

SUPPORTING INFORMATION

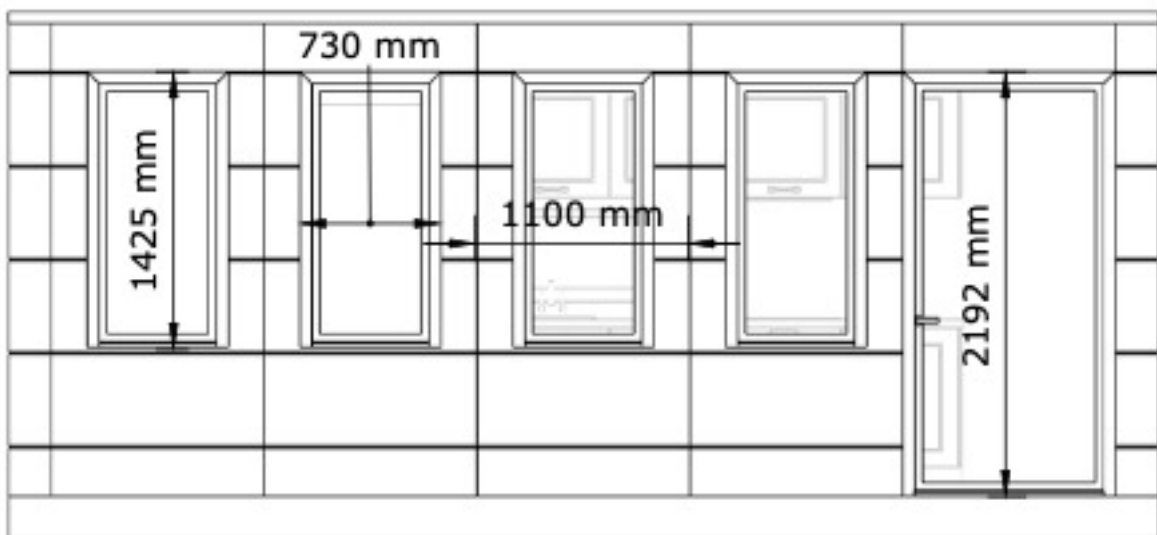
Regarding the

Submission for Certificate of Lawfulness for the

Installation of a Mobile Home

*aka hybrid garden annexe**

under section 192 of the Town & Country Planning Act 1990



Annexa 535

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PART I: SUMMARY

The Purpose of this Document

This document has been prepared in support of an application for a Certificate of Lawfulness under Section 192 of the Town and Country Planning Act 1990 for the siting of a mobile home, described here as a hybrid garden annexe, within the curtilage of an existing dwelling. It draws upon both the RADOS (Rapid Assembly Deployments On Site) and FASTUP (Factory Assembled Standardised Twin Unit Protocol) methodologies to demonstrate that, whether assembled on site as a single unit or delivered in two halves and bolted together, the outcome remains the same: a fully compliant caravan within the meaning of the Caravan Sites Act 1968 (as amended).

The statement is intended to assist Local Planning Authorities in confirming the lawfulness of such development by showing:

- I. The absence of *Operational Development*, through evidence of the movability of the structure and its classification in law as a caravan rather than a building.

2. The absence of *Material Change of Use*, through demonstration that the occupation of the hybrid garden annexe will be ancillary and incidental to the main dwelling.

The combined assembly methodologies, supported by relevant case law and appeal precedents, confirm that the proposal satisfies the statutory definition of a caravan and should therefore be regarded as lawful development under the General Permitted Development Order (as amended) 2015.

PART 2: QUICK FACTS

- A **hybrid garden annexe** is designed and manufactured to comply with Section 192 of the Town and Country Planning Act 1990. For planning purposes, the term is interchangeable with *mobile home* or *caravan*.
- Every hybrid garden annexe is built with a rigid floor chassis, enabling it to be lifted, craned, or hoisted in or out of position. Depending on the assembly protocol, this may occur in one piece (single unit) or two sections (twin unit). See attached structural engineer's report.
- Two complementary assembly options are available:
 - **RADOS (Rapid Assembly Deployments On Site)** allows on-site installation in confined or complex locations without road closures, while still ensuring removability as a single unit.
 - **FASTUP (Factory Assembled Standardised Twin Unit Protocol)** provides for factory completion in two halves, which are transported and joined on site, and can also be removed in two sections if necessary.
- A hybrid garden annexe is **not fixed to the ground**. It rests on foundations such as screw piles or pads under its own weight, with service connections that are temporary and easily reversible.
- By contrast, a **SIPS-based building** lacks the integral chassis and structural strength required for mobility, and therefore cannot be considered a hybrid garden annexe or caravan in planning law.
- The term *hybrid garden annexe* is primarily a descriptive and marketing term used to denote a caravan sited within a domestic garden setting.
- This submission is based on the statutory definition of a caravan and supporting case law. It does **not** rely on Permitted Development Rights.



PART 3: INTRODUCTION

Given recent advances in the manufacture and assembly of mobile homes, particularly through GX Modular's development of the **RADOS (Rapid Assembly Deployments On Site)** and **FASTUP (Factory Assembled Standardised Twin Unit Protocol)** systems, hybrid garden annexes are now specifically designed to comply with the statutory definition of a caravan. The supplementary documents submitted alongside this statement – the *RADOS Garden Annexe Caravan Final Assembly Methodology and Planning Compliance Statement* and the *FASTUP Garden Annexe Caravan Final Assembly Methodology and Planning Compliance Statement* – provide detailed technical explanations of both protocols. Together they demonstrate that whether assembled on site in a single unit (RADOS) or transported in two halves and bolted together (FASTUP), the outcome is identical: a moveable structure designed for human habitation which meets the size, mobility and construction requirements of the Caravan Sites Act 1968 (as amended).

This document therefore draws on those supplementary supporting statements to confirm the lawful status of the hybrid garden annexe. It sets out full details of the proposal to demonstrate that its stationing does not amount to operational development. In conjunction with Part 4, it also establishes that there will be no material change of use, as the annexe will function in an ancillary and incidental manner to the host dwelling.



Figure 1 Removal of hybrid annexe by truck/hoist

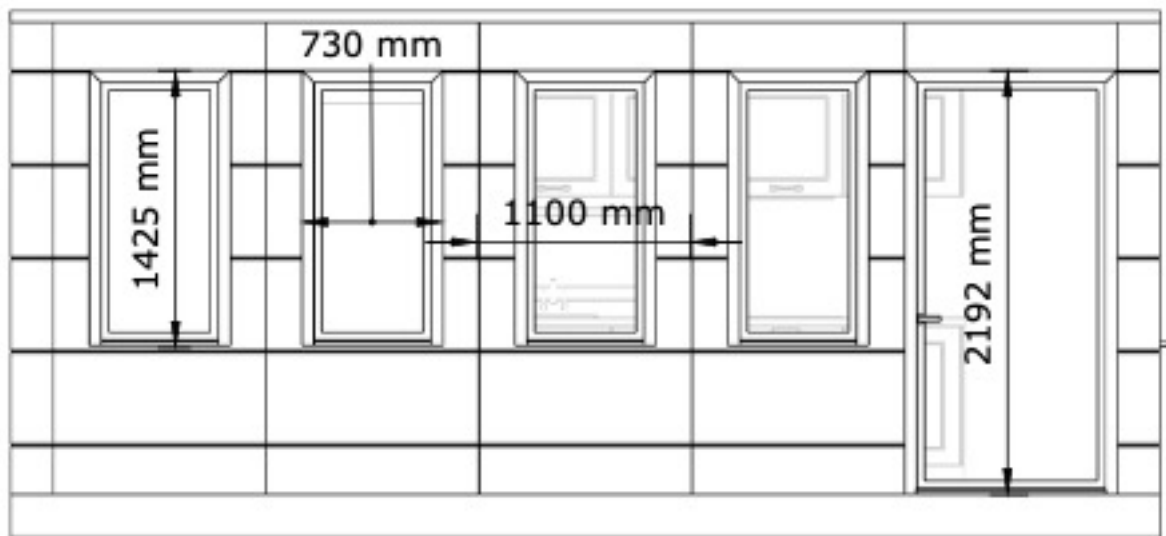
PART 4: SUPPORTING INFORMATION

(This section includes client-specific details - to be redacted by the LPA as necessary)

I. Applicant Name and Address

Steven and Lesley Stride - 10 Malmesbury Road, Leigh, Wiltshire, SN6 6RH

Specific Product to be sited above



ANNEXXA 535 Side Elevation. For other elevations, see **Proposed Scaled Elevations**

Image of product ANNEXXA 535 See above and drawings.

Dimensions of product 5940mm wide, 4290mm Deep, 2733mm High O.A.

Materials: Medite Tricoya Extreme Colour Devonshire Cream. Frames to windows and doors UPVC Colour Black. Roof Single membrane UPDM rubber – **Subject to client specification.**

3. Intended Use and Justification

3.1 The relationship between the occupants of the hybrid garden annexe and the main dwelling is additional living accommodation for my client's mother. This is necessary as my client's mother will be moving into the proposed annexe, whilst they will provide support and care for their mother. My client's mother will reside in close proximity to the main dwelling, whilst the main dwelling will be occupied by my client's.

My client will provide support for a variety of care needs, including washing, shopping, dining, and other household tasks, as required by their mother.

3.2 The size of the footprint of the hybrid garden annexe: please refer to the attached proposed site plan and proposed elevations.

3.3 Comparison of the main dwelling interior living accommodation area: Please refer to the attached proposed site plan and proposed elevations.

3.4 Use of the *hybrid garden annexe* will be entirely ancillary to the use of the main dwelling house, both with fully interchangeable facilities and shared utilities. The users of the annexe, my client's elderly mother, will also dine and will spend leisure time within the main dwelling house.

The proposed annexe is needed to provide care and support for my client's mother. This arrangement establishes a functional link between the hybrid garden annexe and the host dwelling.

The hybrid garden annexe is equipped with interchangeable facilities that provide functional living space for my client to reside in and allow space to be created inside the dwelling for my client's wife to receive the necessary care and support requirements they require for their day-to-day living, **while not intended for any separate use from the main property.**

4. Confirmation of Dependency

We confirm that the hybrid garden annexe shares the address and access with the main dwelling, utilises the same post box and parking, and shares the same utility meters and garden area.

The hybrid garden annexe is consequently wholly dependent upon the main dwelling, and neither annexe nor the occupants can function without the main dwelling.

5. Statement from Applicant

"I seek to provide additional single-storey living accommodation at my home for my mother, for the purposes of her eldercare."

APPENDICES

APPENDIX I - TERMINOLOGIES

Appendix Ia

Definition of a Caravan/Mobile Home

For planning purposes, the term *caravan* is defined within Section 29(1) of the Caravan Sites and Control of Development Act 1960, as qualified by Section 13 of the Caravan Sites Act 1968 (as amended in 2006). Together, these provisions establish that a caravan or mobile home is a structure designed or adapted for human habitation which is capable of being moved from one place to another, and which falls within prescribed dimensional limits.

To qualify as a caravan or mobile home within the meaning of the Caravan Sites Act 1968 (as amended 2006), a structure must satisfy the following three statutory criteria:

A. Size

The Act prescribes that the maximum dimensions of a caravan are:

- Length: **20.0m**
- Width: **6.8m**
- Internal height: **3.05m** (measured internally from finished floor to the highest point of the ceiling).

The proposed hybrid garden annexes assembled under both the **RADOS** (single-unit) and **FASTUP** (twin-unit) methodologies fall significantly below these thresholds and therefore meet the statutory size requirement.

B. Mobility

The Act requires that a caravan is “a structure which, when assembled, is physically capable of being moved by road from one place to another (whether by being towed, or by being transported on a motor vehicle or trailer).”

Both methods satisfy this test. Under **RADOS**, the completed single-unit structure can be lifted intact and placed on a flatbed lorry for transportation. Under **FASTUP**, the two factory-finished halves are joined on site but remain capable of being detached and transported in sections, before being re-assembled elsewhere.

C. Construction

The Act does not stipulate that caravans must be pre-assembled off-site. It only specifies, in the case of twin-unit caravans, that the final act of assembly must involve the joining together of no more than two separately constructed sections using bolts, clamps or similar devices.

- The **RADOS methodology** satisfies this as a single-unit caravan, constructed entirely on site from precision-cut components.
- The **FASTUP methodology** satisfies this as a twin-unit caravan, delivered in two pre-assembled halves and bolted together on site.

D. Transportability

Importantly, a caravan must be capable of being transported once fully assembled. There is no requirement that it be capable of transportation prior to completion. The hybrid garden annexes

proposed here comply with this test: the **RADOS unit** can be moved as one complete structure, while the **FASTUP twin-unit** can be transported in two sections before re-assembly elsewhere.

Appendix 1b

General Definition and Detail of Hybrid Garden Annexes

The design, manufacture and installation of all hybrid garden annexes produced by **GX Modular** are undertaken specifically to comply with Section 13 of the Caravan Sites Act 1968 (as amended in 2006). Each unit is designed within the statutory limits for **size**, and both assembly methodologies satisfy the tests of **mobility** and **construction**: the **RADOS** protocol delivering a compliant single-unit caravan assembled on site, and the **FASTUP** protocol delivering a compliant twin-unit caravan formed by the joining together of two factory-built halves. In both cases, the outcome is a structure that meets all three statutory tests and is therefore lawful in planning terms as a caravan.



These hybrid garden annexes are designed and manufactured in the UK by **GX Modular** and are marketed under the brand names: *Garden Annexes*, *Ivy*, *St George Annexes*, *XB*, and *Annexa*. Each unit is factory-produced using precision-engineered components to BS3632 standards and can either be:

- **Craned into position** as a single, fully assembled structure, or
- **Rapidly assembled on site** from pre-manufactured components (RADOS protocol), or
- **Delivered in two factory-built halves** and joined together on site (FASTUP protocol).

In all cases, the hybrid garden annexe is a fully moveable structure, transportable in one or two pieces, and compliant with all aspects of the statutory definition of a caravan under Section 13 of the Caravan Sites Act 1968 (as amended 2006). Importantly, the method of assembly—whether factory-built and bolted together or assembled entirely on site—has no bearing on its lawful status as a caravan in planning terms.

A *Hybrid Garden Annexe* complies with all aspects of the definition of a caravan (Caravan Act 1968, Section 13, amended 2006)

a. Size: All hybrid garden annexes are designed within the prescribed limits. Typical dimensions are:

- Length: **11.44m**
- Width: **5.4m**
- Internal height: **2.25m** (rising to **3.03m** in some applications, measured internally from finished floor to the highest point of the ceiling). These figures are significantly below the statutory maxima of 20m length, 6.8m width, and 3.05m internal height.

b. Movability: All *hybrid garden annexes* by GX Modular are: “a structure which when assembled is physically capable of being moved by road from one place to another (whether by being towed, or by being transported on a motor vehicle or trailer”.

- Under the **RADOS methodology**, the single-unit annexe can be craned intact onto a flatbed lorry.
- Under the **FASTUP methodology**, the two factory-built halves can be transported separately and reassembled elsewhere.

The hybrid garden annexe is designed to rest solely under its own weight and is not permanently affixed to the ground. Typical foundations consist of either small concrete plinths (maximum 5 sqm), lightweight lattice supports, low-impact ground screws, or small plinth blocks. These bases provide stability while maintaining full removability. Service connections (water, electricity, drainage) are supplied separately and can be rapidly disconnected, ensuring the unit remains a moveable structure.

Both the **RADOS** (single-unit) and **FASTUP** (twin-unit) methodologies comply with this requirement, as in either case the final product is a caravan that sits on minimal foundations, can be lifted or craned for relocation, and is not subject to permanent works that would otherwise constitute operational development.

- See structural engineers report attached concerning lifting by crane.

Please view a hybrid garden annexe being moved by crane:

<https://www.youtube.com/watch?v=o8OWC0FCyOw&t=83s>



<https://www.youtube.com/watch?v=o8OWC0FCyOw&t=83s>

- c. **Construction** A hybrid garden annexe manufactured by GX Modular is factory-built using precision-engineered components and may be delivered to site in one of two lawful ways:
- **FASTUP protocol** – factory-assembled in two halves which are transported to site and craned into position before being securely bolted together; or
 - **RADOS protocol** – rapidly assembled on site within approximately five days from the same pre-manufactured and pre-finished components that would otherwise be assembled in the factory.

The chassis is constructed from pre-machined and indexed cross-laminated timber (CLT) components (maximum length 5.4m). Walls are 222mm thick, comprising 150mm pre-manufactured studwork with 100mm slab insulation. The rigid floor consists of 220mm CLT with 150mm joists and pre-cut 100mm insulation, while all roof and ceiling components are CNC-cut before final assembly. In both methods, no material cutting is required on site, as all components are delivered ready for installation.

Once assembled, the hybrid garden annexe is fully moveable either as a single unit or in two sections. It may be lifted and removed by crane within hours, or disassembled and relocated rapidly.

In all cases, the structure sits on minimal foundations, is not permanently affixed to the land, and remains a moveable caravan in law rather than a building.

Appendix 1c

ANNEXXA 535 as supplied will be **5940mm wide, 4290mm Deep, 2733mm High O.A**

This hybrid garden annexe, supplied by **GX Modular**, has been designed to comply with the statutory definition of a caravan and can be delivered and assembled using either of the company's established protocols. Under the **FASTUP** methodology, the annexe is factory-assembled in two pre-finished sections, transported to site and joined together by crane. Under the **RADOS** methodology, the same precision-manufactured, pre-finished and pre-cabled components are delivered directly to site and rapidly assembled within approximately five days, replicating the process that would otherwise be completed in the factory.

The choice between FASTUP and RADOS is determined by site circumstances such as access and logistics, with a full survey undertaken to identify the most practical approach. Importantly, the lawfulness of the unit does not depend on which method is chosen. In both cases, the final outcome is identical: a fully moveable hybrid garden annexe which complies with the statutory **size, mobility and construction** requirements.

Whether craned into position as a twin-unit under **FASTUP**, or man-portably assembled on site under **RADOS**, no material cutting of components is required, the structure is completed to the same specification, and it remains removable in one or two pieces by crane or rapid disassembly. The assembly method is immaterial to compliance with the construction test, as both processes result in a caravan in law rather than a building.

The hybrid garden annexe will provide comfortable ancillary accommodation for family members and, by virtue of satisfying the legal tests of use, size, mobility and construction, it falls squarely within the statutory definition of a caravan as set out in the Caravan Sites and Control of Development Act 1960 and the Caravan Sites Act 1968 (as amended).

Appendix 1d

Confirmation

This hybrid garden annexe fully complies with the statutory definition of a caravan or mobile home by meeting the tests of **size, mobility and construction**. Whether assembled on site under the **RADOS** protocol or delivered in two factory-built halves under the **FASTUP** protocol, the final structure remains fully moveable and within the legal dimensional limits. The method of assembly is therefore immaterial: in all cases, the unit satisfies the three statutory criteria and must be regarded as a caravan in planning law.

Appendix 2a

Matters regarding Operational Development

In the sections above, it has been demonstrated that this hybrid garden annexe satisfies the three statutory tests of **size, mobility and construction** set out in Section 13 of the Caravan Sites Act 1968 (as amended 2006). Accordingly, it falls within the legal definition of a caravan. As established in case law, the stationing of a caravan within the curtilage of a dwelling constitutes a *use of land* and does not amount to operational development under Section 55 of the Town and Country Planning Act 1990.

Appendix 2b

Matters regarding Material Change of Use

As demonstrated above, the proposed hybrid garden annexe will be used solely in an **ancillary capacity** to the lawful C3 residential use of the host property. The supporting information:

- Outlines the relationship between the intended occupants of the annexe and those of the main dwelling;
- Demonstrates that the footprint of the annexe is proportionate to the size of the dwelling and garden;
- Compares the internal accommodation of the annexe against the main house to confirm its subordinate scale; and
- Clarifies the secondary, subordinate function of the annexe within the overall planning unit.

It is recognised that a Certificate of Lawfulness can only be issued on the basis of the use described in this application. However, the Local Planning Authority is reminded that the application must be determined on the stated facts, not on speculation about possible future scenarios.

On this basis, the siting of the hybrid garden annexe does **not** amount to a material change of use, and the residential planning unit remains unaltered.

Appendix 2c

Overall Conclusion

Given the evidence set out above, and in light of established case law, the proposal clearly demonstrates that the siting of the hybrid garden annexe does not constitute operational development and does not give rise to a material change of use. The structure falls within the statutory definition of a caravan, and its occupation will remain ancillary to the host dwelling. On the balance of probability, the application meets the legal tests required, and a Certificate of Lawfulness should therefore be granted.

Appendix 3a**FAQs & Supporting Evidence****How can the Hybrid Garden Annexe be considered independent as it includes kitchen and washing facilities?**

The inclusion of kitchen and washing facilities within a hybrid garden annexe does not, in itself, render the unit independent. The critical planning consideration is not the presence of such facilities, but the overall relationship between the annexe and the host dwelling. In this case, all utilities are shared, there are no



separate service meters, and the annexe will not have its own postal address. As outlined in **Part 4**, the occupation of the annexe will remain subordinate and ancillary to the main dwelling house.

This approach is supported by appeal decision **APP/L5810/X/15/3140569**, which confirmed that accommodation can be used “interchangeably” between a main dwelling and an annexe without creating a separate planning unit. Similarly, the High Court in **Uttlesford DC v SoS (Environment) and White [1991] JPL 171** established that the decisive factors are not the presence of bathroom or kitchen facilities, but the absence of independence in terms of utilities, access and postal address.

Accordingly, the proposed hybrid garden annexe cannot reasonably be regarded as independent accommodation, and its use remains lawfully ancillary to the host property.

Given that the Hybrid Garden Annexe maybe assembled on site then isn't this operational development?

The fact that a hybrid garden annexe may be assembled on site does not alter its legal status as a caravan or render it operational development. There is no meaningful distinction between craning a factory-completed unit into a domestic garden under the **FASTUP** twin-unit protocol, and assembling the same pre-manufactured components on site under the **RADOS** single-unit protocol. In both cases, the timescale is similar, the process uses the same pre-finished components, and the outcome is identical: a moveable structure designed and manufactured to comply with the statutory definition of a caravan.

The Planning Inspectorate has consistently confirmed this principle. In appeal decision **APP/N1025/C/01/1074589**, it was held that the decisive factor is the *movability of the finished structure*, not the method of assembly. The Inspector noted that “a caravan may be delivered to site in many pieces,” provided that once assembled it remains physically capable of being moved as a whole.

Accordingly, whether deployed by crane in two factory-built sections (**FASTUP**) or rapidly assembled on site by technicians from man-portable panels (**RADOS**), the hybrid garden annexe is

not a “building” in planning terms. Its siting is therefore a use of land rather than operational development.

Doesn't the connection to services mean that this becomes a permanent structure?

The provision of service connections does not alter the status of a hybrid garden annexe or affect its compliance with the statutory mobility test. Hybrid garden annexes can be specified with a ready **de-coupling station**, allowing water, electricity and drainage to be rapidly disconnected in the same way as with a conventional mobile home. These connections are temporary and easily reversible, and do not amount to physical attachment to the land.

This position is supported by appeal decision **APP/L5810/X/15/3140569**, which confirmed that attachment to services is not equivalent to attachment to the land itself. Similarly, appeal decision **APP/J1915/X/11/2159970** established that the relevant test is whether the completed unit is capable of being moved once assembled, not whether it can be disconnected from services.

Accordingly, the presence of service connections has no bearing on the lawful definition of the structure as a caravan, and does not undermine its compliance with the statutory criteria.

How can you convince me the Hybrid Garden Annexe is movable once its assembled-on-site?

All hybrid garden annexes manufactured by **GX Modular** are specifically designed to be moveable, ensuring compliance with the statutory mobility test under Section 13 of the Caravan Sites Act 1968 (as amended). Units may be:

- **Craned into position** as complete structures or twin-units joined on site, or
- **Rapidly assembled and disassembled on site** using pre-manufactured components, with removal possible within hours.

Independent evidence supports this position. A demonstration of craned installation can be viewed online (see [video link](#)), and the accompanying structural engineer's report confirms the system for safe lifting and relocation by crane.

The Planning Inspectorate has endorsed this principle. In appeal decision **APP/N1025/C/01/1074589**, it was confirmed that the statutory test relates to the *capability* of the completed unit to be moved, not the practicalities of site access or the use of a trailer. Accordingly, hybrid garden annexes remain lawful caravans in planning terms, irrespective of whether they are delivered by crane or assembled on site.

Why not apply this through permitted development rights?

To ensure suitable interior headroom for permanent residential use, the minimum external height of a hybrid garden annexe is approximately **2.69m**. This dimension remains comfortably within the statutory limits prescribed under Section 13 of the Caravan Sites Act 1968 (as amended 2006).

It is important to emphasise that the siting of a hybrid garden annexe, caravan or mobile home for purposes ancillary to the main dwelling does **not** amount to operational development. As such, it should not be assessed under **Class E, Part 1 of Schedule 2 of the GPDO 2015**, which relates to operational development for outbuildings such as sheds or garages. The correct legal framework is that of the Caravan Sites Act and established case law, which confirm that caravans constitute use of land, not building operations.

Are there any similar precedents to which to refer?

This position has been supported in several appeal decisions and court judgments, including:

- **APP/B5480/C/17/3174314** – confirming that the siting of a mobile home within a garden was a use of land rather than operational development.
- **APP/N1025/C/01/1074589** – confirming that the method of assembly is immaterial provided the completed unit is moveable.
- **APP/L5810/X/15/3140569** – confirming that service connections do not alter the status of a caravan.
- **Measor v SOS (1998)** – High Court authority that a caravan is not a building because of its lack of permanence and attachment.
- **Uttlesford DC v SSE & White [1991] JPL 171** – confirming that independence is judged not by the presence of facilities but by the absence of separate services, meters, or postal address.

Together, these precedents consistently support the principle that caravans fall within the scope of *use of land*, not operational development.

Appendix 3b

Movability Statement

This appendix sets out the nature and specification of the GX Modular range of hybrid garden annexes and demonstrates their full compliance with the statutory definition of a caravan under Section 13 of the Caravan Sites Act 1968 (as amended 2006).



The **GX range of hybrid garden annexes** includes all compliant structures marketed under the following brand names: *St George*, *XB*, *Ivy*, and *Annexa*. Each model is designed and manufactured to the same specification, ensuring compliance with Section 13 of the Caravan Sites Act 1968 (as amended 2006).

Sizes

The GX range of hybrid garden annexes is available in the following size models: 430, 435, 440, 445,

530, 535, 540, 545, 630, 635, 640, 645, 730, 735, 740, 745, 830, 835, 840, 845, 930, 935, 940, and 945.

Dimensions

All GX annexes fall comfortably within the statutory maximum dimensions for a caravan as defined in Section 13 of the Caravan Sites Act 1968 (as amended 2006):

- Maximum depth: **6.8m**
- Maximum length: **20.0m**
- Maximum internal height: **3.05m** (measured floor to ceiling)

Construction

All GX annexes are manufactured in the UK from **cross-laminated timber (CLT)**. Each structure incorporates a **225mm structural base rail frame**, providing the foundation for the entire design. This engineered chassis is common to both assembly protocols — **RADOS (Rapid Assembly Deployments On Site)** and **FASTUP (Factory Assembled Standardised Twin Unit Protocol)** — and ensures that whether the unit is craned into position or assembled on site, it is designed as a fully moveable structure capable of transportation and relocation.

Movability

Every GX annexe is designed with integrated systems to guarantee mobility, regardless of whether it is assembled under the RADOS or FASTUP protocol. Each unit includes:

- Indexed **hoist/lift points**
- **Pneumatic lift mat points** for raising the structure
- A **removable wheeled transport rig** for relocation

Movement can be achieved either by engaging pneumatic lift mats at the marked points and hoisting the annexe by crane/hiab onto a suitable trailer, or by reattaching the wheeled transport rig to roll the unit into place for transport.

The attached illustrations demonstrate the base rail frame, lift mat points, hoist points and removable rig system. For example, a GX 430 unit can be relocated by crane-lift as a twin-unit under FASTUP, or by rapid disassembly and removal under RADOS, with both methods ensuring full compliance with the statutory definition of a caravan.

Summary

Whichever assembly method is chosen — **FASTUP** (twin-unit, factory-assembled and craned into place) or **RADOS** (single-unit, rapidly assembled on site) — the resulting hybrid garden annexe is identical in outcome. Each model in the GX range remains within the statutory size limits, incorporates a structural base rail frame to ensure mobility, and is fully moveable either as a complete unit or in two sections. Accordingly, all GX hybrid garden annexes meet the requirements of Section 13 of the Caravan Sites Act 1968 (as amended 2006) and are lawfully to be regarded as caravans rather than buildings.

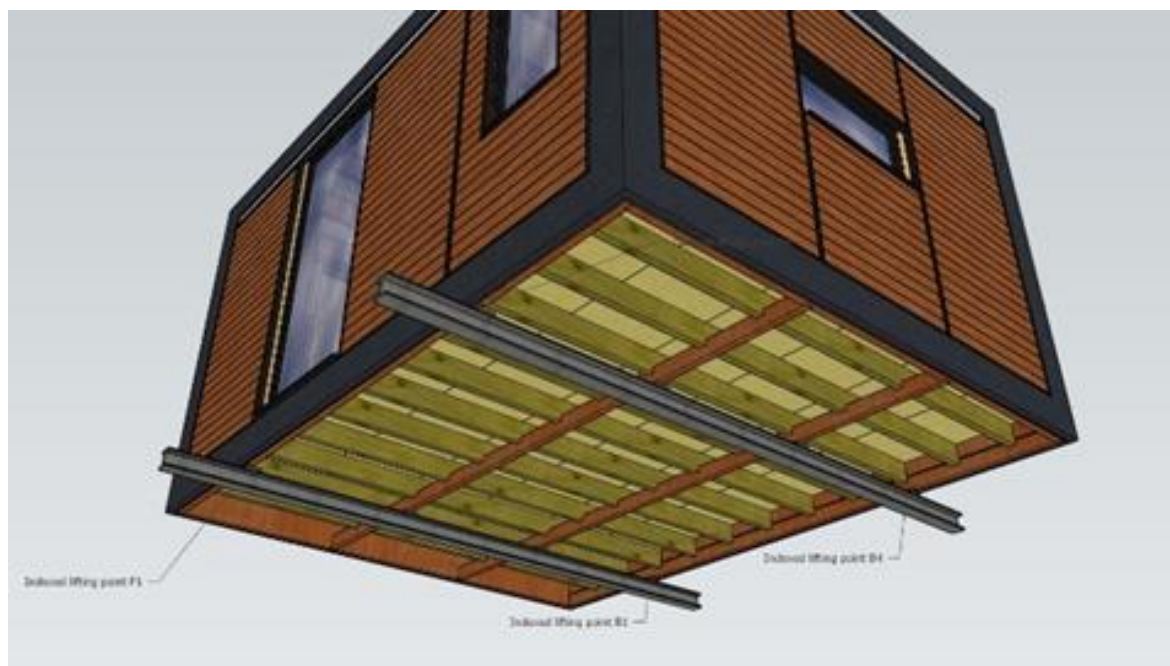
The siting of a GX hybrid garden annexe therefore constitutes a **use of land** and does **not** amount to operational development.

Example Movement Alternatives for the 430 size

Option A: Move 430 by hoist

- A typical 430 with pneumatic lift mat points so marked

- Removable transport beam for 430
- 430 with a pair of removable transport beam in place



Option B: Move 430 by wheeled skid

- 430 with alternative move method – Removable wheeled skid



BS 3632 Caravan

Referred to as

Hybrid Garden Annexe

Caravan Installation Protocols

GX Caravans (marketed as annexes) are comprised of a set of precision cut components manufactured in the GX Factory with two possible assembly protocols.

These protocols are identical in terms of input (an identical set of components) and identical in outcome (a finished, fully movable, liveable annexe).

The chosen methodology of assembly is selected in consideration of the site, client choice, and access provisions.

There is no material difference in terms of the outcome, and it is only the geographic location of the assembly process that varies between the protocols.



FASTUP - Factory Assembled Standardised Twin Unit Protocol

The definitive set of precision-machined and coded components manufactured to the GX prescription and BS3638 standard. The set of finished components is assembled at the GX factory site into two parts and transported to site and clamped together.

The hybrid garden annexe may be supplied in two parts and bolted together on site. The following access points and methodology apply. Images shown X-Ray by way of explanation.

1. Assembly is completed via the F3/4 -B3/4 access points (**see figure 1**) on the completed sections. X-ray style images to demonstrate fixing points
2. Clamp fixings by way of M16 T nuts applied at Alpha via Access points (**see figure 2**) on jointing section in floor

3. Clamp fixings by way of M16 T nuts applied at Alpha via Access points (**see figure 3**) on jointing section in walls F & B
4. Clamp fixings by way of M16 T nuts applied at Alpha via Access points (**see figure 4**) on jointing section in roof

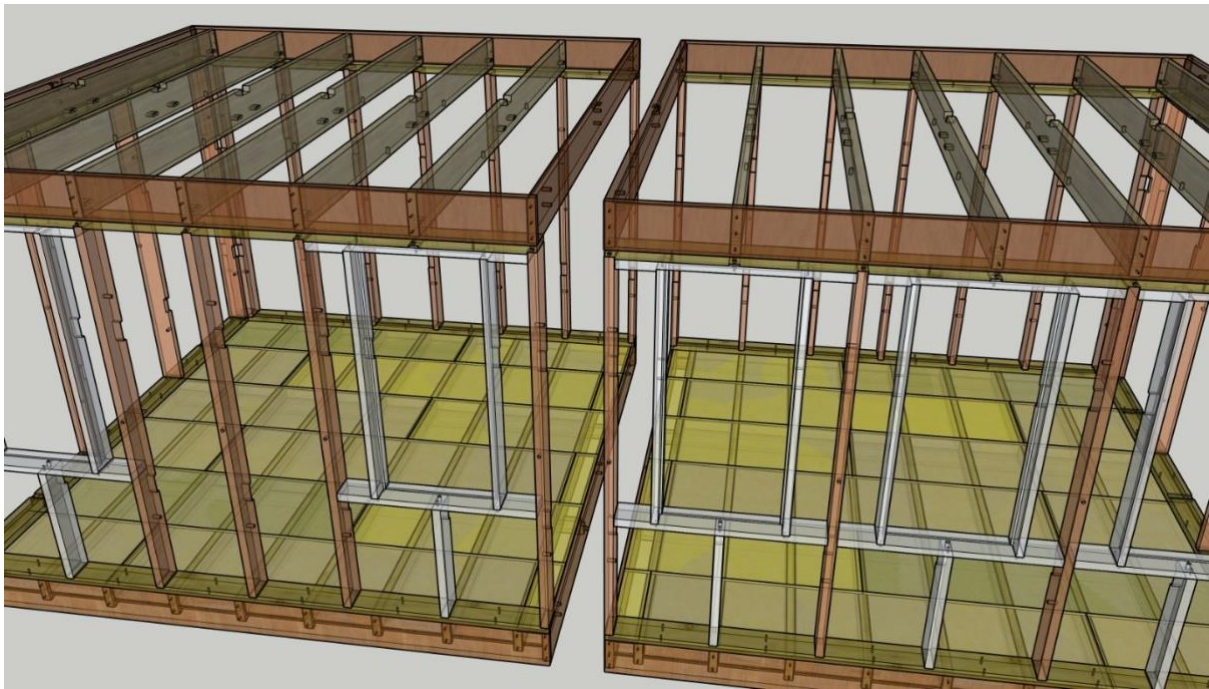


Figure 2 Hybrid Garden Annexe Assembly point F3/4 to B3/4 as twin unit

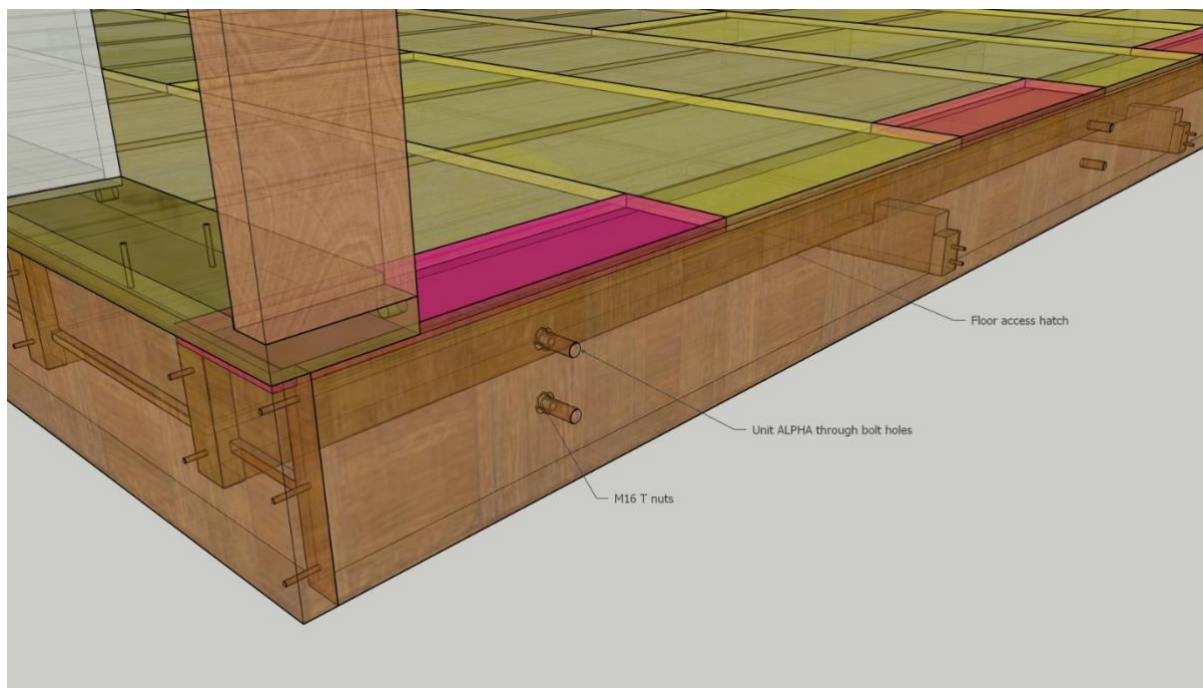


Figure 3 Base rail fixing points for Hybrid garden annexe Twin unit caravan to BS 3238 including ALPHA location via floor access hatch M16 T nuts

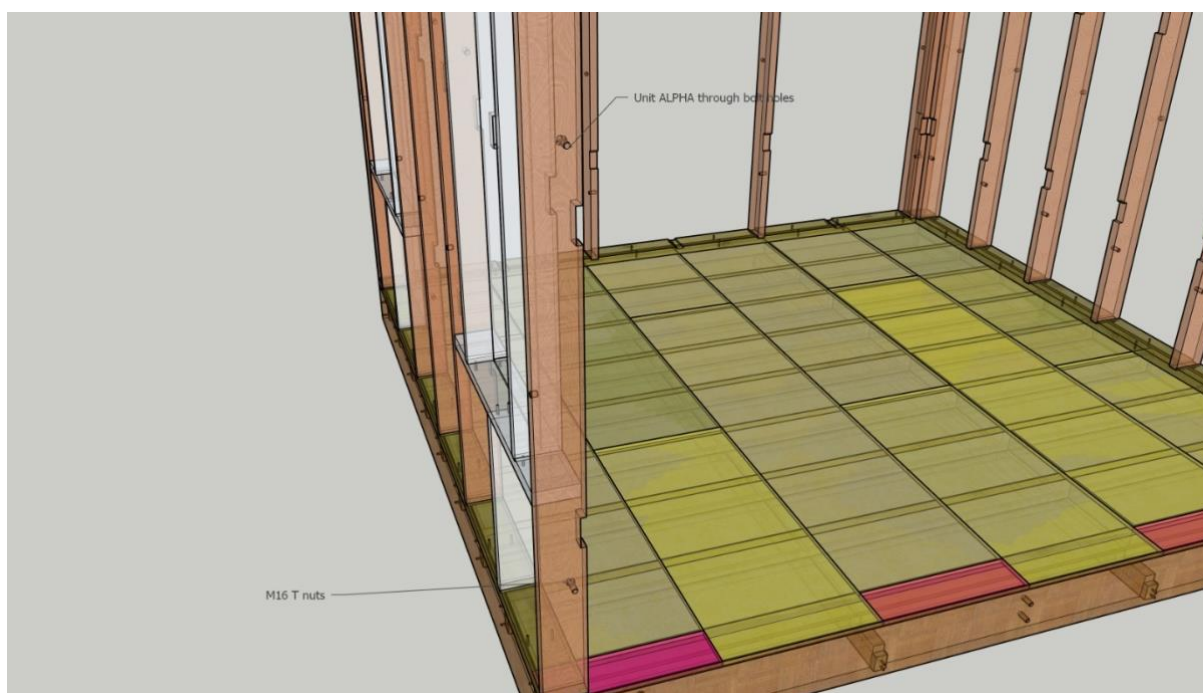


Figure 4 X-Ray image of finished section showing fixing points for M16 T nuts for twin unit caravan assembly. Note ALPHA access points.

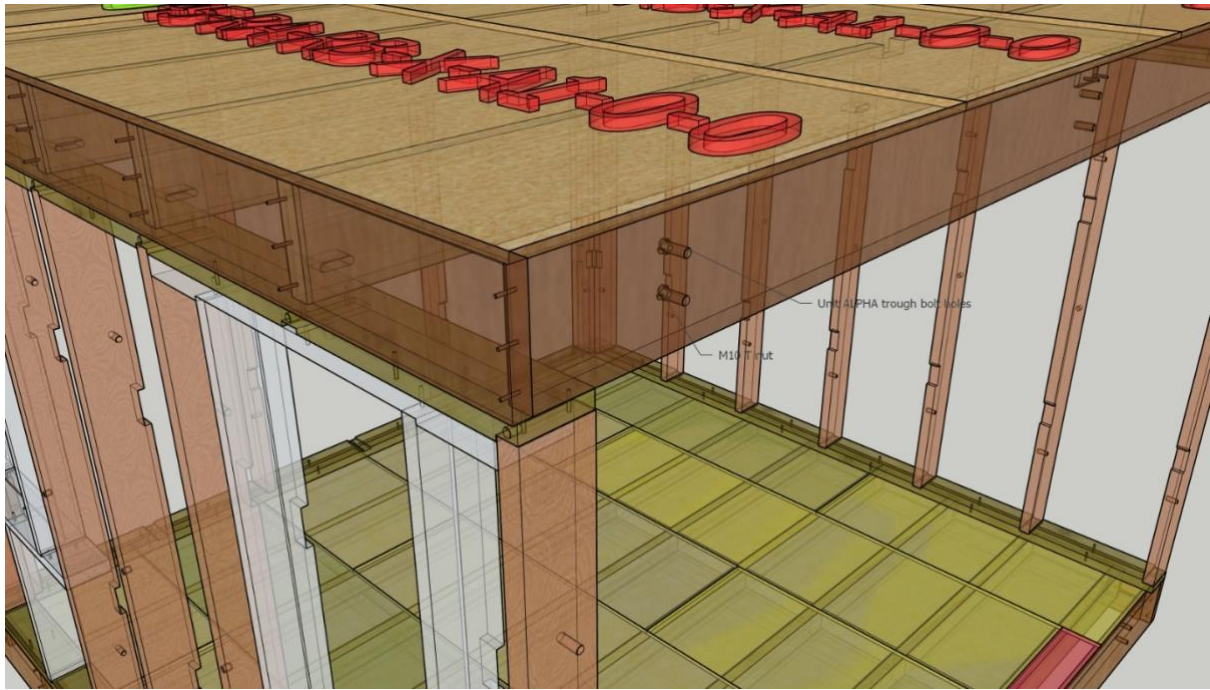


Figure 5 Roof section joining locators access points and Alpha clamping and fixing points with M16 T Nuts



RADOS Rapid Assembly Deployments On Site

The definitive set of precision-machined and coded components manufactured to the GX prescription and BS3638 standard. The set of finished components is transported and assembled on-site.

Using the identical pre-cut components for the annexe/caravan as the FASTUP methodology, the hybrid garden annexe may be rapidly assembled on site.

Day 1 - Skeleton

Full assembly of all pre-cut frame components including structural base rails, floor joists, insulated floor, wall and floor plates, studded throughout, window cassettes, roof rafters and roof boards.

Day 2 – Shell-on

Full completion of watertight prefabricated shell including 360 sheathing, fire wrap membrane, window & doors fully fitted, roof bonded and trimmed.

Day 3 – Interior Completion

Full interior completion including final cabling, lighting, positioning of pre-cut slab insulation and hanging of pre-finished interior linings.

Day 4 – Completion

Interior Pack completed including positioning of pre-finished kitchen cabinetry and bathroom pod.



Figure 6- Day 1 Skeleton completed



Figure 7 – Day 2 Shell-on

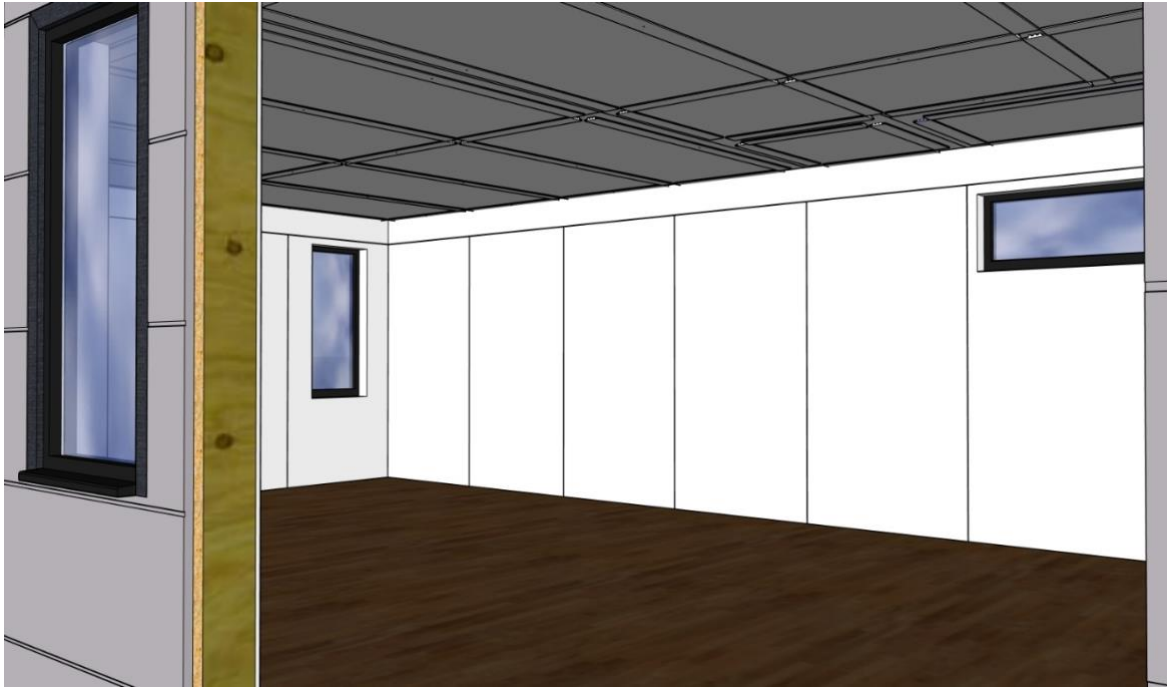


Figure 8 Day 3 Interior Completed

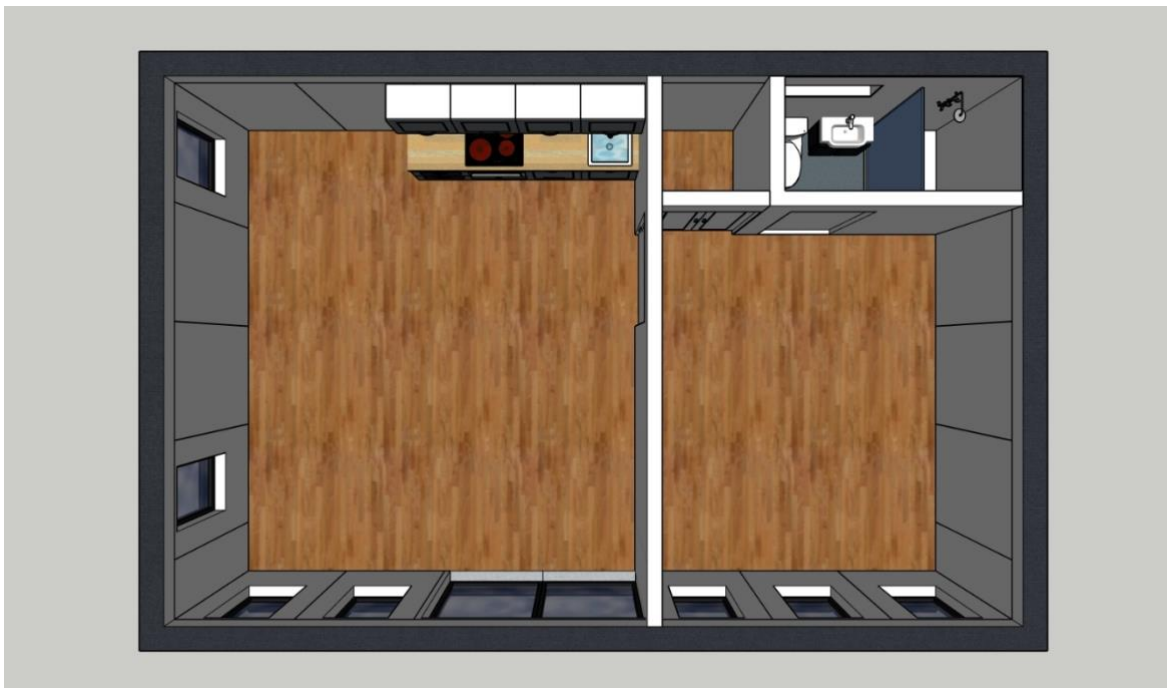


Figure 9 Day 4 Completion

Appendix 3c

Manufacture

All GX hybrid garden annexes are manufactured at the GX factory near Bury St Edmunds, where each individual component is **CNC-machined to a tolerance of 0.1mm**. The core frame is formed from **150mm cross-laminated timber (glulam)**, incorporating **100mm slab insulation** and **15mm internal/external panel work**. Each component is precisely engineered and indexed to allow for rapid assembly, whether in the factory under the FASTUP protocol or on site under the RADOS protocol.



Appendix 3d

Installation Options

The assembly of a hybrid garden annexe may be carried out either in the **GX factory** or **on site**, with both processes completed within similar timescales.

- **Crane Options:** The annexe may be craned directly into position as a complete unit (FASTUP) or, alternatively, individual pre-manufactured components may be craned onto site for immediate assembly (RADOS). A demonstration of crane installation is available here: [video link](#).

Whichever method is chosen, the outcome is identical: a fully moveable structure that complies with the statutory definition of a caravan under Section 13 of the Caravan Sites Act 1968 (as amended).





Appendix 4

PRECEDENTS

A substantial body of case law and appeal decisions confirms the lawful status of caravans (including hybrid garden annexes) and the principle that their siting constitutes use of land rather than operational development. The key precedents are as follows:

✓ Measor v SOS (1998)

The High Court held that a structure meeting the definition of a caravan under the 1960 and 1968 Acts would not normally be considered a "building" under the 1990 Act due to its lack of permanence and attachment. *Supports the principle that caravans are movable chattels, not operational development.*

✓ Brentall v Erewash Borough Council [2002] (Appeal decision by J G Roberts)

"It is not necessary for it (a caravan) to be towed, only that it is capable of being moved by road." *Confirms that actual movement is not required; theoretical capability is sufficient.*

✓ Brightlingsea Haven Ltd v Morris [2008]

"It is irrelevant to the test where the structure actually is, and whether it may have difficulty in reaching a road." *Confirms that site access constraints are irrelevant; only the inherent movability of the structure matters.*

✓ Byrne v SoS & Arun DC [1997]

The Court clarified that twin-unit caravans must be "separately constructed" before being joined together. *Supports FASTUP: the joining of two halves with bolts is consistent with the statutory definition.*

✓ Appeal decision APP/L5810/X/15/3140569

The Inspector held that accommodation may be used interchangeably between a dwelling and an annexe, and that attachment to services is not equivalent to attachment to the land. *Confirms that kitchens/bathrooms in annexes do not confer independence, and that service connections do not alter mobility.*

✓ Uttlesford DC v SoS & White [1991]

The High Court established that the decisive factors are not the presence of facilities, but the lack of independence, e.g. no separate meters, postal address or curtilage. *Supports ancillary/incidental use arguments in Part 4.*

✓ Appeal decision APP/N1025/C/01/1074589

The Inspector confirmed that "a caravan may be delivered to site in many pieces," and the key test is movability once fully assembled. The structure need not be capable of access by road or trailer; only the *capability of movement* matters. *Supports both FASTUP and RADOS, as each results in a moveable unit regardless of how it reaches site.*

✓ Appeal decision APP/B5480/C/17/3174314

The Inspector confirmed there is no requirement for two sections of a twin-unit caravan to be created away from site, provided they are separately constructed and finally joined together with bolts. *Direct precedent for FASTUP twin-unit assembly.*

✓ Appeal decision APP/J1915/X/11/2159970

The Inspector held that the test is whether the unit, once fully assembled, is capable of being transported as a whole by road. Practicalities of site access or the likelihood of movement are irrelevant; the only requirement is inherent structural mobility. *Directly supports both RADOS and FASTUP, confirming theoretical mobility is sufficient.*

Analysis

The combined effect of these precedents is clear:

- Caravans are not buildings due to their lack of permanence (*Meason*).
- Actual towing is unnecessary; capability of movement is the test (*Brentall, APP/N1025/C/01/1074589*).
- Access difficulties are immaterial (*Brightlingsea, APP/J1915/X/11/2159970*).
- Twin-units are lawful where separately constructed and finally bolted together (*Byrne, APP/B5480/C/17/3174314*).
- Service connections do not affect mobility (*APP/L5810/X/15/3140569*).
- Ancillary annexes remain within the main planning unit if no independent curtilage or services exist (*Uttlesford, APP/L5810/X/15/3140569*).

Taken together, these decisions establish that GX hybrid garden annexes, whether deployed under FASTUP or RADOS, are lawful caravans under Section 13 of the Caravan Sites Act 1968 (as amended), and their siting constitutes use of land, not operational development.

Conclusion

The evidence presented in this statement, supported by supplementary documents and established case law, confirms that the GX range of hybrid garden annexes satisfies the statutory definition of a caravan under Section 13 of the Caravan Sites Act 1968 (as amended). Whether assembled on site through the **RADOS** protocol or delivered in two sections under the **FASTUP** protocol, the outcome is identical: a moveable structure designed for human habitation that remains within the prescribed limits of **size, mobility and construction**.

It has further been demonstrated that the proposed use of the hybrid garden annexe will be **ancillary to the main C3 dwelling**, with no creation of a separate planning unit. The siting of the unit therefore does not constitute operational development or a material change of use.

In line with the consistent approach of the Courts and the Planning Inspectorate, and on the balance of probability, the siting of the hybrid garden annexe falls within the lawful definition of a caravan. Accordingly, the application meets the requirements of Section 192 of the Town and Country Planning Act 1990, and a Certificate of Lawfulness should be granted.