



By Email to:

planning.general@gravesham.gov.uk

Mr. Peter Price – Case Officer peter.price@gravesham.gov.uk

Cc: ian.brown@gravesham.gov.uk

21 December 2021

Dear Planning

Re: Application reference: 20211342 for retention of mobile home

I am writing in my role as the Greyhound Trust Chief Executive in relation to the above application made by Mr. Chris Pearson with full authority of the Board of Directors who oversee the Charity (Registered Charity Numbers 269668 and SC044047) and with the oversight of our Legal Advisors, who are currently working to progress a Trespass claim against Mr. Pearson for unlawful occupation of Greyhound Trust land.

The Greyhound Trust has operated from the Croft View since 1995 and became the legal owners of the whole of the site on 26 November 2018; as such, we are well placed to accurately reflect the usage of the site and Mr. Pearson's interaction with the site during this time.

Mr. Pearson continually appears to try different tactics via planning to try and secure planning for his 'timber lodge' and this has been ongoing for many years.

To be absolutely clear, Greyhound Trust do not, have not and will never support the applications being made by Mr. Pearson. Mr. Pearson occupies this land unlawfully and does not have Greyhound Trust permission to be on the site and we do not support the siting of his 'timber lodge' on charity owned land.

We were not formally told of this application which relates to land owned by the Charity, however, we became aware of it via the planning site notices.

We previously wrote to you regarding his application for a lawful development certificate in 2019 for his 'timber lodge', which was rejected by planning and at appeal. Our comments relating to this application stand and for ease of reference are included at the end of this submission. In addition, we would like to bring the councils awareness to the following points, inaccuracies and misrepresentations in the current application as follows:

- a) The planning application states the site is 0.38 hectares; the site which Mr. Pearson is illegally occupying is part of a wider site owned and managed by Greyhound Trust which is in fact a total of 3.3 acres as shown by the ordnance survey mapping:



Crown Copyright reserved.
This plan is based upon the Ordnance Survey Map with the sanction
of the Controller of H M Stationery Office.

- b) The application is written in a way that appears to lead the reader to the assumption that the residential house, kennels and 'Timber bank' (which is a single skinned outbuilding not suitable for or permissible for habitation) are somehow linked to Mr. Pearson; they are not.

All residential, commercial and charitable uses of this site are in buildings and on land owned 100% by Greyhound Trust and all legal existing use is use that Greyhound Trust authorises. Mr. Pearson is in no way authorised to occupy, use or direct any activity or occupation on the land that his application relates to and has no authority to access Greyhound Trust owned land or buildings.

- c) Mr. Pearson is occupying the land upon which is 'timber lodge' stands unlawfully and without permission. Mr. Pearson has been told that he is unlawfully occupying this land by Greyhound Trust and their Legal Advisors since 2018.
- d) Greyhound Trust Legal Advisors have informed Mr. Pearson that Greyhound Trust will be taking formal trespass proceedings against him for his unlawful occupation of the land his 'timber lodge' illegally resides and this is currently being processed.
- e) Greyhound Trust have informed Gravesham Council that this Trespass action is being taken.
- f) Previous applications for lawful development of this 'timber lodge' were not approved by Gravesham Council and Mr. Pearson lost his appeal. Greyhound Trust have been supported of Gravesham Council addressing this with Mr. Pearson and have always been fully co-operative.
- g) Since the time that Mr. Pearson lost his appeal, he has been assuring Gravesham council that he is moving the 'timber lodge' and I understand he was given much leeway due to covid and remains in breach.
- h) The elevation plans and associated application implies that 'Timber bank' (not to be confused with 'timber lodge'), is somehow more than an outbuilding used for storage due to

the fact it is presented with a name and shown as being beside the 'timber lodge' on elevation plans.

This is an outbuilding which is unsuitable for habitation and has no planning authority to be used for anything other than storage (Timber Bank is an outbuilding owned fully by Greyhound Trust).

- i) The plans identify 'concrete hard standing for general parking' and identifies 6 car parking spaces and 2 LGV parking spaces.

This parking is Greyhound Trust car parking and Mr. Pearson has no right to use the parking, it is privately owned land, which again he currently trespasses over to access his illegally sited 'timber lodge'. If Mr. Pearson parks on this area, he is again illegally parking as he has no right to access the parking.

- j) Mr. Pearson illegally and without permission uses the Greyhound Trust entrance to our fully owned site to access his unauthorised and unlawfully sited 'timber lodge' which he unlawfully occupies.
- k) The planning application states that waste is managed by a septic tank, again, this is unlawfully used. Mr. Pearson uses this septic tank that belongs to Greyhound Trust without authority.
- l) Mr. Pearson has also, without permission, accessed utilities from Greyhound Trust for his 'timber lodge'.
- m) There is no previous planning or certificates for lawfulness of any type of caravan / 'timber lodge' and this application to retain should be refused.
- n) This is an inappropriate application given the greenbelt and no level of VSC has been relied upon or proven.

Should you require further information or wish to discuss the contents of this letter, please feel free to contact me directly lisa.ceo@greyhoundtrust.org.uk where a telephone call can also be arranged.

Regards

Lisa Morris
Chief Executive
On Behalf of Greyhound Trust

Greyhound Trust, National Greyhound Centre, Peeks Brook Lane, Horley, RH6 9SX

Enc: copy of previous correspondence submitted regarding 'timber lodge' in associated planning application that was refused at planning and appeal.

Previously submitted regarding previous application made by Mr. Pearson:



By Email to planning.general@gravesham.gov.uk
1 November 2019

Dear planning

Re: Application for lawful development certificate relating to Croft View, White Horse Lane, Meopham, DA13 0UE

I am writing in my role as the Greyhound Trust Chief Executive in relation to the above application made by Mr. Chris Pearson.

The application contains some inaccuracies that I would like to draw your attention to:

Section 6 of the application states *"Mobile home in use over twenty six years as stated by Greyhound Trust is not visible from the main road and provides a dwelling for Mr. Pearson"*

The Greyhound Trust has not made these representations to Mr. Pearson and has no intention of doing so. As such, the Greyhound Trust would like to re-iterate to the planning department that we are not in support of these comments or this application.

Section 10 of the application states that the applicants interest in the land is as the owner. This is inaccurate, at the time the application was made the site as a whole was in the possession of the receivers and the Greyhound Trust were the successful bidders at the Savills property auction for the whole site on 26 November 2018; as such, Greyhound Trust now own the whole Croft View site.

The Greyhound Trust has operated from the Croft View since 1995 and are now the legal owners of the site; as such, we are well placed to accurately reflect the usage of the site and Mr. Pearson's interaction with the site during this time.

The mobile home that was on site before the Timber Lodge / Mobile Home that Mr. Pearson owns was not owned by Mr. Pearson, it was owned by the previous owner of the Croft view Site, Mr. Jim Jeremy.

It was only when Mr. Jim Jeremy was terminally ill that Mr. Pearson sold his house in Vigo, purchased the Timber lodge / Mobile home and placed it in situ. I understand from Greyhound Trust representatives that when this occurred, Mr. Jim Jeremy was very unwell and not fully compos mentis.

I also understand that one of your planning officers named Eddie has had many dealings with Mr. Pearson and has knowledge of him owning a property in the locality during the time he is claiming that the mobile home was in residential usage.

Should you require further information or wish to discuss the contents of this letter, please feel free to contact me directly lisa.ceo@greyhoundtrust.org.uk or 0208 335 3016.

Yours sincerely

Lisa Morris

Chief Executive, On behalf of Greyhound Trust