

Robert Jones
Development Management
East Herts District Council
Wallfields
Pegs Lane
Hertford SG13 8EQ

Our Ref:

Your Ref:

23rd January 2026 (by email)

Dear Robert Jones,

**Application number 3/25/2000/PIP
Land Adj. to The Stables and Denzils Barn Epping Green SG13 8NQ
Permission in principle for erection of one to nine dwellinghouses**

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 East Herts District Plan 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 Statement refers directly to the December 2024 revision of the NPPF and the introduction of the concept of grey belt as effectively the sole justification for the submission of this application. No attempt is made to identify 'very special circumstances' or any local conditions which may apply to overcome the presumption that development is inappropriate in the Green Belt.
3. 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 which is aided by pressure from the growth of the capital as the major development generator in this and the surrounding areas in Hertfordshire.
4. The proposed development clearly constitutes encroachment into the countryside. 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.



Campaign to Protect
Rural England
Hertfordshire

5. 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.
6. 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 purposeful illogicality of the revised NPPF supporting five purposes of the Green Belt (para 143) and then permitting only three purposes to be considered in applications (NPPF Glossary definition) where the site is designated as grey belt by the applicant, is clearly apparent.
7. This means in practice that the protection previously offered by the Green Belt has effectively disappeared with the introduction of grey belt. This is now widely recognised by the development industry and the subsequent damage to the principle of countryside protection is in danger of bringing the planning system into disrepute.
8. 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. 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.