

From: [REDACTED] [REDACTED]@planninginspectorate.gov.uk> On Behalf Of [REDACTED]
Sent: 24 March 2025 09:28
To: [REDACTED] <[REDACTED]@planninginspectorate.gov.uk>; appeals@gpsltd.co.uk; Planning Appeals <PlanningAppeals@Barnet.gov.uk>; [REDACTED]
<[REDACTED]>
Subject: RE: APP/N5090/W/24/3346789: Land NW of Mays Lane, Arkley, Barnet

**** Warning External Email ****

Good morning again,

The Inspector has asked me to confirm that Mr Pitts does not intend to make oral submissions on the 28 April and has instead made his comments in writing, which is Inquiry Document 22.

Kind regards

[REDACTED]



[REDACTED]
Inquiries & Major Casework Team Leader

Planning Inspectorate

T [REDACTED] | M [REDACTED]@planninginspectorate.gov.uk

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From: [REDACTED] <[REDACTED]@planninginspectorate.gov.uk> On Behalf Of [REDACTED]

Sent: 24 March 2025 09:02

To: appeals@gpsltd.co.uk; planning.appeals@barnet.gov.uk; [REDACTED]

<[REDACTED]>

Cc: Bell, Alison <ALISON.BELL@planninginspectorate.gov.uk>

Subject: FW: APP/N5090/W/24/3346789: Land NW of Mays Lane, Arkley, Barnet

Good morning,

Please see Mr Pitts' submission below, for your information.

Kind regards

[REDACTED]



Planning
Inspectorate

[REDACTED]
Inquiries & Major Casework Team Leader

Planning Inspectorate

T [REDACTED] | M [REDACTED] [\[REDACTED\]@planninginspectorate.gov.uk](mailto:[REDACTED]@planninginspectorate.gov.uk)

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From: Laurence >

Sent: 22 March 2025 14:41

To: [REDACTED] <[REDACTED]@planninginspectorate.gov.uk>

Subject: Re: APP/N5090/W/24/3346789: Land NW of Mays Lane, Arkley, Barnet

Hi [REDACTED]

As said previously, I am unhappy about resuming the inquiry online. For a variety of reasons this form of inquiry is very difficult for me. So, in the absence of the inquiry reverting to an in person event, I give you my submission in writing below which should be presented to the Inspector.

Regards,

Laurence Pitts

LL

Tue 14/01/2025 08:15

From: Laurence

From: Laurence

Sent: 13 January 2025 17:50

To: Laurence

Subject: caravan site appeal

My name is Laurence Pitts. I am a retired chartered surveyor and chartered town planner, and have worked for three local planning authorities, and spent many years in the private sector. I will not

reiterate in detail the arguments put forward by Barnet Planning Authority opposing the subject material change of use, but will comment on the salient objections that I have to the proposal, both from a professional angle and from the perspective as a local resident, living within two-thirds of a mile of the site.

The applicants have submitted proposals for changing the use of this Green Belt site, currently used for horse grazing, into a caravan site. The precise details, in my opinion are not so relevant as the principle of the change of use.

Mays Lane is a relatively narrow road over two miles long, starting close to High Barnet Northern Line tube station in the east, and ending in the west in farmland, with other rural uses, where it merges into Barnet Gate Lane. The built-up residential character to the east, containing a mix of private and local authority housing, old and new, creates an urban feel and a sense of place. The road is also quite busy, especially at rush hour, with a twenty mile an hour speed limit along most of the route.

The urbanised nature of the eastern part is in marked contrast to the western section, which is also much quieter traffic-wise due to Quinta Drive taking much of the load off this area.

So, we have a contrast between the two sections of Mays Lane. The reason: the Metropolitan Green Belt.

Anyone living close to or visiting the Green Belt at the west of Mays Lane cannot fail to be impressed by the beauty of the countryside, with a variety of trees, field shapes and hills either side of the valley which follows and is defined by Dollis Brook. The Green Belt notation has enabled this area to be preserved and conserved, whilst at the same time allowing appropriate uses to take place, including agricultural, recreational and woodland. Open Green Belt land also separates the Mays Lane built-up area from Totteridge to the south.

The big question is, should a permanent caravan site be located on pristine Green Belt land according to planning guidelines? The answer is no, unless there are very special circumstances to clearly outweigh this policy. The applicants have put forward arguments over the educational and health requirements of the proposed occupiers of the site. The Council has argued that such special needs can be accommodated on established sites in neighbouring administrative authorities, such as Hertsmere, Harrow and Brent.

The principle of the special circumstances for such a development in the Green Belt were considered in a recent legal challenge to an appeal decision in Basildon (Ward v SSLUHC and Basildon District Council 2024). The legal challenge, which argued that insufficient weight was attached to the best interests of the children, as well as that the decision was not sufficiently fair, failed. In fact some

factors did go against the council, including the lack of an up to date local plan, and some genuine needs of the children. The main conclusion I can draw from this case is that any compromise to the Green Belt policy needs to be based on truly overwhelming evidence. Without knowing the exact personal circumstance of the proposed occupiers of the caravans, I cannot be conclusive, but the arguments put forward by the Council seem quite reasonable.

The implications of allowing the proposal to go ahead are significant.

First of all, there is the question of precedent. If permission were to be granted, then anyone, anywhere in the Green Belt would have a plausible argument for a similar development. This would defeat the very purpose the Green Belt to stop uncontrolled urban expansion.

Secondly, once the caravan site has been approved, then it would prove virtually impossible, in my opinion, to refuse incremental intensification of the use of the site. The site, being defined as a caravan site, would forever change its status and no doubt involve pressures to add further pitches, more infrastructure and associated development, including pressure over time to extend the site.

Thirdly, this part of Mays Lane has no pavement on either side of the road and is relatively tranquil, with a much lower traffic flow than the urban section to the east, as described above. There would inevitably be an increase in traffic generation due to the caravan site, with also possibly a highway safety issue due to limited sight lines, and the lack of safe footways.

I know there are many other factors that need to be taken into account, and matters that could be resolved over time by the submission of further reports and details, such as flood risk assessments, traffic safety studies and environmental protection measures. However, if the proposal is approved, then there is no turning back. A valuable Green Belt site will have been lost, compromising the policy for future generations.

I therefore implore the Inspector to turn down this appeal on the grounds that there are no special circumstances to outweigh the inappropriateness of the development and its potential harm to the Green Belt.

LL

From: [REDACTED] <[REDACTED]@planninginspectorate.gov.uk> on behalf of [REDACTED]
[REDACTED]@planninginspectorate.gov.uk>

Sent: 21 March 2025 15:40

To: Laurence

Cc: [REDACTED] <[REDACTED]@planninginspectorate.gov.uk>

Subject: RE: APP/N5090/W/24/3346789: Land NW of Mays Lane, Arkley, Barnet

Dear Laurence,

Thank you for your email.

The Inquiry was adjourned yesterday because the Council's planning witness was unexpectedly taken ill. In the absence of this witness, the programme was completed in one day. Unfortunately, it is not possible to convert the 28 April into an in-person session because the participants are spread out around the country and would need to travel on the Sunday to attend. For this reason, Inquiries do not sit on a Monday unless they are virtual events. The Council has offered to assist you make your representatives virtually by letting you use its equipment and a meeting room.

The Inspector extends his apologies for the inconvenience caused but hopes you can understand why the decision to adjourn was taken.

Kind regards

[REDACTED]



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From: Laurence

Sent: 21 March 2025 12:34

To: [REDACTED] <[REDACTED]@planninginspectorate.gov.uk>

Cc: [REDACTED] <[REDACTED]@planninginspectorate.gov.uk>

Subject: Re: APP/N5090/W/24/3346789: Land NW of Mays Lane, Arkley, Barnet

Dear [REDACTED]

I am extremely unhappy about the rescheduling of today's in person public inquiry into a virtual session on 28th April. I made special arrangements to be available for today, and cancelled some important commitments. Please arrange for the 28th April session to be in person so that I can present my objections at the appropriate forum for such an important planning issue.

Regards,

Laurence Pitts

From: [REDACTED] <[REDACTED]@planninginspectorate.gov.uk>

Sent: 21 March 2025 11:56

To: Laurence

Cc: [REDACTED] <[REDACTED]@planninginspectorate.gov.uk>

Subject: APP/N5090/W/24/3346789: Land NW of Mays Lane, Arkley, Barnet

Dear Mr Pitts

The Inspector has asked me to contact you to let you know that unfortunately the inquiry won't be sitting today.

The inquiry will resume virtually on 28th April and the Inspector will allow you the opportunity to address the inquiry at that stage. The Council can offer support if you need any assistance taking part virtually.

Alternatively, the Inspector is happy to receive your written submissions.

Kind regards



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