

Martin Cowie
Planning and Building Control
Hertsmere Borough Council
Civic Offices, Elstree Way
Borehamwood
Herts. WD6 1WA

Our Ref:

Your Ref:

30th September 2026 (by email)

Dear Martin Cowie,

**Planning application no. 26/1164/FUL
Land North of Potters Lane, Borehamwood
Hybrid application consisting of (i) A full planning application for 154 dwellings (Use Class C3),
and the construction of a new synagogue (Use Class F1) landscaping and associated works
with access from Potters Lane; (ii) An outline application with all matters reserved for the
construction of a new care home (Use Class C2)**

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 the primary justification for the submission of this application. They also present a "fall-back position", as is becoming increasingly common with applications of this nature that, in the event of grey belt not being established, very special circumstances can be identified to clearly outweigh the harm caused to the Green Belt in this location.
3. This application is part of a flood of planning applications being made in Hertsmere by developers and land-owners on the Green Belt since the revision of the NPPF in December 2024, to the extent that the principle of protection of the countryside, especially in southern Hertfordshire is being very seriously jeopardised. The site is not presently allocated for housing in the adopted Core Strategy and this is a speculative application for residential and additional development of a nature that Green Belt legislation is designed specifically to prevent.



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4. Very significant local community opposition continues in Hertsmeire to development in the Green Belt and as evidenced by the volume of community representations received to public consultations on the emerging Local Plan and increasing number of planning applications throughout the Borough. The proposed development would very clearly constitute a breach of the first and third purposes of the Green Belt as identified in the NPPF (Policy GB2) to prevent urban sprawl and encroachment onto open countryside.
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 the town of Borehamwood which the Green Belt legislation was designed to prevent, by virtue of purpose a) as noted in Policy GB2 of the NPPF 2026. 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 this part of southern Hertfordshire.
7. 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.
8. It is noted that a resolution to grant permission for part of this site was passed in 2017 but the decision was never issued. Since then, significant portions of the Green Belt in the Borehamwood and Elstree area have been removed and the cumulative effect of applications is leading to the considerable reduction of open areas in southern Hertfordshire.
9. Remaining issues quoted in the consultant's Planning Statement regarding very special circumstances constitute obligations 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 public services and facilities and the like reduces the consideration of such issues to a check-list of items irrespective



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of the conditions and circumstances of the location and inevitably renders them as less “special”.

10. 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 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.
11. We note the intention to provide 50% affordable housing but this is essentially meaningless without further information and commitments to its provision. With regard to the provision of affordable housing, legally binding agreements between appropriate institutions involved in the provision of truly affordable low cost housing should be required.
12. 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.
13. In summary, it is undeniable that the planning policy context created by the 2024 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, it is unreasonable at best for the revised NPPF to support five purposes of the Green Belt and then only permit three purposes to be considered in applications is unsupportable in this case.
14. The effect of this illogicality is devastating for the Green Belt and the continuing granting of planning consents is damaging and unnecessary in the light of the failure to use previously developed land and unimplemented planning permissions. Recent research by [CPRE](#) indicates that 1.54 million homes could be provided on “brownfield land” across England, thereby reducing the need to use designated protected open land.
15. Southern Hertfordshire is under unrelenting pressure for development and the value of the open countryside that remains increases for local communities and visitors, notwithstanding wider environmental benefits relating to the amelioration of the effects of climate change, maintenance and enhancement of biodiversity, and physical and mental health.



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We urge the Council to refuse permission for this inappropriate speculative 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.