

Appeal in relation to planning application ref: 23/3816/FUL for a material change of use for stationing of caravans for residential use with hard-standing and dayrooms ancillary to that use Land On The North West Side Of Mays Lane Arkley Barnet EN5 2AH – appeal ref APP/N5090/W/24/3346789 Statement by Mr A Coltman 30/01/2025

Summary of public comments pdf document¹

This is a brief summary of the public comments to the proposal collated in October 2023.

- the scale of local opposition – over 1300 comments (over 99% opposed)
- the locality of objections near the appeal site
- top reasons for objection: need to protect Green Belt/countryside/open spaces, biodiversity/wildlife/nature, traffic/congestion issues, environmental impact/climate change

I would now like to talk about these topics in more detail.

Landscape character

When you go south down Barnet Gate Lane, on the left you will see a vast expanse of agricultural fields that are ploughed in spring with cereal crops, and you will hear skylarks in the spring. On the right is an extensive area of grassland with fields lined by hedges and oak trees. You pass farm buildings and woodland, and may see cattle or horses grazing. This section of Mays Lane down to the Quinta Open Space has a unique rural appearance. You can appreciate this scenery especially from Whittings Hill or the Dollis Valley Green Walk which passes near to the appeal site.²

The appeal site is grassland typical of the fields in the area with hedgerows, blackthorn, hawthorn and oak trees – characteristics of the English countryside. It was once part of Barnet Common,³ an open area created around the 16th century and later enclosed into the patchwork of fields that we see today along Dollis Valley. It was an important area for grazing horses and producing hay, and still is to some extent. You can see from old maps, aerial photography and satellite images that the appeal site has never been developed.

Nearby Whittings Wood (which is managed by the Woodland Trust) and Whittings Open Space are popular with dog walkers, families and people enjoying nature. You can see into the appeal site in late autumn to early spring⁴, and the grass there is radiant in the early morning sunshine. I can imagine that a caravan site with “day rooms” (which I calculate to be 3.5m high) and hardstanding covering the place would be a noticeable intrusion into this part of the countryside, and there were a lot of public comments about this being inappropriate and detrimental to the character of the area. We care passionately about preserving this remaining part of the countryside in Barnet. For us, this sentiment is based not on legalistic argument, desk studies or Google Earth images but on our daily experience.

Wildlife

It is fairly quiet near the appeal site at this time of year but you may hear tawny owls in the evening and noisy rooks congregating. In spring it is alive with the sound of Song Thrushes, Blackbirds, Wrens, Woodpeckers etc, and migrants such as Chiffchaffs, Blackcaps and even a Cuckoo. You may hear the mewing cry of a Buzzard, observe a Kestrel hovering over the fields, as well as Swallows and Swifts. A Heron may be found by the brook. Foxes, deer, badgers and other animals can be encountered in the area too.

No bird or bat activity surveys have been carried out at the appeal site, only a “preliminary ecology

appraisal” in November 2023 - outside the optimal period (April to October) as the report admits. However, surveys carried out in 2023⁵ at the nearby "Whalebones" estate (an area of similar habitat about 1km north east of the site) found 38 species of bird – a relatively high density – and 4 species of bat. It is possible that many species of birds and mammals (field mice, water voles, foxes, badgers etc) use the appeal site.

In summer in the late evening, bats can be seen flying by the treelines – including near the appeal site. These are probably Pipistrelle, but records of others (Noctule and Myotis) have been confirmed by an ecological desk study.⁶ Although there may be no suitable habitat for roosting bats on the appeal site, in the immediate surrounding area to the north there are a series of mature oak trees that appear to have cracks, holes and ivy cover that could provide suitable roosts. Therefore, it is quite possible that bats use the appeal site as an area for foraging or commuting. As is well-known, bats are very susceptible to artificial lighting, which can disorientate them and disrupt their feeding activities, so a caravan site and associated lighting could be damaging to them

It should be acknowledged that the UK has suffered a significant loss of biodiversity in recent years - not only birds and animals but also insects, moths, butterflies etc⁷. A recent report by Defra⁸ shows that over the past 5 years bird populations of indexed species have suffered declines (7% in England), partly due to loss of habitat, especially farmland and woodland birds. Therefore in the absence of surveys of the appeal site, a precautionary approach should be adopted towards a development that could harm biodiversity.

Climate change

In May 2022, Barnet Council declared a climate emergency⁹ with the goal of tackling climate change and biodiversity loss. This means taking measures to increase sustainability, protect green spaces and biodiversity. It is well known that peatland and woodlands are habitats for carbon storage but grasslands are also important. In the UK, more than a third of top-soil carbon is stored in grassland soils¹⁰ so serious consideration should be given to protecting the health of the soil at the appeal site rather than allowing irreparable damage to be caused.

Flooding

In addition to the flow of water down Dollis Brook from the north, water also comes off the fields to the west down drainage ditches and feeds into the brook in times of heavy rainfall. Although water levels are lower during the summer, during severe storms in autumn/winter it can become a torrent. A year ago a heavy wooden footbridge over the brook was swept away downstream and still has not been restored. During these times you see flooding in the woods and on the appeal site and it is not clear that a sustainable drainage system would make any difference to that. The other concern is about pollution if the intention is to release used water from the site into the brook.

Highway safety

Referring to the statement on highway matters by Mr Hurlstone:¹¹ in section 3.11-14 he mentions being able to walk from the appeal site east along the road without any issues despite the fact that there is no pavement on either side and assumes that road users would be aware of pedestrians in the road because of the road signs (although you would miss the sign if you came down Nupton Drive and turned right). He notes the playing fields and sport facilities in the area and concludes that "These facilities would be expected to attract pedestrians and cyclists travelling along Mays Lane, passing the Appeal Site on route."

These assumptions are fanciful in my opinion. In my experience not many people walk along Mays Lane near the appeal site, probably because it is not perceived to be safe. The only cyclists tend to be the few dedicated ones, and pelotons during the weekend, although there are more leisure cyclists during the summer. Although there is a 30 mph speed limit, I would say the average vehicle speed is 35-40mph. It used to be a quiet country lane, but in my 20 years of travelling along this road (including commuting to work) there has been an increase in the volume of traffic and it seems to be more constant at times.

In point 3.21 it says that he has never come across a site that is so accessible to local services, with "excellent visibility and street lighting", but concedes that the "facilities may require pedestrians to walk along a short section of carriageway where there are no footways". This all assumes that people would be happy to walk down the exposed section of road mentioned, which is about 140m long, without much of a verge, with potentially fast moving traffic going past. Perhaps it is OK in good conditions, but would it be safe, say, for a family with young children, or for teenagers to walk to school or other activities on a regular basis? What about during times of bad weather or during dark winter evenings? Hypothetically speaking, would you be happy for your own children to use this route on a regular basis?

Also, overtaking can be an issue because of the bends in the road and the poor road surface in places. If there are cyclists or a learner driver going slowly, for example, and you are driving west along Mays Lane, starting from Shelford Road, there are few good overtaking places in the early part of the route because of the bends, apart from between Partridge Lane and the appeal site, which could lead to an incident if a large vehicle was emerging from there. There is an example on Google Street View from March 2023 of a car overtaking going east near the appeal site.¹²

Lastly, further west where Mays Lane meets Barnet Gate Lane, there is a series of bends where cars sometimes go wide and come to grief if they are going too fast. I once saw an accident involving two cars there.¹³ It is rare to see large vehicles going down this road, so a large caravan going round the bends would be unexpected by cars going the other way.

Future expansion

Lastly, although each planning case should be determined on its own merits, you cannot ignore the fact that caravan sites have a tendency to expand. If the appeal site is approved, there is a high probability that there will be another planning application for additional pitches in the future. Here are a couple of examples:

1. Brookes Place, Potters Bar, Hertsmere (formally known as the "Pylon Site") - it started with 6 pitches and successive planning applications succeeded in increasing the number of pitches: to 12 in 2002; to 21 in 2012 and then to 25 pitches in 2013.¹⁴
2. Orchard Place, Southend Arterial Road, Rayleigh, Essex - there was an application in 2015 to remove conditions imposed in 2012 and increase the number of caravans on site from 4 to 8. Seven years later in 2022 there was an application to increase the number from 8 to 12.¹⁵ . These cases involved Green Planning Studio.

Conclusion

I am opposed to this application because it involves developing and materially changing a field that should be left undeveloped as it is part of the wider countryside. The proposed caravan site with buildings would be aesthetically incongruous within its surroundings, visible from some view points. It would generate noise and disturbance, from human activity and vehicle movements, which would affect wildlife and the tranquillity of the surrounding area. There are highways concerns and issues with flooding.

The Green Belt is important for the "health of Barnet", for its residents and wildlife, and for maintaining the historic natural environment. For all these reasons, I urge you to refuse this appeal.

References

1. "Barnet planning application 233816FUL summary of public comments 27.10.2023.pdf" (submitted to Planning Inspectorate on 02/09/2024)
2. <https://www.barnet.gov.uk/parks-sport-and-leisure/walks-and-trails/dollis-valley-greenwalk>
3. Barnet Common 1805 map
https://commons.wikimedia.org/wiki/File:Barnet_Common_on_an_1805_map_by_William_Hyett.jpg
4. Photos of the appeal site taken 25/01/2025 – see appendix
5. Breeding Bird Survey report 2023 & Bat Activity Survey reports for Land between Wood Street and Wellhouse Lane, EN5 4BZ – Barnet planning
<https://publicaccess.barnet.gov.uk/online-applications> ref 23/4117/FUL
6. An Ecological data search for Mays Lane – Rule 6 Party Statement of Case – Appendix Part 3
7. <https://stateofnature.org.uk/>
8. <https://www.gov.uk/government/statistics/wild-bird-populations-in-the-uk/wild-bird-populations-in-the-uk-and-england-1970-to-2023>
9. <https://admin.uat.barnet.gov.uk/sustainability-barnet/how-we-are-dealing-climate-emergency>
10. <https://www.plantlife.org.uk/wp-content/uploads/2023/08/Grasslands-as-a-Carbon-Store.pdf>
11. Highways statement a14 - 2024-06-14_jph_statement_d1_240302.pdf
12. Google Street View of overtaking March 2023 – see appendix
13. Photo of accident on Barnet Gate Lane in February 2017 – see appendix
14. <https://www6.hertsmere.gov.uk/online-applications/> refs: 2002 – TP/2001/0361, 2012 - TP/12/0786 , 2013 - TP/13/1583
15. <https://publicaccess.castlepoint.gov.uk/online-applications/> - refs: 2015 - 5/1049/VAR, 2022 - 22/0073/VAR

Appendix



Looking at the appeal site from Whitings Open Space





Overtaking near the appeal site (Google Street View)



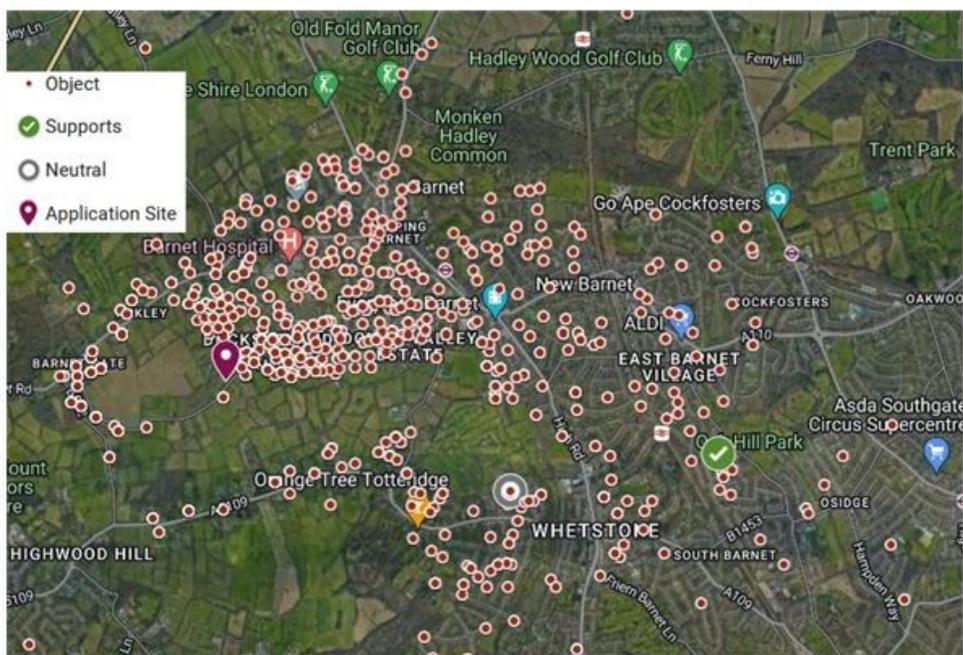
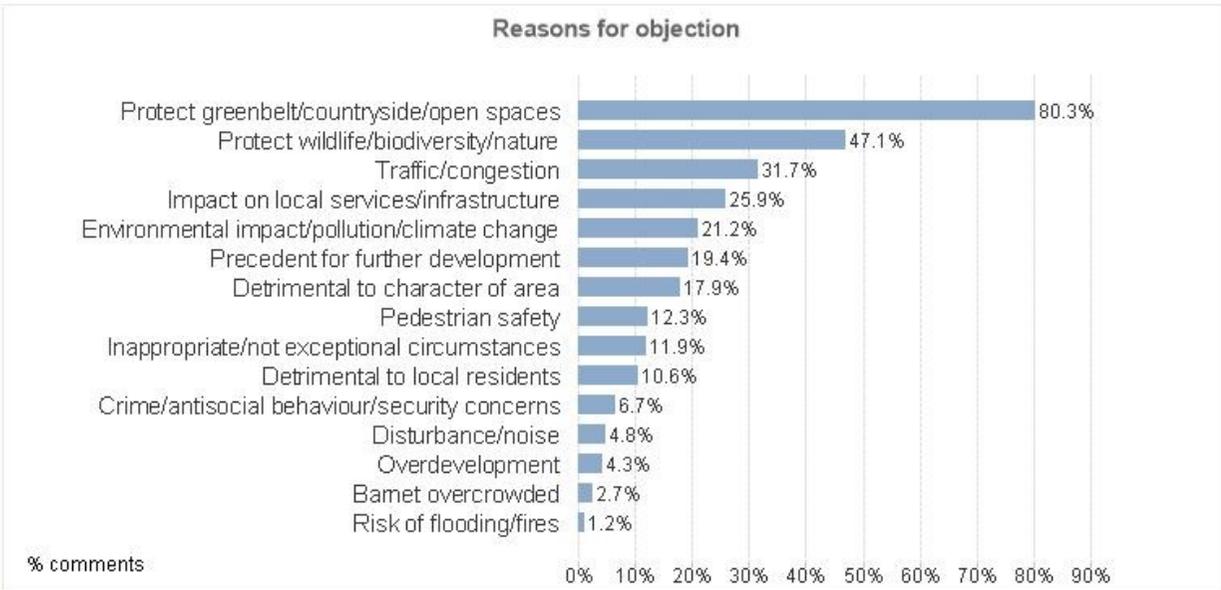
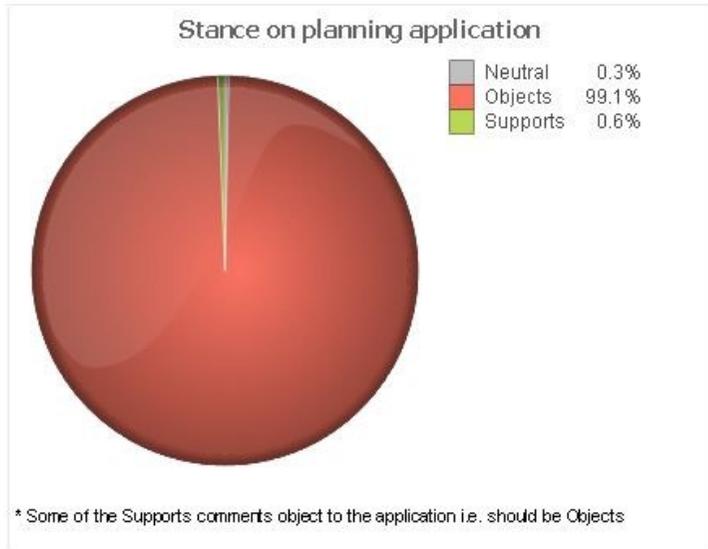
Accident on Barnet Gate Lane on the S bends



Barnet Planning – Application Comments (16/09/2023 - 25/10/2023)

23/3816/FUL | A material change of use for stationing of caravans for residential use with hardstanding and dayrooms ancillary to that use | Land On The North West Side Of Mays Lane Arkley Barnet EN5 2AH

Public Comments (1318)



"A residential caravan site would be out of character with the fields that make up the Dollis Valley green space. We need to protect Green Belt land"

"...sets a precedent for further development on land which should be reserved as a green area for nearby residents as well as for wildlife."

"it would be outrageous to allow a caravan park to be built on this land"

"in no time there will be more caravans there..."

"If this application gets the green light, it will mark the beginning of the end of the Green Belts in Barnet and in doing so, Barnet will cease to be the desirable place to live in, which it is now."

"Local infrastructure ... is struggling to support the local community."

"allowing it to become a gypsy caravan park ... will be detrimental to the wellbeing of local residents"

"...the area is a corridor for a wide range of wildlife"

"In May 2022, the London Borough of Barnet declared a Climate and Biodiversity Emergency... This development DOES NOT align with this promise."

"Due to the overwhelming opposition to this proposal, it would be a democratic failure for this to be granted"

"This proposal is damaging in so many ways...Please refuse this application."