

**APPLICATION BY THE LONDON BOROUGH OF LAMBETH TO ERECT
TEMPORARY EVENT FENCING AND STRUCTURES ON CLAPHAM COMMON
PURSUANT TO ARTICLE 12 OF THE MINISTRY OF HOUSING
AND LOCAL GOVERNMENT PROVISIONAL ORDER CONFIRMATION
(GREATER LONDON PARKS AND OPEN SPACES) ACT 1967
APPLICATION REF: COM/3312935**

**NOTE TO THE INQUIRY SUBMITTED BY FRIENDS OF CLAPHAM COMMON
ARISING FROM THE RE-EXAMINATION OF KEVIN CROOK**

1. On day 1 of the public inquiry, during re-examination, Mr. Kevin Crook gave evidence that an answer that he had given in cross examination was incorrect.
2. During cross examination Mr. Crook confirmed that the headroom between the area of Clapham Common which he stated was to be enclosed for the purposes of the August 2024 event (78,998 sq.m. (proof para.23)) and 10% of the area which he contends to be “open space” at Clapham Common (i.e 79,295.9 sq.m¹), is 297.9 sq.m. (rounded to 300 sq.m.). He stated in re-examination, however, that had had omitted in his calculation of the “headroom” a parcel of land on the east side of the A24 (Clapham Common Southside). He identified this area on the plan at appendix 30 to his evidence (K Crook App bundle p.58). The parcel that Mr. Crook referred to is the southwestern-most parcel identified (shaded blue) on that plan. It comprises 374 sq.m.. It is located on the eastern side of the A24 between Lynette Avenue and its junction with the A205/Cavendish Road. On the basis of Mr. Crook’s evidence given in re-examination, the headroom would become 671.9 sq.m. (presumably with a corresponding increase to the area Mr. Crook claims to be “open space”)
3. Attached to this note are two screenshots taken from Google Maps street view, both dated August 2022. These screenshots show the parcel of land referred to in re-examination by Mr. Crook. The parcel comprises an extended area of pavement (or part thereof). Although this parcel may well have been included with the area identified as common land on the 1877 Inclosure Commissioners’ plan (K Crook App.2 App Bundle p.14), it is common

¹ i.e. 10% of the total area claimed by Mr. Crook to be “open space” – 792,959 sq. m. (Proof para 35).

ground that it is not known whether it was registered as common land in pursuance of the CRA 1965 or thus whether it is now deemed not to be common land (CRA 1965 s.1).

4. As with other parcels relied on by Mr. Crook as “open space” on the east side of the A24 which similarly comprise extended pavements, the Friends submit it cannot reasonably be concluded that the additional parcel referred to by Mr. Crook in re-examination comprises “open space” within the meaning given to the term by the 1967 Act.
5. As with the other parcels of land relied on by Mr. Crook as “open space” which are in issue, the Inspector is invited to visit these parcels during the unaccompanied site visit.

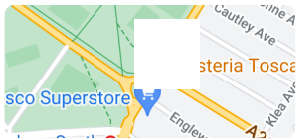
14 JUNE 2023

98 Clapham Common South Side



London, England
Google Street View
Aug 2022 See more dates

Image capture: Aug 2022 © 2023 Google



London, England
Google Street View
Aug 2022 See more dates



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