

# STEPHEN JUPP

BA(Hons), LLM, MRTPI

## CHARTERED TOWN PLANNER

Development Control Division  
Horsham District Council  
Parkside  
Horsham  
RH12 1RL

Tuesday, 03 February 2026

Dear Sir/Madam:

**Re: Woodside Equestrian Centre,**

**Retention of top surface to majority of existing hardcore area and its use for the parking of vehicles in connection with the use of the equestrian centre and resiting of lorry containers onto historic hardsurfaced area**

I have pleasure in enclosing the above planning application which is retrospective. This application largely builds on the scheme submitted as part of the appeal papers to refused application DC/24/1405, which the inspector refused to consider, but which the case officer, Kate Turner, commented by way of letter dated 01 December 2025 *"It is noted that at paragraph 2.12 the appellant suggests an alternative approach which would be reduce the number of caravan stored and some of the hardstanding- and plant a native hedge. This is considered a positive step, which we think would be better dealt with under a new application rather than through this appeal, as the description would require amending to refer to the removal of hardstanding."* This letter is attached at Appendix 1.

There are two elements to this application.

The first is the laying of a top surface to the pre-existing hardcore surface of the land. Evidence is provided to demonstrate the pre-existing surface. Two number holes have been dug – one south east of the lorry containers and one south east of the touring caravans – the later one being in an area that at first impression still appears grassed. This appearance is similar to that of the other areas, now covered in the top surface, prior to the undertaking of those works. In my view it clearly demonstrates a substantial depth of hardcore – around 17cm. Photographs of these holes form part of the application submission papers.

PLANNING APPLICATIONS.

AUTOCAD DRAWINGS.

GENERAL ADVICE.

OBJECTION LETTERS.

APPEALS.

SITE DEVELOPMENT APPRAISALS.

LOCAL PLAN SUBMISSIONS.

EXPERT PLANNING ADVICE.

SPECIALISING IN:

DEVELOPMENT CONTROL,

AGRICULTURE,

ENFORCEMENT AND

NATURE CONSERVATION LAW

### PARTNERS:

**STEPHEN JUPP**  
BA(Hons), LLM, MRTPI

**LYNN JUPP**

**PO BOX 839**  
**CHICHESTER**  
**WEST SUSSEX**  
**PO19 9XQ**

**Mobile: 07777-618886**

**E-Mail:**  
**steve@planning-solutions.co.uk**

**Web Site:**  
**www.planning-solutions.co.uk**

**Member of the**  
**Royal Town Planning**



As a result, it is plain beyond peradventure that the application red line area has been a hardsurfaced area for a considerable period of time. Any top grass is a result of it not being used for a period of time. The top area in the zone southwest of the application site which appears grassed indicates that any grass / vegetation is of minimal depth and the land is not useable for grazing or exercising horses.

For reasons I consider it wholly appropriate to place a top dressing on it. Indeed, if the application is resisted, I would make legal submissions that the works undertake constitute maintenance and are not development as the area of pre-existing hardstanding has not been increased. In this regard it is noteworthy that this was a matter in dispute between the parties in the now withdrawn enforcement notice.

This area that has had the topping surface laid on it is to be used as a carpark solely for the equestrian centre as the original area [to the north west] was wholly insufficient to meet their needs and allow access from its southern corner into the building complex. No part of this area will be used for the storage and the corners along the NW boundary adjacent to the road will be resited [see second element below], scalplings scrapped off and a fence erected to stop the top area being used for any purpose. The planting of a hedgerow would be considered if considered necessary to obtain a planning permission.

The second element is the use of part of the land for the storage of lorry containers – noting that the previous caravan storage element has now been deleted.

This storage exists and the roadside photographs 5, 6 and 7 demonstrate that the storage is not visible from the public highway.

Permission is sought for a maximum of 8no lorry containers. This storage would be limited to the southern area of the original hardsurfaced area and as illustrated in photograph 2 and marked on Drawing 3B, would be seen with the backdrop of the centre's main building complex. The area was the original car park but such use restricted access to the site by HGVs and made it impossible for them to turn on site, Therefore the need for the next area to be used for parking.

Attached as part of the application submissions, at Appendix 2, is a letter dated 30 August 2024 from T & P Accountants LLP which sets out very clearly the essential need to have this limited storage as part of the equestrian diversification of the business since:

*Our client's main income source now arises from the rental of storage containers and parking for vehicles. The normal equestrian income of livery etc. has been reducing every year for a long time; the rental and parking income has effectively been subsidising the losses from the Equestrian Centre for many years.*

*Based on historical results, we have no doubt that substantial losses would be incurred by the business if the rental and parking income ceased. This would likely result in redundancies for the two employees.*

In my view this essential need to ensure that the rural equestrian business can continue demonstrates compelling and exceptional circumstances for this use in the countryside.

The need to support rural business is clearly set out within LP Policies 10, 26 and 29. This combined with the absence of any visual or landscape character harm leads me to the clear and overwhelming conclusion that the development accords with the

provisions of the Development plan. On this basis, planning permission should be granted.

Yours sincerely,



**STEPHEN JUPP**  
BA(Hons), LL.M, MRTPI  
Chartered Town Planner

## APPENDIX 1

HDC CASE OFFICER LETTER  
FOR APPEAL DATED 01  
DECEMBER 2025

## APPENDIX 2

T & P ACCOUNTS LLP  
LETTER DATED  
30 AUGUST 2024