



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/26/1066
Our Ref: 11086-dh

8 September 2026

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/26/1066
Proposal: Sitting of a static caravan as a temporary rural workers dwelling (Retrospective).

Thank you for your instruction dated 30 July 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, a three year cashflow forecast, the associated plans and application form.

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

RAC were instructed to appraise an earlier application DC/25/2809 (RAC ref 11045-dh dated 6 March 2026 with additional comments provided on 17 March 2026).

On 6 March RAC 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.



Reading Agricultural Consultants Ltd

Registered Office as above

Company No. 3282982

Registered in England



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.

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."

On 17 March 2026 following the submission of some additional information RAC 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 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.

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.

RAC have concerns regarding the availability of land for the proposed enterprises and recommend the council seek further clarification or information.

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."

Background

1. The applicants, Mr and Mrs Bell, own the application site which extends to 2.58 hectares (6.37 acres) and it is detailed in the Planning Statement that the site comprises established paddocks, stabling, agricultural buildings, storage areas and associated equestrian infrastructure.
2. The AJS details that the applicants currently keep the following horses and livestock on site:
 - 3 broodmares (all in foal);
 - 3 youngstock in training;
 - 20 goats; and
 - 10 poultry.
3. The applicants intend to develop their equestrian breeding and livestock enterprises on site.

4. 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).
5. An 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.
6. 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.
7. The Business Plan also refers to diversified income through sale of manure and agricultural services but no additional details are provided of any sales or services.
8. 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

9. 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.
10. 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

11. National planning policy guidance for development in the countryside is set out in the National Planning Policy Framework (NPPF) updated in August 2026.
12. The National Planning Policy Framework places a presumption in favour of sustainable development at the heart of the planning system. Policy S3 - Presumption in Favour of Sustainable Development provides that decisions on development proposals should apply this presumption. This means that:
 - development proposals within settlements should be considered against Policy S4;
 - development proposals outside settlements should be considered against Policy S5; and
 - in all locations, proposals that accord with an up-to-date development plan and the national decision-making policies in the Framework should be approved without delay.
13. Policy DM3 - Determining Development Proposals requires local planning authorities to work with applicants in a positive and proactive manner, seeking solutions to problems arising from initial proposals where necessary, taking a proportionate approach to the planning matters raised, considering whether otherwise unacceptable proposals can be made acceptable

through planning conditions or obligations, and not refusing applications which should clearly be approved having regard to the development plan, the Framework and other material considerations.

14. The objective of Chapter 4 of the Framework is to promote sustainable patterns of development, including enabling development which supports the rural economy and rural communities while safeguarding the intrinsic character and beauty of the countryside.
15. Within this context, Policy S5 - Principle of Development Outside Settlements recognises that certain forms of development should be approved outside settlements where the benefits are not substantially outweighed by adverse effects. These include development for rural businesses and services where a countryside location is necessary, the reuse, extension or replacement of existing buildings, the redevelopment of previously developed land, and limited infilling within groups of houses.
16. Policy HO8 - Isolated Homes in the Countryside continues the long-established approach of resisting isolated new homes in the countryside unless specified exceptions apply. One such exception is where there is an essential need for a rural worker, including someone taking majority control of a farm business, to live permanently at or near their place of work in the countryside.
17. Chapter 7 - Building a Strong, Effective Economy seeks to ensure that planning decisions support economic growth.
18. Policy E1 - Supporting Economic Growth requires planning policies and decisions to create the conditions in which businesses can invest, expand and adapt, and confirms that significant weight should be given to supporting economic growth and productivity, taking account of local business needs and wider opportunities for development.
19. Policy E2 - Supporting a Prosperous Rural Economy states that planning policies and decisions should enable:
 - a) the sustainable growth and expansion of all types of business in rural areas, including through the conversion of existing buildings and well-designed new buildings;
 - b) the development and diversification of agricultural and other land-based rural businesses; and
 - c) sustainable rural tourism and leisure developments which respect the character of the countryside and contribute to local prosperity.
20. 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?*'
21. 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;*
22. It further notes that: "*Employment on an assembly or food packing line, or the need to accommodate seasonal workers, will generally not be sufficient to justify building isolated rural dwellings*".

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 are developing an equestrian breeding and mixed livestock enterprise at the application site.

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 in the rural area.
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’ developing equestrian and livestock enterprises at the application site, the essential needs could 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 broodmares 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 (May 2026), John Nix Pocketbook (2026) 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	0.006	10	0.06	300	18
Quail	0.017	Unknown	0	50	0.85
Ducks	0.06	Unknown	0.06	20	1.2
Seasonal geese	0.4	Unknown	0.4	5	2
Store lambs	0.19	Unknown	0	15	2.85
Goats	0.5	20	20	30	15
Sows	1.88	2	3.78	Unknown	0
Rearing and Finishing Pigs	0.14	Unknown	0	Unknown	0
Broodmares	76	3	228	3	228
Foal (0-1yo)	35	3	105	3	105
Sub Total			356.84		340
30% Reduction for economies of scale			99.9		99.9
Sub Total			256.94		273
15% management and maintenance			38.54		40.95
Total			295.48		313.95
Full-time workers @ 275 SWDs			1.07		1.14

36. RAC considers that there could be an essential need relating to the equestrian breeding enterprise, however it is recommended that the Council seek clarification from the applicant/agent regarding the size of the livestock enterprises within the three year Business Plan which will add to the essential need for a resident rural worker.

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, sheep breeding and pig breeding with progeny reared and finished.
41. The Business Plan and Cashflow Projections have now considered some operating costs but does not appear to have taken into account the cost of purchasing the livestock associated with the increasing stock numbers over the three year period.
42. 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 being unknown.
43. RAC recommend that the Council request further details relating to the cost of sales, mainly livestock purchases, which will better demonstrate if the applicants' business will be viable and sustainable by the end of the three year plan period and whether it can afford the notional costs detailed above.
44. RAC would note that minimum wage for a full-time worker is currently £27,960 per annum.
45. 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.
46. 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.
47. This information would be fully scrutinised and the applicants' agricultural business will have to have demonstrated that it is profitable, financially viable and sustainable.
48. 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

49. A search of Rightmove on 4 September 2026 displays 5 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.



Lyons Road, Slinfold, Horsham, West Sussex

Equestrian Facility 6 4

0.29 miles

A Grade II listed equestrian property with detached granary, pool, stabling, outbuildings and 6.4 acres

Added on 04/02/2026

£2,250,000 PREMIUM LISTING

Strutt & Parker 01403 912671 Local call rate Contact Save



Lyons Road, Slinfold, Horsham, West Sussex, RH13

Detached 8 4

0.47 miles

A versatile family home set in beautiful semi rural surroundings.

Reduced yesterday

£1,695,000 Guide Price

savills 01798 301451 Local call rate Contact Save



Lyons Road, Slinfold, RH13

Detached 4 2

0.30 miles

A generously proportioned four-bedroom detached family home occupying an idyllic and private position, set within approximately 1.4 acres of gardens, small pasture field and woodland. Approached via a long private driveway, the setting offers superb seclusion whilst having easy...

Added on 23/06/2026

£1,250,000 Guide Price WITH LAND

Henry Adams 01403 333828 Local call rate Contact Save



Five Oaks Road, Slinfold, RH13

Detached 4 3

0.35 miles

Guide price £1,000,000 - £1,100,000 An exceptionally versatile and spacious 4 bedroom detached house of 3,197 sq ft with optional downstairs bedroom suite, large driveway, garaging, occupying a hugely private and secure 1.40 acre plot and offered to the market with no onward chain.

Reduced on 18/03/2026

£1,000,000 Guide Price

MANSELL MORGAN 01403 912652 Local call rate Contact Save



Five Oaks Road, Slinfold, RH13

House 4 2

0.46 miles

OPEN HOUSE - Saturday 5th September. A beautifully presented and extended four-bedroom farm cottage, set along a shared private driveway in a highly sought-after semi-rural location.

Reduced on 21/08/2026

£700,000 Guide Price NO CHAIN

Henry Adams 01403 333828 Local call rate Contact Save

Conclusion

50. The applicants propose the temporary siting of a mobile home at the application site for a period of three years.
51. The proposed temporary 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.
52. RAC considers there is currently not a justified essential need for a full-time worker to reside on site to meet the needs of the horses and livestock.
53. The applicants have provided a Business Plan with anticipated income and costs for the three year business plan. RAC suggests that the Council request more details for the Cashflow Projections which would include cost of sales and the livestock purchases.

54. 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.
55. 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