

Proof of Evidence of Nick Laister BA (Hons) Dip TP MRTPI MIHT MCIHT

22 August 2019

Land at North Fairground Site Vale of Health London NW3 1AU

Certificate of Lawfulness Section 192 Proposed use of land as a site for the stationing of seven static caravans for the purposes of human habitation

Appeal by Knightsbridge Parks LLP

1. My name is Nick Laister, I now represent the appellants, Knightsbridge Parks LLP, having taken over from Ben Eiser.
2. I am a chartered town planner and Operational Director responsible for planning in the south of England at RPS Planning & Development (part of the RPS Group plc). I have worked professionally as a town planner for 27 years, and have been at RPS for 23 of those years. I work on development projects for blue chip clients across the UK and have experience across most sectors including residential, tourism and leisure, commercial and retail. I am a nationally-recognised expert in planning for caravans of all types, including holiday and residential uses, acting for numerous national and local operators on sites across the UK and have done for well over 20 years. I also act for a number of fairground and circus operators and have successfully secured planning permission for travelling showpeople's sites and have also secured development plan allocations for showpeople's sites.
3. I propose to rely on the Proof of Evidence of Ben Eiser that has previously been circulated.
4. Mr Eiser has correctly identified the well settled approach of considering whether a material change of use has taken place. The key questions are whether there is a change to the character of the use ('the on-site effects') and whether there are any off-site effects. Mr Eiser has set out why there will not be a change in the character of the use because there is no requirement for the travelling showpeople to store equipment on the site. As a mixed-use site there is no requirement for any specific level of equipment to be sited there, nor any requirement for any specific balance between the residential units occupied by showpeople and by those not involved in the fairground business, and there would be no noticeable difference between a residential unit occupied by a showperson and one occupied by a person not involved with the fairground business. There will be no noticeable off-site effects, other than a likely reduction in traffic movements if there are only 7 remaining caravans on site.
5. In relation to this point, I would add that, in my experience, a large proportion of showpeople's sites do have large, often twin-unit, caravans. These caravans, and their residential paraphernalia, can be the dominant feature of a showpeople's site, particularly when the fairground business only involves small children's rides or a food/drink stall. These sites can be almost indistinguishable to a residential caravan site.
6. My final point relates to Paragraph 55 of Mr Eiser's proof of evidence, which discusses operational development. I have visited the site and can confirm that no operational development would be necessary to site 7 residential caravans on the site.
7. Mr Eiser refers to a likely intention to break up some of the hardstanding to create gardens. In my experience, this is not unusual at either a showpeople's site or a residential caravan site. I agree

with Mr Eiser that this aspiration should not be a consideration in this appeal because it can be done, and often is done, whether the site is a showpeople's site, a mixed use showpeople/residential site, or a residential site.

8. I confirm that I propose to rely on documents already submitted to the inquiry by Mr Eiser and/or other participants.