

5 Cranley Gardens
Muswell Hill
London
N10 3AA

5th August 2011

Ms Litha Efthymiou
Programme Officer
Haringey Council

Dear Ms Efthymiou

Proposal Map

I enclose a copy of the CD-R which I was given at the presentation by Ciara Whelehan on 2nd June 2010 on how to submit representations on the three LDF public consultations running concurrently. It contains 13 pdf documents and a folder called 'Map changes'. Open that folder and you will find there are 13 jpegs of maps (not the 25 as claimed at Hearing 5 and in Haringey's Hearing Statement EX-11). This series of map changes is not the same as the series in the appendix to the March 2011 Submission version of the Core Strategy. The Council's claim that *'these maps were consulted on at the same time as consultation on the Core Strategy Submission document (May 2010)'* (Hearing Statement EX-11, paragraph 1) is therefore false.

Only maps 1 to 5, and 8 to 10 on the CD-R are the same as the corresponding ones in the March 2011 Submission version. Maps 6, 7 and 11 are slightly different. (The CD-R version of map 7 appears unfinished.) The jpeg called 'Map 12' on the CD-R is labelled 'map 17' but actually corresponds to 'map 13' in the March 2011 Submission version. Map 13 from the CD-R version corresponds to map 12 in the March 2011 Submission version. None of the maps numbered 14 to 25 in the Submission version are present on the CD-R version. Having asked others who attended the same meeting and took away hard copy bundles instead of the CD-R, it emerges that none of the map changes were included. My local public library doesn't have them for the CS Proposed Submission either.

At the 2nd June meeting when I received the CD-R I posed the question about when and how I should comment on the MOL boundaries on the proposals map. I recall the answer very clearly. I was told that "the proposals map was not yet ready to be consulted on, and that we (the public and stakeholder groups) should keep our responses specifically to the text in the Core Strategy document for that consultation, (or to the Development Management and Site Allocations DPDs for those consultations), and to refer to the paragraph numbers".

After the meeting I showed Ciara Whelehan the Title Plans of Haringey Council-owned Parkland Walk which had been obtained from the Land Registry, and asked her specifically what I needed to do to get that primary evidence of the Council's disposals from the MOL included in the LDF process. The Council's advice was

unclear, and the preparation of the Proposals Map did not come across as transparent and robust. I did not know which DPD the Proposals Map should go with so I subsequently copied the Title Plans to each of the three public consultations.

In addition to that meeting there was written guidance about how to comment on the Core Strategy public consultation which I have attached. As you will see this too makes no mention of the Proposals Map being part of the Core Strategy.

I had been raising concerns with the Council about the realignment of MOL boundaries prior to the Core Strategy Proposed Submission public consultation. The advice since 2009 has been that the appropriate time for the Council to correct any errors in the Proposals Map would be the LDF process, but it didn't specify whether it was Core Strategy or another part of the LDF.

Haringey's statement on the Proposals Map (EX-11) compares its approach to Hackney and Enfield's. I haven't investigated whether they have an equivalent history of realignment of the MOL around disposals from parkland assets, but I did investigate Islington Council which also owns part of the Parkland Walk, and found no evidence of the problem there. Haringey's recent history of selling off bits of parkland appears different to other LPAs, and makes it particularly unsound to evade public consultation of the Proposals Map.

In summary, this letter constitutes prima facie evidence that the Council has failed by not consulting on the Proposals Map, and has lied in its formal evidence to the Core Strategy Examination. I submit that these failures and omissions have materially affected the soundness of the process and rendered the changed MOL boundaries on the Proposals Map not conforming with the London Plan.

Would you like me to bring in the original CD-R so that you can verify the copy?

Yours sincerely

Elizabeth Sutton-Klein

Elizabeth Sutton-Klein

Encs: CD-R of Haringey Council's Core Strategy Proposed Submission

Core Strategy Pre-submission Consultation 'Making a Representation'
Guidance Note