

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

Our Ref:

Your Ref:

10th July 2026 (by email)

Dear Georgia O'Brien,

**Planning application no. 26/0619/FUL
Land Between Hill Crest and Dove Lane, Potters Bar
Redevelopment of the site for the erection of 112 dwellings, site access, roads,
parking, open space, SuDs and associated infrastructure**

I write with regard to the above planning 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 being 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 planning consultants note the 2024 revision of the NPPF and the introduction of the concept of grey belt as a significant justification for the submission of this application. No other special circumstances are identified relating to local conditions and circumstances which would justify development in this location.
3. The site is identified as a "considered site" in the recent Hertsmere Local Plan Regulation 18 Consultation Document which we believe should not be recognised as an emerging Local Plan due to the lack of specific policy proposals. Accordingly, it is not appropriate in our view for such a significant allocation in the Green Belt to be determined outside the Local Plan process.
4. Very significant local community opposition continues to development in the Green Belt. 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 onto open countryside.



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5. We entirely refute the assertion that the first purpose of the Green Belt has no relevance in this case and that this site constitutes grey belt under the present legal definitions. In the case of the London Metropolitan Green Belt, the first purpose of the Green Belt refers as much to the effect of the urban sprawl emanating from the growth of the capital as the major development generator in this and the surrounding areas, as to the sprawl of other major settlements.
6. The proposed development is clearly urban sprawl beyond the built-up area of Potters Bar which the Green Belt legislation was designed to prevent. Arguments relating to the inconsequential impact of each individual application on the Green Belt as a whole become seriously inappropriate when the cumulative effect of several applications is considered, as is occurring in Hertfordshire.
7. A planning inquiry has recently concluded on an adjoining site which was not included in the Local Plan Regulation 18 document. Together these two applications seek to provide over 1000 units on Green Belt land, and further proposals for a major data centre and solar installations at South Mimms comprise the effective disappearance of the Green Belt between South Mimms and Potters Bar, thus jeopardising the Green Belt as a whole in this area.
8. It is noteworthy that virtually every major planning application for residential and commercial development within the Green Belt in Hertfordshire made since 12th December 2024 has identified the site as grey belt, notwithstanding the quality and character of the landscape or local conditions in each case. This is clearly an unsustainable position and it is becoming increasingly clear that the existing definitions and guidance on grey belt are entirely inadequate to prevent the wholesale removal of highly valued and significant Green Belt protections.
9. CPRE Hertfordshire thus believes that the first reason for the Green Belt as identified in NPPF paragraph 143 applies in this case, and together with purpose c) regarding encroachment onto the countryside, provide the “strong reason” required to refuse development as noted in the NPPF footnote 7. Recent planning inquiry, and increasingly Council planning decisions permitting development are demonstrating the hugely damaging impact of the present definition of grey belt on open countryside.
10. We note the intention to provide 50% affordable housing but this is essentially meaningless without further information and commitments to its provision. The existence of legally binding agreements between appropriate institutions involved in the provision of truly affordable low cost housing should be required in this case.



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11. Given the inadequacy of the official definition to reflect the true state of the housing market in Hertfordshire, affordability for average earning households is generally unattainable in the County. There is significant experience in Hertfordshire and elsewhere of initial commitments to affordable housing not being maintained, generally quoting viability issues and at the very least the Council should seek robust guarantees regarding affordable housing proposals.
12. In summary, it is undeniable that the new planning policy context created by the 2024 revised NPPF has provoked a disturbingly high number of new applications and re-applications for sites which were previously refused permission. Whereas a proportion of such applications may warrant consideration for various reasons, the illogicality of the revised NPPF supporting five purposes of the Green Belt (para 143) and then only permitting three purposes to be considered in applications (NPPF Glossary definition) is unsupportable in this case.
13. The Green Belt in this area 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. The value of the open countryside that remains increases for local communities and visitors.
14. Benefits of the Green Belt also relate to the amelioration of the effects of climate change, maintenance and enhancement of biodiversity, and physical and mental health. These are being lost due to the extensive cumulative impact of recent applications in this area and we urge the Council to refuse permission for this inappropriate 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.