

Moorpool Allotment Association.



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The Planning Department,
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18th March 2008.

Planning Applications :

S/00872/08/FUL
S/00869/08/CAC
S/00874/08/FUL
S/00870/08/CAC
S/00873/08/FUL
S/00871/08/CAC

Dear Sirs,

I refer to the above planning applications, and write to submit our objections as detailed below. The Committee of the Moorpool Allotment Association has considered the plans as submitted by Grainger plc. We subsequently held a meeting for members of the MAA and a motion was passed by members sanctioning an objection to these proposals.

Further, the MAA has seen the content of objections from the MRG (Moorpool Regeneration Group) and the MRA (Moorpool Residents Association) and fully supports the points contained in those documents.

Contents

Background and overview to objections.
Reasons for objecting to building development on all allotment sites:
Annex 1. Letters & Valley Site Allotments.
Annex 2. Contract & Eviction notice.
Annex 3. Moorpool Regeneration Group survey results.
Annex 4. Moorpool Allotment Association applications.
Annex 5. Moorpool Duck #33 Feb 2008.
Annex 6. Newt Pictures from Margaret Grove.
Annex 7. 1931 & 2005 Flooding of Margaret Grove & Valley Site

Annex 8. Background history of Moorpool Allotments

BACKGROUND AND OVERVIEW TO OBJECTIONS:

The Moorpool Allotments Association, on behalf of its members and all residents who, over a number of years, have expressed a desire to cultivate and maintain allotments upon the Moorpool Estate, submits this document by way of formal objection to the development upon allotment sites.

The Association asserts that the importance of the availability and use of allotments in today's society cannot be overstated and should not be underestimated.

In its document **"The Future for Allotments" 1998 The Department for Communities and Local Government** made the following observations and recommendations to Local Authorities:

"We believe that allotments will often form a component part of healthy neighbourhoods. Given the undisputed health benefits of allotments, we strongly recommend that allotment provision be explicitly noted in national public health strategy and be integrated into the local delivery of that strategy, particularly for the over 50s age-group which traditionally dominates the profile of allotment holders. (Paragraph 13)

We recommend that health authorities should recognise and exploit the therapeutic potential of allotments for people with mental or physical health problems. (Paragraph 15)"

It further stated:

"The Government agrees that allotments will often form a component part of healthy neighbourhoods, and will consider this in the development of Healthy Neighbourhoods policy. The Department of Health is also currently considering responses to the Green Paper 'Our Healthier Nation'. The Government recognises the health benefits of allotment gardening, and the Committee's recommendations will be taken into account in the development of the White Paper."

When dealing with the threat to private sites, it was stated:

"We welcome the contribution made by private sites to overall allotment provision and recognise that providing allotments is essentially a charitable activity for private firms. However, we urge owners of private sites to re-examine their policies towards allotment provision and, where appropriate, to adopt a long-term and positive approach. (Paragraph 61)"

In its document **"Allotments" 16th March 2005**, the Department outlined the following:

"What is our policy for allotments? Allotments and community gardens are valuable green spaces and community assets that can help improve people's quality of life by promoting healthy food, exercise and community interaction.

Government recognises the unique role of allotments as places, which bring all sections of the community together. They provide opportunities for people to grow their own produce as part of the long-term promotion of sustainability and healthy living.

Public interest in allotments has undergone a recent revival in line with current thinking on healthy eating, organic food and exercise. This has created a greater demand for allotments in some areas, which is critical to protecting them from a change of use in the future as a consequence of disuse or dereliction.

The Government's aim is to ensure that allotments are well managed, are considered as part of the overall green infrastructure, and are only disposed of where there is no demand for them and established criteria have been met. We are committed to working with local authorities to promote best practice and ensure quality and appropriate availability now and for future generations.

The Association makes its objections, as outlined further below, in accordance with Planning Policy guidelines (PPG17, PPG3) and the Birmingham UDP 2005. However, before expanding upon these objections, it is submitted that the Committee should have regard to the fundamental issue of the basis upon which the Applicant, Grainger Plc, makes its application in relation to both the demolition of garages, and the proposed development upon allotment sites. It is the Applicant's case that the garages are in such a state of dereliction that they are in total conflict with the conservation status of the estate. The Applicant further asserts that there is such a lack of demand for both garages and allotments that development should be strongly considered. The Association firmly asserts that these bases are not only misleading but an unsound premise upon which to consider this application. There is a strong demand for garage facilities, and the Association would refer the Committee to the documentation relating to traffic objections. In relation to both the garage sites and allotments there is one reason, and one reason alone that the sites are both dilapidated and overgrown and un-let; the lack of responsibility taken by the Applicant for the sites, over a number of years and its cynical refusal to issue new tenancies for garages and allotment plots, despite enquiries and requests from residents. The figures have been deliberately manipulated and controlled.

In relation to Local Authority allotments from March 1998, the Government placed an additional requirement on authorities to demonstrate the active promotion of allotments before they can dispose of statutory allotment land. Where an authority attempts to dispose of statutory allotment land on the basis of lack of demand, information about the promotion of allotments is used to assess the inherent demand for allotments. ("Allotments" 2005 Dept of Communities and Local Government.) Given the content of government

documentation and discussion regarding private allotment land, promoting its protection and enhancement, and the content of the UDP, which applies equally to both statutory and private allotments, the Association asserts that the above requirement should also be applied to private allotment land.

The Valley site has been under the sole control and ownership of the Applicant since 2001 (Planning Statement Page 1/Para1.6), the Applicant having taken over the former controlling company Bradford Property Trust. The Applicant has conceded that it has failed to maintain garages and forecourts (Planning Statement Page/20/ Para 5.5 & PS/24 para2). Further the Applicant has failed to promote the allotments under its control (See Annex 1. Letters & Valley Site Allotments). The Applicant outlines that the garages detract from the character of the estate, the site having been subject to persistent vandalism, and that the allotments are generally neglected. (Planning Statement P5 para 2.15). As landlord, the Applicant has taken no steps to prevent this or to maintain or promote the areas, and has therefore manipulated a situation, upon which it now proposes to rely under the guise of enhancing and preserving this conservation area. The dereliction of these sites is as a result of the Applicant's dereliction of its duty as landlord. The Association feels strongly that the Committee be aware of this and has this at the forefront of its mind when applying the relevant policy statements upon the issues of demand, and exceptional circumstances for development of allotment sites.

It is against this background that the Association makes the following objections:

REASONS FOR OBJECTING TO BUILDING DEVELOPMENT ON ALL ALLOTMENT SITES:

1. The area of allotments is an urban open space of public value. Accordingly, the requirements and rationale of the UDP should apply equally to our allotments, notwithstanding their "private" status. These two points are evidenced by the following facts:
 - i) They have been used as public allotments since 1915 since their inception as part of a community estate.
 - ii) Contracts have been issued and maintained for the use of allotments.
 - iii) Eviction notices have been served under the Allotments Act 1922. (See Annex 2. Contract & Eviction Notice)
 - iv) On 25th March 1998 the government introduced a requirement for authorities to demonstrate the steps they have taken to promote allotments in their area before they can obtain the Secretary of State's consent to dispose of statutory allotment land. As stated, the Applicant has failed to undertake such action. (See Annex 1. Letters & Valley Site Allotments)
 - v) The Applicant may argue that our allotments do not constitute statutory allotment land. However, there is support for the argument that any policy or decision relating to allotments should apply to both local authority and private allotments. When refusing an application for development on allotment sites in Margaret Grove in 1996, the planning office applied para 3.62 (relating to allotments) of the UDP and the policies of the City of Birmingham Planning Policy Guidance Note 17.

vi) On 6th April 2004, there was a debate in the House of Lords in relation to allotments. The loss of non-statutory allotments for development was acknowledged and an opinion expressed that local authorities should be encouraged to record the number of non-statutory allotments and increase the number of spaces available for allotments. (***Hansard Publications & Records***)

2. The planning proposals would result in a reduction of the number of allotments, but of equal significance, a reduction in the area of allotment space, therefore resulting in a reduction of urban open space for public benefit. This is evidenced by the following facts:

i) The overall area of allotment land upon the estate is presently 2697 m². The proposed development would result in an allotment area of 1440m², thus a loss of open space of 1265 m², which is conceded by the Applicant. (Planning Statement P21 para 5.7) (PS page9 para3.13 & PS page 20 paras5.2 & 5.4)

ii) In order for a reduction as outlined above to be considered, the Applicant must show a lack of demand and/or exceptional circumstances (paras 3.62A and 3.52A UDP.) This will be expanded upon further below.

3. It is suggested that the proposed alternative allotment space would meet the demand for allotments, as there has been a reduction in the demand for allotments. This is incorrect and misleading. There is a demand for the existing area of allotments and therefore lack of demand is not a basis upon which to consider this application. This is evidenced by the following facts:

i) The figures relied upon by the Applicant are based upon the current usage to demonstrate "demand". It is also based upon the consideration of cultivated allotment land only and not the whole area of allotment land. This is contrary to para 3.62A UDP. (*"Planning permission will not be granted for the redevelopment of allotments simply because the allotments have fallen out of use or become derelict."*)

ii) For many years BPT, and the Applicant, who has now taken over BPT have refused to issue new tenancies for available allotment land, (See Annex 1. Letters & Valley Site Allotments) or indeed maintain that land, (Planning Statement p5 para 2.15) hence the reason for the extent of uncultivated and un-let allotment land.

iii) The recent survey commissioned by the MRG shows that there is in fact a demand for allotments in excess of that quoted by Grainger. (See Annex 3 MRG Survey results). Further the Association has received a number of requests for tenancies. (See annex 4 Moorpool Allotment Association applications) This is in addition to any requests the Applicant may have had, which it has failed to mention or disclose in its application.

iv) The Applicant purports to suggest that the land available for allotment use will be increased by relying solely upon figures of cultivated land.

v) In accordance with the UDP, planning permission will not be granted for the redevelopment of allotments simply because allotments have fallen out of use and become derelict (Para 3.62) and accordingly the

total area of cultivated and uncultivated, let and un-let land should be taken into account when considering the overall area of allotment land upon the estate and demand.

vi) Accordingly, the Applicant's manipulation of the figures by the "re-introduction" of allotment sites and therefore suggesting an increase of 175m² of cultivated allotment land is misleading and incorrect, in supporting its assertion that there is insufficient demand. Moreover, the land, which it proposes to "re-introduce", falls beyond the boundaries of this application.

4. The Association strongly resists the assertion that there is a lack of demand for the full area of allotments. However, even in the event that the Committee were persuaded that this were the case, the proposals put forward by Grainger do not comply with the further requirements of 3.62A and 3.52A UDP. *"Where it can be demonstrated that the demand for allotments has fallen, consideration will be given to alternative uses for surplus allotments. Such uses will be alternative recreational, nature conservation or horticultural uses, subject to the policy set out in para 3.52A."* Non-compliance is demonstrated by the following facts:

i) The area of allotments proposed to be developed upon will be replaced by private residential gardens. These are not recreational, nature conservation or horticultural facilities, and do not constitute open space within the meaning of para 3.48 UDP.

ii) The benefit created by the construction and sale of residential areas upon allotment sites is to Grainger Plc and its shareholders only. The Applicant has now confirmed that it will not support investment in improving community facilities (Planning Statement p8 para3.4)

iii) The Applicant's assertion that funds raised by such sales will release money for future estate refurbishment (Planning Statement p1 para1.9) (PS page8 para3.1) conflicts with its assertion at public consultation that its overriding obligation was to make profit for its shareholders.

iv) Given the poor state of the spaces upon the estate under The Applicant's ownership, and its concession of prior total lack of investment, (Planning Statement p1 paras 1.7 & 1.8), (PS page 4 para 2.7) future investment is unlikely.

v) The alternative proposals for allotment provision do not meet the requirements of para 3.52A UDP as outlined below.

5. Para 3.52 UDP is relevant for the consideration of uses for surplus allotments, as referred to above, and to assist the Committee in determining whether exceptional circumstances exist to allow other forms of development upon allotment sites. By virtue of para 3.52A *"Proposals which would result in the loss of open space will only be permitted in exceptional circumstances. In determining whether exceptional circumstances exist, the City Council will take account of the availability of public open space nearby, its quality, and how well it meets local needs. It is unlikely that developers will be able to demonstrate that exceptional circumstances exist where: (a) existing public open space falls below the standard 2 hectares per 1000 population; and/or (b) there would be a loss of space from the open space network."* (para 3.52A UDP) By virtue of para 3.62A UDP *"If in exceptional circumstances planning permission is granted to other forms of development on part of the site this will be*

subject to the provision of an appropriate, equivalent, long term recreational community benefit." (Para 3.62A) The Association submits that the Applicant's proposals satisfy neither of these statements. This is evidenced by the following:

- i) The existing public open space in Harborne is presently only 1.62 hectares, therefore falling below the standard of 2 hectares per 1000 population. Whilst the content of para 3.53 UDP is acknowledged, i.e. the possibility of taking into account the cumulative provision for adjacent wards, even having regard to this, the availability of public open space nearby, its quality and how well it meets local needs are insufficient. For example, the two closest areas of public open space are Grove Park and Queens Park (approx 2 miles and 1 mile away respectively). Grove Park does not provide play facilities for children and neither are within easily accessible walking distance. Local needs are not met.
- ii) Further, PPG17 states, "*Where recreational facilities are of a poor quality or under-used (as the Applicant argues is the case here), this should not be taken as necessarily indicating an absence of need in the area.*" (Para 17 PPG17)
- iii) If the proposals to develop allotment land were allowed there would be a loss of land from the open space network. Moreover, para 3.53 UDP further states "*every effort will be made to encourage provision of new public open space, incorporating new nature conservation interest where appropriate, in areas of existing deficiency where the opportunity arises.*" The Applicant does not propose any additional open space, but proposes further reduction in an already deficient, inadequately served area, with no assurance that there will be no future depletion of allotment land, the Applicant having withdrawn its earlier offer to secure the remaining allotments in perpetuity. (See Statement of Community Involvement P10 para Community Trust.3 Consultation documentation September 2007)
- iv) The Association does not agree therefore that exceptional circumstances are established. However, in the event that the Committee found there to be exceptional circumstances, the proposals made by the Applicant do not meet the further requirements of para 3.52A, i.e. "*Where developers are able to demonstrate that exceptional circumstances exist to justify the release of open space for development, the practice will be to seek an appropriate recreational community benefit of equal value to compensate for the open space loss, that is at least as accessible to current and potential users, and at least equivalent in terms of size, usefulness attractiveness and quality.*" The Applicant's allotment proposals are not equivalent in terms of size, as they would lead to a loss of 1257m² of open space. Whilst the Applicant purports to improve the attractiveness and quality, by improving a situation of un-cultivated allotments deliberately created by its actions, by offering additional facilities and a payment of £5,000 this would not meet the requirement that this be at least as accessible to current and potential users, given the demand for allotments. Indeed, the proposals would reduce the potential availability to a wider range of the community because of the reduction of area of open space. The "improved" area would only be available to a select few, thus decreasing the level of "community benefit."

v) PPG 17 states, *"The recreational quality of open spaces can be eroded by insensitive development or incremental loss of the site. In considering planning applications, either with or adjoining open space, local authorities should weigh any benefits being offered to the community against the loss of open space that will occur. They should seek to ensure that all proposed development takes account of, and is sensitive to the local context."* (para 16 PPG17) As outlined the "package" being offered by the Applicant will reduce the availability of community benefit, ignoring the benefit to potential users of allotments, and will benefit only its and its shareholders' profits. The "package" does not take account of and is not sensitive to the local context given the demand for allotments and the conservation status of the estate.

vi) Accordingly the Association asserts that not only is there demand for the existing allotment area of 2697m², but in addition exceptional circumstances are not established, and even if they were the proposals placed before the Committee by the Applicant do not meet the requirements of para 3.52A UDP.

6. There has been no robust assessment of the existing and future needs of the community for open space, sports and recreational facilities in accordance with PPG17. *"The Government expects all local authorities to carry out assessments of needs and audits of open space and sports and recreational facilities in accordance with the paras above."* (para 5 PPG17) Further, *"In the absence of a robust and up-to-date assessment by a local authority, an applicant for planning permission may seek to demonstrate through an independent assessment that land or buildings are surplus to requirements. Developers will need to consult the local community and demonstrate that their proposals are widely supported by them."* (para 10 PPG17) The Association asserts that the Applicant has failed to do this and such an assessment is vital to this process. This is evidenced by the following:

i) By virtue of PPG 17 *"Allotments must not be regarded as "previously developed land" as defined in Annex C PPS3. Even where land does fall within the definition of "previously developed" its existing and potential value for recreation and other purposes should be properly assessed before development is considered."* (Para 14 PPG17)

ii) The Applicant has stated that it has been advised that no such assessment is required because of the scale of proposed loss of open space. However, the local community has repeatedly expressed to the Applicant that it is not in favour of the development, as proposed, leading to loss of allotments. This view was overwhelmingly expressed at a public meeting held by the Applicant in addition to two other meetings. Indeed at a recent local meeting of residents on 12th February 2008 a motion to object vehemently to the proposals was carried unanimously (110 in favour, one abstention, none against (Annex 5. Moorpool Duck ~33, Feb 2008).

iii) As such, not only is there a lack of assessment, the strength of feeling of the community would indicate that notwithstanding the scale of development this should be a vital part of the process.

7. The consultation process, upon which the Applicant proposes to rely, is flawed. The Association would urge the Committee to have regard to the full submissions made upon this point in the objection letter of the MRG.
8. The planning proposals and the resulting loss of current allotments would have a significant environmental and ecological impact. This is evidenced by the following facts:
 - i) There is evidence from the National Society of Allotment & Leisure Gardeners to show that allotments have an average of up to 30% higher species diversity than urban parks (**Allotments Local Action Plan for Cambridgeshire January 2000**)
 - ii) The allotments, as they stand, therefore make an important contribution to Harborne's ecology, and act as a green corridor for species movement across the city, which is significant particularly given the conservation status of the estate.
 - iii) Reduction of this contribution will damage the ecology and higher species diversity.
 - iv) The rationale and strategy of the UDP "seeks to ensure that development is carefully located and carefully planned, to avoid or at least minimise adverse environmental impact and ensure the most efficient use of non-renewable resources." (Para 2.8C) Further, "It is not the intention to attract new development for its own sake." (Para 2.37)
 - v) The members of the allotment association and those residents supporting the maintenance of existing allotments wish to preserve the total area constituting area of ecological significance.
 - vi) The Applicant has provided an ecology report, which purports to suggest that there will be minimal ecological impact if development were allowed. The Association maintains that this report is superficial and deficient in detail and cannot be relied upon. For example, the report does not mention the existence of frogs, a species so well known in the area that road signs are placed at the end of Margaret Grove for their protection. The report has stated there is no requirement to undertake a newt survey due to a lack of suitable breeding sites/ponds adjacent or within any of the sites. There is a resident's garden adjacent to Site C, with a pond where various species of newt inhabit and breed. (Annex 6 Newts pictures from Margaret Grove) Further, the cursory bat survey conducted by the Applicant does not accord with the decision of **R v Cornwall County Council ex parte Jill Hardy (2001)** or the **English Nature Bat Mitigation Guidelines**. The Association would ask the Committee to have regard to the separate objections put forward by the MRG on the issue of ecology.
9. The Applicant has submitted proposals for partial development within a conservation area without a master plan for the entire development. The Association asserts that such a master plan is a vital part of information for the Committee to consider when determining the present applications. This is evidenced by the following:
 - i) At a previous public meeting the Applicant produced a potential master plan. This has now been withdrawn. However, when asked directly if the present proposals would be the full extent of its

development, the Applicant would not confirm this to be the case or give any assurances to relinquish further applications.

10. The partial proposal and the submission of separate applications is an attempt to avoid the social housing threshold, which under PPS3 and UDP chapter 5 should be considered by the Committee. This is particularly relevant having regard to:

- i) One of the original aims of the Estate was to provide social housing. Until recently the large number of rented properties ensured both a realistic social mix on the Estate and that the Moorpool Estate could serve as a reservoir of housing for important social groups whose salary scales were lagging behind in the current housing market. The selling off of rented property on the Estate is eroding this important social function.
- ii) The current proposal to build less than 25 dwellings, the submission of those proposals without a master plan or assurances of no further development, and to ask that the site applications be considered separately seems to be a deliberate attempt to circumvent the policy requirement. " *The City Council will seek the inclusion of an element of affordable housing on housing developments on sites of 25 dwellings or more or 1 ha or more, or such thresholds as may be set in future Government guidance.*" (Para 5.37B UDP) It is of note that the total area of the three sites is 1.02 ha. As stated, there have been no assurances of the relinquishment of future planning applications on previously referred to sites.
- iii) PPS3 outlines " *For smaller sites, the mix of housing should contribute to the creation of mixed communities having regard to the proportions of households that require market or affordable housing and the existing mix of housing in the locality.*" (para 24 PPS3). As stated the extent of affordable housing has already been reduced upon the Estate by the selling off of former rented properties.

11. Site A, where it is proposed there be development upon allotments has previously flooded to a significant extent. The photos (annex 7. 1931 & 2005 Flooding photos of Margaret Grove and Valley site) to this document evidence this. This issue has not been adequately addressed in the Applicant's proposal or planning designs. The Association would ask that the Committee have regard to the particular reference to this point outlined in the MRG objections. The Applicant claims that the Valley Site (A) was originally destined for residential building and for reasons unknown never implemented (Planning Statement p5 para2.12). In fact, in their Character Appraisal Document, they contradict themselves by showing the same Valley Site as parkland. It is believed that building did not occur due to drainage problems, which remain extant (see annex 7. 1931 & 2005 Flooding of Margaret Grove & Valley Site). The Applicant conceded at a public meeting a continued failure to perform any maintenance on the land drains on the Valley site. The building of residential properties will only serve to exacerbate a palpably real threat of future flooding.

12. Of great significance is the assertion that the proposed building development upon the existing allotments would irreversibly damage the character of the estate. This is evidenced by the following facts;

- i) In 1908 the founding principles of the estate were documented. "It was impossible for a tenant to do anything which would endanger the character of the adjoining houses and street." "...employers of labour were answerable for calling together on a limited space many thousands of operatives..they had a great responsibility..they should not leave it to the City Council to purchase a little space here and there. They wanted city councillors and urban district councils to have the power to say to building speculators "You shall not crowd houses irrespective of decency and health of the children and inhabitants." Notwithstanding the status of ownership of the estate today, the character of the estate has remained and the residents wish this to be maintained. The existence of the current allotments is an integral part of this.
- ii) Once removed, the many allotments already carefully tended will be lost and the proposed replacement inadequate, reduced and deficient.
- iii) By virtue of PPS3 *"Design which is inappropriate in its context, or which fails to take the opportunities available for improving the character and quality of an area and the way it functions should not be accepted."* (para 12). Further, *"There is no presumption that land that is previously developed is necessarily suitable for housing development nor that the whole of the curtilage should be developed."* (Annex B).
- iv) The Applicant has exhibited its disregard for the character of the estate by allowing the dereliction of allotments, (Planning Statement page 21 para 5.6) garages and other public spaces to fulfil its own development and investment requirements. Its assertion that the proposed sites are an "eyesore" and in conflict with the status of the Estate, whilst true, are of their making. The Association asserts that the development of housing is not the way in which to enhance and preserve the character of the estate.
- v) The proposed buildings do not comply with the original architectural aims of the Moorpool Estate. Of significance, it is a unique feature of the estate that some allotments are available at the bottom of residents' gardens. The Association asks that the Committee has regard to the MRG Character Appraisal document, and the specific objections made by the MRG flowing from that document.
- vi) The Applicant submits that there were historically some proposals for further housing on site A. The Association submits that this is an irrelevant point. However, factually, and of significance, from its inception the site was made up of allotments. The Association does not accept that the garages should be demolished because there is lack of demand. However, were it the finding of the Committee that demolition should occur, since the Applicant concedes that the land was originally used for allotment provision, (Planning Statement page 5 para.2.13) and having regard to the above objections, any reversion of use should be for open space.

In conclusion, for the above reasons the Moorpool Allotment Association strenuously objects, on behalf of its members, and potential members to the

planning proposals as submitted. *"Promotion of social inclusion and community cohesion, well planned and maintained open spaces and good quality sports and recreational facilities can play a major part in improving people's sense of well being in the place they live. As a focal point for community activities, they can bring together members of deprived communities and provide opportunities for people for social intervention. (Planning objectives PPG17)* It is an unfortunate reality that there is nothing contained within the proposals put forward by the Applicant to support this objective, or to preserve and enhance the character of the Estate, and indeed its proposals only serve to diminish the community of this Estate for the sake of profit. The Applicant has not justified the loss of open space in accordance with the requirements of the guidance documents and the Association asks that the Committee refuse the applications.

Yours sincerely

Dr M. J. Parkes.
Secretary: Moorpool Allotment Association.