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Our ref: NAPC/2330 Date: 9 July 2026

Andrew Hunt, Senior Planner

Development Management, Planning
Knowsley Metropolitan Borough Council
Huyton Library, Westmorland Road, Huyton, Knowsley, L36 9FB
By email: Andrew.Hunt@knowsley.gov.uk

Dear Andrew,

Application ref. 26/00281/CLD – Certificate of Lawfulness (proposed use)

Siting of a mobile home for use ancillary to the dwellinghouse

The Smithy, Greensbridge Lane, Tarbock Green, Knowsley, L35 1QH

Thank you for your email of 3 July setting out your queries on the Planning Statement, and apologies for the slightly delayed reply — it took a little while to get the room details back from the client. I've set out below the clarification and confirmations you asked for, and hope these tie everything up.

1. The four 'incidental' tests – source

The four incidental tests cited in our statement are those set out by Mrs Ann Winterton MP during the "Travellers (Middlewich)" debate, HC Deb 22 November 2005, at columns 1487–1488. You're quite right that our link pointed to the adjacent column (.../51122-40.htm) — apologies for that. The correct link, which shows the four factors in full, is:

<https://publications.parliament.uk/pa/cm200506/cmhansrd/vo051122/debtext/51122-39.htm>

For ease, the four factors are:

(1) the degree to which the caravan is functionally connected with, and subordinate to, the use of the dwellinghouse; (2) the relative scale of accommodation in the dwellinghouse and the caravan; (3) the relative size of the dwellinghouse, its garden and the caravan; and (4) the relationship between the occupants.

They are really just a practical way of framing the settled legal question of whether a use is incidental/ancillary to the primary residential use, and whether a separate planning unit is thereby created. That underlying question is governed by case law, including *Burdle v Secretary of State for the Environment* [1972] 1 WLR 1207 (identification of the planning unit), *Uttlesford DC v Secretary of State for the Environment & White* [1992] JPL 171 (a self-contained annexe does not necessarily form a separate planning unit – occupation and functional interdependence are determinative) and *Gravesham BC v Secretary of State for the Environment & O'Brien* (1984) 47 P&CR 142.

2. Confirmation of sizes (tests 2 and 3)

The figures you asked for are set out below, and summarised in the table underneath.

Main dwelling. The Smithy is a two-storey, semi-detached Class C3 dwellinghouse of brick construction beneath a pitched, tiled roof. Its accommodation is as follows:

Ground floor: entrance lobby with WC and washroom; large living room with dining area; small kitchen; single bedroom; family bathroom; dressing room; master bedroom with en-suite shower and WC; and a conservatory to the rear. A mezzanine study is provided over the living room.

First floor: two further bedrooms (one single, one double) formed within the eaves.

The dwelling therefore provides four bedrooms plus a study over two floors. It has a footprint of approximately 144 m² (17.7 × 11.9 m) and, as a two-storey property, a gross internal floor area in the region of 180 m². (Floor areas are approximate, scaled from the Ordnance Survey block plan; a precise figure can be provided from the EPC or a measured survey if required.)

Garden area. The residential curtilage (application site) extends to approximately 1,400 m² (0.14 ha). Excluding the dwelling and the retained outbuilding, the garden amounts to approximately 1,220 m².

Outbuilding to be retained. The outbuilding to be retained (to the south-west of the dwelling, adjoining Greensbridge Lane) has a footprint of approximately 38 m². For completeness, the existing garage (approximately 43 m²), shown centrally on the block plan, is to be removed.

Item	Approx. size
Main dwelling (The Smithy) – two-storey	~144 m ² footprint / ~180 m ² GIA
Garden / amenity land (excluding buildings)	~1,220 m ²
Application site / residential curtilage	~1,400 m ² (0.14 ha)
Outbuilding to be retained	~38 m ²
Existing garage (to be removed)	~43 m ²
Proposed mobile home (single storey)	14.5 m × 6.5 m ≈ 94 m ²
Net increase in footprint (mobile home less garage removed)	≈ 51 m²

For context on tests 2 and 3: the mobile home is 14.5 m × 6.5 m (about 94 m²) and single storey, so it takes up only around 7% of the plot and is clearly smaller than the house. It also replaces the existing garage (about 43 m²), which is being removed — so the net increase in the footprint of structures on the site is only around 51 m², roughly half the mobile home's own footprint (and, in any event, a caravan is not operational development). The dwelling, its garden and the caravan therefore sit comfortably within the balance those factors envisage.

I hope that ties everything up. In line with paragraph 39 of the NPPF, please just let me know if you need anything further before determination — we'd welcome the chance to respond to any outstanding points before a decision is issued.

Yours sincerely,

Edward Pina-Butler

For and on behalf of NAPC Ltd

Agent for the applicant, Mrs Val Hester