



## Woodford Neighbourhood Forum

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Planning Services  
Stockport Metropolitan Borough Council  
Town Hall, Edward Street  
Stockport  
SK1 3XE

10 January 2026

To: Planning Officer

**Reference:** DC/097357

**Proposal:** Certificate of Lawful Existing Use to confirm the use of land for the lawful siting of caravans and use as holiday / tourism accommodation

**Location:** Land To The Rear Of 465 Chester Road Woodford Stockport SK7 1PR

### 1. Comments and Concerns

We are aware that this is an application for a Certificate of Lawful Existing Use (CLEU), which is presumably why we were not notified. Nevertheless, we do have a number of concerns, and a member of our team who has considerable experience in managing holiday parks has supplied detailed considerations, as outlined in sections 3 and 4.

Soon after we had noticed this planning application on your website, the planning portal was out of action from the evening of Friday 8<sup>th</sup> January until Monday 12<sup>th</sup> January, which impeded our ability to study the documents and timelines. We can now see that the determination deadline was 18<sup>th</sup> December, but we are submitting this response in case there is still time for it to be considered.

### 2. Policies relevant to the application

We believe that planning policies relevant to this application include:

2.1. NPPF 2024

2.2. Stockport Development Plan:

- Woodford Neighbourhood Plan 2019
- Saved UDP 2011
- Core Strategy 2011

a) Woodford Neighbourhood Plan

While the Woodford Neighbourhood Plan does not include a specific policy covering the proposed uses in this application, they are not compatible with the vision and objectives of the neighbourhood plan and would have a negative impact on landscape, village character and residential amenity.

b) Stockport UDP

Residential amenity, control of development in Green Belt policies and quality of development may be relevant, for example:

## CDH1.2 Non Residential Development In Predominantly Residential Areas. GBA1.2 CONTROL OF DEVELOPMENT IN GREEN BELT

c) Stockport Core Strategy:  
Development Management Policy SIE-1 Quality Places

### 3. Issues relating to evidence for and future management of existing use

#### a) Insufficient Evidence of Specific Use as Holiday/Tourist Accommodation.

The application claims the caravans have been used for "*holiday purposes*" but provides no substantive proof of this. Aerial and site photos merely show the physical presence of caravans, not their active use as short-term holiday lets. There are no supporting documents such as:

- Booking records, guest logs, or invoices showing transient occupancy.
- Advertising materials (e.g., listings on platforms like Airbnb or holiday rental sites).
- Guest reviews on TripAdvisor or similar holiday review sites.
- Utility bills, council tax records, or maintenance logs tied to holiday operations.
- Sworn affidavits or statutory declarations from previous owners, tenants, or guests confirming holiday use.

UK planning guidance emphasises that visual evidence alone is inadequate for proving use; documentary corroboration is essential to distinguish holiday accommodation from residential or storage purposes. The vague statement that "*ground rent was paid to the owner of No. 465 Chester Road*" is unsubstantiated ("*it is understood*"), lacking receipts or agreements.

#### b) Lack of Proof of Continuous and Uninterrupted Use Over 10 Years.

While aerial imagery spans 2003–2021, it is sporadic and does not cover every year, creating gaps where use cannot be verified. Post 2021 imagery is dismissed as poor quality, but no alternative evidence such as drone photos or witness statements are provided. The 10-year immunity period must be demonstrated up to the application date, and interruptions (e.g., periods of disuse or different use) could in my view reset the clock. Without timelines of occupancy or operations, it's impossible to confirm the use was continuous rather than occasional or seasonal storage.

#### c) Condition of Caravans Suggests Non-Holiday Use.

The site photos (Figures 12–19) depict caravans in a dilapidated state: overgrown with vegetation, surrounded by debris (e.g., scattered items, rubbish), and integrated into the wooded landscape as if stationary for years without maintenance. Some appear abandoned or used for storage, with no signs of holiday facilities like welcome signage, dedicated parking, waste disposal, or amenities such as a picnic area or electrical hookups for tourists. This contrasts with typical holiday caravan sites, which are maintained for visitor appeal. The unkempt appearance raises suspicions of unauthorised residential use or simple land occupation, which would not qualify for CLEU under holiday classification.

d) Potential for Residential or Other Unauthorised Use Caravans can become immune from enforcement after 10 years only for the exact use claimed. If they have been occupied residentially as permanent homes, this could constitute a different breach of planning control. The application does not address this distinction, and without occupant records, it is plausible that the caravans served as low-cost housing rather than tourism. Additionally, under the Caravan Sites and Control of Development Act 1960, a site license is often required for caravan sites holiday or otherwise, but no evidence of licensing history is provided, which could undermine the claim of lawful operations.

e) Failure to Meet Evidentiary Standards: The application requires a robust evidential bundle, including historical records and third-party confirmations. Relying solely on Google Earth imagery

and undated site photos falls short. The application's conclusion that use is lawful "on the balance of probabilities" is speculative without corroboration, and the burden of proof lies entirely with the applicant.

f) We respectfully suggest that the Council seeks additional proofs, or conducts site inspections before making a decision to grant a CLEU.

#### **4. Conditions**

In the event of a decision to grant a CLEU it would confirm only the existing use as holiday accommodation, not permit residential conversion. To enforce this and prevent "creep" into permanent housing, we would like to suggest that the Council considers attaching planning conditions on the application or subsequent permissions such as:

- a) Mandatory Closure Period: Require the caravans to be unavailable for letting for a minimum of 8 weeks per year (e.g., during winter, such as January–February), with no occupancy allowed. This breaks continuity and prevents use as main residences, aligning with precedents where sites must vacate to maintain holiday status.
- b) Occupancy Restrictions: Limit individual stays to no more than 28 consecutive days, with no return within 14 days, and prohibit use as a sole or main residence.
- c) Record-Keeping: Mandate the owner to maintain a register of all occupants, including their primary home addresses and stay dates, available for council inspection on request.
- d) Site Maintenance and Licensing: Require compliance with caravan site licensing under the 1960 Act, including health/safety standards for holiday use, and annual reporting to confirm non-residential compliance.

Yours sincerely,

Evelyn Frearson On behalf of Woodford Neighbourhood Forum Management Committee