

**Town and County Planning Act 1990
Section 78 (As Amended)**

JOINT POSITION STATEMENT

Prepared by:

**Woolf Bond Planning Ltd
for Bloor Homes Ltd**

and

Hertsmere Borough Council



**Land to the west of Barnet Road, and east of Baker Street,
Potters Bar**

PINS Ref: 6004002

LPA Ref: 24/1101/OUTEI

WBP Ref: 6110

15th May 2026

1.0. INTRODUCTION

- 1.1. This Joint Position Statement has been prepared by Mr Steven Brown, Managing Director of Woolf Bond Planning Ltd on behalf of the Appellant (Bloor Homes Ltd) and Mr Steven Stroud on behalf of Hertsmere Borough Council (“HBC”).
- 1.2. The Council is now in a position to agree that the Appeal Site comprises grey belt land. As the Appeal Scheme accords with the Golden Rules, the proposal represents appropriate development and should be positively determined in accordance with the presumption in favour of sustainable development at paragraph 11(d)(ii) of the NPPF.
- 1.3. The Council confirms that the evidence prepared by Mr Stroud (**CD9.1**) and Mr Radmall (**CD9.2**) is withdrawn and is no longer relied upon, save in relation to matters addressing the planning obligation and the wording of the draft planning conditions.

2.0. CONTEXT

- 2.1. As recorded at paragraph 5.15 of the Planning Statement of Common Ground (“SoCG”) (**CD7.1**), HBC agreed that if the Inspector were to conclude that the Appeal Scheme would utilise grey belt land and that the Appeal Scheme was found to accord with the Golden Rules, then the Appeal Scheme should not be regarded as inappropriate development in the Green Belt and should be positively determined in accordance with the presumption in favour of sustainable development at paragraph 11(d)(ii) of the NPPF.
- 2.2. Paragraph 4.27 also records HBC’s agreement that the Appeal Scheme does satisfy the golden rules at paragraphs 156 and 157 of the NPPF.
- 2.3. In the circumstances, and as recorded at paragraph 4.23 of the Planning SoCG (**CD7.1**), the only area of dispute relating to whether the Site comprises grey belt, is whether the Appeal Site makes a strong contribution to Green Belt purpose (a).
- 2.4. The Officer Report to Committee upon the Appeal Application suggests that the Appeal Site makes a moderate contribution (**CD3.1**, paragraph 1.68 refers).

- 2.5. Using the terminology in the Green Belt PPG (**CD6.2**), Mr Brown's proof of evidence for the Appellant is that the Appeal Site makes a 'weak or none' contribution to purpose (a) (**CD8.1**, paragraph 1.38).
- 2.6. Mr Stroud's proof of evidence for HBC states that the Appeal Site makes a 'strong' contribution purpose (a) (**CD9.1**, paragraph 5.14).
- 2.7. However, the Council recently published its Green Belt Assessment (**CD5.21**), the publication of which post-dates the preparation of **CD3.1**, and was only made available in the final days leading up to the finalisation of the parties' written planning evidence at **CD8.1** and **CD9.1**.
- 2.8. Paragraph 2.3.5 of the Green Belt Assessment states that Potters Bar is not a large built-up area. The Assessment goes on to explain that the Appeal Site (Site Ref PB-008) makes a 'weak/none' contribution to purpose (a) (**CD5.21**, Figure 3.1 and pages 287 and 288 refer).
- 2.9. In the circumstances, the Council now accepts that purpose (a) is not engaged on account of Potters Bar not comprising a large built up area.
- 2.10. Because the Appeal Site does not make a strong contribution to purpose (a), HBC agrees that the Appeal Site comprises grey belt land.

3.0. THE AGREED POSITION

- 3.1. It is now agreed and accepted by HBC that the Appeal Site does not make a strong contribution to purpose (a). Accordingly, HBC agrees that the Appeal Site comprises grey belt land.
- 3.2. It is also agreed that the Appeal Scheme would comply with paragraph 155 of the NPPF.
- 3.3. As a result, development of the Appeal Site in the manner proposed would not be inappropriate development, and the adverse impacts of the development would not significantly and demonstrably outweigh the benefits.

- 3.4. The Council confirms that the evidence prepared by Mr Stroud (CD9.1) and Mr Radmall (CD9.2) is withdrawn and is no longer relied upon, save in relation to matters addressing the planning obligation and the wording of the draft planning conditions.
- 3.5. **HBC's formal position is that the Appeal should be positively determined** in accordance with the presumption in favour of sustainable development at paragraph 11(d)(ii) of the NPPF; subject to receipt of a satisfactory s.106 and the imposition of appropriately worded planning conditions.
- 3.6. In the circumstances, it is agreed between the Appellant and HBC that:
- (i) there are no grounds for a costs application or an award of costs (neither party shall be seeking an award of costs);
 - (ii) the Appellant shall not enforce any award of costs should it be initiated by the Inspector or Secretary of State; and
 - (iii) HBC does not oppose the grant of planning permission (subject to the imposition of appropriate conditions).
- 3.7. This Position Statement is jointly signed by the Appellant and HBC.

Signed: *Steven Brown*

for Woolf Bond Planning Ltd on behalf of Bloor Homes Ltd.

Steven Brown (BSc Hons DipTP MRTPI)
NAME

15th May 2026
DATE

Signed on *Steven Stroud*
on behalf of Hertsmere Borough Council

Steven Stroud MRTPI
NAME

15th May 2026
DATE
