

Our ref: CCG
Your ref: 6009890

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RH20 2AZ

6 July 2026

Planning Inspectorate
Room 3B Eagle Wing
Temple Quay House
2 The Square
Bristol
BS1 6PN

Dear Planning Inspectorate

Site Address: Beckley Stud, Reeds Lane, Southwater, RH13 9DQ

The Appellant welcomes the opportunity to provide final comments in response to the representations made by interested parties. Horsham District Council has not submitted a statement in relation to the appeal and, accordingly, there is no Council statement requiring a specific response.

We have reviewed the representations submitted by interested parties and, whilst their concerns are acknowledged, the majority of the objections repeat issues previously considered both by Horsham District Council and by the Planning Inspector in determining Appeal APP/Z3825/W/23/3324019. The previous Inspector's findings remain a material consideration and provide important context for the assessment of the current proposal. As such, reference is made to those findings where relevant in responding to the principal matters raised by the third parties below.

Many of the comments relate to matters of opinion rather than planning evidence and do not undermine the planning merits of the proposal subject of this appeal.

Rather than responding to each third-party representation individually, the Appellant has set out below a consolidated response to the principal matters and recurring issues raised across the representations.

Essential Need for a Countryside Location

Representations argue that the proposal is driven solely by commercial convenience rather than an essential countryside need.

This interpretation overlooks both the previous Inspector's findings and the evidence submitted in support of this appeal and detailed further in the Justification Report found in Appendix G attached to the appeal submission.

The previous appeal established that the Equine America operation is functionally linked to Beckley Stud because the site provides an operational equestrian environment in which products are researched, tested and refined. That conclusion was fundamental to the Inspector's decision to grant



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planning permission for the mixed-use operation and remains a material consideration in the determination of this appeal.

The current proposal does not seek to establish an entirely new commercial use of the site. It does however support the continued operation of the accepted mixed-use by providing more appropriate and permanent storage facility.

It is acknowledged that ownership does provide commercial advantages, that is not the planning justification. The previous Inspector accepted that the operational relationship between the equestrian activities on site and Equine America's product research, testing and development justified the mixed-use at this location. The present proposal simply provides storage to support that already accepted relationship.

Alleged Industrialisation of the Site

Representations suggest that Beckley Stud has evolved into an industrial warehouse complex and that the proposal represents a fundamental change from the mixed-use previously accepted by the Planning Inspector.

The Appellant respectfully disagrees with this statement.

The principle of the mixed equestrian, residential and commercial use of Beckley Stud was established by the Inspector's decision under Appeal APP/Z3825/W/23/3324019. In reaching that decision, the Inspector accepted that the storage and distribution activities undertaken by Equine America were functionally linked to the equestrian operation and formed an appropriate rural diversification. That established planning position is a significant material consideration in the determination of this appeal.

Whilst the operation of the equestrian enterprise has evolved over time, this does not amount to the abandonment or replacement of that use. Horses remain at Beckley Stud, the site continues to play an active role in Equine America's product research, observation and development programme, and the wider breeding operation as outlined in the Statement of Case and Justification Report.

The site continues to operate as a mixed-use equestrian, residential and commercial enterprise, consistent with the mixed-use character accepted in the previous appeal decision.

Planning policy does not require rural businesses to remain static or constrained to their existing form. The National Planning Policy Framework recognises the importance of supporting a prosperous rural economy by enabling existing businesses to grow, adapt and diversify in response to changing economic circumstances. Successful rural enterprises must inevitably evolve if they are to remain commercially viable, competitive and resilient.

It is important that Local Planning Authorities adopt a positive approach towards proposals that safeguard and strengthen established rural businesses. Where an enterprise provides valuable employment opportunities within a rural area, investment that supports its continued operation, growth and long-term sustainability should attract significant weight in the planning balance. Resisting appropriate development that enables a well-established rural business to adapt and remain viable would be contrary to the overarching objectives of national planning policy, which seeks to promote sustainable economic growth and support the prosperity of rural communities.



The current proposal therefore represents the continuation of an established mixed-use operation rather than a material change in the character of the site and the suggestion that the proposal represents the “industrialisation” of the site is not supported by the planning history or the evidence before the Inspector.

The Scale of the Proposed Building

Objectors argue that the proposed warehouse represents an unjustified increase in commercial activity.

The proposed building is larger than the existing storage building because it is intended to meet the operational requirements of the business as it exists today, rather than those that existed when the earlier permission was granted. As explained within the accompanying Justification Report, continued growth in product range, stockholding, packaging and order fulfilment has created a genuine need for additional storage capacity. The scale of the building is therefore driven by operational requirements rather than unjust expansion.

Transport Statement

Representations criticise reliance upon the June 2022 Transport Statement.

Representations question the continued reliance on the June 2022 Transport Statement. However, that assessment remains relevant as it considered the operational characteristics of the established mixed-use activities at Beckley Stud and the suitability of the site access and surrounding highway network.

Importantly, the statutory Highway Authority raised no objection to the previous proposal and did not identify any severe highway impacts arising from the established use of the site. Likewise, neither the Highway Authority nor any interested party has produced technical highway evidence to demonstrate that the current proposal would give rise to a severe residual cumulative impact on the highway network.

The concerns raised by objectors are therefore based on personal observations and assumptions rather than professional transport evidence.

Whilst Equine America has experienced significant business growth, this has principally been accommodated through increased stockholding and improved operational efficiency rather than a proportionate increase in vehicle movements. An increase in storage capacity should not automatically be taken to indicate a corresponding increase in HGV movements.

The National Planning Policy Framework is clear that development should only be refused on highway grounds where there would be an unacceptable impact on highway safety, or where the residual cumulative impacts on the road network would be severe. No technical evidence has been submitted to demonstrate that either of these tests is met in respect of the proposal.

HGV Movements

Third Party comments state that the proposed warehouse will inevitably result in a significant increase in HGV movements. However, no technical evidence has been submitted to support this.



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The proposal is intended to provide permanent storage accommodation for the existing business and improve operational efficiency by replacing temporary storage arrangements. Whilst the business has grown, this should not be taken to mean that increased storage capacity will result in a proportionate increase in vehicle movements. Deliveries already occur as part of the established lawful operation at Beckley Stud, and neither the Highway Authority nor any other party has produced technical evidence to demonstrate that the proposal would give rise to unacceptable highway impacts.

Third-party representations refer to rigid lorries, articulated vehicles and increased commercial traffic associated with the site. These comments are based largely on individual observations rather than objective transport evidence. No traffic surveys, vehicle logs, accident data or other technical assessments have been submitted to demonstrate either an increase in vehicle movements attributable to the proposal or that the operation would result in unacceptable impacts on the local highway network.

Some representations also refer to an alleged breach of Condition 7 of Planning Permission DC/22/0118. Any alleged breach of planning condition is a separate enforcement matter and is not determinative of the planning merits of this appeal. In any event, observations regarding the size of individual vehicles do not provide reliable evidence of vehicle frequency, classification or the overall planning significance of delivery activity.

Employee Numbers

Representations refer to differing employee numbers across planning submissions and the company's website. This is not evidence of unreliability. Staffing levels in a growing business will naturally fluctuate over time, and the documents referred to were prepared at different dates.

Furthermore, the previous employee limitation of 12 arose from the now withdrawn water neutrality requirements rather than because 12 employees represented an accepted planning limit for the business.

Continued Equestrian Activities

Representations suggest that because the sand school is redundant and some equestrian activities have altered, the equestrian enterprise no longer exists.

The Appellant respectfully disagrees.

The Appeal Statement and supporting justification explains that horses remain at Beckley Stud and continue to be used in Equine America's ongoing product development and testing programme.

The previous Inspector accepted that the equestrian activities and commercial operation function together. The fact that operational practices have evolved does not remove this functional relationship.

It is commonplace for rural businesses to adapt and evolve their operations over time to remain commercially viable. Such operational changes do not, in themselves, signify a departure from the established business model or the mixed-use of the site.



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Suggestions that an Industrial Estate Would be More Appropriate

Objectors argue that Equine America should relocate to nearby industrial premises. This misunderstands the planning issue.

The planning system does not require an applicant to demonstrate that no alternative commercial premises exist where the proposal is otherwise acceptable in planning terms. The relevant question is whether the development before the Inspector is acceptable on this site, having regard to the development plan, national policy and other material considerations.

Cumulative Development

Representations raise concerns that the proposed warehouse forms part of a gradual process of commercial expansion and that granting permission would lead to further development at Beckley Stud.

The Appellant acknowledges that the planning history of the site provides relevant context and that the cumulative effects of development are a material consideration. However, the Inspector is required to determine the appeal before them on its own planning merits, having regard to the Development Plan and other material considerations.

The current proposal has been brought forward to provide a permanent replacement for temporary storage arrangements that arose from the operational growth of an already established mixed-use. It is intended to provide appropriate long term storage accommodation to support the operational requirements of the established rural business.

Assertions that permission for the proposal would inevitably result in further buildings or future expansion are speculative and cannot reasonably be afforded significant weight.

Should any future development be proposed, it would be subject to its own planning application and assessed independently against the relevant planning policies and the circumstances prevailing at that time.

Enforcement History

Representations place significant weight upon previous enforcement matters.

Previous enforcement matters are noted, but they are subject to a separate planning regime and must be considered on their own facts. They do not demonstrate that the appeal proposal is unacceptable in planning terms.

European Distribution

Third party comments raise why the need to dispatch from Beckley Stud if there is an already established European distribution centre in The Netherlands.

Beckley Stud remains the operational headquarters of Equine America (UK) Limited. Whilst the business also operates a distribution facility in The Netherlands to serve parts of the European market, the UK operation continues to function as the company's principal base for product development, research, testing, administration and distribution. The existence of a European facility therefore does not remove the operational need for appropriate storage accommodation at Beckley Stud.



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As outlined in the accompanying Justification Report attached to the appeal in Appendix G, relocation would have a wide and significant consequences for both Equine America (UK) Limited and the surrounding rural economy. Some of the principal impacts contained within the report are outlined below:

- It is considered highly unlikely that the existing workforce, including employees who have worked for the company for up to 30 years, would relocate to The Netherlands. As a result, the current team of employees would be at significant risk of redundancy. The distinctive workplace culture and rural environment provided at Beckley Stud are not characteristics commonly replicated within conventional business operations. As a result, employees seeking alternative employment opportunities would be unlikely to find a comparable working environment offering the same combination of workplace culture and employee-focused benefits.
- The relocation of operations would also result in the loss of substantial economic expenditure within the local area. [REDACTED]
[REDACTED] The removal of the operation from Beckley Stud would therefore reduce expenditure within the local economy, including among a number of rural businesses that currently benefit indirectly from the company's presence and activity.
- The existing operational model also supports UK-based manufacturing. At present, products are produced through relationships with multiple UK manufacturers before being distributed from Beckley Stud. If UK distribution operations were significantly reduced or ceased entirely, there would be increased commercial pressure to relocate a greater proportion of manufacturing activity to mainland Europe in order to reduce export and transport costs. This could result in a further loss of economic activity from the UK supply chain.
- The presence of Equine America (UK) Limited at Beckley Stud also contributes to the wider rural equestrian economy through links with veterinary professionals, nutritionists, riders, breeders and equestrian events.

Speculation Regarding Future Development

Objectors speculate that permission for this building would inevitably lead to further expansion. Such an argument is speculative.

The appeal must be determined on the basis of the proposal before the Inspector.

Potential future proposals cannot form a basis for refusing this appeal.

Miscellaneous Matters

Representations have alleged hedgerow removal, external lighting and other unrelated activities.

These matters either fall outside the scope of the current appeal or are subject to separate legislative and regulatory controls. They do not alter the planning assessment of the proposed storage building.



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Conclusion

The interested party representations repeat concerns previously raised during earlier planning applications.

No objector has produced technical evidence demonstrating unacceptable highway impacts, landscape harm beyond that already assessed, or that the proposal fundamentally changes the lawful mixed-use character of Beckley Stud.

The previous Inspector's findings remain a material consideration and provide important context for the assessment of the current proposal.

The current proposal provides permanent storage facility required to support an established mixed-use enterprise whose planning principle has already been accepted. It does not introduce a new commercial use but enables an existing rural business to continue operating efficiently from its established base.

The representations do not identify any new material planning considerations that outweigh the significant economic, operational and planning benefits of the proposal.

For these reasons, we respectfully submit that the interested party representations should be afforded limited weight and that the appeal should be allowed.

Yours faithfully



Charlotte Catton-Giltinane Assoc RTPI
Senior Planner

