

Planning Statement

Application for a Certificate of Lawfulness: Siting of a Single-Unit Caravan

Site Address: Croft Cottage, 98a, South Street, Tarring, Worthing, BN14 7NB

Applicant: Whitlock & Lowe Ltd

1.0. Introduction

1.1. This Planning Statement has been prepared in support of an application made under Section 192 of the Town and Country Planning Act 1990 (as amended). The purpose of the application is to confirm, as a matter of law rather than planning judgment, that the proposed siting of a single-unit caravan within the domestic garden of the host dwelling constitutes a lawful use of land that does not require express planning permission. The statutory exercise is therefore limited to whether the proposal falls within the legal definition of development; considerations of planning merit, landscape impact, design quality, or amenity judgment are not engaged in this process.

1.2. Whitlock & Lowe Ltd is a specialist manufacturer of bespoke oak-framed caravans. Over a sustained period, the company has secured a substantial number of Lawful Development Certificates across a wide range of local planning authorities. These decisions have consistently applied the same statutory framework governing caravans, the same interpretation of incidental domestic use, and the same legal distinction between caravans and buildings. This consistency across authorities demonstrates a settled and well-understood interpretation of the relevant legislation.

1.3. The caravan proposed for Croft Cottage is a single-unit structure expressly designed to comply with the Caravan Sites and Control of Development Act 1960 and the Caravan Sites Act 1968. Its intended use is solely ancillary to the main dwellinghouse. It will remain physically, functionally and legally part of the same residential planning unit, with no independent planning identity.

1.4. As demonstrated through this statement, the proposal satisfies all statutory criteria relevant to caravan status and incidental domestic use. It does not involve operational development, does not give rise to a material change in land use, and therefore falls outside the definition of development contained in Section 55 of the Town and Country Planning Act 1990. The lawful position follows directly from statute and established appeal authority rather than discretionary planning judgment.

1.5. All case law referenced in this statement can be seen in full, in the Case Law document provided with this application.

2.0. Proposed Use and Relationship with Dwelling

2.1. The caravan will provide additional accommodation for family members in a manner wholly ancillary to the host dwelling. It will rely upon the main house for key services including electricity, water supply and waste. No separate curtilage will be created, no subdivision of the planning unit will occur, and no separate vehicular access or postal address will arise. The siting is entirely within the established domestic garden area and will not alter the character of the residential use.

2.2. Occupation will remain under control of the same household as the principal dwelling. The accommodation will not be let, sold, or otherwise occupied independently. This functional integration ensures that the caravan serves a subordinate domestic role rather than forming an independent residential unit.

2.3. This form of ancillary domestic accommodation is firmly established in planning law. Numerous appeal decisions confirm that the siting of a caravan for family accommodation within a residential curtilage does not

constitute a material change of use where functional dependency and household control remain intact. The proposal therefore represents a continuation of lawful residential use rather than any intensification or diversification of that use.

2.4. Recent appeal authority, including *APP/R3650/X/25/3359353 (8 Forge Close, Farnham)*, confirms that a caravan used by a dependent relative within a residential garden remains incidental to the dwellinghouse and does not create a separate planning unit. That reasoning applies directly here. The presence of sleeping, cooking or sanitary facilities does not in itself create independence where occupation remains ancillary and controlled within the same household.

3.0. The Legal Framework

3.1. The determination of whether the proposal constitutes development is governed principally by three statutes:

- *The Caravan Sites and Control of Development Act 1960;*
- *The Caravan Sites Act 1968; and*
- *The Town and Country Planning Act 1990.*

Together, these establish the legal definition of a caravan, the physical characteristics required for that status, and the circumstances in which siting such a structure does not amount to development.

3.2. Section 29(1) of the 1960 Act defines a caravan as:

“Any structure designed or adapted for human habitation which is capable of being moved from one place to another.”

This definition is capability-based. It does not require intention to move, frequency of movement, or proof that movement could lawfully occur on the public highway. The test is concerned with inherent physical mobility rather than logistical or regulatory considerations external to planning law.

3.3. The Caravan Sites Act 1968 supplements that definition by introducing size parameters and clarifying mobility considerations. Crucially, the specific construction provisions within Section 13 relate to twin-unit caravans assembled from two sections. They do not impose equivalent requirements upon single-unit caravans. This statutory distinction has been repeatedly recognised in appeal decisions and reflects Parliament’s deliberate differentiation between caravan types.

3.4. Where a structure satisfies the statutory definition of a caravan, it cannot simultaneously be treated as a building merely because of its appearance, durability, or level of internal accommodation. The legal classification depends upon statutory definition rather than subjective assessment of permanence or domestic functionality.

3.5. Consequently, the siting of a caravan within the curtilage of a dwellinghouse for purposes incidental to that dwelling does not constitute development. This interpretation has been confirmed consistently through judicial authority and Planning Inspectorate decisions over many decades.

4.0. Section 55 of the Town and Country Planning Act 1990

4.1. Definition of Development

4.1.1. Section 55(1) of the 1990 Act defines “development” as (i) the carrying out of building, engineering, mining or other operations, in, on, over or under land, or (ii) the making of any material change in the use of any buildings or other land. A Certificate of Lawfulness application is therefore a legal exercise concerned with whether the proposal falls within the statutory definition of development; it is not an evaluative judgment on planning merits. The decision-maker must apply the statutory framework and established authority and determine the matter on the balance of probability.

4.1.2. Importantly, Section 55(2) sets out exclusions from the definition of development. The relevant exclusion is Section 55(2)(d), which provides that:

“The use of any land for purposes incidental to the enjoyment of the dwellinghouse as such [shall not be taken to involve development].”

4.1.3. This exclusion is not marginal. It is a deliberate statutory carve-out recognising that the enjoyment of a dwellinghouse commonly involves ancillary and subordinate domestic activities and arrangements. Where the use is genuinely incidental to the enjoyment of the dwellinghouse as such, the statute operates to remove that use from planning control entirely (i.e. it is not development). The relevant question is therefore whether, as a matter of fact and degree, the proposed siting and use of the caravan would remain incidental to the enjoyment of Croft Cottage as a single dwellinghouse, and whether the siting itself entails operational development.

4.1.4. The correct approach is reflected in Inspector authority such as *Harlington*, which frames the issue in two limbs: (1) whether the use would be incidental to the enjoyment of the dwellinghouse, and (2) whether siting would involve operational development. That is the proper legal structure for analysis, and it is applied below.

4.2. Planning Unit, Incidental Use, and Control

4.2.1. In assessing whether there is any material change in the use of land, the courts have long held that the first step is identifying the planning unit. In *Burdle v Secretary of State for the Environment* [1972], the Court of Appeal established that the planning unit is a matter of fact and degree, typically comprising the unit of occupation and the land which is functionally related to it. Where the land forms part of a single residential planning unit, ancillary accommodation sited within that unit does not of itself create a new planning unit or a new primary use.

4.2.2. Applied here, the proposal does not involve any subdivision of the residential planning unit at Croft Cottage. The caravan would be sited within the domestic garden/curtilage and would remain in the same ownership and under the same household control as the principal dwelling. Critically, there would be no separate curtilage, no separate postal address, and no separate vehicular access created. These are precisely the practical indicators that the occupation would remain within a single planning unit and that no independent planning identity would arise.

4.2.3. The mere provision of additional accommodation within a residential planning unit does not automatically generate a separate use. The test is whether the proposed use would be functionally subordinate and incidental, rather than independent. Inspector reasoning in *Harlington* is directly relevant: even when a mobile home contains facilities for day-to-day living, that does not preclude a finding of incidental use where the evidence is that the use would not be as an independent unit of accommodation and would remain within the control of the main household. That approach is consistent with the statutory wording of Section 55(2)(d), which turns on incidental enjoyment of the dwellinghouse “as such”.

4.2.4. Accordingly, the proposed siting at Croft Cottage is properly characterised as ancillary domestic accommodation within a single residential planning unit. On that footing, and subject to caravan status/operational development considerations addressed below, section 55(2)(d) is engaged.

4.3. “Building” Status and Permanence: Legal Focus

4.3.1. A recurring error in caravan cases is to treat “permanence” as something that can be inferred from internal fit-out, comfort, or duration of siting. That is not the correct legal approach. Whether something is a “building” for planning purposes is primarily a question of physical attachment and permanence in land-use terms, assessed on the facts.

4.3.2. In *Gravesham BC v Secretary of State [1984]*, the court confirmed that the test is physical rather than functional. A structure resting by its own weight and capable of removal without demolition is not to be treated as a building simply because it is habitable.

4.3.3. That approach aligns closely with the Inspector analysis in *Teddington*, which makes two points of direct relevance: (i) physical attachment to the ground is the key consideration, and (ii) attachment to services is not the same as physical attachment to land. A caravan may be connected to services within acquiring the degree of permanence or attachment required of buildings. The proposal here is expressly designed to avoid permanence and attachment in planning terms, as set out below.

4.3.4. The correct conclusion to draw is therefore this: if the unit satisfies the statutory caravan definition (size/mobility) and is sited without foundations/anchoring such that it remains removable intact, then it does not become a building by inference. The question is answered by statutory definition and physical reality, not by impression.

5.0. Compliance with the Size and Construction Requirements

5.1. Size

5.1.1. The Caravan Sites Act 1968 sets maximum dimensional limits for caravans, including (when assembled) 20 metres in length, 6.8 metres in width, and a maximum internal floor-to-ceiling height of 3.05 metres in relation to living accommodation. The proposed caravan at Croft Cottage measures 10.2 metres in length, 5 metres in width, with a maximum internal height within the 3.05 metre threshold. These are confirmed on the submitted drawings.

5.1.2. Compliance with the statutory size limits is not discretionary; it is a defined legal threshold. Where a structure falls within those limits, it satisfies the size limb of the caravan definition and cannot be excluded from caravan status by subjective characterisation.

5.2. Size and Measurement Clarification

5.2.1. It is also relevant to clarify how dimensional limits under the Caravan Sites Act 1968 are properly interpreted in practice, particularly where elements such as eaves, fascia boards, guttering or other minor projections are present. The statutory maximum width of 6.8 metres is consistently interpreted as wall-to-wall measurement rather than including incidental roof overhangs or rainwater goods. This reflects both industry practice and authoritative legal interpretation.

5.2.2. This approach was examined in detail in the appeal decision relating to *Trotters Plot, Wimborne (APP/U1240/C/18/3204771 & 3207038)*, where the Inspector considered whether roof overhangs should be included in assessing compliance with the statutory size limits. Having reviewed relevant authority, including the High Court judgment in *Brightlingsea Haven Ltd v Morris [2008]*, the Inspector concluded that it is normal practice when measuring the width of a structure of this nature to take wall-to-wall dimensions and exclude roof projections. The judgment cited by the Inspector observed that Parliament was more likely to have intended control over the principal structural envelope rather than ancillary roof detailing.

5.2.3. The Inspector further noted that Government consultation material relating to caravan spacing and dimensional standards also reflects a wall-to-wall interpretation. While such material is not determinative of statutory meaning, it provides useful confirmation of consistent national practice in both the manufacturing and planning contexts.

5.2.4. This interpretation avoids arbitrary or unintended outcomes whereby minor architectural detailing, necessary for weatherproofing and longevity, could otherwise disqualify structures that clearly fall within the intended scope of the statutory caravan definition. The courts have recognised that such approach would be inconsistent with both industry practice and the legislative purpose underlying the Caravan Sites Act framework.

5.2.5. Accordingly, the dimensional assessment of the proposed caravan has been undertaken on a wall-to-wall basis consistent with established case law, appeal precedent, and longstanding professional practice. On that basis, the structure comfortably complies with the statutory size limitations and therefore satisfies the dimensional component of the caravan definition.

5.3. Construction: correct statutory application for a single unit

5.3.1. It is important that the statutory scheme is applied as drafted. Section 13(1) of the 1968 Act contains provisions dealing expressly with twin-unit caravans (i.e. those comprised of no more than two sections separately constructed and designed to be assembled on site). Those provisions do not create an additional “construction test” for single-unit caravans.

5.3.2. This distinction is confirmed in Inspector authority such as *Forge Close*, which states that because a single-unit caravan is proposed, it is not necessary under Section 13(1) that it is composed of not more than two sections designed to be assembled by bolts/clamps/devices. The Inspector's reasoning is clear: assembly on site does not of itself mean the proposal is not a caravan when the statutory provisions specific to twin-units are properly understood.

5.3.3. The proposed unit at Croft Cottage is a single-unit caravan. It is therefore to be assessed against the statutory size and mobility criteria applicable to single units, without importing additional construction requirements not contained in the legislation. The unit is designed with an integral chassis and is intended to remain a transportable structure in planning terms.

6.0. Compliance with the Mobility Test

6.1. Correct legal test: capability, not convenience

6.1.1. Section 29(1) of the 1960 Act defines a caravan by reference to capability: it must be capable of being moved from one place to another (towed or transported on motor vehicle/trailer). The mobility test is therefore concerned with inherent physical capability, assessed as a matter of fact and degree.

6.1.2. Inspector authority is consistent on what does *not* form part of the mobility tests. *Teddington* explains that the unit need not be mobile in the sense of being towed on its own wheels; it is sufficient that it can be picked up intact (including floor and roof) and placed on a lorry by crane or hoist. Critically, that decision also makes clear the illegality of transportation on the public highway is irrelevant to the mobility assessment in caravan definition terms. The planning question is capability, not compliance with highway regulations.

6.1.3. Likewise, *Forge Close* and *Romford* address the common but incorrect focus on access and logistics. They confirm that perceived difficulties with craning and manoeuvring are not the point; it is the unit which must possess the necessary mobile qualities, not the means of access to and from the site. A lack of intention to move, or constraints in the road network, are not determinative of caravan status.

6.2. Application to Croft Cottage

6.2.1. The proposal at Croft Cottage is designed to satisfy the mobility test in the manner contemplated by the statute and described in the above authority. The unit incorporates an integral chassis and is capable of being lifted and transported intact. It will rest on adjustable steel pads placed on levelled ground, ensuring that it is not physically fixed to the land.

6.2.2. Service connections (electricity, water, drainage) will be made in a reversible manner. As *Teddington* makes clear, attachment to services is not the same as attachment to land.

6.2.3. In practical terms, following disconnection of services, the unit can be lifted by crane and placed onto a suitable vehicle for transportation. That satisfies the statutory concept of "capable of being moved", which is the correct legal test.

6.3. Evidence and burden

6.3.1. In an LDC context the onus is on the applicant to provide sufficient information on the balance of probability. This statement and the accompanying plans and specifications are intended to do precisely that: demonstrate, through design, construction and proposed siting that the structure retains the inherent mobility required by statute. The attached structural calculations are not for the proposal put forward, but relate to one of our significantly larger units, therefore being entirely relevant. Bespoke calculations take time to create so are typically produced post issuing of Certificate. That said, if required, they can be produced to help the Authority.

6.3.2. The key point is that the mobility test is not converted into a requirement to demonstrate preferred methods of transport, highway lawfulness, or site-specific logistical calculations. Those considerations sit outside the statutory definition and have been treated as irrelevant in the Inspector authority cited above. The application therefore addresses the correct legal test: inherent capability.

7.0. Operational Development

7.1. Proper approach

7.1.1. Even when the structure is a caravan, it remains necessary to consider whether siting it would involve operational development. The correct focus is whether building or engineering operations are involved, and whether siting gives rise to permanence and attachment in a manner consistent with building works.

7.1.2. *Harlington* is directly instructive: where the unit rests on supports and is not physically attached to the ground, and where it can be removed (including by crane), siting does not constitute operational development. The Inspector in that case was satisfied that the siting of the mobile home would not constitute operational development.

7.2. Application to Croft Cottage

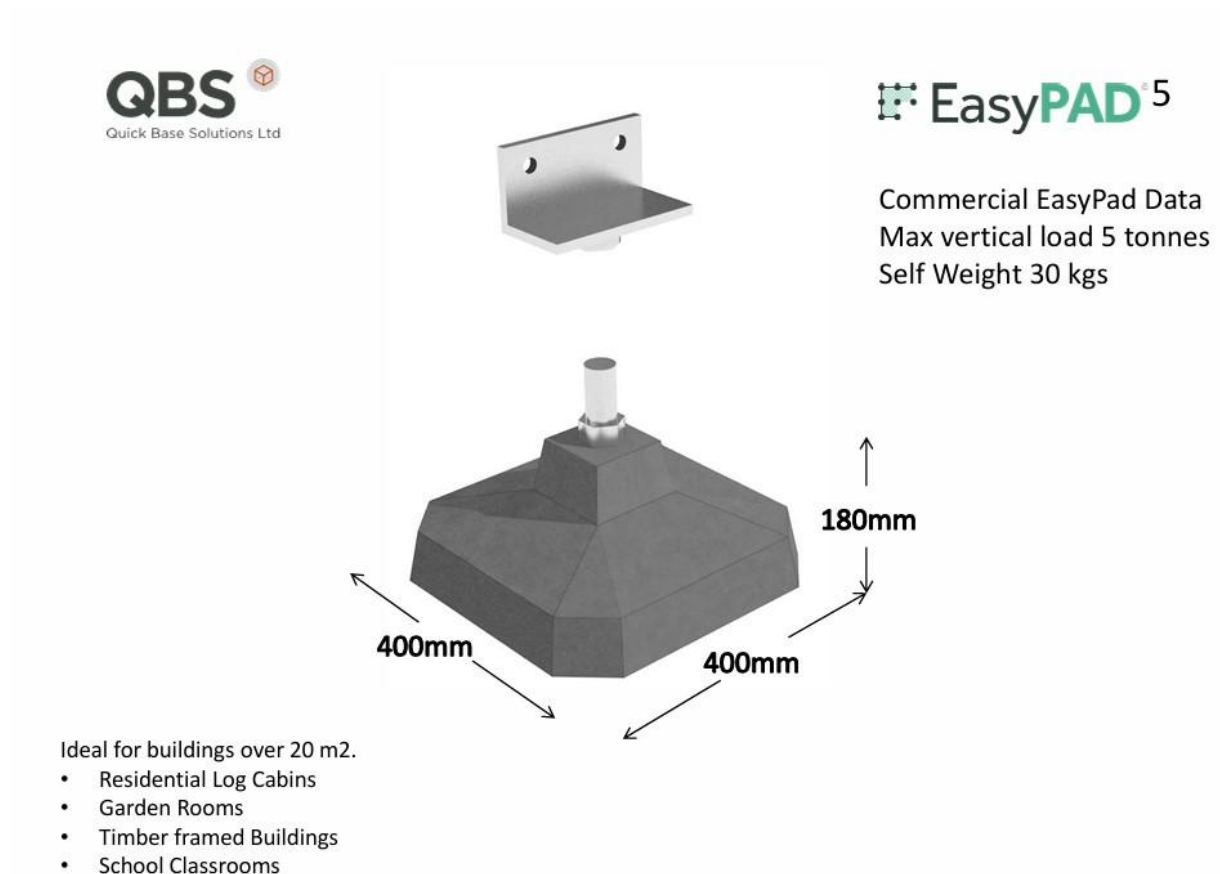
7.2.1. No operational development is proposed. The works are limited to minor levelling (if at all) and the placement of non-permanent support pads. There will be no foundations, no excavation of the type that would create permanence, and no anchoring or fixation which would tie the structure to the land.

7.2.2. The structure will rest by its own weight on adjustable pads. This is consistent with the long-established principle (often cited by analogy) that structures resting by their own weight and not fixed into the ground are not ordinarily building operations. In any event, the decisive facts are that the siting is fully reversible, and removal can occur without demolition or land restoration.

7.2.3. Any connection to services is temporary and removable and does not alter the physical status of the unit or convert the siting into building operations. This mirrors the reasoning in *Teddington*, which distinguishes service connections from attachment to land.

7.2.4. Accordingly, siting the caravan at Croft Cottage does not constitute operational development within the meaning of Section 55(1)

Note 1:



Example of pads that the chassis will sit upon

8.0. Relevant Appeal Authority

8.1. The present proposal aligns with a consistent body of Inspector authority addressing (i) caravan definition and mobility, (ii) incidental use within a residential planning unit, and (iii) operational development.

8.2. *Forge Close* confirms that, for a single unit caravan, it is not necessary to satisfy the twin-unit construction provisions in Section 13(1) of the 1968 Act. It also confirms that perceived access/logistics issues and intention to move are not determinative of caravan status.

8.3. *Teddington* provides a clear articulation of the mobility test: the unit can be moved by being lifted intact and placed on a lorry by crane or hoists; it needs not to be towed on its own running gear. It also makes clear that

illegality of transport on the highway is irrelevant to the planning definition of mobility. *Teddington* further addresses permanence and attachment: minimal physical attachment to land, and service connections not equating to attachment, mean the unit does not acquire the permanence of a building. This is also supported in appeal reference: *APP/X0360/C/19/3221552 & APP/X0360/C/19/3221553*.

8.4. *Harlington* is particularly helpful in an LDC context because it frames the issues in the correct two-part structure (incidental use and operational development) and demonstrates that the presence of full living facilities does not preclude incidental use where the evidence supports a subordinate relationship and household control. It also confirms that a unit resting on supports and removable by crane can be found not to involve operational development.

8.5. *Romford* reinforces the same principles on logistics/access and intention to move, confirming that a lack of intention to move, or absence of suitable means of access or adequate road network, is not relevant to whether something is a caravan.

8.6. Taken together, these decisions reflect a stable approach: where a single-unit structure meets statutory size limits, is inherently capable of being moved intact, is not physically attached to the land, and is used incidentally to the enjoyment of a dwellinghouse within a single planning unit, a Certificate of Lawfulness should be granted.

8.7. Finally, the *Trotters Plot* appeal decisions (*APP/U1240/C/18/3204771 & APP/U1240/C/18/3207038*) further reinforce the established approach to caravan definition, particularly in relation to dimensional interpretation, construction methodology and mobility. The Inspector confirmed that dimensional limits are properly assessed on a wall-to-wall basis, excluding incidental roof projections such as eaves or guttering, consistent with the reasoning in *Brightlingsea Haven Ltd v Morris*. The decision also recognised that on-site assembly from prefabricated components does not preclude caravan status where the resulting structure satisfies statutory mobility requirements, and that normal service arrangements (pads, beams, or levelling systems) do not constitute additional structural sections or evidence of permanence. The focus remains on inherent capability of movement and compliance with statutory size limits rather than construction logistics or ancillary detailing.

9.0. National Consistency and Precedent

9.1. Whitlock & Lowe Ltd has secured a strong record of Certificate of Lawfulness for materially similar proposals across numerous authorities, each applying the same legislative framework and principles. While each case turns on its own facts, the repeated acceptance of the same legal approach demonstrates that the statutory interpretation relied upon is well established nationally.

9.2. The consistent themes across those decisions are: (i) compliance with statutory size limits, (ii) an evidence-based conclusion that the unit is inherently capable of movement intact, (iii) siting without foundations/anchoring such that it remains removable, and (iv) occupation that remains ancillary and subordinate to the host dwelling under unified household control.

9.3. This consistency is relevant because it demonstrates that the approach advanced in this statement is not novel, stretched or policy-driven; it is the settled application of the caravan definition and the Section 55(2)(d)

exclusion. It also promotes fairness and predictability in decision-making, which is a core aspect of good administrative practice in LDC determinations.

9.4. The following list outlines our recent granting of certificates;

- **PL/24/3659/SA**-Kinsella Cottage, Mopes Farm, Denham Lane, Chalfont St Peter, Buckinghamshire, SL9 0QH
- **24/07551/CLP**- The Jays, Chinnor Road, Bledlow Ridge, Buckinghamshire, HP14 4AA
- **24/00570/CLP**- Crickley Hall, Crickley Hill, Witcombe, Gloucester, Gloucestershire, GL3 4UQ
- **PL/25/0324/SA**- Nashleigh Farm, Ashley Green Road, Chesham, Buckinghamshire, HP5 3PF
- **MO/2025/0078/PCL**- The Pheasantry, Mill Lane, Newdigate, Dorking, Surrey, RH5 5AL
- **24/00298/CPL** | Certificate of lawfulness application for proposed siting of mobile home to provide ancillary annexe accommodation | Upper Wingbury Farm Leighton Road Wingrave Buckinghamshire HP22 4LW
- **25/05542/CLP** | Certificate of lawfulness for proposed siting of caravan to provide additional accommodation for family of homeowners | Dovers Farm Frieth Road Frieth Buckinghamshire RG9 6PU
- **25/00830/CLOPUD**, Manton House Sevenhampton Cheltenham Gloucestershire GL54 5SL
- **2025/0684** - George House 16 Meadway Esher KT10 9HF
- **RR/2025/450/O**, Furnace Oast, Furnace Lane, Broad Oak, Brede, TN31 6ET
- **25/00884/COL**, The Old Rectory High Road Horsington Templecombe Somerset BA8 0DN
- **25/0994/CLPUD**, Tanners Cottage, Weathercock Lane, Congleton, CW12 3PS
- **P/CLP/2025/03802**, Turbary Cottage, Holt Heath, Mannington, BH21 7JZ
- **C25/0420/44/TC**, St Brides Cottage, Porthmadog, LL49 9YA
- **M/25/01120/CLPU**, Bridge Cottage, Whiteleaved Oak, Bromsberrow, HR8 1SE
- **P0905/25/LD2**, Clifton House, The Lottery, Redmarley, Gloucester, GL19 3HX
- **WA/2024/02157**, 8 Forge Close, Farnham, GU9 9PX
- **25/02425/CPL**, Oakridge Farm, Pilch Lane, Great Horwood, Buckinghamshire, MK17 0NX
- **PL/2025/07388**, Bay Tree House, The Green, East Knoyle, Salisbury, SP3 6BN
- **EHDC-25-1038-LDCP**, Park House, Ropley, Hampshire, SO24 0EW
- **M/2501485/CLPU**, Littleton Bungalow, Lower Interfields, Malvern, WR14 1UU
- **PL/2025/08106**, Combe Farm, Combe Lane, Bratton, Westbury, BA13 4SY
- **DM/25/2436**, Chatesgrove, Cross Colwood Lane, Bolney, Haywards Heath
- **RR/2025/1900/LDP**, Quedley Farm, Union Street, Flimwell, TN5 7NY
- **PL4/1/117/NBH**, Pilgrims, Broadmead, Sway, Hordle, SO41 6DH
- **DC/25/1819/CLP**, Lodge Farm, Hargrave Road, Little Saxham, Suffolk, IP29 5LH
- **P25/02798/CLP**, Corner House Farm, Shepperdine Road, Oldbury on Severn, BS35 1RJ
- **CB/25/03437/LDCP**, Tyne Hill Farm, Shillington Road, Lower Stondon, Henlow, SG16 6JX
- **25/012367/LDCP**, Sandlea Farm, Middle Road, Tiptoe, Lymington, SO41 6EJ

- **25/00751/CLPUD**, The Nooks, Cocks Lane, Warfield, RG42 6JE
- **25/03926/CLOPUD**, Windfalls, Silver Street, South Carney, GL7 5TP
- **LW/25/0658**, The Anchor Inn, Anchor Lane, Barcombe, BN8 5EA
- **3/2024/0273**, Rock House, Higher Road, Longridge, PR3 2TW
- **26/01026/CPL**, Wyndhurst, Wollerton, Market Drayton, TF9 3NB
- **2026/0277**, 131 Brunwell Street, Brunwell, Norfolk, NR16 1QY
- **25/01464/CLDP**, 1 Mount Rise, Kenn, EX6 7XE
- **2025/0663/LDP**, Rye Hill Lodge, Norton Junction, Long Buckby NN6 7PW

10.0. Conclusion

10.1. The correct legal test in a Section 192 application is whether on the balance of probability, the proposal would be lawful. That requires the decision-maker to apply the statutory definition of “caravan”, assess incidental use under Section 55(2)(d), and determine whether any operational development would occur. Planning merits are not engaged.

10.2. On the evidence and the correct application of statute and authority, the proposed unit at Croft Cottage satisfies the definition of the caravan. It would fall within the statutory size limits and retains the inherent mobility required by Section 29(1) and the 1960 Act. As confirmed in *Teddington*, it is sufficient that the unit can be lifted intact and placed on a lorry by crane or hoist; it need not be towed, and questions of highway legality do not form part of the mobility test. As reinforced by *Forge Close* and *Romford*, access constraints, manoeuvring arrangements and intention to move are not determinative.

10.3. The proposal also satisfies the incidental use test. The caravan will remain within the domestic curtilage of Croft Cottage, under the control of the same household, with no separate planning unit created. There will be no separate curtilage, no separate postal address and no independent vehicular access. In line with *Harlington*, the presence of facilities for day-to-day living does not preclude incidental use where the evidence demonstrates a subordinate relationship and household controls; and if the unit were ever used other than as described, the Certificate would not authorise that different use.

10.4. The siting would not involve operational development. The unit will rest on adjustable pads, without foundations, anchoring or works that create permanence. Any service connections will be reversible and do not constitute physical attachment to the land. As per *Teddington* and *Harlington*, the unit would not acquire the permanence and attachment required of buildings and can be removed intact without demolition.

10.5. For these reasons, the proposed siting of the single-unit caravan at Croft Cottage falls outside of the definition of development and is lawful under Section 192 of the Town and Country Planning Act 1990 (as amended). Whitlock & Lowe Ltd therefore respectfully requires that a Certificate of Lawfulness (Proposed Use) be granted in the terms applied for.

Note 2:



Examples of steel chassis upon which the caravan will be sited: