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Your Ref: DC/26/0648
Our Ref: 11113-hd

18 June 2026

For the attention of Hannah Darley

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

Dear Ms Darley,

Site: Jendens Farm, Smithers Hill Lane, Shipley, West Sussex, RH13 8PP.
Application: DC/26/0648
Proposal: Retention and completion of partially constructed cabin (in place of a mobile home now removed) to be used as groom / farm workers accommodation.

Thank you for your instruction dated 13 May 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, Design and Access Statement (PDAS) (dated April 2026) prepared by the applicant's agent, NJA Town Planning Ltd, and the associated plans and application form.

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

Background

1. The applicants, Mr and Mrs Driscoll, own the application site which extends to 48.96 hectares (121 acres) and comprises the farmhouse, barns and outbuildings, bull pens, stables and associated equestrian facilities and an office building.
2. The site benefits from a historic permission (DC/10/0723) which granted the siting of the mobile home known as 'Cabin 1' which required the removal of the mobile home by 15 September 2011. It is understood that this cabin has not been removed and has remained on site in excess of 10 years.
3. This application relates to 'Cabin 2' which the PDAS details that this mobile home has been removed and replaced by the partially constructed cabin. It is detailed that 'Cabin 2' was in situ for in excess of 10 years prior to the removal and replacement of the current cabin.
4. The PDAS details that the cabin will be used as a groom/farm worker's accommodation replacing the current unauthorised rural workers dwelling provided by 'Cabin 2'.



Reading Agricultural Consultants Ltd

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Company No. 3282982

Registered in England



5. The partially constructed cabin will comprise two bedrooms, two bathrooms, a kitchen and living room which will provide accommodation for a rural worker.
6. The agricultural or equestrian activities on site and the role of the rural worker within the applicants' business is unknown.
7. Whilst the satellite images show the cabin has been on site, the use of 'Cabin 2' as accommodation for a rural worker in excess of 10 years has not been demonstrated or detailed within the submission documents.

Relevant Planning Policies

8. National planning policy guidance for development in the countryside is set out in the National Planning Policy Framework (NPPF) updated in December 2024.
9. 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.
10. 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.
11. 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..."
12. 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..."*
13. 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..."
14. 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;...*

15. 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'?

16. 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;*

17. 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."*

18. 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."*

19. 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

20. 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 business activities of the applicants are unknown.
21. 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.
22. 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.”*
23. 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. It is unknown who is responsible for the duty of care of any animals kept at the application site.
24. 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.
25. In the case of the applicants’ enterprise there is no information submitted which detail the essential need and justification for a rural worker to reside on site.
26. Without any of these details it is not possible for RAC to conclude on whether the application meets the essential need tests as set out in the NPPF and Local Plan Policy 20.

Financial Sustainability

27. 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.
28. 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.
29. 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.
30. No information of the applicants' business has been submitted and therefore it is not possible for RAC to conclude on the financial sustainability of the enterprise.
31. RAC would require financial statements (which would be treated in confidence) or the last three trading years to be submitted to be able to comment on whether the business can demonstrate that it is sustainable and viable and likely to remain so.

Other Dwellings

32. A search of Rightmove on 16 June 2026 displays no properties for sale within ½ mile of the application site postcode (RH13 8PP).

Conclusion

33. Without full details of the agricultural or equestrian activities on site it is not possible for RAC to conclude if the applicants' proposal is compliant with the NPPF or Policy 20 of the Horsham District Planning Framework.

I hope these comments are helpful.

Yours sincerely

Olivia Wojniak