



Town and Country Planning Act 1990
Section 195 Planning Appeal

London Borough of Hillingdon Appeal Statement

Appeal By:

Mr Robert Joyce

Proposal:

Use of the land to site a mobile home for ancillary use to the main dwellinghouse
(Application for a Certificate of Lawful Development for a Proposed Development)

Appeal Site:

35 Copperfield Avenue
Hillingdon
UB4 3NX

Our Ref:
Your Ref:

22078/APP/2025/1108
APP/R5510/X/25/3368937

1. Introduction

- 1.1 This appeal statement is submitted by the London Borough of Hillingdon, as the Local Planning Authority (LPA), in respect of the appeal against its refusal to grant a certificate of lawful proposed development for the Use of the land to site a mobile home for ancillary use to the main dwellinghouse.
- 1.2 The LPA refused the application on 11 June 2025 for the following reason (as stated on the decision notice):

It is considered that the use of the land to site a mobile home would result in 'development' as defined within Section 55 of the Town and Country Planning Act 1990 as on the balance of probability, the proposal would involve the creation of a separate planning unit for use as a self-contained independent dwelling, resulting in a material change of the sites use.

2. LPA Comments on Appellant's Statement of Case

- 2.1 The Council considers that the decision reflects the Council's assessment of the evidence submitted with the application which is documented in the Planning Officer's Delegated Report attached as Appendix 1. This statement will not repeat the delegated report and will focus on addressing matters raised in the Appellant's statement of case.
- 2.2 The appellant considers that the mobile home will not operate as a self-contained or independent dwelling. Instead, it is designed to facilitate an ongoing familial relationship that is functionally and physically tied to the main dwelling. The proposal arises from the family's personal need to allow the appellant's granddaughter, her partner, and two young children to remain living with her grandfather in the home they have long shared. This arrangement has existed since 2022, providing crucial financial relief and emotional support to the appellant. The proposed mobile home will allow additional space for the granddaughter and her growing family to occupy the main house with the appellant moving into the mobile home allowing the rest of the family to reside in the main dwelling. The appellant advises that this approach is not only practical, given his desire for a more manageable single-level living space but is driven by a shared commitment to remain under one roof and maintain strong daily interdependencies. The mobile home will be located within the same residential curtilage, accessed solely via the main house and garden. There will be no separate curtilage, no new access point, no independent postal address, and no individual council tax registration. All utilities and services will be shared. The entire property will continue to operate as a single planning unit and as a single household.
- 2.3 The Council however the mobile building (if situated in the proposed location) could be accessed from Colham Road, within the street scene there are already multiple examples of dwellings with separate rear entrances to the garden via Colham Road such as the adjoining neighbours at Nos.33 and 37 Copperfield Avenue. Officers note that the appellant has confirmed that access would be from the main dwelling on Copperfield Avenue. However, the future access would not be easy to control by the

Council, given its siting. Furthermore, given the presence of a kitchen/living room, bathroom facilities and 2 separate bedrooms shown on the submitted plans, it is considered that on the balance of probability, the unit could be occupied separately to the main dwelling, and would be capable of use as a independent dwelling.

3. Conclusion

- 3.1 Conclusively, based on the details that were accompanied with the application, on the balance of probability, the proposed caravan would be capable of use as a self-contained form of accommodation, and would therefore constitute the creation of a separate planning unit, and therefore would result in a material change of use, contrary to Section 55 of the Town and Country Planning Act 1990.

Appendices

Appendix 1 – Planning Officer’s Delegated Report