

## Core Strategy objections / support from Chris Mason on behalf of Friends of the Parkland Walk

Core Strategy - Chapter 6 Section 3 Open space and Diversity.

Policy SP 13 first bullet point.

Consider as unsound (not consistent with National policy)

Without a Proposals Map produced at this stage, one has to rely on the old UDP PM. Looking back over old UDP inquiry material, in respect of the Parkland Walk, it appears the only discussion was on notations used. The extent of Metropolitan Open Land (MOL) and alterations to MOL boundaries has never been raised, discussed or debated since they were first defined in the 1982 Plan. It would appear that mapping changes may have been made but the gains or losses never debated or questioned.

It is therefore arguable that the boundary is actually where it was first designated, and in line with decisions on Green Belt boundary errors one ignores mapping changes that have not been discussed and debated as substantive changes to the boundary line - they are merely mapping errors not detected before.

Firstly it is necessary to show the location of these designations or certainly the large tracts on the key diagram on page 238/9 as it is as important as Green Belt. The detailed changes need to be discussed in relation to the changes scheduled to the old UDP Proposals Map and the acceptable changes mapped on the new Core Strategy edition to be deposited later in the process.

The objector will produce a schedule and mapping changes over time at the Examination for the Inspector to decide on the desirability of maintain the original designated position or debating amendments. The objector's view is that the line should not be changed unless there is an over-riding reason and that losses to the community asset should be made good.

Protecting and enhancing existing boundaries is meaningless given the Cabinet Decision of 22/4/2008 when it was agreed to seek new leases for those areas of land once leased to residents that is designated MOL and Green Chain and Nature reserve as domestic Freehold disposals. From an investigation of some sample cases it would appear these sales or leases have also been made without the benefit of planning permission to change the use from public open space to domestic garden or to alter the MOL boundary. It is believed land theft has taken place and to date very little action has taken place, apart from appointment of legal services to investigate the matter. FPW is opposed to any disposals and is of the opinion that those made in recent years are improper and illegal.

17/1/16.3  
[Signature]

Change considered necessary: This policy therefore needs to be amended to secure the restoration of land disposed of and defend the boundaries as originally designated unless the change is debated and agreed as appropriate as part of this process to be in compliance with the existing and emerging London Plan.

Policy SP 13 Bullet point "Provide amenity space in accordance with the Council's Open Space and Recreational Standards Supplementary Planning Document"

Consider as unsound (not consistent with National policy)

Supplementary planning guidance should amplify and provide details of local application of policy. This is providing policy to deliver what is in SPG (should be SPD) on a straight reading this appears to put SPG above policy.

Change considered necessary: should be re-written to make it work the right way round.

Policy SP 13 bullet point : "Secure improvements, enhancement and management in both quality and access to existing green spaces;"

Consider as unsound (not consistent with National policy)

This appears to introduce dubious practice if the contributions are from developers but the development is not such that it should not proceed without the provision of the open space.

If from its own funds it creates new open space in areas of deficiency, or by agreement take land from a developer to create new open space as part of a masterplan, then that is acceptable. If this and the next bullet point mean get a developer to contribute land or funding for open space so the authority does not have to AND the development could happen without that open space and is not a refusable proposal as a result, then this is tantamount to asking for sweeteners to create open space from the goodwill of developers.

Change considered necessary: This needs to be turned round to state the open space provision necessary in policy and then to offer to pool or facilitate using its own CPO or other powers to create the open space necessary to redress the deficiency, without which the development should not proceed.

Policy SP 13 section commencing "The Council will enhance and improve...."

Consider as unsound (not effective)

This is hollow - LBH needs to reverse one of its own corporate decisions before this will ring true and make all appropriate efforts to nullify its own disposals from the asset stripping exercise of the late 1990s.

Change considered necessary: there should be a bullet point in this strategic policy to that effect.

Policy SP13 bullet point commencing "Securing a financial contribution ...."

Consider as unsound (not consistent with National policy)

The necessary qualification to make it compliant with tests is not present.

Change considered necessary: the additional words should be added 'where the development should not proceed without such provision to meet policy standards.'

Paragraph 6.3.3. Protecting our open spaces

Consider as unsound (not effective)

Once more this is hollow given the Council's own activities in disposing of public open space, that is also MOL and not pursuing land thefts.

Stronger wording to guide the council's own corporate actions and join up thinking is required.

Change considered necessary: The council will use its powers to enforce the encroachments of open space and reverse recent losses by acquiring replacement land to make up that lost if it can not be successfully reclaimed.

Paragraph 6.3.11 Metropolitan Open Land -

Consider as sound

Fine words that are strongly supported but corporate actions and other decisions need to show that these fine words are actually meant.

17/2/6.3  
17/3/6.3