

STATUTORY DECLARATION

I, ~~Atsushi and Yasuko~~ of ~~East Finchley~~ Vale of Health, London NW3 1AU, do solemnly declare as follows:

Introduction

1. I make this Statutory Declaration pursuant to my objection to the London Borough of Camden ("Camden") to Planning Application 2010/2845/P under Section 191 of the Town and Country Planning Act 1991 for a Certificate of Lawful Use as a caravan site in respect of the North Fairground Site ("the Fairground") in the Vale of Health, NW3 1AU.
2. I have lived at ~~Atsushi and Yasuko~~ Vale of Health, NW3 1AU, since 1993 and our house faces the Fairground directly, with only a small access path between the front of our house and the site; I thus have detailed personal knowledge of the use of the site over the past 17 years.

Use of the site

3. The site was almost empty when we moved here in 1993 and only 3 caravans were lived in permanently. Apart from that it was used to store and repair some funfair equipment as well as during the Easter funfair with rides. Although the larger rides stopped after a few years the Easter funfair use continued until at least 2002 or longer with smaller activities, such as a rifle range, a goldfish lottery stand and a Merry Go Round for small children as well as a stand with food and beverages.
4. The use of the site changed only after the last serious enquiry about a planning application for residential use was informally rejected by Camden Council in 2003 and the owners of the ground started to rent out caravans or spaces on the site. When we questioned the owners about renting caravans/spaces to produce an income and wrote a letter of complaint to Camden Council regarding this; we no longer have a copy of Camden's reply but their explanation was that everybody living on the fairground was either family or employed to work on repairing fairground equipment and therefore entitled to live on the site.
5. The applicants state that the site is no longer used for fairground activities, which is not correct. It is still the case that during parts of the autumn, the whole of the winter and parts of spring the site is used to park fairground rides (see photographic images 4-7, 9,10) and unregistered old lorries,(see photographic images 12 & 13) in the gaps between the caravans and to repair fairground equipment owned by the applicants. Although the site is less full in the summer one of the rides and one lorry are parked outside our house right now and the lorry has been there for many years. (See photographic evidence Image 11).
6. When the applicants started to allow more caravans on the site it considerably deteriorated. We had first hand experience of this for many years and have been appalled by the extent of neglect of the site.

Problems with current use

7. The current arrangement of caravans as shown on the site plan of the application is presently approximately correct, except for the fact that it shows a non-existent pedestrian entrance in the NW corner. However, this arrangement has only been like this for a couple of years or less, but definitely not for the last 10 years, particularly in the south part of the North Fairground Site. The attached document 'Comments on the North Fairground Site plan' gives evidence (which is correct to the best of my knowledge and belief) regarding this point.
8. The recent effort to clean up the site (since about 3 months) seems to coincide with this planning application. However, this is not the state the site has usually been in. We have complained several times to the owners and the council about the state of the fairground site with rubbish and waste scattered around, (see photographic images 8 & 10), attracting rats and foxes, which came to our path as well. Also, there have been several occasions when waste was burned in open bonfires in oil drums, causing pollution (see photographic image 10).
9. Another effect, which the increase in caravans has had, is a much higher noise level as caravans do not have the same sound protection as houses. We were forced to move our bedrooms to the back of the house because there were many nights when we and our children were woken up by the noise level on the site, especially in the summer months when more activities take place outside and people play music, sing or gather around an open fire late into the night. Although most of the people living on the site are not overly noisy individually (with the exception of 1 or 2 people), the site has the acoustics of an open-air theatre (very similar to that in Regents Park); you can hear every sneeze, cough and conversation etc. The noise disturbance has therefore been continuous and has caused many sleepless nights and considerable upset over the years.

AND I MAKE this solemn declaration conscientiously believing it to be true by virtue of the provisions of the Statutory Declarations Act 1835.

DECLARED by the said ~~David Wright~~

at ...

on ...

Before me

CKFT
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29 July 2010.

Solicitor/Commissioner for Oaths

C.A. WRIGHT.

Comments on North Fairground Site Plan submitted by applicants

Looking at the plan of who permanently lives in caravans on the North Fairground Site since 2000 according to the applicants as well as their statutory declarations, we have come across several inconsistencies. We believe that actually only 4 caravans have been permanently lived in since 2000.

Out of the 21 caravans listed on the plan 10 of them are either empty, not on site or in use during winter months only. Although the owners of caravans C09, C18 and C19 say in their statutory declarations that they have lived on the site since 2000 for C09, 1998 for C18 and 1999 for C19 it is questionable whether they have lived there permanently or in that location. In fact the aerial photograph submitted by the applicants of 2002 (see photographic image 3) shows that there was no caravan in the location of C09 at that time. C18 was also not parked where indicated on the plan as people in a green double-decker bus lived there for several years until at least Nov. 2001, (see photographic evidence image 1 & 2). C19 was also not in the indicated location as the space was occupied by a yellow caravan for many years until the owner died in or around 2006. All other caravans which are lived in came after 2000.

At least 6 of the presently lived in caravans have occupants with professions which are not related to fairground activities. According to our understanding the lawful use of the site is 'winter quarters for travelling showmen.' It is therefore questionable whether these occupants should have been allowed to live on the site in the first place.

<u>Caravans permanently lived in since 2000</u>	<u>YES</u>	<u>NO</u>
C01: marked as empty but not currently at the site, not registered on electoral system		X
C02: lived in since 2010, no statutory declaration, Musician, not registered on electoral system, 2 old lorries were located here until approx. 2009 for many years		X
C03: marked as empty, not registered on electoral system		X
C04: does not live there, used as postal address, registered on electoral system, no statutory declaration		X
C05: only lived in in winter months not registered on electoral system, works for fairground no statutory declaration		X
C06: lived there since 2007, according to statutory declaration not registered on electoral system, works in IT		X
C07: lived on site since 1985 according to statutory declaration registered on electoral system	X	

<u>Caravans permanently lived in since 2000</u>	<u>YES</u>	<u>NO</u>
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C08: Used by owner to take to fairground sites parked during winter, not registered on electoral system, works for fairground, no statutory declaration		X
C09: Lived in since 2000 according to statutory declaration, not registered on electoral system, not in aerial photo of 2002, Retailer, works all over UK (how much is he away?)	?	?
C10: marked as empty, not registered on electoral system		X
C11: lived there since 1985, registered on electoral system	X	
C12: lived there since 1985, registered on electoral system	X	
C13: lived there since 1985, registered on electoral system	X	
C14: only lived in in winter months not registered on electoral system, works for fairground		X
C15: not on site		X
C16: lived in since 2002 according to statutory declaration not registered on electoral system, works as mechanic		X
C17: marked as empty, not lived in, not registered on electoral system		X
C18: lived there since 1998 according to statutory declaration There is photographic evidence that a green bus was in this location at least until Nov. 2001 not registered on electoral system, works at Mdme Thoussoud	?	?
C19: lived there since 1999 according to statutory declaration, not registered on electoral system This caravan has not been in this location since 1999, the space was occupied by a yellow caravan whose owner died in 2006, (see photographic image 1)	?	?
C20: lived there since 2008 according to statutory declaration not registered on electoral system, masseur		X
C21: not on site		X

Photographic Evidence in support of Statutory Declarations by ~~Mr. [REDACTED]~~ and ~~Mr. [REDACTED]~~



Image 1

2000, in this image a green double-decker bus is in the location of C18. The yellow caravan in the far right corner is in the present location of C19 and was there for several years after 2000.

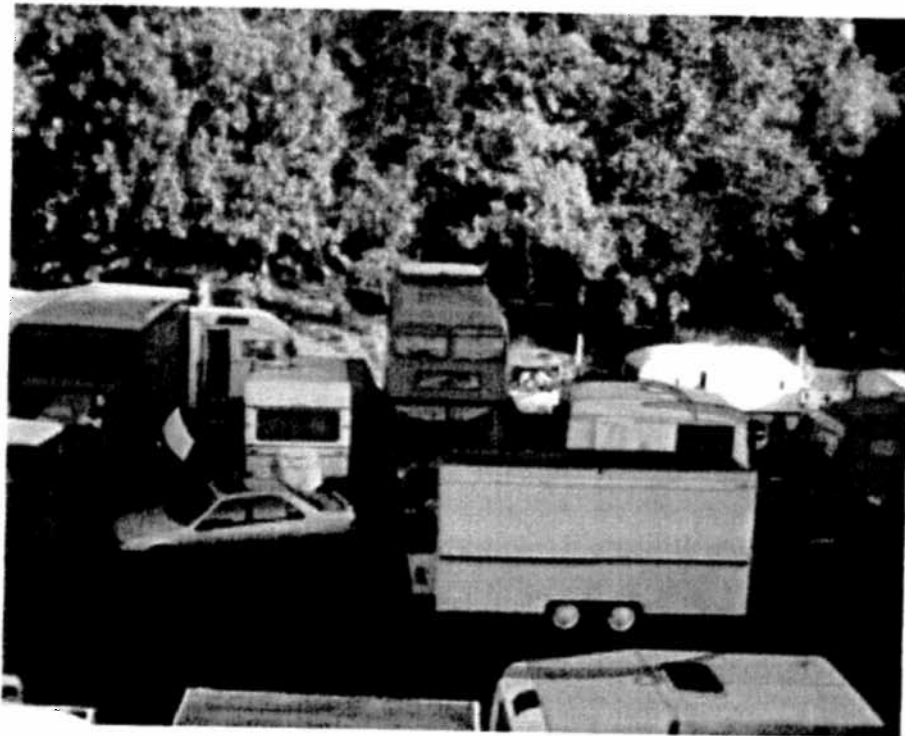


Image 2

Nov.2001, The green double-decker bus is still there,

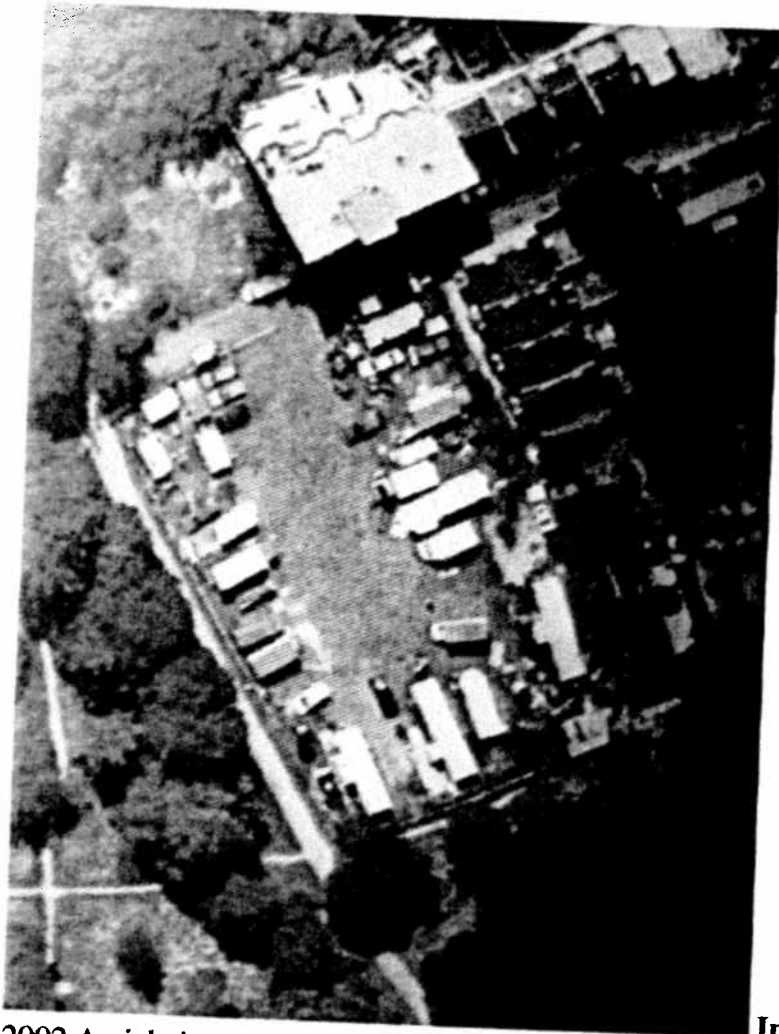


Image 3
 2002 Aerial view of site, both C09 and C18 are not in their current locations *Summer*



Image 4
 Winter 2006, 2 old lorries were located where C01 & C02 are now for many years



Image 5

20007, several funfair rides & equipment in gaps between caravans



Image 6

2007 or 2008, 2 Funfair rides



Image 7

Detail of above image in far south corner of site



Image 8

2007 or 2008, Rubbish left on the path between North and South fairground site, the site has been in the current, tidied up state only since about 3-4 months



Image 9

Winter 2009/10 Funfair ride in far south corner of site seen from street entrance



Image 10

Feb 2010, Burning waste in oil drum next to Faiground Rifle Range, as referred to in complaint to Camden Council, Ref. RX/MXT/122519



Image 11
July 2010, showing a Fairground ride
and old lorry, parked outside 3 & 2 East View



Image 12
July 2010, the storage lorry in the back has
been there for many years , detail below



Image 13
July 2010, Storage lorry in between C11 & C12