



22 August 2019

LAND ADJOINING THE WHALEBONES, WOOD STREET EN5 4BZ

Comments on planning application no. 19/3949/FUL

The Barnet Society objects to this proposal.

We do so with some regret. We accept the principle of some new housing to fund replacement facilities for the artists and beekeepers and future maintenance of the estate, and it is unusual to have building and landscape design of such quality proposed in Chipping Barnet.

However, the site's size, location and history make it especially sensitive. Although Whalebones is not designated as Green Belt, it includes the last remaining fields near the town centre and is an integral part of the Wood Street Conservation Area (CA).

We object to the proposals on two basic grounds: first, it is an unacceptable breach of CA policy; and second, in our view it would be overdevelopment of the site. We also have concerns about its sustainability.

Conservation Area Policy

Land in the CA should not be considered available for development in the same way as elsewhere. The fact that Barnet faces a major housing need should not override existing planning policies.

The Council's Wood Street CA Character Appraisal Statement (2007) says (in 2.1) that, '*The Council will seek to ensure that **new development within the conservation area seeks to preserve or enhance the special character or appearance of the area...***' We believe that this application would do neither.

The CA extends this far west specifically to take in Whalebones, so the special character of this area of land is fundamental. As 4.2 of the Character Appraisal states, '*The elevated position enjoyed by Wood Street allows long range views down side roads to the south over the open countryside of the Dollis Valley... This is central to defining the area's special character.*' And among Whalebones' key characteristics listed in 6.5 is this: '***The open rural character of the grounds and views in and across the site are highly important aspects of the character of the conservation area and echo the Green Belt and the open country beyond.***' If the project proceeds in its present form, over half the site – most of which is currently green – would be lost to residential development. It would lose its rural character and links with the Green Belt and open country.

Historic England concurs. Its advice dated 12 April 2019 to the developer's consultants, Brighter Planning, states, '*...the spread of development across the site would collectively represent a visible urban hardening to this western part of the conservation area. This means the prominence of its open natural landscaped character and views out into Dollis*

Valley, which it's currently noted for, would be somewhat reduced. In our view this would present harm [to] the character and appearance of the conservation area.'



Whalebones meadow looking south. Barnet Hospital in middle-distance, left. Dollis Valley in far distance.

As well as offering fine open views across the site north and south, the meadow at the west end is an essential natural and visual buffer between Chipping Barnet and Arkley; without it, they will lose their separate identities forever. The fact that Elmbank has been developed – outside CA controls – does not justify a development of similar scale next to it.



Whalebones meadow looking north. Wood Street in far distance.

Were the proposed layout to be flipped, with most of the housing at the eastern end of the site and a green corridor/park between the Whalebones and Elmbank, this could be avoided. But the developer does not seem to have considered this or other possible layouts.

Although the Agricultural Viability Report dismisses commercial and community farming, it does not explore other land-based activities of a kind likely to have interested Gwyneth Cowing including education, training and/or therapy in horticulture, animal husbandry and environmental studies, perhaps in partnership with a local school or college. A city farm for young and old people, including those with special needs, would be another possibility in keeping with the spirit of Ms Cowing's will.

The lack of a wide-ranging appraisal of the above (and other) options casts further doubt on the rightness of the present proposal.

Permanently securing the majority of the Whalebones estate in broadly its present character and achieving public access to all or part of it would be well worth having. However, the present proposal gives up far too much of the asset to be considered commensurate with the benefit and removes a large part of the present visual amenity. And if public benefit would be provided by an urban park, healing garden and playground instead of the open/agricultural landscape, how would that square with the character protected by the CA?

Altogether, approval of this application would create a very bad precedent for other Barnet CAs.

Overdevelopment

We are unconvinced that so many homes are necessary to pay for replacing the studio and upkeep of the rest of the estate. No business case or other financial assessment has been provided to demonstrate the minimum quantity of homes to ensure viability. Given the profits to be made on such an attractive site, such a large development needs proper justification.

We might also expect, if a healing garden and playground is to support patients and visitors to the hospital, to see participation and a contribution from the Health Trust and/or a medical charity. Their financial contribution would reduce the number of houses required.

A serious consequence of the quantity and type of new homes would be some 200 additional cars and 300 cycles (curiously scarce in the visualisations). These would exacerbate what is already heavy congestion at peak times. This would be particularly problematic in Wellhouse Lane around the bus terminal, where ambulant and semi-ambulant pedestrians and wheelchairs compound the hazards of increasing hospital traffic. A further consequence would be higher levels of air and noise pollution – especially unfortunate near a hospital.

Despite the technical consultants' assurances, we also have some concern about ground conditions. That drainage is an issue on High Barnet's heavy clay is confirmed by the Agricultural Viability Report's mention of 'impeded drainage' and 'A spring emerging at a central point in the western part of the field gives way to wet conditions...', and also by reported ground-water problems at neighbouring Elmbank.

Sustainability

Although the developer promises a net gain in biodiversity, we are not persuaded that the ecological impact of such a large development and extended construction period could be entirely mitigated.

And although we acknowledge that the developer's environmental standards represent an advance on today's norms, they fall short of tomorrow's challenge: we face a climate emergency. The designs would not achieve zero-carbon emissions of themselves; a carbon-offset payment would be necessary. No mention is made of embodied carbon, whole-life carbon assessment, material passporting or other moves towards a circular economy.

Clearly such cutting-edge green technology is not (yet) a planning requirement, but in our view development of this exceptional site on the proposed scale could only be justified by adopting exemplary design targets.

Alternatively, a more modest and revised layout would be acceptable.