
STATUTORY DECLARATION OF PAUL TUNSTALL MRTPI

I, **Paul Tunstall**, of **JWPC Ltd, 1B Waterview, Lancaster, LA1 4XS** do solemnly and sincerely declare, that:

1. I am appointed as Town Planning advisor to Mr Shokat Dalal. I hold the position of Managing Director of JWPC Ltd. I have been a Chartered Member of the Royal Town Planning Institute since April 2000.
2. I first visited Woodfold Park Stud on 16th July 2021 on instruction of Mr Dalal in order to advise him prior his purchase of the dwelling and surrounding land.
3. I was advised by Mr Dalal at the time of the visit that Mr Graham Gough was owner and occupier of the house at that time.
4. The purpose of the visit was to advise Mr Dalal on the potential from a town planning point of view, of the property to accept a number of extensions and alternations. It was described to me that these would be to the sides and rear (south) of the main dwelling.
5. I walked around all sides of the house and did not view the interior. I walked within the immediate environs of the grounds in order to see it in its setting.
6. It was very clear to me house known as Woodfold Park Stud was in use as a family dwelling at that time.
7. There was no evidence that I saw to indicate that the stud business was operational on site. There were no horses on the premises (including the menage), no commercial vehicles such as horse-boxes or tractors and no staff.
8. The rear grassed space between the rear of the house and the stone retaining wall was clearly used in association with the adjacent dwelling in my opinion. The area was kept closely mown. There were a number of semi-mature shrubs planted in the borders of that lawn. There were also ceramic plant pots and some garden furniture (sun loungers, tables and chairs on the patio) within this area. There was a gas barbeque and gas bottle there.

There was no evidence (such as hoof-prints or manure) that any horses had used this space.

9. I can confirm that I took the attached photograph which illustrates these points on 16th July 2021.
10. In light of the above and in my experience as a town planning consultant who has advised clients on land use matters, including the definition and extent of residential curtilages for many years, I quickly formed the view that the space between the rear of Woodfold Park Stud and the stone retaining wall to the south is domestic curtilage.
11. This opinion informed my view at the time that the house (subject to there being no planning conditions or Article 4 Direction to indicate otherwise and other normal size and location constraints) could benefit from Permitted Development Rights to facilitate rear extension.
12. I continue to advise Mr Dalal and have visited the site again since. I did not see that anything had materially changed in the subsequent visits.

Photograph of the appeal site I took on 16th July 2021 (looking north)



SIGNED by the Declarant **Mr Paul Tunstall MRTPI**



Declared at: COUNTY OF LANCASHIRE

on: 1 MARCH 2024

before me:



Signed

SAJID AABEDIN PATEL

Solicitor

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