

Georgia O'Brien
Planning and Building Control
Hertsmere Borough Council
Civic Offices, Elstree Way
Borehamwood
Herts. WD6 1WA

Our Ref:

Your Ref:

11th October 2024 (by email)

Dear Georgia O'Brien,

Application no. 24/1101/OUTEI

Land to the West of Barnet Road, and East of Baker Street, Potters Bar

Outline application (with all matters reserved except for means of access) for a new neighbourhood comprising up to 900 dwellings (Use Class C3) (including affordable housing), a neighbourhood centre and community facilities (Use Class E (a), Class E (e) and F2 (b)), a primary school (Use Class F1 (a)), land for an up to 80-bed care home (Use Class C2), strategic and informal open space, landscaping, parking, associated infrastructure and works, with vehicle and pedestrian accesses from Baker Street and Barnet Road

I write with regard to the above major application to which CPRE Hertfordshire objects for the following reasons.

1. The land identified for this proposed development is designated as London Metropolitan Green Belt in the adopted Hertsmere Core Strategy where development is stated as inappropriate unless very special circumstances are identified which clearly outweigh the harms caused, according to criteria in the National Planning Policy Framework (NPPF).
2. The applicant's consultant's Design and Access statement notes that the proposed development is a "sustainable new neighbourhood" of up to 900 units which comprises a significant extension to the built-up area of Potters Bar. CPRE Hertfordshire believes that proposed development of this magnitude involving alteration of the Green Belt boundary should be incorporated as part of the Local Plan preparation process to ensure full coordination with the provision of infrastructure, services and facilities, and not by speculative planning applications.
3. This site is not included in the emerging Draft Local Plan on which extensive public consultation has taken place, leading to the initial setting aside of the Draft Local Plan and subsequent re-consultation on a revised version. Very significant local community

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CPRE Hertfordshire is a Charitable Incorporated Organisation

President: Sir Simon Bowes Lyon, KCVO
Chairman: Allan McNab

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opposition continues to development on the Green Belt and the Council is proceeding at an accelerated pace towards Examination in Public and adoption of the Local Plan.

4. The proposed development would clearly constitute a breach of the first and third purposes of the Green Belt as identified in the NPPF (paragraph 143) to prevent urban sprawl and encroachment on open countryside. The open countryside in this proposal case is crossed by a public pathway and provides unencumbered vistas and a rural landscape adjacent to the built-up area.
5. The Planning Statement suggests that the site may be considered as “grey belt” according to the definition in the recent publication of amendments to the National Planning Policy Framework (NPPF) for public consultation. Notwithstanding the status of the proposed NPPF amendments as consultation proposals with no statutory or policy weight at present, the matter of “grey belt” is a matter of significant debate and relevance.
6. The assertion of the site as “grey belt” is clearly entirely unacceptable as it is not previously developed land and it makes a contribution to two of the five purposes of the Green Belt, as noted above. It is damaging to introduce the concept of “grey belt” until robust and consistent criteria are formulated at the appropriate level and the already widespread application of the term in recent development proposals in Hertfordshire jeopardises the survival of the Green Belt in many locations.
7. The remaining issues quoted as contributing to the very special circumstances relate to the general housing situation in Herts mere and elsewhere, and constitute benefits which would accrue to any proposed development of this size and function. The now standard practice in major planning applications in the Hertfordshire Green Belt of listing such benefits, including care homes, reduces the consideration of such issues to a check-list of items irrespective of the conditions and circumstances of the location and inevitably renders them as less “special”.
8. As significant as the proposed benefits is the growing paucity of open space adjacent to built-up areas with its attendant physical and mental health benefits. The Green Belt around Potters Bar is under unrelenting pressure for development which is jeopardising the highly valued benefits which protection brings, and its continual reduction is in danger of bringing the planning system into disrepute.
9. The existence of legally binding agreements between appropriate institutions involved in the provision of truly affordable low cost housing would be required in any case. Given the inadequacy of the official definition to reflect the true state of the housing market in Hertfordshire, affordability for average earning households is unattainable



and should not be used as contributing to very special circumstances in the determination of a planning application.

10. It is highly regrettable that we are not able to access the content of the 646 objections made to this application, presumably by local organisations and residents. It is best practice for local planning authorities to provide access to these responses and we note that Hertsmere exceptionally in Hertfordshire does not provide this information.
11. This application is not supported through the Local Plan process and we urge the Council to refuse permission for this development.

Yours sincerely,

Chris Berry
Planning Manager

NOTE: We would request that this letter is published on the Council's website as a document relating to this application and should be grateful if you would notify us of the date of the appropriate meeting if it is to be determined by planning committee.