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Your Ref: DC/24/1958
Our Ref: 10696-jb

19 March 2025

For the attention of Jacques Burrowes
Horsham District Council
Albery House
Springfield Road
Horsham
West Sussex
RH12 "GB

Dear Mr Burrowes,

Site: **Gibbons Mill Farm, Gatefield Bungalow, The Haven, Billinghurst, West Sussex.**
Application: **DC/24/1958**
Proposal: **Demolition of existing dwelling and construction of replacement dwelling**

Thank you for your instruction dated 11 March 2025 requesting Reading Agricultural Consultants Ltd (RAC) comments on the above planning application.

The appraisal has been produced by Alan Bloor an Associate of RAC.

In preparing this desktop response I have had regard to:

- the application form and associated plans; and
- a Design and Access Statement.

I would note that the Council have previously instructed RAC on the following planning applications at Gibbons Farm:

DC/13/0535: 'Erection of an agricultural workers dwelling to replace temporary mobile home'. Approved 16 July 2013. (RAC Ref: 5899-BOD).

DC/10/0924: 'Temporary siting of a mobile home at dairy to accommodate a member of dairy staff'. Approved 7 July 2010. (RAC Ref: 4945-KT).

1. Gibbons Mill Farm is a 300 acre dairy farm owned and farmed by the applicant, Antony Adorian, trading as PM & A Adorian.

2. Gatefield Bungalow, the subject of this application, is a single storey three-bedroom dwelling occupied by a rural worker employed by the applicant on the dairy farm. The DAS indicates that the bungalow was built some 40 years ago

3. Gatefield Bungalow has an existing agricultural occupancy condition attached. The agricultural occupancy conditions have not been provided.

4. The applicant's proposal is to demolish the existing bungalow and replace it with a two storey three-bedroom rural worker's dwelling with an agricultural occupancy condition attached.

5. Details within the DAS suggest the floor area of the proposed replacement dwelling would have a marginal 3% increase in comparison to the existing bungalow on site.

6. The applicant's intention is that that current full-time rural worker and family residing in the existing Gatefield Bungalow would move into the new proposed dwelling on its completion. The existing Gatehouse Bungalow would be demolished on completion of the new dwelling.

7. The DAS notes that the new dwelling would be sited entirely within the established garden curtilage of the existing property.

8. The DAS notes that Gatefield Bungalow has been continually occupied by a full-time employee on the dairy farm for the past 40 years.

Relevant Planning Policies

9. National planning policy guidance for development in the countryside is set out in the National Planning Policy Framework (NPPF) updated in December 2024.

10. 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.

11. 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.

12. 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…".

13. 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…"

14. 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…"

15. 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;…"

16. 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'?

17. 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;*

18. 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."*

19. 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."*

20. Policy 26 of the Horsham District Planning Framework (excluding South Downs National Park) deals with countryside protection and enhancement and states:

"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."*

21. Policy 28 is concerned with Replacement Dwellings and House Extensions in the Countryside and notes:

"Outside the defined built-up areas, house extensions, replacement dwellings and ancillary accommodation will be supported if the development can be accommodated appropriately within the curtilage of the existing dwelling. In addition:

1. *Replacement dwellings will only be supported on a one for one basis and f it can be demonstrated that the property is not derelict.*
2. *Replacement dwellings should not be disproportionate to the size of the existing dwelling whilst extensions should also, and in addition, be in keeping with the scale and character of the existing dwelling. The cumulative impact of existing extensions will be taken into account…"*

Appraisal

22. The applicant proposes to replace an existing rural worker dwelling with a new rural worker dwelling with an attached occupancy condition. The existing rural worker dwelling would be demolished upon completion of the new dwelling.

23. The existing dwelling, Gatehouse Bungalow, is occupied by a full-time rural worker employed by the applicant on the dairy farm. On completion of the new dwelling, the full-time rural worker would relocate into the dwelling.

24. The total floor area of the new proposed three-bedroom two-storey dwelling is similar to the existing three-bedroom single storey dwelling.

25. It is evident that the applicant's proposal is for the one-for-one replacement of an existing lawful rural worker dwelling with occupancy conditions attached.

26. It is evident that there is a justified and continuing need to house a full-time rural worker on the applicant's dairy farm.

27. RAC has previously appraised an additional rural worker dwelling at Gibbons Mill Farm, which has been accepted by the Council.

28. Overall, RAC would accept that the applicant's proposal to replace and demolish an existing 40 year old permitted rural worker dwelling with a new rural worker dwelling with agricultural occupancy conditions attached is compliant with national and local plan policy.

I trust these comments are helpful in your deliberations.



Alan Bloor