REBECCA LORD
PLANNING

Lawful Development Certificate Application Report

Site: Pond Cottage, 32 School Lane, Aston, SG2 7HA

[redacted]

Prepared by Mrs. Rebecca Lord MSc MRTPI

Date: 04/04/2023

Ref: RL/487/2

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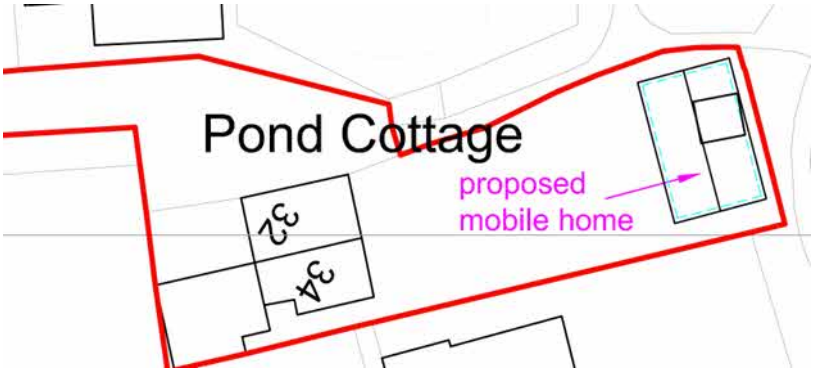
1. Introduction and Preliminary Issues

1.1 This report is submitted in support of an application for a Lawful Development Certificate (LDC) pursuant to S.192 of the Town and Country Planning Act 1990 (as amended).

1.2 This application by Robert and Selina French is made to confirm that the provision of a twin unit mobile home in the garden of their family home to provide additional accommodation for occupation by Selina's mother and stepfather would not result in operational development or a material change of use, and as such planning permission is not required.

1.3 The property comprises a two storey detached house and gardens. The proposed location for the positioning of the mobile home in the garden is shown in the block plan extract below. This may be subject to minor variation but the final location within the garden is immaterial in the consideration of the application. A small timber summer house will be removed.

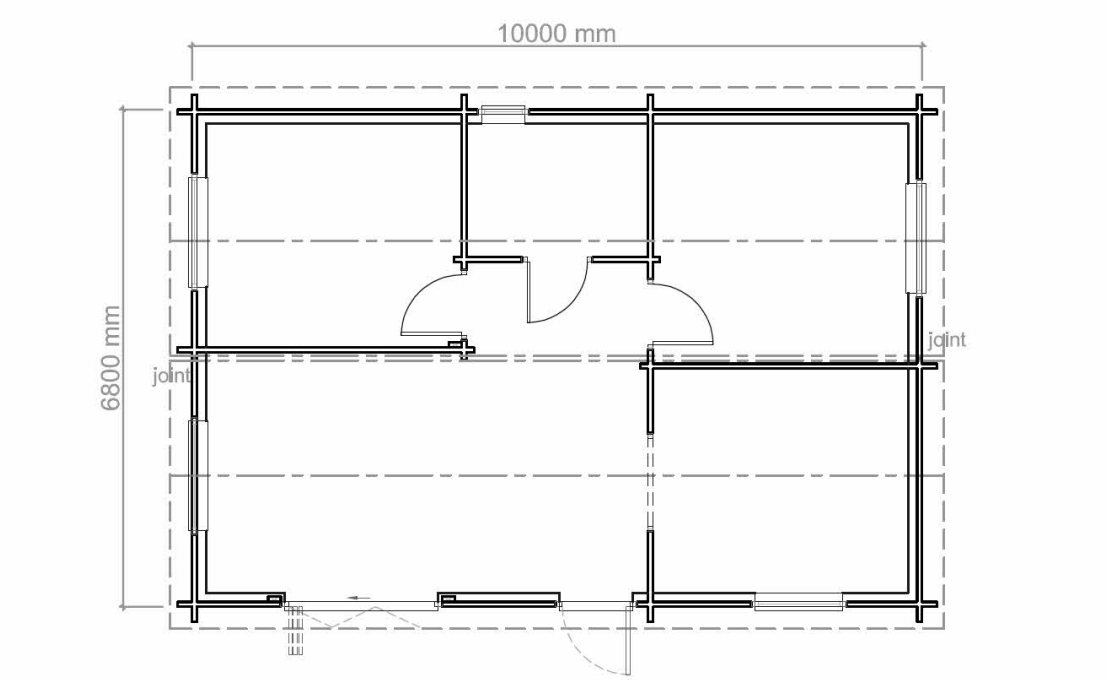


1.4 The existing vehicle access and main parking area will remain unchanged. No separate vehicle access to the mobile home unit is proposed.

1.5 The proposed twin unit mobile home would have maximum external wall to wall measurements of 10m by 6.8m with a maximum internal floor to ceiling height of 3.05m.

1.6 In the previous application (3/23/0136/CLPO) the case officer incorrectly provided dimensions of 10.4m by 7.2m in her report and stated a maximum external height of 3.3m.

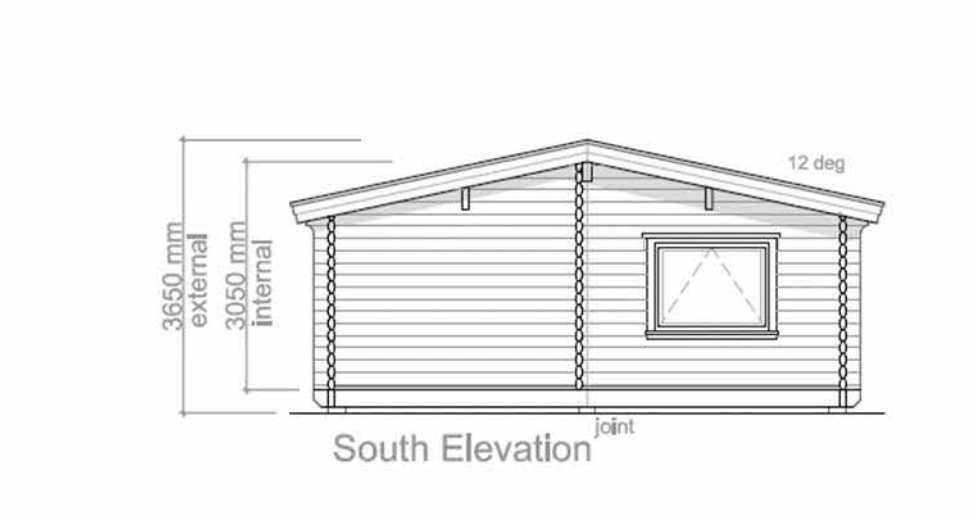
1.7 These incorrect measurements appear to be based on an assessment of the block plan and therefore included the small eave overhangs, also the report refers to the small external projections at the corners where the timbers are connected. These elements that are irrelevant to the calculations, the correct measurement assessment to apply is the external wall to wall measurements that contain the usable space. The wall to wall measurements are clearly shown in the application plans.



1.8 An appeal decision confirming this wall to wall of useable space excluding eaves overhangs as the correct approach to the assessment of size is provided at Appendix 14, relevant extract below:

> 13. The remaining area of dispute concerns the width of the building. The appellant has taken a measurement from outer wall to wall of just under 20 feet. The measurement of width, including the eaves, is a little over 22 feet. In my opinion measurement should generally be taken wall to wall unless the eaves and roof of the building is a substantial structural element in itself. An example could be an alpine style chalet where there could be a considerable overhang of the roof to enclose a veranda. This appears to have been the circumstances in the Short appeal. I found the appeal building to be a chalet with a conventional roof of a design common to chalet parks throughout the country. My conclusion is that the building as measured wall to wall (externally) meets the statutory size for a twin unit caravan. On this basis the appeal on ground (c) succeeds in relation to the caravan only. The other grounds for appeal no longer need to be determined. The patio and

1.9 In addition the external floor to ceiling height as mentioned in the report is irrelevant to the assessment. It is noted that the case officer criticised the lack of a cross section drawing showing the floor to ceiling height in her report thereby ignoring the clear, precise and unambiguous evidence of the internal floor to ceiling height that was provided both in the written report, in the written details from the manufacturer, and as clearly shown on the drawings provided:



1.10 In the course of the application the case officer was asked to contact the agent should any issues arise on the assessment of the application, had she done so rather than just issuing an erroneous decision based on her misunderstanding of the relevant size assessment criteria it would have saved the applicant the additional cost of the preparation of this application and reduced the workload of the LPA in processing this application for which it will receive no fee.

1.11 The area of the garden for the siting is level and has a close physical and functional association to the dwelling house. To provide level siting the mobile home unit will sit on adjustable base pads that are de minimis and as such planning permission is not required.

1.12 The dwelling house and its occupation by the applicant and her family is lawful. There are no know planning enforcement notices, conditions, or Article 4 Directions to prevent the siting of a twin unit mobile home in the garden of the property for use as additional accommodation within the single residential planning unit.

1.13 No Caravan Site Licence or Building Regulations are required for the mobile home as proposed.

2. Assessment

2.1 The judgment in Gabbitas v SSE & Newham LBC [1985] JPL 630 makes it clear that if the local planning authority has no evidence of its own, or from others, to contradict or otherwise make the Appellant's version of events less than probable, there is no good reason not to grant a LDC, provided the Appellant's evidence is sufficiently precise and unambiguous.

2.2 This is also stated in the relevant Planning Practice Guidance, extract below:

> **Who is responsible for providing sufficient information to support an application?**
>
> The applicant is responsible for providing sufficient information to support an application, although a local planning authority always needs to co-operate with an applicant who is seeking information that the authority may hold about the planning status of the land. A local planning authority is entitled to canvass evidence if it so wishes before determining an application. If a local planning authority obtains evidence, this needs to be shared with the applicant who needs to have the opportunity to comment on it and possibly produce counter-evidence.
>
> In the case of applications for existing use, if a local planning authority has no evidence itself, nor any from others, to contradict or otherwise make the applicant's version of events less than probable, there is no good reason to refuse the application, provided the applicant's evidence alone is sufficiently precise and unambiguous to justify the grant of a certificate on the balance of probability.
>
> In the case of applications for proposed development, an applicant needs to describe the proposal with sufficient clarity and precision to enable a local planning authority to understand exactly what is involved.
>
> Paragraph: 006 Reference ID: 17c-006-20140306
>
> Revision date: 06 03 2014

2.3 In making the assessment of the proposal in this case the following matters need to be addressed:

Does the proposal comprise operational development?

Is the mobile home unit a caravan within the legal definition?

Is the proposed use consistent with the lawful use of the land or does it give rise to a material change of use?

Operational Development

2.4 Section 55 1A) of the Act defines development as including 'operations normally undertaken by a person carrying on a business as a builder.

2.5 The proposed twin unit mobile unit will not be constructed by a builder, it will be provided by a manufacturer who will make the two parts from premanufactured parts on site with the final act of assembly being the joining of those parts with bolts. There will be no foundations and there is no intention to physically attach the twin unit mobile home to the land.

2.6 Details of how the twin unit mobile home will be connected to services are provided in the manufacturer's information pack produced at Appendix 1 of this report. The Courts have long held that such connections to utilities do not amount to attachment as detachment from the services is a simple matter which can be achieved within minutes.

2.7 In the case of Measor v SSETR [1999] JPL 182 the Deputy Judge said that whilst he would be wary of holding, as a matter of law, that a 'structure' which satisfies the definition of, for example, a caravan under section 13 could never be a 'building' for the purpose of the 1990 Act as amended, he also found that a caravan would not generally satisfy the well-established definition of a building, having regard to factors of permanence and attachment. Indeed, it would be contrary to the purposes of the 1990 Act as amended to hold that because caravans were defined as 'structures' in the 1960 Act they fell within the definition of 'building' in the 1990 Act. It can therefore be concluded that compliance with the definition of a 'caravan' is a useful indicator of whether operational development would be taking place.

2.8 Regarding the issue of permanence, the unit is required to meet the need for additional accommodation for the family as explained in the following subsection on use. The length of time the mobile home unit is required cannot be specified beyond this. Nonetheless it is not intended to be a permanent addition to the land and can be readily and simply be removed once it is no longer needed.

2.9 Attention is drawn to the recent appeal decision (3277752) produced at Appendix 2 of this report and to paragraphs 27, 28 and 29 concerning the issue of permanence, in which an Inspector noted that *'…..*the proposed caravan may well remain in place for many years. But this is not unusual for a twin-unit caravan and does not necessarily mean therefore that the proposal would be permanent. There is no evidence that the proposal would result in a permanent physical alteration to the land or interfere with its physical characteristics…….. Taking into account all of the above, and as a matter of fact and degree, I give greater weight to the lack of permanence and physical attachment to the ground than to the size of the proposal.' The Inspector concluded the structure was a twin unit mobile home and not a building, costs were awarded in favour of the appellant .

2.10 Whilst a unit of this kind cannot be moved around with the same ease as a touring caravan for instance, the same can be said for 'static' caravans and mobile homes located on residential caravan sites. Such units are not readily transportable without the aid of cranes with straps or cradles and flatbed lorries, yet these are recognised in law as caravans not amounting to buildings. The issues regarding mobility of the unit are examined in the following sub section.

2.11 In addition, the appeal decision (3142534) produced in Appendix 3 examines the relevance of the 2012 'Woolley Chickens' case concerning the interpretation of a building. The Inspector concluded that the case law, which concerned large poultry units subject to Environmental Impact Assessment Regulations, was distinguishable from the consideration of a LDC application for a caravan as in that case there was no need to consider the statutory definition of a caravan (paragraph 24) which had greater weight in the determination of the appeal. It was concluded that the mobile home was a caravan and not a building.

Definition of a Caravan

2.12 The Law: A caravan is defined in Section 29 of the Caravan Sites and Control of Development Act 1960 as any structure designed or adapted for human habitation which is capable of being moved from one place to another (whether by being towed, or by being transported on a motor vehicle or trailer) and any other motor vehicle so designed or adapted, but does not include a) any railway rolling stock which is for the time being on rails forming part of a railway system, or b) any tent.

2.13 Section 13 of the Caravan Sites Act 1968 extends the definition of caravan to include twin unit caravans, which must be (in order to meet the expanded definition) composed of not more than two sections, constructed, or designed to be assembled on site by means of bolts, clamps or other devices, and should not exceed 60 feet in length, 20 feet in width and 10 feet in height overall (size later changed see below).

2.14 The size limitation of caravans as originally set out in the Caravan Sites and Control of Development Act 1960 was updated through The Caravan Sites Act 1968 and Social Landlords (Permissible Additional Purposes) (England) Order 2006 (Definition of Caravan) (Amendment) (England) Order 2006. The Order introduced the following maximum dimensions:

- Length (exclusive of any drawbar): 20 metres (65.616 feet)
- Width: 6.8 metres (23.309 feet)
- Height measured internally from the floor at the lowest level to the ceiling at the highest level: 3.05 metres (10.006 feet).

2.15 Evidence: The manufacturer has provided a certificate of compliance with the legislative limitations of the Caravan Sites Act (CSA) which is produced at Appendix 1. This includes technical details about the manufacturing process and installation of the proposed twin unit mobile home on site.

2.16 It should be noted that this document is signed by the Operations Director of the manufacturer in the full knowledge of the penalties for providing false or misleading information in seeking a LDC, and as such in the absence of any evidence to the contrary, it should be given significant weight when applying 'the balance of probability' test in the LDC assessment.

2.17 Size: The dimensions of the proposed twin unit mobile home (see para 1.5 onwards) do not exceed the CSA size limitations.

2.18 Refer to the twin unit mobile home plans which clearly show the wall to wall measurements of 10m by 6.8m and the internal floor to ceiling measurement not exceeding 3.05m.

2.19 Also refer to the appeal decision at Appendix 14 which confirms that eave overhangs are not to be included in the assessment, it is the external wall to wall measurement of useable space.

2.20 If this evidence and the method of assessment that has been applied in this report is not accepted by the LPA, please contact the agent to explain on what basis this is disputed to allow the agent an opportunity to respond before any decision is issued.

2.21 Construction: It should be noted that there is no requirement in the CSA for a caravan, whether it is a touring caravan, single unit, or twin unit mobile home to be made in any particular materials, or for it to be made in any particular location. Further it is not uncommon for mobile homes to be made in timber materials.

2.22 The method for the manufacture and installation of the proposed twin unit mobile home is set out in Appendix 1. Due to the restricted access to the property in this case the twin unit mobile home unit is to be pre-manufactured in a factory and then assembled in two parts on site with the joining of these two parts as the final act of assembly.

2.23 It is common practice to build or assemble caravans in hard to access back gardens. In Byrne v SSE and Arun DC QED 1997 concerning a twin unit mobile home it was found that the two parts need not be identifiable as caravans or capable of human habitation individually, only that the two parts should be separately constructed and then joined together.

2.24 The assembly of a caravan unit on site also complies with the construction tests as discussed in the extract of the appeal decision APP/N1025/C/01/1074589 (Erewash Borough Council). A full copy is produced in Appendix 4.

The construction test

5. The local planning authority draws my attention to the analysis of the meaning of the words 'composed of not more than two sections separately constructed and designed to be assembled on a site by means of bolts, clamps or other devices' which was given in *Byrne v SSE and Arun DC, QBD 1997*. There is no requirement for the 2 sections to be each identifiable as caravans, or capable of habitation, before they are joined together. However, it was found that it was an 'essential part of the construction process in order to bring a structure which would not otherwise be a caravan, within the definition of that which is deemed to be a caravan, that there should be two sections separately constructed which are then designed to be assembled on a site..... If the process of construction was not by the creation of two separately constructed sections then joined together, the terms of the paragraph [section 13(1)(a) of the Caravan Sites Act 1968] are not satisfied'. They were not in that case because the log cabin concerned, composed of individual timbers clamped together as in that before me, had not at any time been composed of 2 separately constructed sections which were then joined together on the site.

6. That was not so in the case before me. Though the Park Home was delivered by lorry in many pieces I see no requirement in section 13(1)(a) that the process of creating the 2 separate sections must take place away from the site on which they are then joined together. It is necessary only that the act of joining the 2 sections together should be the final act of assembly. The appellant's evidence and photographs taken during the process of assembly demonstrate that the 2 sections, split at the base and ridge and each with a separate ridge beam, were constructed separately. The appellant was clear on this point. His evidence as to the facts of the matter was not disputed. In my opinion the process of construction fulfilled the test of section 13(1)(a).

2.25 It is important to note that in this decision it is confirmed that there is no requirement in S.13(1)(a) that the creation or manufacture of the two parts of a twin unit mobile home need take place elsewhere. This is also confirmed in the planning enforcement appeal decision produced at Appendix 5 (3174314) in which an Inspector held that it was lawful to make the two parts of a twin unit mobile side by side on site prior to joining those two parts by bolts as the last act of assembly (see paras 10 and 11).

2.26 On this evidence it is clear that the proposed twin unit mobile home meets the construction test.

2.27 Mobility: The twin unit mobile home need not have direct access to a road to be deemed a caravan, it must simply be capable of being moved in terms of its structural integrity.

2.28 The manufacturer confirms in Appendix 1 that once completed the proposed mobile home will be capable of being moved as one unit. The usual method for transportation by road is to lift the mobile home unit onto a flatbed lorry using a crane.

2.29 Appendix 1 includes photographic evidence of the movement of twin unit mobile homes (made by the same manufacturer) by crane both in two parts and as one when completed.

2.30 On this evidence it is clear that on the balance of probability the proposed structure meets the mobility test.

2.31 CSA Conclusion: On the information provided it can be concluded that on the balance of probability the proposed mobile home unit:

conforms to all the size and constructional requirements of the CSA.
conforms with the mobility criteria of the CSA
that is not proposed to be physically attached to the land, and
It is not a permanent building (as noted in the preceding section)

2.32 It is therefore concluded that the provision of the proposed twin unit mobile home on the land would not result in operational development.

Proposed Use

2.33 The application site is a single dwelling house with gardens. This comprises one residential planning unit with no planning restrictions on occupation. The issue of 'curtilage' is not relevant to the assessment as this is not a land use and permitted development rights are not being considered.

2.34 The main house is occupied by Robert and Selina with their two school age children. The proposed mobile home unit will provide additional accommodation for the family. It is proposed that the twin unit mobile home will provide level access accommodation for Selina's

mother Barbara Taylor age 77 and her stepfather Brian Taylor age 83. They have reached an age where they need care and support from their family and living with Selina and the family will mean there is help on hand.

2.35 The facts of the proposed use are as follows:

1. The mobile home unit will not be physically separated from the rest of the garden of the main dwelling.
2. The garden will be shared by all occupants.
3. No separate services are proposed, there will be one household electricity and water bill.
4. There would be no separate postal address.
5. The proposed mobile home unit will provide bedroom, bathroom and living room accommodation with limited kitchenette facilities for the preparation of hot drinks, and snacks.
6. The family will regularly share meals together in the main house.
7. The family will socialise with each other in the living room and all family members will have access to other areas of the house and the mobile home unit.
8. There will be no washing machine or laundry facilities other than in the main house, these will be used by all family members.

2.36 The assessment of a planning unit and the relevant three tests is set out in the leading case of Burdle v Secretary of State for the Environment (1972):

1. Where it is possible to recognise a single main purpose of the occupier's use of his land to which secondary activities were incidental or ancillary, the whole unit of occupation should be considered as the planning unit.
2. Secondly however, it may be apt to consider the entire unit of occupation even though the occupier carries on a variety of activities, it is not possible to say that one is incidental or ancillary to the other. In these instances, there would be a composite use where the component activities could fluctuate in their intensity from time to time but the different activities would not be confined within separate or physically distinct areas of land.
3. Thirdly though, it was recognised that it may frequently occur that within a single unit of occupation, two or more physically separate or distinct areas are occupied for substantially different and unrelated purposes. In such a case, each area used for a different main purpose ought to be considered as a separate planning unit.

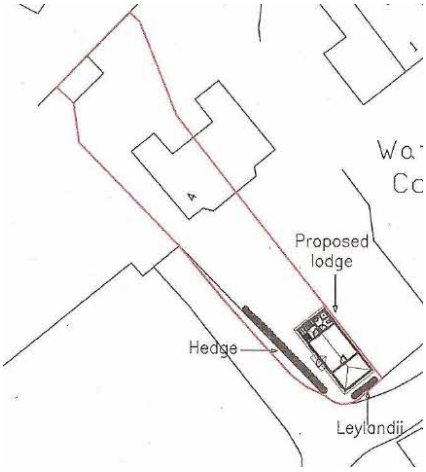
2.37 In this case the property will remain in one ownership and control and the single main use will remain as a one residential dwelling house.

2.38 Based on this information it is clear that the proposed mobile home will simply provide additional accommodation for use by one family. This is consistent and indeed part of the primary residential dwelling house use, as such the property as a whole will remain as one

planning unit with the single primary use as a dwelling house. The proposal does not therefore amount to a change of use for planning purposes.

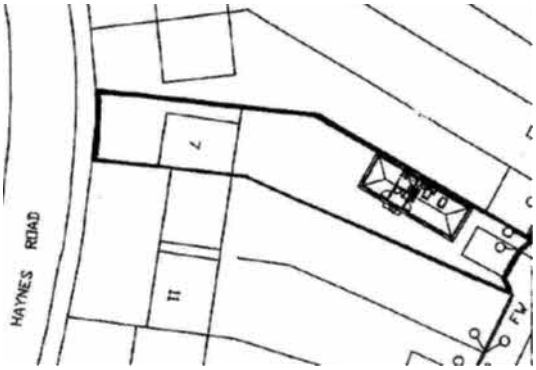
2.39 This assessment is consistent with a Secretary of State decision reported at page 144 in the Journal of Planning Law [1987], and as referred to in the Whitehead judgment (1992 JPL report copy Appendix 6 concerned the meaning of incidental. In that case, the Secretary of State's view was that the use of an existing building in a residential garden as a bedroom was not incidental to the use of the dwelling, but an integral part of the main use of the planning unit.

2.40 The following planning appeal decisions support the methodology of the assessment undertaken in this report. Appendix 7 2159970: 4 Waterwork Cottage Redricks Lane, Sawbridgeworth: East Hertfordshire DC. Whilst this case primarily addressed the issue of development in terms of construction and size, it is noted that the Council did not dispute that the mobile home would have facilities that enabled a degree of independent living and that the unit would in effect be a granny annexe. At paragraph 8 the Inspector confirms that the unit is a caravan therefore it would involve a use of land. As that use would be the same as the lawful use in the remainder of the planning unit it would not involve a change of use that requires planning permission.



Extract of LDC plan showing relationship to house and scale.

2.41 Appendix 8 2190398: 7 Haynes Road, Northfleet, Gravesend: Gravesham BC. In this case the Inspector concluded that the use of a caravan (log cabin style) as a granny annexe would not amount to a change of use, see paragraphs 1, 2, 9 and 10. A LDC was issued for 'The stationing of a mobile home in the rear garden for use as a granny annexe'.



Extract of LDC plan showing relationship to house and scale.

2.42 In appeal decision 2109940 concerning Homefield, Moss Lane, Burscough, Ormskirk an Inspector found that the siting of two number static caravans within the grounds of a house to provide sleeping accommodation for two adult sons and for social and entertaining purposes was found to provide additional accommodation to the main dwelling, and the use of the words 'incidental and subordinate' were not relevant. Costs were awarded to the appellants as the local planning authority had incorrectly assessed the proposal. The appeal decision, site plan and costs decision are contained in Appendix 9. Attention is drawn to paragraph 4 of the costs decision.

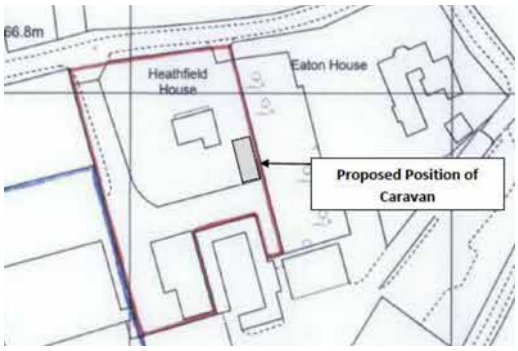
Extract of plan showing relationship of two units to the house

2.43 A further Appeal decision (2181651) concerned the provision of a log cabin type mobile home for staff accommodation at a site in Black Hills, Esher. On the evidence provided the Inspector concluded that 'given the clear functional link between the mobile home and the dwelling, and the ancillary and subordinate nature of the accommodation to be provided, the siting of a mobile home for the purposes described would not amount to a material change of use. Extract of the LDC plan with unit highlighted yellow below, copy of decision produced as Appendix 10.

2.44 In addition, attention is drawn to the appeal decision (3142534) at Appendix 3 concerning a mobile home for use as a granny annex in the garden of a house in Poole. On the basis of circumstances that were very similar to this case the Inspector found at paragraph 20 that whilst the mobile home unit would have all the facilities for independent living, it would not be used in a manner independent from the main dwelling, and the use as described would be a use that comprised part and parcel of the primary dwelling house use which was already taking place within the planning unit. Further such use would not be incidental as it provided primary living space, and no change of use would occur.

2.45 Attention is drawn the appeal and costs decisions at Appendix 11 concerning a proposed mobile home in the rear garden of a property in Chelmsford (3151073). This decision confirms that in applying the 'balance of probabilities test' the information originally provided with the application was sufficient for it to be concluded that the siting of the unit for residential use as part of the single household was lawful at the time the application was made (para 17). Additional information submitted after the application was validated (such as detailed structural calculations from the supplier and a written statement from the future occupier) was not necessary to reach this conclusion. An award of the full costs of the appeal was made against the LPA. As the agent for that application and appeal I can confirm the information was somewhat less that provided with this application.

2.46 A further appeal and costs decision against the refusal by Colchester Borough Council to issue a LDC for a caravan for use as additional accommodation is produced at Appendix 12 (3177321). The Inspector notes that while the Council concluded that the caravan 'is highly likely to be capable of independent occupation' that is not what was applied for and the evidence was that it was to be used as additional accommodation. As this was what had been applied for, this is what the LPA should have been tested. The LDC for a caravan for use as additional accommodation was granted on the basis that it would not constitute development, and full appeal costs were awarded in favour of the appellant.



2.47 In addition to the above appeal decision letters 3 LDCs issued for similar applications made to the LPA (references 17/1338; 17/2343 and 20/0412) are produced in Appendix 13, two of which were application made by RLP. There has been no change in statute or leading case law since those decision were made, as such the issue of an LDC would be consistent with these decisions.

Consideration of an Incidental Use

2.48 In addition to the planning unit based assessment above, which we rely on as the correct assessment methodology in this case, S.55(2)(d) of the Town and Country Planning Act 1990 (the Act) provides that any use incidental to a residential use within the curtilage of the dwelling is not development for planning purposes.

2.49 There is case law on what can reasonably be considered as an incidental to the use of a dwelling house. The Courts have determined that a degree of reasonableness has to be applied when deciding what is incidental. The word incidental is not defined in the Town and

Country Planning Act, so its normal dictionary definition is used. The Oxford dictionary defines incidental as something which is minor to the main thing/event.

2.50 The Courts have looked at the question of whether a building (not a mobile home) that is substantially larger than the original dwelling house is incidental to the original dwelling house and determined that if it was so large it may no longer be incidental or ancillary [Eagles v Min of Environment and Welsh Assembly 2009 EWHC 1028].

2.51 However, in this case the proposed unit is subordinate in scale to the two storey accommodation in the main dwelling and the proposed use comprises the same use as the original dwelling (applying the Court's reasonableness test). The proposal will not create a separate dwelling and the unit will function as additional accommodation for the main dwelling.

2.52 Although we rely on the assessment that the provision of primary accommodation is part and parcel of the main dwelling house use, and as such it is not a material change of use or an incidental use, if that analysis is not accepted it is clear that the proposed use would be incidental to the main use of the land as a residential dwelling and would not, in any event, constitute development.

3. Conclusion

3.1 It has been clearly demonstrated in the submissions that on the burden of proof the proposed structure is a twin unit mobile home that complies with the statutory definition of a caravan as set out in the CSA and that providing the unit on the land would not result in operational development.

3.2 The proposed occupation of the mobile home as additional accommodation by members of the family as part of the lawful use of the existing single residential planning unit would comprise an integral part of the primary residential use. Alternatively, it would be incidental to the main use of the land as a residential dwelling and as such would not result in a material change of use or the subdivision of the planning unit.

3.3 It has been demonstrated that incorrect criteria for the assessment of the size of the twin unit mobile home were applied by the LPA in the assessment of the previous application 3/23/0136/CLPO. It should be noted that size was the only reason given for the refusal to issue an LDC, all other matters concerning the assessment of the unit as a caravan within the CSA criteria, and the proposed use were accepted by the LPA.

3.4 It is concluded that proposal does not therefore result in development within the definition at S.55 of the Act.

3.5 The LPA has issued LDCs for similar units in the past as shown in Appendix 13. These were all for use as additional family accommodation. Whilst each case has to be assessed on its own evidence there are common themes in all of these cases in that the twin unit mobile homes were to be assembled on site in two parts that would be joined together, and that the proposed use was as additional family accommodation as part of one household. There has been no change in statute or leading case law since those decision were made, as such the issue of an LDC in this case would be consistent with previous decisions.

3.6 Based on the clear and unambiguous submissions it is concluded that a Lawful Development Certificate should be issued in accordance with the terms of the application.

3.7 In order to avoid any further misinterpretations, if any of the matters set out in this report and the application material raise any issues of concern or questions in the course of the LPAs assessment it is requested that the case officer communicates with the planning agent to explain what the issues are and to allow an opportunity to respond before any decision is issued so as to avoid any further wasted time and expense.

List of Appendices:

1. Certificate of conformity with the legislative limitations from the supplier
2. Appeal decision 3277752, LDC and Costs decision (RB Kingston-upon-Thames)

3. Appeal decision 3142534 and LDC (Borough of Poole)
4. Appeal decision 1074589 (Erewash Borough Council)
5. Appeal Decision 3714314 (LB Havering)
6. Whitehead judgment 1992 JPL
7. Appeal decision 2159970, LDC and plan (East Hertfordshire DC)
8. Appeal decision 2190398, LDC and plan (Gravesham BC)
9. Appeal decision 2109940 LDC and costs (West Lancashire DC)
10. Appeal decision 2181651 and LDC (Elmbridge DC)
11. Appeal decision 3151073, LDC and Costs Decision (Maldon DC)
12. Appeal decision 3177321, LDC and Costs Decision (Colchester BC)
13. Copies of LDCs issued by the LPA ref: 17/1338; 17/2343 and 20/0412
14. Appeal decision 1063495 (Guildford Borough Council)