



READING AGRICULTURAL CONSULTANTS

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Your Ref: DC/26/1336
Our Ref: 11217-bt

29 September 2026

For the attention of Bethan Tinning

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

Dear Ms Tinning,

Site: Princes Barn, Adversane Lane, Broadford Bridge, West Sussex.
Application: DC/26/1336
Proposal: Erection of temporary single storey rural workers dwelling and agricultural building.

Thank you for your instruction dated 8 September 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 (undated) and Business Plan (undated) which includes a three year cashflow forecast prepared by the applicant's agent, Glencairn Ltd, 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 notes that at the time of writing this appraisal a Prior Notification application for the erection of a storage building (DC/26/1345) is awaiting a decision by the Council.

Background

1. The application site extends to 38.44 hectares (95 acres) of grassland. RAC considers that the submitted Location Plan does not show the full extent of the holding.
2. The applicant, Mr Rodd Vodden, operates a fallow deer breeding enterprise and the Planning Statement details that there are currently 140 fallow deer on site and considers that there is now a requirement to live on site to meet the welfare requirements of the fallow deer.
3. It is unknown if the 140 fallow deer are all hinds or if it includes any calves, youngstock or stags.
4. The building proposed within this application will provide secure storage for machinery and equipment. RAC notes that this proposed building duplicates the building proposed in the Prior Notification application (DC/26/1345).



Reading Agricultural Consultants Ltd

Registered Office as above

Company No. 3282982

Registered in England



5. RAC is unsure whether the proposed building will be utilised for safe handling of the fallow deer.
6. The Business Plan details that the applicant intends to maintain a herd of 140 fallow deer with scope for gradual expansion however the increase in stock numbers is unknown. It details that the breeding herd will mature over the three year period which will increase the income sources through venison sales, breeding stock sales, cull animals and ancillary agricultural income. The ancillary income is not detailed.
7. It is detailed that venison will be sold into the commercial market through wholesale and retail markets. It is unknown what age the applicant intends to rear the deer to for finishing and slaughter but RAC is aware of other deer farms rearing calves to 15-18 months old.
8. It is noted that the applicant will retain selected breeding females and breeding stags to improve herd genetics with surplus breeding stock sold to other deer farms.
9. It is unknown how long the applicant has been farming the fallow deer herd at its current size and why the applicant now considers that there is a need to reside on site.

Proposal

10. The application before the Council proposes the temporary siting of a three-bed mobile home for a period of three years and the erection of an agricultural storage building.
11. The mobile home will provide accommodation for the applicant and as such it will be occupied by a rural worker.
12. The storage building measures 23m x 18m (414m²) and has an eaves height of 5m and ridge height of 6.9m and is accessed via a roller shutter door on the western elevation.

Relevant Planning Policies

13. National planning policy guidance for development in the countryside is set out in the National Planning Policy Framework (NPPF) updated in August 2026.
14. 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.
15. 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.
16. 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.

17. 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.
18. Policy HO11 - 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.
19. Chapter 7 - Building a Strong, Effective Economy seeks to ensure that planning decisions support economic growth.
20. 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.
21. 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.
22. Planning Practice Guidance titled 'Housing Needs of Different Groups' (May 2021) 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?*'
23. 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;*
24. 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*".
25. 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."*

26. 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."*

27. 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

Essential Need

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 is operating and developing a fallow deer breeding herd.
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 livestock 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 in the rural area.

31. The Code of recommendations for the welfare of farmed deer (2023) notes that:

“All stockmen should be familiar with the behaviour of deer and must be competent in their handling and management to safeguard the welfare of the herd and individual animals...”
and

“Badly managed deer do not thrive and the stockman needs to watch for signs of disease or distress. The good stockman will be able to recognise trouble at its early stages and may be able to identify the cause and put matters right immediately. If the cause is not obvious, or if the stockman’s immediate action is not effective, veterinary or other expert advice should be obtained as soon as possible. ...”

32. 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.

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. An assessment of the existing essential need has been provided in the Planning Statement and these can be summarised as follows:

- the close supervision of hinds at calving time;
- the close supervision of all growing livestock and carrying out of stock tasks when necessary to maintain health of stock; and
- dealing promptly with any unforeseen incidents which can occur at any time of day or night.

35. In addition, it notes there may be additional welfare requirements relating to the rutting season (mating) from August to mid November, calving period from May to June and weaning at the end of August each year.

36. RAC would note that the issue of security is also now acknowledged by the Police and Insurers to be an increasing problem in rural areas and outlying units, especially where buildings, machinery and livestock, are at risk of theft, vandalism or fire. It is accepted that additional emergencies may occur from time to time which includes animals escaping, where immediate action is required to prevent accidents.

37. The Planning Statement notes for an implied herd size of 125 deer there is a labour requirement of 15 hours per deer per year (1.87 SWDs).

38. RAC considers that for the 140 deer the labour requirement can be calculated as 261.8 SWDs (140 x 1.87) before management and maintenance. With a 15% allowance for management and maintenance the labour requirement can be calculated as 301.07 SWDs or 1.09 full-time workers.

39. RAC considers that there is an essential need for at least 1 full-time rural worker to reside on site to meet the welfare needs of the livestock at Princes Barn.

Financial Sustainability

40. 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.
41. 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.
42. 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.
43. The submitted Business Plan and Cashflow Projections shows income through venison, breeding stock, cull animals and ancillary income increasing over the three year period.
44. The number of deer being finished or sold for breeding each year is unknown from the submission documents, but it is noted that the Cashflow Projections show sales doubling between years 1 and 3 which RAC assumes is due to an increase in the number of retained breeding and finishing stock over the 3 year period.
45. From the projections provided, RAC considers the business plan has been planned on a sound financial basis and the projections details that the net profit will be able to meet the notional costs in Year 2 of the Business Plan.
46. RAC would note that minimum wage for a full-time worker is currently £27,960 per annum.
47. 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 fallow deer enterprise would be thoroughly tested over the next three years.
48. However, the applicant needs 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.
49. This information would be fully scrutinised and the applicant's fallow deer agricultural business will have to have demonstrated that it is profitable, financially viable and sustainable.
50. In the event that at the end of the three year time period the applicant's 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

51. A search of Rightmove on 28 September 2026 displays no properties for sale within ½ mile of the application site (the closest postcode being RH14 9EG). The closest property is advertised as 0.54 miles away however this property is in fact 1 mile from the application site which RAC would consider beyond the affordability of a rural worker and beyond sight and sound of the livestock kept on site.



Stane Street, Adversane

Terraced
2
1

0.54 miles

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Agricultural Barn

52. RAC notes that the Planning Statement submitted with this application is the same as the pending prior notification application for DC/26/1345. RAC notes the prior notification was due for decision on 17 September 2026 but has an agreed expiry date of 15 October 2026.
53. RAC has been asked to assess the proposed storage building.
54. The building measures 23m x 18m (414m²) and has an eaves height of 5m and ridge height of 6.9m and is accessed via a roller shutter door on the western elevation.
55. It has been designed to provide storage for machinery, livestock equipment, handling equipment, fencing materials, maintenance equipment, feed and a workshop area.
56. RAC accepts that it is advisable to store agricultural machinery under cover to protect it from the elements of the weather. It protects machinery from corrosion and in particular damage to any moving parts and therefore minimises maintenance requirements and periods of downtime.
57. It is generally considered within the industry that an additional 25% to 30% of machinery storage space is acceptable within a building to allow for the safe manoeuvring and handling of agricultural machinery within the building.
58. The exact machinery and equipment to be stored within the building has not been detailed however RAC considers the building is appropriately designed for agricultural storage and its proposed use.

Conclusion

59. The applicant proposes the temporary siting of a mobile home at the application site for a period of three years.
60. The proposed temporary dwelling would be occupied by a full-time rural worker, being Mr Vodden (the applicant), who provides the daily management, supervision and care for all livestock on site.
61. RAC considers there is a justified essential need for a full-time worker to reside on site to meet the needs of the livestock.
62. The applicant has provided a Business Plan with anticipated income and costs for the three year business plan which RAC considers has been planned on a sound financial basis.
63. RAC is not aware of any other residential dwellings in the immediate locality that are suitable and available and would meet the essential need.
64. 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.

65. RAC considers the proposed agricultural building is appropriately designed for the purposes of secure agricultural storage for machinery and livestock feed.

I hope these comments are helpful.

Yours sincerely

Olivia Wojniak