

Haringey Core Strategy – examination in public

Further written information by Chris Mason.

Date 13th June 2011.

Which matter /issue it relates to?

My principal concern is that in respect of 17/1/6.3 the crucial point has been sidestepped and not dealt with.

Which particular part of the core strategy is unsound?

Flat refusal to deal with MOL designations and not producing a Proposals Map to check boundary changes since first designation that have never been debated, discussed or recorded in words but have been re-mapped. This excludes community concerns and involvement.

Which soundness test (s) it fails?

National Policy and the Replacement London Plan states that boundaries should be defined in planning documents and changes debated in the plan making process. Numerous changes have been found since MOL was first defined in the 1982 plan and changes have never been debated but have happened on previous maps but have gone unchallenged, thus it must be put right transparently in this round involving the communities that are stakeholders.

Why does it fail?

Lack of community involvement and non compliance with national and regional policy. This is compounded by sales or leases of Metropolitan Open Land by the authority to adjacent householders without justification. The proposed boundary must be scrutinised so the boundary is not changed to regularise the sales. Thus the evidence base available to the community suggests there is something being hidden by the authority.

How can the core strategy be made sound?

Produce a draft Proposals Map and plot all changes since the first designation that have never been debated and decide on balance which are acceptable and those that are not and where losses have been made and other areas adjacent could make this up, then consider these as additions. In an area as complex as London this has to be done accurately on landline OS data sets and verified with the community. The CS is the overarching document with which to do it.

What is the precise change/wording that is being sought?

Opportunity to check boundary changes that have never been debated and to raise changes in MOL boundaries and extents of it has never been done. There is a case for including some Significant

Open Land in the matrix that makes up the open spaces in the west of the Borough, some patches are MOL but detached from neighbouring areas and others are not. This needs an opportunity to engage with this plan making process that has been denied.

Discourse in respect of open space and biodiversity.

1. I noted that the boundaries of Metropolitan Open Land (MOL) were first designated in the 1982 Plan. To our fairly certain knowledge, the only discussion of this topic has been over the notation on Proposals Map in a subsequent revision of the plan. The Friends group was dormant at the time of that UDP revision, and we did not participate. We have, however, now compared the Proposals Map from 1982 (which appears to have been produced by traditional optical means) and subsequent maps which appear to have been produced from a digital base.
2. Many small changes, some adding to Metropolitan Open Land and some removing designated land are a sensible tidying up, putting boundaries where they should have been on the correct fence lines, which were generally those of the former railway land as purchased from British Rail. We have, however, by e mail of 14th December 2010 to our chairman David Warren received the following view:

From: Whelehan Ciara

Sent: Tuesday, December 14, 2010 4:08 PM

To: 'David Warren'

Subject: RE: Parkland Walk - Metropolitan Open Land

Hi David,

Thank you for your email and apologies for the delay in responding.

To answer you questions:

1. *Parkland Walk is formally designated as Metropolitan Open Land. It is also designated an Ecological Valuable Site, of Metropolitan Importance.*
2. *Parkland Walk was designated MOL in the 1982 Haringey District Plan, recommended by the Planning Inspector in his report dated October 1980.*
3. *This formal designation does include specific boundaries and the Inspector's Report into the Public Inquiry in 1980 states that the boundary is shown on the Proposals Map of the District Plan.*
4. *The two main adopted policies which protect the Parkland Walk are OS2 Metropolitan Open Land and OS6 Ecologically Valuable Sites and their Corridors. Any changes to the boundary of MOL would have to be done through the plan making process and would be subject to formal consultation, an Examination in Public and then subsequently approved in the Core Strategy.*

5. As far as we can tell from the information available in the District Plan 1982 and the existing UDP 2006, no significant changes have been made to the boundary of the Parkland Walk since 1982.

6. There are no proposals to make any changes to the MOL boundary in the emerging Core Strategy.

7. The Proposals Map from the UDP (2006) does show the MOL boundary for Parkland Walk, it is not indicative.

I trust the above answers your queries.

Regards,

Ciara

Ciara Whelehan

Team Leader Planning Policy

3. Other changes indicate the deviousness on behalf of the authority, a matter confirmed to our chairman by the Head of Development Management, who admitted that the boundary was changed in a few places around the sites council wanted to sell off or dispose by lease to others. These sites are:
 - The former garden centre at Cranley Gardens N10;
 - The former Station House at Stapleton Hall Road N4;
 - The former railway cottage at 3 Francis Place N6.
4. It would also appear that the whole area of the “bowl” at Highgate Station was added after the first definition, and other areas elsewhere in the Borough have not been checked as they are not the immediate interests of the Friends, but it is felt a warning should be conveyed to the inspector that boundaries could be and have been moved. Others have called for Priory Park to become MOL, so the whole stock of Green Belt and MOL needs attention at the LDF Core Strategy stage.
5. In respect of the Parkland Walk, alterations in the boundary have been made so areas have been designated or de-designated as metropolitan open land by stealth if one accepts all the presently mapped boundaries on the last UDP Proposals Map without question. This is not in accordance with the London Plan as it now stands and seems an inappropriate practice in the past. The Friends have received differing opinions from different officers over recent years. Some regard the Friends view as correct (in that the boundary is defined where it was **first** defined unless it has been amended **through debate in the plan making process**). Others, more worryingly, regard it as where it is on the current UDP Proposals Map. The Friends regard deletions as errors of drafting (as are additions) but, given the Friends role in supporting open space, nature reserves diversity and Metropolitan Open Land, we

would not object to increases in the area. The Friends therefore feel that this present plan making round should be the process where the alterations to Green Belt and MOL boundaries since their original designations are checked, and put back where they were first designated unless previously debated and agreed or changed as part of the present process.

6. The Friends have produced detailed maps showing the additions and deletions since 1982 in subsequent editions of the Proposals Map which can be produced at the examination on 5th July when this topic is programmed or submitted by that time if an appearance is not necessary as a result of this submission.
7. The writer once produced a Proposals Map for a Local Plan and it was the first digitisation process and also followed presently mapped fence lines. One fence line included an area of former green belt that had been enclosed as residential garden. This was challenged by the local amenity society and precipitated a second enquiry. The view held there was that the green belt boundary was as originally designated and that the additional garden area was still green belt and the boundary change was regarded as an error. Having undertaken this task myself and made a similar error, the writer is now particularly vigilant as he knows how easily it is done. If there is a secondary agenda to assist land transactions as well, as there seems to be at Haringey, then a particularly hawkish approach must be taken by groups acting as critical friends.
8. The Friends are therefore particularly concerned about changes that might yet happen on a Proposals Map that has not been seen and vetted. The cause for this concern is the fact that Haringey, probably improperly, embarked on a programme of selling garden extensions to adjacent households without the de-designating the land as Metropolitan Open Land or changing the land use from public open space to residential garden. It did impose covenants to prevent the building of sheds etc. but there are now a number of these plots for which the Council is no longer receiving rent (although some were sold freehold). This is a very unsatisfactory situation that has resulted in a further erosion of Metropolitan Open Land without debate or due process. Our prime concern is that the boundary of Metropolitan Open Land could be "conveniently moved" to the present fence lines when the proposals map is finally drawn, despite the claim that no change is proposed.
9. Thus the Friends are particularly concerned that the various changes over the years have never been debated, but should be debated now to be in conformity with Chapter 7 of the Replacement London Plan. The lack of Proposals Map gives the Friends no chance

to check that surreptitious changes will not be made and these garden areas taken out of MOL without discussion or debate. We simply do not trust the council as they have already proved three times that they are prepared to move the boundary in order to facilitate a sale.

10. As part of the core strategy process, amendments have been proposed to the 2006 UDP Proposals Map. The on line version is currently a mess with many designations in the wrong place or missing. A borough wide paper or e-map showing these amendments has not been produced, instead, extracts highlighting the proposed changes were produced and these have been submitted to the planning inspector alongside the Core Strategy. These Proposal Map amendments should be incorporated into a new borough wide Proposals Map and subjected to community scrutiny before the inspector closes the Examination – with a deferral to allow it to happen and all relevant parties consulted on the draft.
11. The council response is that the representation is factually incorrect, but the evidence above suggests that the council is trying to cover sales that it made in the stance agreed by Cabinet on 22nd April 2008 of re-leasing land (which the Friends dispute as improper) and that this matter should be examined and debated in the forum expected by Chapter 7 of the Replacement London Plan. The Friends therefore contend that to proceed without a draft Proposals Map to establish the boundary between Metropolitan Open Land and ordinary urban land, or to consider amendments wanted by the community is unsound.
12. If necessary as evidence, the Friends can produce sets of eight drawings detailing the changes to MOL boundaries to its area of interest over the last 30 years to demonstrate that it is not acceptable to simply roll forward the old UDP mapping, as it contains un-debated changes. Also it can map the areas it now regards as under threat to possible, further surreptitious mapping changes.
13. The writer is of the view that the Authority should be required to pause and produce a PM and consult on it before the Examination is closed at a deferred date. An alternative, if the unusual exception can be allowed as sound procedure, is to have a diagrammatic PM showing the areas of significant change and require that a fully developed map on OS Landline data be produced with a revised draft of the DMP (with any policies found to be too detailed in the CS incorporated in it) and subjected to a new round of community engagement with stakeholders before that is Examined.