



**READING
AGRICULTURAL
CONSULTANTS**

Gate House
Beechwood Court
Long Toll
Woodcote
Reading RG8 0RR
Tel: 01491 684 233
rac@reading-ag.com
www.reading-ag.com

Your Ref: DC/26/0471
Our Ref: 11141-dh

28 July 2026

For the attention of Daniel Holmes

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

Dear Mr Holmes,

Site: Winterfields Farm, Golf Club Lane ,Wiggonholt, Pulborough, West Sussex, RH20 2EN.

Application: DC/26/0471

Proposal: Change of Use for the stationing of a mobile home on the site for a temporary period of 5 years in which to accommodate a rural worker.

Thank you for your instruction dated 11 June 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 Planning Statement (dated December 2025) prepared by the applicant's agent, Batcheller Monkhouse, and the associated plans and application form.

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

RAC have also been provided with further details of the applicant's farming business and financial statements for Winterfields Farm Limited for the years ending 30 April 2023 to 30 April 2025.

Background

1. The applicant, Mr Michael Sadler, owns and lives at Winterfields Farm which extends to 18.2 hectares (45 acres) of grassland and comprises 14 stables.
2. The applicant, trading as Winterfields Farm Ltd, owns Winterfields Farm, Ashington Farm and Ashleigh House Stud.
3. Ashington Farm extends to 52.6 hectares (130 acres) of pasture used for producing hay and haylage followed by over winter sheep keep. Any fodder not consumed by horses at Ashleigh House Stud or Winterfields Farm is sold.
4. Ashleigh House Stud is owned by the applicant and his son, Clive Sadler. Clive operates a steeplechase racing yard on the 12.1 hectares (30 acres) site which comprises 42 stables with



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ancillary horse walker and storage barns. It is detailed that the facilities at Winterfields Farm are more modern and larger and therefore better equipped to accommodate sick and injured horses.

5. The applicant grazes sheep and keeps part-livery horses on site alongside 'turning away' (temporary period of rest and recuperation) of the racehorses trained at Ashleigh House (also under the applicant's ownership).
6. The Planning Statement details that as part of the livery tasks, the applicant is responsible for feeding horses, mucking out the stables and turning out/bringing in horses from the fields. The racehorses are on site for rest and recuperation following the racing season and will require daily checks and veterinary treatments.
7. The applicant previously kept a flock of breeding ewes on site however now only store lambs are overwintered on site (number unknown).
8. The Planning Statement details that the applicant, Michael Sadler, is beyond retirement age and whilst still significantly involved in operating Winterfields Farm and Ashleigh Stud he now requires physical help, particularly at the application site.
9. This application proposes the temporary siting of a rural worker dwelling for 5 years to provide accommodation for a worker who will assist the applicant with the physical livery tasks on the holding.

Relevant Planning Policies

10. National planning policy guidance for development in the countryside is set out in the National Planning Policy Framework (NPPF) updated in December 2024.
11. 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.
12. 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.
13. 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..."

14. 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...”*
15. 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...”
16. 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;...”*
17. 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’?
18. 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;*
19. 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.”*
20. 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.”*

21. 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

22. 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 operates a well-established equestrian business with horses on part-livery and racehorses on rest and recuperation following the racing season.
23. The applicant considers that a temporary rural dwelling on site to house a rural worker 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.
24. 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.
25. 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 applicant and his appointed deputy.
26. 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.”

27. 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.
28. In the case of the applicant's established equestrian enterprise at the application site, it is considered and accepted by RAC that the essential needs for the horses on site arise from:
- 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;
 - 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.
 - the provision of security for animals from theft or malicious attack; and
 - dealing promptly with unforeseen emergencies.
29. For the benefit of the Council, the labour requirements for the applicant's equestrian enterprise can be calculated using Standard Worker Days (SWD) data from the Equine Business Guide (8th Edition). For each full-time worker, the SWD equivalent is 278 days.
30. There is no standard labour calculation for the 'turned away' racehorses and the number to be 'turned away' at a time is unknown. A horse on grass livery would require 2 SWDs however it is accepted by RAC that many of the horses will be receiving additional treatments. Therefore, an average of 15 horses 'turned away' are considered to be appropriate on part livery.

Horse	SWDs	Size	Total SMDs
Part Livery	38	14	532
Turned Away Racehorses	19	15	285
Total			817
40% reduction for 11-20 horses			326.8
Total			490.2
Full-time workers			1.76

31. RAC accepts that there would be a continued and justified essential need for a rural worker to be on site to provide 24-hour supervision in order to support and manage an enterprise of this scale and nature and to ensure that horse welfare is not compromised.
32. This is currently being met by the applicant, Michael Sadler, however he now requires assistance with the physical livery tasks on the site.

Financial Sustainability

33. 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.
34. 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.
35. 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.
36. The applicant trades as Winterfields Farm Ltd and it is detailed in an email from the agent to the Council (dated 14 July 2026) that Winterfields Farm is the base for the applicant's agricultural and equestrian enterprises alongside the commercial portfolio which includes the letting of freehold land and buildings at the farm.
37. It is detailed that the farming and equestrian element of Winterfields Farm Ltd is not included in the provided accounts and that the accounts include the employment of two full-time workers however they are primarily involved in the management of the commercial properties.
38. The turnover for Winterfields Farm Ltd includes equipment hire, rents received and racing income. The Planning Statement details that the applicant operates a crane hire business and therefore RAC assumes the equipment hire income relates to the crane hire.
39. It is accepted that the net profit of Winterfields Farm Ltd can afford to employ a rural worker to assist Mr Sadler with the agricultural and equestrian activities on site however the accounts provided do not show the viability or sustainability of the applicant's agricultural or equestrian enterprises.
40. As such RAC is unable to comment on the financial viability or sustainability of the rural enterprises however it is accepted that as this planning application is for the temporary siting of a rural worker dwelling the submitted accounts are able to meet the notional costs.

Other Dwellings

41. A search of Rightmove on 21 July 2026 displays two properties for sale within ½ mile of the application site postcode (RH20 2EJ). The closest property advertised for sale is located on Tudor Close, 0.34 miles from the application site, which RAC would consider beyond the affordability of a rural worker and beyond sight and sound of the horses kept on site.



Conclusion

42. The applicant proposes the temporary siting of a mobile home for a period of five years.
43. The proposed dwelling would be occupied by a full-time rural worker, being the applicant's appointed deputy , who will provide the daily management, supervision and care for all horses on site.
44. The mobile home is proposed to be sited opposite the existing stable building.
45. RAC considers there is a justified essential need for a full-time worker to reside on site to meet the needs of the horses kept on site.
46. The applicant has provided a copy of the financial accounts for Winterfields Farm Ltd which demonstrate that the net profit can meet the financial test and the costs of employing a rural worker to assist Mr Sadler in the day-to-day care and management of the horses on site.
47. 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.
48. RAC considers that the proposal for the temporary siting of a rural worker's dwelling for a five year period at the application site is compliant with national and local planning policy.

I hope these comments are helpful.

Yours sincerely

Olivia Wojniak