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Development Control
Planning Services
London Borough of Camden
Town Hall
Argyle Street
London
WC1H 8ND

[redacted]

Date 20 July 2010

Dear Sir

Lower Fairground Site - Vale of Health - Planning ref: 2010/2845/P

Thank you for your planning consultation letter, to which I am replying on behalf of the City of London Corporation as owner of the adjoining Hampstead Heath.

Hampstead Heath is identified on your deposited Unitary Development Plan as a Public Open Space, Metropolitan Open Land (MOL), an Area of Special Character and a Site of Nature Conservation Importance. It is noted that your planning policies acknowledge that the Heath is unique, with its varied woodland, heathland, grassland, parkland and ponds, creating special problems for design and development, and emphasising the importance in retaining and developing the character of the natural country on the fringes of the Heath.

The City Corporation has a duty to maintain the Heath and to protect and preserve its amenity and character for the benefit and enjoyment of the public. Conservation of the Heath is a fundamental concern to the City Corporation and it is wholly committed to maintaining and protecting and preserving this valued and important urban open space.

The subject property is situated within the Vale of Health which is entirely surrounded by the Heath and forms an important "enclave". As a parcel of designated MOL, this site has protection equivalent to Greenbelt designation. The general atmosphere of the site has a particular intimacy with the Heath with its open unbuilt landform, compacted earth and gravel surfacing and a semi-transparency that forms an important buffer to the built form beyond. This particular site is visible from a number of vantage points around this part of the Heath and its use as a fairground site is entirely complimentary to the character and history of the Heath.

In terms of this application the City's overriding objective is that the site's MOL designation must be protected through adherence national, regional and local planning policies.

At a national level PPG2 makes it clear that the essential characteristic of Green Belts is their permanence. Their protection must be maintained as far as can be seen ahead.

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Policy 3.D.10 of the London Plan states:

> *Policies should include a presumption against inappropriate development of MOL and give the same level of protection as the green belt. Essential facilities for appropriate uses will only be acceptable where they do not have an adverse impact on the openness of MOL.*

In addition Camden's own policies state:

> **N1 - Metropolitan Open Land** - The Council will only grant planning permission for appropriate development on Metropolitan Open Land.
>
> Appropriate development under this policy is considered to be:
>
> a. cemeteries
>
> b. open air sport and recreational facilities
>
> c. open air leisure, arts and cultural facilities
>
> d. open air tourist facilities
>
> e. allotments
>
> f. the construction of new buildings for essential facilities associated with criteria a) - b)
>
> g. the limited extension, alteration or replacement of existing dwellings

This site has been owned and managed by a fairground family for many decades and is known locally as the "Lower Fairground Site". The current Sui Generis Use as a Showman's Site is therefore an accurate definition of its actual use, acknowledging the presence of residential caravans that support fairground operations.

Changing its use from a fairground site with caravans to a "residential caravan site" is not considered appropriate development under the policies stated above. The City's concern is that the word "residential" implies a permanency that is completely at odds with protecting the sites designation as Metropolitan Open Land status over the long term.

In addition the application is silent on the detail of how many residential caravans could ultimately be provided, what size and form these will take, what surface treatments are proposed including utility provisions, how car parking arrangements will be accommodated and what boundary treatments are proposed. Such matters are vital in terms of determining the potential impact of any decision to determine this application.

Given the sites contentious planning history over the past 10-15 years, the City opposes this application for a Certificate of Lawfulness as a Residential Caravan Site and asks that it be refused.

Yours sincerely

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