

Statutory Declaration

In support of Lawful Development Certificate for an Existing Use or Development

for the

*“existing use of Westfield Lakes Caravan Park as a ‘caravan site’ in accordance with
Planning Permission reference 7/113/1991”*

At Westfield Lakes Caravan Park, Far Ings Road, Barton-upon-Humber, DN18 5RG

[REDACTED]
[REDACTED] solemnly and sincerely make this Statutory Declaration in support of an application for a Lawful Development Certificate for an Existing Use or Development at the above site. I declare as follows:

- I am a Director of David Lee Photography Limited (Company No 01291092), since 25th March 2002. Previously, the company was owned by my father, David Lee, and I worked for him at the company since September 1989.
- I have knowledge of the former Westfield Lakes Caravan Park and the adjoining Humber Bridge Country Hotel (formerly Reeds Hotel). I have visited the site on the following occasions on a professional basis (as a photographer), either on behalf of the owners of the site or those engaged in events (such as weddings) at the site, until 2013:
 - 5th September 1997
 - 10th September 1997
 - 26th October 1997
 - 14th August 1998
 - 18th August 1998
 - 8th September 1998
 - 18th November 1998
 - 7th January 1999
 - 21st August 1999
 - 18th July 2000
 - 27th August 2000
 - 27th October 2000
 - 18th June 2002
 - 26th July 2002
 - 3rd October 2002
 - 25th January 2005

- 5th May 2005
- 6th May 2006
- 3rd June 2005
- 4th May 2010
- 14th September 2012
- 17th October 2013
- 31st January 2013
- To the best of my knowledge, I can confirm the following:
 - I am aware that caravans were stationed in the area hatched purple on the plan found in Exhibit A, until around 2003.
 - As far as I am aware, those same caravans were relocated to the northern area of the site hatched orange in Exhibit A sometime between 2003 and 2005.
 - The caravans which were stationed in the area hatched orange on the plan found in Exhibit A were there until after 2013.
 - As far as I am aware, the two caravans located in the western field were occupied until after 2013.
 - As far as I am aware, I have not seen any hotel event activities formally or otherwise that had taken place in the area hatched purple in Exhibit A (referred to as the 'Eastern Field' in the Exhibit).
- The company has taken the following photographs of site:
 - A photograph taken by myself, dated 24th April 2007 is found in Exhibit B (photograph reference 1D8I2900). This was taken on the date of event where we were contracted to take photographs. It shows the site from a distance. The two caravans are visible to the west of the chalet within the area hatched orange found on the plan in Exhibit A – see the foreground in front of the hotel. There are no other activities taking place within the Eastern Field hatched purple in the plan found in Exhibit A.
 - Aerial photograph taken on 6th March 2007 by the company, found in Exhibit C. This shows the Westfield Lakes Caravan Park and the adjoining hotel looking in a north-eastern direction. There are no activities taking place within the Eastern Field hatched purple in the plan found in Exhibit A.
 - Aerial photograph taken on 5th December 2013 by the company, found in Exhibit D. This shows the Westfield Lakes Caravan Park and the adjoining hotel looking in an eastern direction. There are two caravans visible at the western end of the site, referred to as the Western Field hatched in green on the plan found in Exhibit A. There are two caravans which are visible at the western end of the Eastern Field

hatched purple on the plan found in Exhibit A. There are no other activities found taking place within the Eastern Field is visible in this photograph.

- From my knowledge of the site over many years, I am unable to recall a time when hotel guests were actively using the Eastern Field hatched purple on the plan found in Exhibit A for any activities associated with their stay or visit to the hotel, other than to use the access drive.

And I make this solemn declaration conscientiously believing the same to be true and by virtue of the provisions of the Statutory Declarations Act 1835.

Declared by Michael John Lee

[Redacted signature]

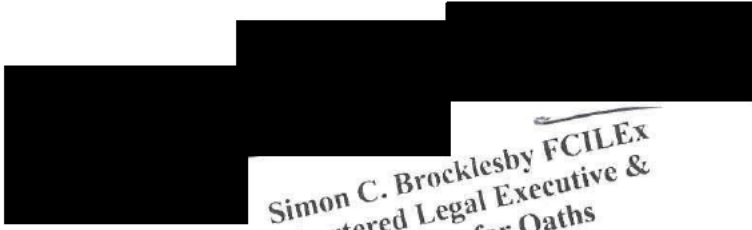
[Redacted signature]

This... 31st ... Day of ... October ... 2024

[Redacted signature]

**Simon C. Brocklesby FCILEx
Chartered Legal Executive &
Commissioner for Oaths
Mason Baggott & Garton
90-92 High Street
Barton upon Humber DN18 5PU**

Exhibit A – Laister Planning Figure 1



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Legend

- Application Site Location
- Other Land Controlled by Applicant
- The 'Eastern Field'
- The 'Western Field'
- Area Occupied by Caravans between 2003-2010

Client:	Elegant Lifestyle Limited
Project:	Westfield Lakes Caravan Park
Title:	Site Location Plan
Drawing No:	Figure 1



Rev	Changes	Date

OS Licence Information:
 2024: 0100031673
 Drawn|Nayan Gandhi
 Chk'd|Nick Laister

Oddfellows Hall, Ground Floor
 London Road, Chipping Norton
 Oxfordshire OX7 5AR

Scale: 1:2,500
 Paper Size: A3

Exhibit B – Photograph dated 24th April 2007



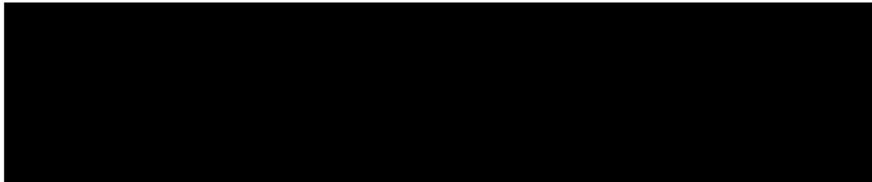
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1D8I2900 Reeds Hotel.jpg

Exhibit C – Aerial Photograph dated 6th March 2007

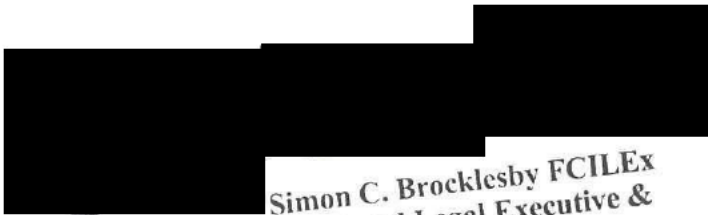


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Exhibit D – Aerial Photograph dated 5th December 2013



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