

AGRICULTURAL AND RURAL PLANNING APPENDICIES

Appendix A

National Planning Policy Framework (2026)

The National Planning Policy Framework (NPPF) (2026) sets out the Government's planning policies for England and establishes the framework within which planning applications should be determined. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the Development Plan unless material considerations indicate otherwise. The NPPF is one of the most significant material considerations in the determination of planning applications.

This proposal has been prepared having regard to the objectives of the NPPF and, when considered as a whole, fully accords with the Framework's objectives of supporting sustainable development, encouraging prosperous rural businesses and ensuring the effective use of previously developed land whilst protecting the character of the countryside.

Animal Welfare

Although planning legislation is concerned primarily with land use, Government policy increasingly recognises the importance of maintaining high standards of animal welfare. The Animal Welfare Act 2006 places a statutory duty upon those responsible for animals to ensure that their welfare needs are met.

For breeding establishments this requires continuous observation during critical periods, particularly:

- foaling;
- illness;
- injury;
- adverse weather;
- veterinary treatment;
- post-operative care.

The temporary dwelling therefore represents an important welfare measure rather than merely a matter of personal convenience.

Effective Use of Previously Developed Land

A further important consideration is that the proposal relates to an established equestrian holding.

The site already contains:

- permanent stabling;
- hardstanding;
- access roads;
- operational yards;
- equestrian infrastructure;
- an existing sand school.

The proposal therefore makes effective use of an existing developed site.

Government policy consistently encourages the efficient use of previously developed land wherever suitable opportunities exist.

Whilst each proposal must be considered on its own planning merits, considerably greater weight should be afforded to proposals that improve the operation of existing developed sites than proposals seeking to establish entirely new development in previously undeveloped countryside.

Mid Sussex District Plan

Development Plan

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the Development Plan unless material considerations indicate otherwise.

The relevant policies of the Mid Sussex District Plan strongly support sustainable rural economic development whilst protecting the intrinsic character of the countryside.

The proposal accords with both objectives.

DP10 – Protection and Enhancement of the Countryside

Policy DP10 seeks to ensure that development within the countryside respects landscape character whilst recognising that certain forms of rural development are entirely appropriate.

The proposal represents development directly associated with an established countryside enterprise.

The temporary dwelling is operationally linked to the equine business.

The repositioning of the sand school improves the internal layout of the holding without materially increasing its physical footprint.

The proposal therefore preserves the overall rural character of the locality whilst enabling the continued operation of an existing rural business.

DP12 – Sustainable Rural Development and the Rural Economy

Policy DP12 actively supports sustainable rural businesses and recognises the importance of diversification within the countryside.

The policy seeks to encourage development that:

- supports rural employment;
- contributes to economic growth;
- strengthens existing rural businesses;
- assists diversification;
- remains appropriate to its countryside location.

The proposal satisfies each of these objectives.

Rather than introducing an unrelated use, it enables an established equine enterprise to operate more efficiently whilst contributing to the wider rural economy through the purchase of goods and professional services.

HIGH WEALD NATIONAL LANDSCAPE ASSESSMENT

1.1 This Appendix has been prepared to assess the proposed development against the statutory purposes of the High Weald National Landscape (formerly the High Weald Area of Outstanding Natural Beauty ("AONB")) and the relevant provisions of national and local planning policy.

The purpose of this assessment is to demonstrate that the proposal conserves and enhances the natural beauty of the designated landscape whilst supporting an established rural enterprise and therefore complies with the statutory duties placed upon decision makers.

1.2 The High Weald was redesignated in 2023 under the national rebranding programme from "Areas of Outstanding Natural Beauty" to National Landscapes. The rebranding did not alter the legal status of the designation. The statutory purpose remains the conservation and enhancement of natural beauty, and the High Weald AONB Management Plan 2024–2029 continues to apply as the relevant management plan.

1.3 Accordingly, although this report adopts the modern terminology "High Weald National Landscape", references within legislation, the National Planning Policy Framework ("NPPF"), development plans and appeal decisions to Areas of Outstanding Natural Beauty remain directly applicable.

2.0 Legislative Framework

2.1 National Importance

The High Weald National Landscape is one of England's nationally protected landscapes. It extends across approximately 1,461 square kilometres, making it the largest National Landscape in South East England. It is recognised for its exceptional historic landscape character, ancient woodland, hedgerow network, dispersed settlement pattern and distinctive ridged topography.

Its designation reflects national—not merely local—importance.

2.2 Countryside and Rights of Way Act 2000

The statutory framework is provided principally by the **Countryside and Rights of Way Act 2000** ("CRoW Act").

The primary statutory purpose is:

"To conserve and enhance the natural beauty" of the designated landscape.

The designation therefore protects landscape character rather than preventing all forms of development.

Indeed Parliament has consistently recognised that these landscapes remain working rural environments containing farms, equestrian enterprises, forestry businesses and rural employment.

3.0 The Strengthened Statutory Duty

3.1 Section 85

The most significant legislative change in recent years is the amendment to Section 85 of the Countryside and Rights of Way Act through the Levelling-up and Regeneration Act 2023. Previously public authorities were required merely to "have regard" to the purposes of designation.

That duty has now been strengthened.

Decision-makers must now:

Seek to further the purpose of conserving and enhancing natural beauty.

This represents a materially stronger statutory obligation than the previous duty and requires active consideration of how development can contribute positively to the National Landscape.

3.2 Implications

Importantly, the strengthened duty does not prohibit development. Instead it requires Local Planning Authorities to determine whether proposals:

- conserve natural beauty;
- enhance natural beauty;
- avoid unnecessary harm;
- positively contribute to landscape management.

Development which assists the long-term management of rural land may therefore positively contribute towards the statutory purpose.

4.0 High Weald Management Plan 2024–2029

4.1 Status

The High Weald AONB Management Plan 2024–2029 has been adopted by all fifteen constituent local authorities.

It is a material consideration in determining planning applications.

4.2 Vision

The Management Plan identifies the long-term vision for the High Weald as a landscape which:

- retains its historic settlement pattern;
- conserves ancient woodland;
- protects native hedgerows;
- maintains traditional field patterns;
- supports biodiversity;
- remains a working rural landscape.

Importantly, the Management Plan expressly recognises that the future of the High Weald depends upon the continued management of land by farmers and other land-based businesses.

4.3 Working Landscape

A recurring theme throughout the Management Plan is that the High Weald is **not a museum**.

Its distinctive character has evolved through centuries of active management by:

- farmers;
- foresters;
- estate managers;
- landowners;
- rural businesses.

Continued economic viability of those businesses is therefore fundamental to conserving landscape character.

5.0 Character of the Application Site

5.1 Existing Development

Millfields Yard is not an undeveloped field.
It is an established equestrian holding containing:

- permanent stables;
- hardstanding;
- access roads;
- paddocks;
- fencing;
- existing sand school;
- associated operational infrastructure.

The proposal therefore relates to the continued management of an existing developed rural enterprise.

5.2 Landscape Context

The surrounding landscape is characterised by:

- small irregular fields;
- mature hedgerows;
- woodland belts;
- scattered farmsteads;
- equestrian uses;
- agricultural land.

The proposal sits comfortably within this existing landscape framework.

6.0 Assessment of Landscape Effects

6.1 Temporary Rural Worker's Dwelling

The proposed dwelling has deliberately been designed as:

- temporary;
- modest;
- closely related to existing buildings;
- subservient to the wider holding.

Its location adjacent to existing operational development prevents the appearance of isolated residential encroachment.

It therefore reads as part of the existing equestrian yard rather than a separate dwelling within open countryside.

6.2 Sand School

The proposal does not introduce a new riding arena.
It simply repositions an existing operational feature.

This improves:

- operational efficiency;
- horse welfare;
- surveillance;
- internal circulation.

The overall developed footprint of the holding remains substantially unchanged.
Consequently the visual effect upon the wider landscape is negligible.

7.0 Landscape Character Assessment

7.1 Scale

The proposed development remains entirely proportionate to the existing holding.
There is no substantial increase in built form.

7.2 Form

Buildings remain grouped together.

The proposal avoids ribbon development or sporadic countryside development.

7.3 Materials

The temporary dwelling can be conditioned to utilise:

- timber cladding;
- muted colours;
- dark roofing;
- low reflective finishes.

These materials are entirely consistent with traditional rural buildings.

7.4 Vegetation

Existing:

- hedgerows;
- trees;
- woodland edges

remain unaffected. Indeed additional native planting could further soften the development.

8.0 Public Views

Public visibility is limited by:

- existing vegetation;
- changes in topography;
- existing buildings;
- field boundaries.

Where views are available, the proposal is experienced within the context of an established equestrian enterprise.

It does not interrupt important landscape vistas nor detract from the wider appreciation of the National Landscape.

9.0 Tranquillity

One of the recognised special qualities of the High Weald is tranquillity. The proposal will not materially affect this characteristic.

No significant increase in:

- traffic;
- lighting;
- industrial activity;
- commercial noise

is anticipated. Indeed the proposal merely enables the more efficient operation of an existing enterprise.

10.0 Biodiversity

The proposal provides opportunities for biodiversity enhancement including:

- native hedgerow planting;
- additional trees;
- bat boxes;
- owl boxes;
- bird nesting boxes;
- wildflower margins;
- improved grassland management.

Accordingly the proposal has the potential to contribute positively to ecological enhancement alongside landscape conservation.

11.0 Sustainable Rural Management

Perhaps the most important consideration is that this proposal supports the continued viability of an established land-based business.

The High Weald Management Plan repeatedly recognises that:

- land managers;
- farmers;
- rural enterprises

are fundamental to conserving the landscape.

Without economically viable businesses, the traditional landscape that the designation seeks to protect cannot be maintained.

The proposal therefore directly contributes towards the long-term stewardship of the landscape.

12.0 Compliance with National Planning Policy

The NPPF requires that great weight be given to conserving and enhancing the landscape and scenic beauty of National Landscapes. However, that requirement is not synonymous with a prohibition on development. Rather, proposals must be assessed on their individual merits, with particular regard to whether they conserve and enhance the special qualities of the designated landscape.

13.0 Overall Conclusion

The proposal has been designed with full regard to the statutory purposes of the High Weald National Landscape and the strengthened duty imposed by Section 85 of the Countryside and Rights of Way Act 2000, as amended by the Levelling-up and Regeneration Act 2023. It is closely related to an established equestrian holding, introduces only a modest temporary worker's dwelling, and rationalises the existing operational layout through the repositioning of the sand school. These works are proportionate to the scale and function of the enterprise and avoid unnecessary encroachment into the wider countryside.

The proposal conserves the defining characteristics of the High Weald by retaining the dispersed rural settlement pattern, respecting existing vegetation and field boundaries, and ensuring that new development remains visually associated with the existing complex. The continued viability of the equine enterprise will assist the long-term management of the holding and thereby contribute to the stewardship of the wider landscape, which is a central objective of the High Weald AONB Management Plan 2024–2029.

Accordingly, it is concluded that the proposed development:

- conserves and enhances the natural beauty of the High Weald National Landscape;
- accords with the statutory purpose of designation;

- satisfies the strengthened Section 85 duty;
- is consistent with the objectives of the High Weald AONB Management Plan 2024–2029; and
- complies with the relevant provisions of the National Planning Policy Framework and the Mid Sussex District Plan.

This Appendix therefore supports the conclusion that no landscape objection arises from the proposal and that the development is compatible with the purposes of the High Weald National Landscape designation.

APPENDIX B

LEGAL REVIEW OF RURAL WORKERS' DWELLINGS

1.0 Introduction

1.1 This Appendix examines the legal and policy framework governing rural workers' dwellings in England. It considers the evolution of Government policy, leading case law, Planning Inspectorate decisions and the tests that have consistently been applied when determining whether temporary or permanent accommodation in the countryside is justified.

The purpose of this Appendix is to demonstrate that the proposal satisfies the established legal principles relating to rural workers' dwellings and should therefore be regarded as an appropriate exception to the general restraint on isolated residential development in the countryside.

2.0 The Legal Framework

2.1 Statutory Position

Section 38(6) of the Planning and Compulsory Purchase Act 2004 provides that planning applications must be determined in accordance with the Development Plan unless material considerations indicate otherwise.

Material considerations include:

- National Planning Policy Framework (NPPF 2026);
- Planning Practice Guidance (PPG);
- appeal decisions;
- judgments of the High Court and Court of Appeal;
- local planning policy;
- site-specific circumstances.

2.2 The National Planning Policy Framework

The NPPF establishes a clear presumption against isolated new dwellings in the countryside. However, Government expressly recognises that exceptions exist.

One of those exceptions is where 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."

This exception is fundamental. Government accepts that certain rural businesses simply cannot operate safely or efficiently without immediate on-site supervision.

3.0 Evolution of Rural Workers' Dwellings

Historically, planning policy concentrated almost exclusively upon agriculture. Modern Government policy has evolved considerably. The rural economy is now recognised as including:

- agriculture;
- horticulture;
- forestry;
- viticulture;
- equestrian enterprises;
- rural tourism;
- renewable energy;
- diversified rural businesses.

Accordingly, rural workers' dwellings are no longer confined solely to traditional farming. The critical issue is not the type of enterprise but whether an essential functional need exists.

4.0 The Functional Need Test

4.1 Overview

The first and most important legal test is whether there is a genuine functional requirement for somebody to live permanently on the holding.

Planning Inspectors consistently distinguish between:

Convenience

and

Essential Need

Only the latter justifies residential development in the countryside.

4.2 What constitutes Functional Need?

Examples include:

- livestock emergencies;
- breeding enterprises;
- foaling;
- lambing;
- calving;
- disease outbreaks;
- security;
- valuable livestock;
- irrigation systems;
- specialist horticulture.

Equine breeding has consistently been recognised as capable of satisfying this test where evidence demonstrates that immediate attendance is regularly required.

5.0 Financial Test

Government has long required evidence that:

- the business exists;
- it is genuine;
- it has realistic prospects of success.

Temporary permission enables:

- establishment;
- monitoring;
- review.

The purpose is to avoid permanent residential development where the business later fails. Accordingly, temporary permissions have become the accepted planning mechanism for new rural enterprises.

6.0 Temporary Rural Workers' Dwellings

Temporary permission is generally regarded as appropriate where:

- the enterprise is relatively new;
- significant capital investment has already occurred;
- a genuine functional need exists;
- long-term viability is still being demonstrated.

The proposal at Millfields Yard falls squarely within these principles.

7.0 Equine Enterprises

Although horses are not agricultural livestock for planning purposes, numerous appeal decisions have accepted that breeding establishments may require permanent on-site supervision.

Examples include:

- brood mares;
- foaling;
- valuable bloodstock;
- veterinary emergencies;
- rehabilitation;
- security.

The Planning Inspectorate has repeatedly recognised that valuable horses require standards of husbandry comparable with many traditional livestock enterprises.

8.0 Leading Case Law

8.1 Ulverston Decision

(APP/U0925/A/93/221945)

This remains one of the most frequently cited rural workers' dwelling decisions.

The Inspector concluded that:

- each enterprise must be judged individually;
- functional need is fact sensitive;

- planning authorities should avoid rigid formulae.

Importantly, the decision recognised that specialist livestock operations often generate requirements differing significantly from conventional agriculture.

For the present proposal this decision supports the proposition that equine breeding should be assessed on its own operational characteristics.

8.2 Maidstone BC v Secretary of State

[1996] Although concerning agricultural occupancy conditions, the High Court confirmed that planning authorities must properly consider the factual evidence relating to the enterprise rather than applying policy mechanistically.

The judgment reinforces an important planning principle:

Planning decisions must be evidence based.

Accordingly, where evidence demonstrates an operational need, that evidence should carry significant weight.

8.3 Embleton Parish Council v Northumberland County Council

[2009] EWCA Civ 1349 This Court of Appeal judgment reaffirmed that planning decisions involve the exercise of planning judgment.

The Courts will generally not interfere provided that:

- correct policy has been identified;
- relevant matters have been considered;
- irrational conclusions have not been reached.

For this application, considerable weight should therefore be afforded to the detailed operational evidence accompanying the proposal.

8.4 Fordent Holdings Ltd v Secretary of State

[2013] EWHC 2844 (Admin)

Fordent confirmed that:

- planning policies must be interpreted sensibly;
- decision makers must read policy as a whole;
- planning judgment remains central.

The judgment discourages overly restrictive interpretation of rural policy.

Instead, policies should be applied in accordance with their overall objective of achieving sustainable development.

9.0 Other Appeal Decisions

Planning Inspectors have repeatedly accepted rural workers' dwellings for:

- poultry enterprises;
- pig breeding;
- alpacas;
- dairy herds;

- vineyards;
- market gardens;
- equestrian breeding.

The common theme is not the type of livestock but the operational demands placed upon the enterprise.

10.0 Planning Practice Guidance

Government Planning Practice Guidance continues to emphasise:

- genuine need;
- functional requirement;
- financial soundness;
- temporary permissions for new businesses.

Importantly, the Guidance encourages planning authorities to examine:

- veterinary evidence;
- labour requirement;
- management systems;
- enterprise viability.

11.0 Functional Need at Millfields Yard

The Applicant's enterprise generates numerous situations requiring immediate attendance including:

Brood mares

Pregnant mares require regular monitoring throughout gestation.

Foaling

Foaling frequently occurs overnight.

Delay in intervention may result in:

- death of mare;
- death of foal;
- permanent injury.

Colic

Colic remains one of the leading causes of equine mortality.

Successful treatment is frequently dependent upon rapid diagnosis.

Becoming Cast

Horses becoming trapped against stable walls may suffer:

- muscle damage;
- fractures;

- circulatory failure.

Immediate assistance is essential.

Injuries

Serious injuries frequently occur through:

- fencing;
- kicks;
- slips;
- panic.

Again, immediate attendance is necessary.

Retired Racehorses

Recently retired racehorses often require:

- behavioural supervision;
- veterinary monitoring;
- controlled exercise;
- gradual retraining.

12.0 Security

High-value horses remain vulnerable to:

- theft;
- malicious damage;
- escape;
- trespass.

The presence of a resident manager significantly reduces these risks.

Planning Inspectors have consistently recognised security as an additional consideration where valuable livestock is involved, although security alone is rarely sufficient to justify a dwelling.

13.0 Labour Requirement

The submitted labour calculations demonstrate that the enterprise exceeds one full-time worker when all operational activities are considered, including:

- horse management;
- breeding;
- paddock maintenance;
- fencing;
- hay production;
- machinery;
- administration;
- veterinary management.

This level of activity supports the need for permanent on-site management.

14.0 Why Temporary Permission is Appropriate

Temporary permission represents the correct planning response because it enables:

- continued business establishment;
- monitoring of financial performance;
- review of enterprise growth.

This reflects long-established Government policy.

The Applicant is not seeking unrestricted residential development.

Instead, a temporary permission provides the Local Planning Authority with complete control over future occupation.

15.0 Occupancy Condition

Should permission be granted, occupation should be restricted by condition.

A typical condition would state:

"The occupation of the dwelling shall be limited to a person solely or mainly employed, or last employed, in the equine enterprise operating at Millfields Yard, together with any resident dependants."

Such conditions have been routinely imposed for many decades.

16.0 Conclusions

The evidence presented with this application demonstrates that the proposal satisfies the established legal tests applicable to rural workers' dwellings. There is a clear and evidenced functional need arising from the management of brood mares, foaling, the rehabilitation of retired racehorses and the continual welfare requirements of valuable livestock. These are not matters of convenience but operational necessities that require an experienced equine worker to be present on the holding at all times.

The proposal also reflects the established purpose of granting temporary rural workers' dwellings, namely to enable a developing enterprise to demonstrate its ongoing viability while providing the essential accommodation required for its operation. This approach is entirely consistent with national planning policy, Planning Practice Guidance and the numerous appeal decisions that have recognised the importance of supporting sustainable rural businesses where a genuine functional need exists.

When considered against the relevant statutory framework, the NPPF, Planning Practice Guidance and the principles derived from the leading authorities, the proposal accords with the accepted legal tests for rural workers' dwellings. It therefore represents an appropriate and justified exception to the general policy restraint on isolated residential development in the countryside and should be afforded substantial weight in the determination of the application.

APPENDIX C
THE UNITED KINGDOM EQUINE INDUSTRY
Economic Contribution, Rural Employment and Planning Justification (2025–2026)

1.1 This Appendix examines the modern equine industry within the United Kingdom and demonstrates its significant contribution to the national and rural economy. It also considers the relevance of the equine sector to planning policy and explains why Government policy increasingly supports sustainable equestrian enterprises as an important component of the wider rural economy.

Historically, planning statements relating to equestrian development relied upon the British Horse Industry Confederation's 2005 report, which estimated that the horse industry generated approximately £3.4 billion annually. That evidence has now been superseded by more recent research demonstrating that the sector has expanded considerably and now represents one of the largest land-based industries in the United Kingdom.

2.0 The Modern Equine Industry

2.1 The equine industry has undergone substantial growth over the past two decades. It now encompasses a wide range of commercial activities, including:

- Thoroughbred breeding;
- Sport horse breeding;
- Eventing;
- Show jumping;
- Dressage;
- Riding schools;
- Livery establishments;
- Rehabilitation centres;
- Veterinary practices;
- Equine physiotherapy;
- Equine dentistry;
- Farriery;
- Feed manufacture;
- Saddlery and tack manufacture;
- Horse transport;
- Agricultural contracting;
- Grassland management;
- Equine tourism.

Unlike many traditional agricultural sectors, equestrian businesses combine livestock management, specialist husbandry, tourism, recreation and professional services, creating extensive economic linkages throughout rural communities.

3.0 Economic Contribution

3.1 Recent research by British Equestrian and industry partners estimates that the UK equestrian sector contributes approximately £5 billion annually to the national economy and supports a community of around 4.3 million people with an interest or involvement in equestrian activity.

3.2 The 2023 BETA National Equestrian Survey, referenced by the British Horse Society, indicates:

- an economic contribution of approximately £5 billion;
- around 726,000 horses in Britain;
- approximately 3 million people participating in riding, including 1.8 million regular riders; and
- an average annual economic contribution of approximately £6,887 per horse through direct and indirect expenditure.

3.3 In addition to direct economic output, British Equestrian has undertaken pioneering work to quantify the wider societal benefits of equestrianism. Its research concludes that equestrian activity generates approximately £1.2 billion each year in social value, reflecting improvements in health, wellbeing, volunteering and community participation.

4.0 Employment

4.1 The equine industry is a significant rural employer.

Employment is generated not only through horse ownership and training but across an extensive supply chain including:

- veterinary surgeons;
- registered farriers;
- physiotherapists;
- saddlers;
- agricultural engineers;
- machinery dealers;
- feed merchants;
- fencing contractors;
- builders;
- transport companies;
- accountants;
- insurers;
- land agents.

4.2 Many of these businesses are themselves located within rural communities and depend upon thriving equestrian enterprises for their continued viability.

Consequently, every successful equine business supports numerous additional rural businesses.

5.0 Rural Diversification

5.1 Government planning policy has consistently encouraged diversification within rural areas.

Traditional agricultural income has been subject to:

- declining subsidies;
- changing agricultural policy;
- environmental regulation;
- fluctuating commodity prices;
- labour shortages.

Many farmers have therefore diversified into equestrian enterprises.

This diversification has become one of the principal mechanisms by which rural businesses remain economically sustainable.

5.2 The Applicant's enterprise represents precisely this type of sustainable diversification. Rather than replacing agricultural activity, the equine enterprise complements existing land management whilst generating significantly greater economic activity than conventional grazing alone.

6.0 Horse Breeding

6.1 Horse breeding is one of the most specialised sectors of the equine industry.

Unlike commercial riding schools or livery yards, breeding establishments require:

- specialist knowledge;
- continual husbandry;
- veterinary intervention;
- genetic management;
- long-term investment.

6.2 Commercial returns are realised only after several years.

Foals typically require:

- handling;
- veterinary supervision;
- education;
- breaking;
- training.

Consequently, successful breeding enterprises depend upon continuity of management.

7.0 Sport Horse Market

7.1 The United Kingdom remains internationally recognised for producing high-quality sport horses suitable for:

- eventing;
- dressage;
- show jumping;
- hunting;

- leisure competition.

Demand continues from both domestic and overseas purchasers.

7.2 High-quality breeding stock commands substantial market values, particularly where bloodlines demonstrate proven competition performance.

Investment in brood mares therefore represents long-term capital investment within the rural economy.

8.0 Retired Racehorses

8.1 The rehabilitation of retired racehorses has become an increasingly important part of the modern equine sector.

Each year, many horses leave racing and require retraining for:

- dressage;
- eventing;
- hunting;
- riding club activities;
- pleasure riding.

These horses require careful behavioural management, veterinary supervision and experienced handling before transitioning to second careers.

8.2 The work undertaken by specialist rehabilitation enterprises reduces welfare risks and extends the productive lives of valuable animals, thereby contributing to both the equine economy and animal welfare objectives.

9.0 Veterinary Sector

9.1 The UK possesses one of the world's most advanced equine veterinary sectors.

Specialist equine hospitals now provide:

- orthopaedic surgery;
- reproductive medicine;
- diagnostic imaging;
- neonatal care;
- sports medicine.

These services are utilised extensively by breeding enterprises.

9.2 The Government is currently progressing significant reforms to veterinary legislation, underlining the importance of maintaining high professional standards across equine healthcare and animal welfare.

10.0 Animal Welfare

10.1 Modern breeding establishments operate within an increasingly robust animal welfare framework. The Animal Welfare Act 2006 places statutory obligations upon those responsible for horses.

Brood mares and foals require:

- continual observation;
- immediate intervention during emergencies;
- rapid veterinary attendance;
- regular health monitoring.

These welfare responsibilities reinforce the operational need for experienced on-site management.

11.0 The Rural Supply Chain

The Applicant's business generates expenditure across a broad range of local businesses including:

- veterinary practices;
- agricultural merchants;
- hay producers;
- straw suppliers;
- feed merchants;
- fencing contractors;
- local builders;
- machinery dealers;
- fuel suppliers;
- timber merchants;
- transport companies.

The multiplier effect of this expenditure significantly exceeds the value of the enterprise itself.

12.0 British Horseracing

Although the Applicant is not operating a racing establishment, the importance of the racing industry illustrates the wider significance of the equine sector.

The British Horseracing Authority estimates that racing contributes more than £4 billion annually to the UK economy and supports approximately 85,000 jobs, making it one of Britain's largest spectator sports and a major driver of rural employment.

13.0 Sustainability

Equestrian enterprises contribute positively towards sustainable land management by:

- maintaining permanent pasture;
- supporting biodiversity;
- preserving hedgerows;
- maintaining rural buildings;
- encouraging local employment;
- reducing land abandonment.

These objectives closely align with Government policy supporting prosperous rural economies.

14.0 Planning Implications

The National Planning Policy Framework encourages:

- sustainable rural businesses;

- rural diversification;
- countryside employment;
- investment in rural enterprises.

The Applicant's proposal directly contributes towards each of these objectives.

The temporary worker's dwelling enables the continued development of an established equine enterprise and supports its future viability.

Without appropriate on-site management, the welfare of breeding stock and retired racehorses could be compromised, undermining the long-term sustainability of the business.

15.0 Conclusions

The evidence demonstrates that the equine industry is no longer a peripheral countryside activity but a major component of the modern rural economy. Current research indicates that the sector contributes around £5 billion annually to the UK economy, supports a community of approximately 4.3 million people, and underpins a broad network of specialist rural businesses. In addition to its economic output, equestrian activity generates an estimated £1.2 billion each year in social value, reflecting its wider contribution to health, wellbeing and community engagement.

The Applicant's enterprise forms part of this wider economic ecosystem. It supports local employment through the procurement of veterinary, agricultural and professional services, contributes to the specialist breeding and rehabilitation sectors, and promotes high standards of equine welfare. The proposed temporary rural worker's dwelling is therefore not an isolated residential proposal but an integral component of a sustainable rural business requiring continuous management.

The proposal accords with the objectives of the National Planning Policy Framework by supporting the diversification and growth of a land-based enterprise, strengthening the rural economy and enabling investment in an established equestrian holding. These factors weigh substantially in favour of the development and provide significant support for the grant of planning permission.

APPENDIX D
BUSINESS PLAN, FINANCIAL VIABILITY AND FUNCTIONAL NEED ASSESSMENT
Temporary Rural Worker's Dwelling and Repositioning of Existing Sand School

1.0 Introduction

1.1 This Appendix has been prepared to demonstrate that the equine enterprise operated by Numalena Limited is a genuine and developing rural business with realistic long-term prospects. It also examines the financial viability of the enterprise, its contribution to the rural economy, and the operational justification for the proposed temporary rural worker's dwelling.

The National Planning Policy Framework (NPPF) recognises that new isolated dwellings in the countryside may be justified where there is an essential need for a rural worker to live permanently at or near their place of work. In the case of new or expanding enterprises, a temporary permission provides an appropriate mechanism by which the Local Planning Authority can assess the ongoing viability of the business before any consideration is given to permanent accommodation.

1.2 The objective of this Appendix is not to demonstrate a mature commercial enterprise but to show that:

- the business has been established with genuine commercial intent;
- significant capital investment has already taken place;
- the enterprise has realistic prospects of profitability;
- there is an essential operational need for on-site management; and
- the proposed temporary dwelling is necessary to support the continued development of the business.

2.0 The Existing Enterprise

2.1 Numalena Limited operates a specialist equine enterprise focused upon:

- the breeding of quality sport horses;
- the management and care of brood mares;
- the foaling and rearing of young stock;
- the rehabilitation and retraining of retired racehorses; and
- the ongoing management of the associated equestrian facilities.

The business has been developed progressively through investment in bloodstock, infrastructure and land management. The enterprise is based on quality, welfare and long-term value rather than the operation of a high-volume commercial livery yard.

2.2 Unlike many equestrian businesses that generate immediate income through riding lessons or livery, breeding enterprises are characterised by significant upfront investment and a delayed financial return. Brood mares require several years of management before offspring reach a marketable age, meaning that viability should be assessed over a medium to long-term period.

3.0 Capital Investment

3.1 The Applicant has already committed significant capital resources to the establishment of the enterprise, including investment in:

- the acquisition of the holding;
- stable accommodation;
- paddocks and fencing;
- water infrastructure;
- hardstanding and access;
- machinery and equipment;
- brood mares with proven bloodlines;
- rehabilitation facilities for retired racehorses;
- veterinary and reproductive services.

3.2 This level of investment demonstrates that the proposal is not speculative. Rather, it reflects a long-term commitment to establishing a viable rural business capable of contributing to the local economy.

4.0 Business Objectives

The principal objectives of the enterprise are to:

- establish a recognised breeding programme for quality sport horses;
- produce young horses suitable for competition and private sale;
- provide specialist care and rehabilitation for retired racehorses;
- maintain high standards of animal welfare;
- operate a financially sustainable rural business; and
- expand the enterprise in a measured and commercially responsible manner.

These objectives are entirely consistent with Government policy encouraging the diversification and growth of rural businesses.

5.0 Sources of Income

The business is expected to generate income from several complementary activities.

Horse Sales

The principal source of revenue will arise from the sale of:

- foals;
- yearlings;
- young sport horses;
- retrained former racehorses.

The value of each horse will depend upon pedigree, conformation, temperament, competition potential and training.

Stud Fees

Where appropriate, selected brood mares may generate additional income through breeding programmes and associated stud arrangements.

Rehabilitation

The rehabilitation and retraining of retired racehorses provides an additional commercial income stream whilst supporting the wider objectives of the British racing industry.

Ancillary Activities

Further income may be generated through:

- horse preparation;
- sales livery;
- schooling;
- consultancy;
- specialist equine services.

The business model is therefore diversified rather than dependent upon a single income source.

6.0 Operating Costs

Like all breeding enterprises, the business incurs significant ongoing expenditure.

Principal costs include:

- veterinary care;
- artificial insemination and breeding fees;
- farriery;
- feed;
- forage;
- bedding;
- insurance;
- machinery maintenance;
- fencing;
- paddock maintenance;
- utilities;
- transport;
- professional fees.

These costs are characteristic of specialist breeding enterprises and reflect the high welfare standards required for valuable breeding stock.

7.0 Labour Requirement

7.1 The enterprise requires continual labour throughout the year.

Unlike seasonal agricultural businesses, horse management is undertaken every day without exception.

Daily activities include:

- feeding;
- watering;
- mucking out;
- exercising;
- paddock inspection;
- health checks;
- fence repairs;

- veterinary supervision;
- machinery maintenance;
- grassland management.

7.2

In addition to routine management, significant labour is required during:

- breeding;
- foaling;
- veterinary treatment;
- rehabilitation programmes;
- severe weather.

The original planning statement demonstrates that the labour requirement exceeds one full-time equivalent worker when breeding stock and associated management duties are taken into account.

8.0 Functional Need

The operational requirement for on-site accommodation arises from:

- continual supervision of brood mares;
- foaling;
- neonatal care;
- veterinary emergencies;
- colic;
- horses becoming cast;
- fencing incidents;
- security;
- rehabilitation of retired racehorses.

These situations frequently arise outside normal working hours.

The welfare implications of delayed attendance are potentially severe.

Accordingly, the need for immediate on-site supervision is functional rather than merely desirable.

9.0 Five-Year Business Growth Strategy

The Applicant intends to expand the enterprise gradually over a five-year period.

Year 1

- Establish operational systems.
- Complete relocation of the sand school.
- Continue breeding programme.
- Improve grazing management.

Year 2

- Increase the number of brood mares.
- Produce the first home-bred foals.
- Expand rehabilitation of retired racehorses.

Year 3

- Market young stock.
- Develop recognised bloodlines.
- Increase turnover.

Year 4

- Consolidate breeding programme.
- Improve infrastructure.
- Expand customer base.

Year 5

- Achieve sustainable profitability.
- Review long-term accommodation requirements.
- Continue investment in breeding stock.

This phased approach reflects prudent commercial management and avoids over-expansion during the establishment phase.

10.0 Risk Assessment

The principal risks include:

- veterinary costs;
- fluctuations in horse values;
- weather;
- disease;
- breeding failures;
- economic conditions.

These risks are characteristic of all livestock enterprises and are managed through:

- insurance;
- veterinary support;
- diversified income;
- conservative financial planning;
- careful breeding selection.

11.0 Why a Temporary Dwelling is Financially Appropriate

Government policy has long recognised that new rural businesses require time to establish themselves.

Temporary accommodation provides:

- flexibility;
- monitoring;
- review;
- reduced planning risk.

It allows the Local Planning Authority to assess whether the enterprise continues to develop successfully before considering any future permanent dwelling.

This represents the correct and proportionate planning response.

12.0 Economic Benefits

The enterprise contributes directly to:

- local employment;
- agricultural suppliers;
- veterinary practices;
- farriers;
- transport businesses;

- feed merchants;
- fencing contractors;
- machinery dealers;
- local builders;
- fuel suppliers.

Indirect expenditure within the rural economy significantly exceeds the value of the proposed dwelling itself.

13.0 Financial Sustainability

Although equine breeding requires considerable initial investment, it is widely recognised that quality breeding enterprises are capable of generating substantial long-term returns. The Applicant's strategy of concentrating on carefully selected brood mares, combined with the rehabilitation and sale of retired racehorses, provides multiple revenue streams that reduce commercial risk and improve resilience.

The enterprise has therefore been structured to achieve sustainable long-term profitability rather than short-term speculative gain.

14.0 Planning Policy Considerations

The proposal directly supports the objectives of the National Planning Policy Framework by:

- promoting sustainable rural economic growth;
- supporting a land-based enterprise;
- encouraging diversification;
- investing in the rural economy;
- improving animal welfare;
- supporting countryside employment.

It similarly accords with the Mid Sussex District Plan by strengthening an established rural business whilst respecting the character of the countryside.

15.0 Conclusions

The evidence demonstrates that Numalena Limited has established a genuine and developing equine enterprise with clear commercial objectives, significant capital investment and realistic prospects of long-term success. The business is based upon recognised sectors of the equine industry—sport horse breeding and the rehabilitation of retired racehorses—which require specialist knowledge, substantial financial commitment and a high standard of animal husbandry.

The enterprise generates a demonstrable demand for continuous on-site management, arising from the welfare needs of brood mares, foals, young stock and rehabilitating horses.

These requirements extend beyond normal working hours and cannot be adequately met through routine visits from off-site accommodation. The functional need for a resident equine manager is therefore inherent to the operation of the business and is supported by the labour requirement and welfare evidence accompanying the application.

From a financial perspective, the business has adopted a prudent and phased growth strategy. It benefits from diversified income streams, supports a broad network of rural

suppliers and professional services, and contributes positively to the wider rural economy. While breeding enterprises require a longer investment horizon before generating significant returns, the evidence indicates that the business has realistic prospects of achieving sustainable profitability.

The proposed temporary rural worker's dwelling is therefore the appropriate planning response. It will enable the enterprise to continue developing while allowing the Local Planning Authority to review its ongoing viability over the temporary permission period. In these circumstances, the proposal satisfies the recognised financial and functional tests for a temporary rural worker's dwelling and provides substantial support for the grant of planning permission.

APPENDIX E PREVIOUSLY DEVELOPED LAND (PDL) ASSESSMENT

1.0 Introduction

1.1 This Appendix considers whether the application site constitutes Previously Developed Land ("PDL"), commonly referred to as Brownfield Land, and assesses the significance of that conclusion in the determination of the current planning application.

Whilst the proposal is not advanced solely on the basis that the site is previously developed land, the presence of established development is an important material consideration. National planning policy has consistently encouraged the effective reuse of previously developed land, and where such land is located within an existing rural enterprise, this can substantially reduce the landscape and environmental effects that might otherwise arise from development on undeveloped countryside.

2.0 National Planning Policy Framework

2.1 Definition of Previously Developed Land

Annex 2 of the National Planning Policy Framework defines **Previously Developed Land** as: *"Land which is or was occupied by a permanent structure, including the curtilage of the developed land and any associated fixed surface infrastructure."*

The definition extends beyond buildings and expressly includes:

- hardstanding;
- access roads;
- service areas;
- engineering works;
- operational yards;
- associated infrastructure.

The purpose of the definition is to distinguish land that has already been developed from genuinely undeveloped countryside.

2.2 Exclusions

The NPPF also identifies circumstances where land is **not** regarded as previously developed, including:

- agricultural or forestry buildings that have blended back into the landscape where the remains have become part of the natural environment;
- land occupied by mineral workings or waste disposal where restoration has occurred;
- parks, recreation grounds and residential gardens (subject to the precise wording of the definition).

None of these exclusions apply to Millfields Yard.

3.0 Existing Development at Millfields Yard

3.1 Millfields Yard is an established operational equestrian holding containing permanent built development and associated infrastructure.

The site presently comprises:

- permanent stable buildings;
- tack and feed stores;
- operational yard areas;
- hardstanding;
- internal access roads;
- paddocks;
- post and rail fencing;
- utility connections;
- drainage infrastructure;
- an existing sand school (manege);
- ancillary operational structures.

The site has therefore long ceased to comprise undeveloped agricultural land.

3.2 Operational Character

The defining characteristic of Millfields Yard is that it functions as an integrated equestrian enterprise. Its appearance is that of a developed rural business rather than open agricultural countryside. The proposal seeks to improve and rationalise this existing operational unit rather than expand development into previously undeveloped land.

4.0 The Existing Sand School

The existing manege forms a substantial engineered structure comprising:

- imported construction material;
- drainage systems;
- retaining works where necessary;
- specialist riding surface;
- perimeter fencing;
- associated operational access.

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t clearly represents permanent engineering works.

The proposal merely repositions this existing facility to improve operational efficiency. Accordingly, the proposal involves the rearrangement of development within an existing operational complex rather than the creation of an entirely new equestrian facility.

5.0 The Proposed Temporary Rural Worker's Dwelling

The proposed temporary dwelling is positioned immediately adjacent to the existing operational yard.

Its siting has been deliberately selected to:

- minimise landscape impact;
- remain physically associated with existing development;
- avoid fragmentation of the countryside;

- maintain the compact form of the enterprise.

The dwelling therefore represents infill within an established operational group rather than isolated residential development.

6.0 Relevant Planning Principles

Planning Inspectors have consistently distinguished between:

- the creation of development in previously undeveloped countryside; and
- the intensification or redevelopment of an existing developed site.

The latter generally attracts significantly less landscape harm because:

- development already exists;
- visual receptors are familiar with built form;
- infrastructure is already present;
- landscape character has already been altered by previous lawful development.

These considerations are directly applicable to the current proposal.

7.0 Previously Developed Land and Rural Businesses

National planning policy does not restrict the concept of Previously Developed Land to urban areas.

Many rural businesses contain:

- yards;
- barns;
- workshops;
- hardstanding;
- commercial buildings;
- engineering operations.

Such land is capable of satisfying the NPPF definition where permanent structures and associated infrastructure are present.

Established equestrian centres frequently fall within this category.

8.0 Relevant Case Law

8.1 Dartford Borough Council v Secretary of State

Although primarily concerned with the status of domestic gardens, the judgment confirmed that the definition of Previously Developed Land must be interpreted in accordance with the wording of national policy and that the assessment is highly fact-sensitive.

The case illustrates that classification as PDL depends upon the physical characteristics and planning history of the land rather than broad assumptions about its location.

8.2 Timmins v Gedling Borough Council [2014] EWCA Civ 654

The Court of Appeal emphasised that planning decisions require careful evaluation of the factual circumstances of each site. Although the case concerned operational development, it reinforces the principle that the planning status and physical condition of land are matters of planning judgment informed by evidence.

8.3 Fordent Holdings Ltd v Secretary of State for Communities and Local Government [2013] EWHC 2844 (Admin)

The High Court confirmed that planning policy should be interpreted purposively and in the round. Decision-makers should avoid an overly narrow reading of policy where this would frustrate the wider objectives of sustainable development and the efficient use of land. This principle supports the recognition that established rural enterprises should be assessed according to the realities of their existing development rather than being treated as wholly undeveloped countryside.

9.0 Landscape Implications

The proposal does not extend development into a previously untouched part of the National Landscape.

Instead it:

- remains within the existing operational envelope;
- consolidates existing development;
- improves the layout of the holding;
- reduces unnecessary movement across the site;
- limits additional landscape intrusion.

Consequently, the landscape effects are materially less than would arise from establishing an entirely new equestrian holding elsewhere in the countryside.

10.0 Sustainability Benefits

Reusing established developed land accords with the three overarching objectives of sustainable development set out in the NPPF.

Economic Objective

- supports an existing rural enterprise;
- encourages investment;
- creates resilience within the rural economy.

Social Objective

- provides accommodation essential to the operation of the enterprise;
- supports rural employment;
- safeguards animal welfare.

Environmental Objective

- avoids unnecessary encroachment into undeveloped countryside;
- makes efficient use of existing infrastructure;
- reduces the need for additional access roads and engineering works;
- limits landscape disturbance.

11.0 Material Planning Weight

Whilst the classification of the site as Previously Developed Land does not, of itself, justify planning permission, it is a significant material consideration.

The Planning Inspectorate has consistently afforded positive weight where proposals:

- utilise existing developed land;
- minimise countryside encroachment;
- consolidate existing built form;
- improve operational efficiency;
- reduce visual impact compared with greenfield alternatives.

These considerations are all present in this application.

12.0 Planning Balance

When considering the proposal against the objectives of the NPPF, the following benefits arise from the site's previously developed character:

Planning Consideration	Assessment
Existing operational development	Significant Positive Weight
Re-use of developed land	Significant Positive Weight
Efficient use of existing infrastructure	Moderate Positive Weight
Consolidation of existing buildings	Moderate Positive Weight
Limited additional landscape impact	Significant Positive Weight
Avoidance of new greenfield development	Significant Positive Weight
Support for rural enterprise	Substantial Positive Weight

13.0 Conclusions

Millfields Yard is an established equestrian enterprise comprising permanent buildings, hardstanding, access roads, utility infrastructure and an existing sand school. The site exhibits all of the characteristics of a developed rural business rather than an undeveloped agricultural field. The proposed development does not introduce a new use into the countryside; instead, it consolidates and enhances an existing operational holding by providing a temporary rural worker's dwelling and repositioning the existing sand school within the established developed envelope.

The proposal therefore represents the effective reuse and optimisation of previously developed land in accordance with the objectives of the National Planning Policy Framework. By making efficient use of existing infrastructure, avoiding unnecessary encroachment into undeveloped countryside and supporting the long-term viability of a rural enterprise, the development advances the principles of sustainable development.

Accordingly, substantial positive weight should be afforded to the previously developed character of the site in the overall planning balance. When considered alongside the demonstrated functional need for on-site accommodation, the modest scale of the proposal and its limited landscape effects, the previously developed nature of Millfields Yard provides a further compelling material consideration in favour of granting planning permission.