bedrooms, 3 bathrooms, 0.35 miles. Guide price £1,150,000 - £1,250,000. Reduced on 09/12/2025 by Mansell McTaggart, Horsham.
- Five Oaks Road, Slinfold, RH13**: Detached, 6 bedrooms, 3 bathrooms, 0.25 miles. Guide price £1,250,000. Added on 10/10/2025 by Hamptons, Horsham.
- Lyons Road, Slinfold, Horsham, West Sussex**: Equestrian Facility, 6 bedrooms, 4 bathrooms, 0.29 miles. Guide price £2,250,000. Added on 04/02/2026 by Strutt & Parker, Covering Horsham.

Availability of Land

51. As the submission documents did not detail the extent of the land holding this did not form part of RAC's earlier appraisal.

52. The applicants propose the re-establishment of the smallholding with a mixed livestock and equestrian enterprise from the site which extends to 2.58 hectares.
53. RAC would note the following stocking for each animal proposed and the required area based on the numbers proposed in the email to the Council dated 16 March 2026:
- 3 broodmares foaling each year
 - 2 per hectare – require 3 hectares to support foal and youngstock
 - 30 goats
 - 10 per hectare – require 3 hectares
 - 50 ducks
 - 4,000 per hectare – requires 0.0125 hectares
 - 30 quail
 - 2,000 per hectare – requires 0.015 hectares
 - 4-5 geese
 - 5-10 per hectare – requires 0.5 hectares
 - 300 chickens
 - 2,500 per hectare – require 0.12 hectares
 - 2 pigs
 - 30 per hectare – require 0.06 hectares but this does not take into account the piglets retained for rearing and finishing. Could increase to 0.5 hectares requirement when both sows have farrowed.
 - 10-15 store lambs purchased for finishing each year
 - 55 per hectare – require 0.27 hectares
54. Using these requirements detailed within DEFRA or RSPCA guidance and codes of welfare, the total land requirement for the applicant's proposed enterprises by the end of Year 3 of the Business Plan would be 6.97 hectares, which is 4.39 hectares more than the application site size.
55. RAC would note that there is no information of poultry housing provided in the submission documents, but this would be required to comply with any enforced statutory housing requirement due to an avian influenza outbreak within a control zone.
56. RAC suggest the Council seek further details on the applicants' proposed grassland and paddock management to meet the stocking requirements of the various enterprises.

Conclusion

57. The applicants propose the temporary siting of a mobile home for a period of three years.
58. The proposed dwelling would be occupied by a full-time rural worker, being Mr or Mrs Bell, who provide the daily management, supervision and care for all horses and livestock on site.
59. RAC considers there could be a marginal justified essential need for a full-time worker to reside on site to meet the needs of the horses and livestock by the end of the three year business plan.
60. The applicants have provided a Business Plan with anticipated income and costs for the three year business plan. RAC would still suggest that the Council request a cashflow forecast with more detailed projections for the three years with evidence for the output and direct costs calculations.
61. RAC is not aware of any other residential dwellings in the immediate locality that are suitable and available and would meet the potential essential need.
62. RAC have concerns regarding the availability of land for the proposed enterprises and recommend the council seek further clarification or information.

63. RAC considers that the proposal for the temporary siting of a rural worker's dwelling at the application site is not compliant with national and local planning policy.

I hope these comments are helpful.

Yours sincerely

Olivia Wojniak