

Mr Charles Thuaire
Development Control Planning Services
London Borough of Camden
Town Hall, Argyle Street
London WC1H 8ND

Dear Mr Thuaire

I am on the committee of the Vale of Health Society and live in the Vale of Health. I would like to present further evidence to support statements made in the letter sent to you by Ian Harrison, Chairman of the Vale of Health Society dated 21st July 2010, which registers the strong objections of the Vale of Health Society members to the above application.

(i) I dispute that the present use of the site, or any part of it, falls within Use Class C3 “dwelling houses”. The word “dwelling house” is not defined in the Order. Accordingly, it must be given its ordinary, everyday meaning. A caravan used as a dwelling is not a house still less a dwelling house. It remains a caravan. The suggested use of the site does not therefore fall into Class C3 of the Use Classes Order, but is a sui generis use as a caravan site.

Your mobile home may be classed as a 'dwelling house' rather than a mobile home if it:

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~~Mr & Mrs D.A. Griffiths, 1, The Vale of Health, London E15 1 1X~~
~~020 7451 9617~~
([http://england.shelter.org.uk/get_advice/eviction/eviction_from_mobile_homes/mobile_homes - definitions](http://england.shelter.org.uk/get_advice/eviction/eviction_from_mobile_homes/mobile_homes_-_definitions))

It is our belief that very few, if any, of the caravans on the site since May 2000 have fulfilled and do fulfill the criteria described above.

- (i) For the reasons set out in Ian Harrison's letter of 21st July, the Vale of Health Society does not accept that there is a single C3 use extending over the whole site. The Vale of Health's case is that the site is used as a staging post for travelling showmen. Alternatively, there are mixed uses over the site, namely that use and use for three residential caravans.

The photograph shown below was taken on 18th June 2000. It is available from <http://www.bluesky-world.com/>. Although it is difficult to see exactly what the objects in the photograph are, I suggest that none could be described as a dwelling house, as that word is commonly understood, and that, at most, three objects could feasibly fulfill the criteria given by Shelter.



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Below are additional photographs showing the site continues to be used for fairground equipment. The photograph below was taken in January 2010 and shows Spencer House on the left and fairground equipment on the site.



The photograph below was taken by me, D.A Griffiths in Jan 2010, and shows showman's vehicles parked as well as vans and cars and fairground equipment parked where caravans are parked today and indicated as permanent on site since May 2000 on the applicants site plan.



To the left of the photograph above, behind the yellow screen you can see the same piece of fairground equipment parked that you can see in the photograph below. The photograph below was probably taken in the summer of 2009. This can be deduced by the presence of the yellow truck that was present unblocking the drain at the top of the road at that time. Some of the buildings shown in the photograph below were painted in new colours no more than five years ago.

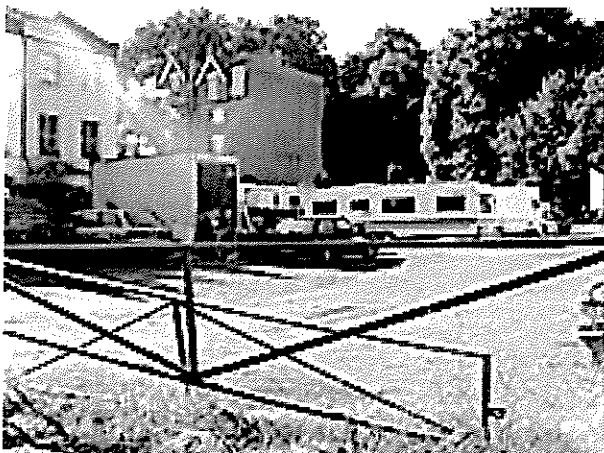
[REDACTED] P. CHURCH, 911 Church Street, Part of P. Church, London NW3 1LW,

[REDACTED] 020 7151 9007

[REDACTED] 11 May 2008



The photograph below is from the Camden New Journal dated 31st July 2008 showing trucks and cars parked, not caravans as indicated on the applicant's site plan.



We believe that accepting this application is inconsistent with the site's status as Metropolitan Open Land and could make it more difficult for Camden to resist future applications for residential development on the site.

For all of the above reasons we would like Camden to reject the application for a Certificate of Lawfulness for this site.

Yours sincerely

[REDACTED] 020 7151 9007

