

Landscape Statement of Common Ground

In Respect of: Land East of Oxhey Lane, Carpenders Park

On behalf of Burlington Developments London Ltd.

Date: 10/06/2026

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1. Introduction

- 1.1. This Landscape Statement of Common Ground (LSoCG) has been prepared between Pegasus Group, on behalf of Burlington Developments London Ltd. and Three Rivers District Council ("TRDC", the "Council"). This LSoCG comprises a separate appendix as listed.
- 1.2. It has been prepared in connection with an outline application for development on Land East of Oxhey Lane, Carpenders Park with all matters reserved except for access ('the application') ('the development') ('the Site').
- 1.3. The application was submitted to Three Rivers District Council ('TRDC', the 'Council') and was validated on 25th June 2025 with the following description of development (application ref: 25/1020/OUT).

"Outline planning application for up to 256 homes (C3 use class) (including affordable and self/custom build housing), housing with care (C2 use class), a children's home (for looked after children) (C2 use class) together with associated access (including off-site highway works), parking, open space and landscaping (appearance, layout, landscaping and scale as reserved matters)."

- 1.4. The application was presented to the Council's Planning Committee on 19th March 2026. Members resolved to refuse planning permission. Prior to a decision being issued the application was called-in by the Secretary of State and therefore a decision was not formally made by TRDC. Notwithstanding this, the published minutes of the 19 March Planning Committee indicate that the proposed reasons for refusal would have been:

"1) It would constitute inappropriate development in the Green Belt, harm openness, and conflict with purpose (a) and (c) of the Green Belt. Very special circumstances would not exist to outweigh the harm to the Green Belt and any other harm identified; and

2) In the absence of a S106 agreement, failure to secure infrastructure contributions."

- 1.5. This LSoCG covers the effects of the proposals upon the landscape character & appearance of the area noting that landscape and visual harm are not cited separately in the proposed reasons for refusal.
- 1.6. The purpose of this LSoCG is to identify the areas where the principal parties (Burlington Developments London Ltd. and the LPA) are in agreement and to narrow down the issues that remain in dispute. This will allow the Public Inquiry to focus on the most pertinent issues. This LSoCG should be read in conjunction with the Planning SoCG and Highways SoCG.

2. Site Location and Description

- 2.1. The application site comprises approximately 12.7 hectares (ha) of land located to the east of Carpenders Park and the A4008 (Oxhey Lane), which would accommodate the vehicular access point into the development. The Site comprises three fields of grassland bounded by belts of trees and scrub. There is one Public Right of Way, footpath ref 'Watford Rural 013' which passes broadly east to west through the northern section of the Site. Carpenders Park Care Home is a modern, 3-storey building off Oxhey Lane immediately adjacent to the western boundary, with existing residential development to the west beyond the road. Properties generally back onto the A4008, and those along Carpenders Avenue to the northwest of the Site are perpendicular to the Site. There are mature hedgerows flanking both the eastern side of Oxhey Road along the Site's western boundary, and along the western side of the road defining the boundary of the rear gardens of properties along Five Fields Close, Wellington Close and Hangar Ruding which back onto the road. The northern boundary is defined by a hedgerow with mature trees, with the eastern boundary enclosed by mature trees and established woodland at Merry Hill nature reserve beyond. The southern boundary is currently open to the field parcel to the south, however there are mature trees with scrub along the course of Hartsbourne Stream between 20–70m south of the boundary.. The engineered Hartsbourne flood alleviation works – together with an extensive flood storage area – form a feature located south of the Site.
- 2.2. Figure 1 submitted with the LVIA shows the location and context of the Site.
- 2.3. Existing tree and hedgerow vegetation associated with the Site includes overgrown hedgerows forming belts of blackthorn scrub and mature trees that follow the internal field boundaries, and along the boundaries with the A4008 Oxhey Lane to the west. There are mature trees along the eastern boundary with young woodland at Merry Hill to the eastern boundary. A tree survey was carried out in November 2024 by ACD Environmental which identified that tree cover within the Site is predominantly oak trees along the northern, eastern and western boundary, with overgrown blackthorn scrub and brambles having overtaken internal hedgerows. The survey identified 27 Category A – 'high' value trees, 30 Category B 'Moderate' value trees, with 19 individual trees and 3 tree groups of Category C 'Low' value.
- 2.4. A provisional Tree Preservation Order (TPO) has been made by TRDC 'Tree Preservation Order no.937 (Carpenders Park Dairy)' which includes trees located on the Site, along the northern and eastern boundary of the Site. A copy of this provisional TPO is included as CD4.1.
- 2.5. The Site does not contain any statutorily or locally listed structures. The closest heritage assets are three Grade II listed buildings and structures further to the south on Oxhey Lane (opposite Grims Dyke Golf Club), Grim's Ditch (a Scheduled Monument) and Grims Dyke (a Grade II listed park and garden). The closest of these is approx. 700m (at the closest point). Additionally, Carpenders Park has no conservation area, and the closest is the 'Brookshill Drive and Grimdyke Estate' Conservation Area within Harrow, approximately 900m to the southeast.
- 2.6. At a national level the Site is located to the western edge of National Character Area: 111 – 'Northern Thames Basin' which covers an extensive area. The Hertfordshire Landscape Character Assessment (2005) locates the site within the 'Bushey Hill Pastures' Landscape Character Area (LCA 14).

- 2.7. The landscape and visual effects set out in the submitted LVIA and LVIA Addendum were considered in relation to the proposals set out in the submitted planning application drawings and Design and Access Statement (DAS). Illustrative Landscape proposals are depicted in the Illustrative Landscape Masterplan (Drawing No. P24-2420_EN_08E).

3. The Proposed Development

- 3.1. The Proposed Development seeks outline planning permission for a mixed-use scheme comprising market, affordable and self/custom build housing (up to 256 homes), housing with care (60 homes), a children's home (for looked after children) together with associated parking, open space, landscaping and vehicular access.
- 3.2. A new primary access is proposed off Oxhey Lane into the northern section of the Site, and two new pedestrian and cycle accesses are proposed (including one emergency vehicle access). The main vehicular access will be via a signalised crossroad junction from Oxhey Lane, opposite Carpenders Avenue. The access is located to the north-western corner of the Site and will extend eastward across the northern section of the Site, then run vertically to the south.
- 3.3. The Illustrative Landscape Masterplan shows how landscaping could be integrated into one layout option for the site.
- 3.4. The illustrative landscape scheme includes the following features which should be incorporated at the detailed design stage:
- A proportion of the Site will be dedicated to landscape, Green Infrastructure, public open space, play and habitat related proposals. This could include public open space and associated landscape proposals which will include a mix of open space, woodland, woodland edge and hedgerow planting together with a community orchard and areas of Public Open Space.
 - Some development is proposed on the highest part of the Site. The northern parcel of the site is the most sensitive when having regard to topography. It is agreed that the easternmost part of the Site is considered to be sensitive, and the parameter plan shows an offset of at least 15m from the adjacent woodland edge to ensure no conflicts with RPAs of trees along the western edge of Merry Hill Wood.
 - The developable area is proposed to be contained within a robust landscape framework around the northern and western site perimeters. Additional planting could be incorporated to enhance and strengthen the existing boundary hedgerows.
 - The proposals would retain the existing PRow extending through the northern part of the Site on its current alignment, set within a green corridor incorporating areas of public open space. Additional pedestrian links and paths around the periphery of the Site could also be provided and would increase the recreational opportunities within the Site, whilst also providing linkages between the adjacent existing residential area and Merry Hill Wood to the east.

4. Matters on which the parties agree

- 4.1. The minuted resolution of the Planning Committee on 19 March 2026 contained no landscape reason for refusal nor mandate from Members of the Planning Committee for such grounds for an individual reason for refusal to be pursued by the Council.

Methodology and Approach

- 4.2. It is agreed that the LVIA methodology submitted with the planning application is generally in accordance with the principles of Guidelines for Landscape and Visual Impact Assessment 3rd Edition, 2013 (GLVIA3). For ease of reference the LVIA methodology is included at Appendix 1 of this LSoCG.
- 4.3. It is agreed that the Site is not a 'valued landscape' in accordance with NPPF Paragraph 187(a).
- 4.4. It is agreed that the Site is not located within any landscape designation, including but not limited to:
- National Park; and
 - National Landscape (AONB).
- 4.5. It is agreed that the Site is not located within any landscape designation under the provisions of the adopted Local Plan and policies map.

Landscape Character

- 4.6. It is agreed that the following landscape features are relevant to the Appeal:
- Land Cover / Land Use;
 - Topography;
 - Vegetation Pattern;
 - Tree Resource;
 - Water Features;
 - Character of the Site and its immediate context; and
 - Character of the local landscape (Bushey Hill Pastures).
- 4.7. There is a single PRoW extending through the northern part of the Site which will be retained on its current alignment with new native tree and hedgerow planting being incorporated. PRoW within the wider area would not be affected (i.e. blocked, obstructed or diverted) by the Proposed Development.
- 4.8. It is agreed that at a national level, the Site and its local setting are located within National Character Area: 111 – 'Northern Thames Basin' 'Thames Valley' National Character Area (NCA 115). It is agreed that this NCA is very extensive in comparison to the Site, and whilst in



broad terms, the Site shares some of the identified characteristics of the NCA, it is located at the urban fringe and therefore built development and the urbanising effects of associated infrastructure and residential development all play a role in the character of the landscape associated with the Site.

4.9. It is agreed that the Site is located within the 'Bushey Hill Pastures' LCA defined by the Hertfordshire Landscape Character Assessment.

4.10. It is agreed that the key characteristics of the Bushey Hill Pastures LCA and its general description are considered to be representative of the local setting of the Site.

Visual Amenity

4.11. Both parties agree that the viewpoints undertaken for the LVIA are representative of the locality and provide sufficient information for the Inspector to reach a conclusion on landscape matters.

4.12. Both parties agree that in the local area, existing built form, woodland, tree growth, mature hedgerows and gently undulating topography have some role in mitigating the landscape and visual effects arising from the Proposed Development.

4.13. It is agreed that partial views of the Site are available from the settlement edge of Carpenders Park to the west, with wider views available from further into Carpenders Park, albeit the level of effect for these more distant viewpoints would not be significant.

4.14. It is agreed that the highest level of visual effects arising from the proposed development would be confined to the Site and the immediate vicinity.

4.15. In terms of residential visual amenity, no properties close to the Proposed Development would be so affected such that the properties would be rendered unattractive places in which to live in terms of public interest. This is reflected in the fact that there is no specific residential amenity reason for refusal.

Landscape Mitigation

4.16. It is agreed that the mitigation suggested forms a response to the constraints and opportunities presented by the Site and will help to reduce the impact on the landscape over time.

Inspectors Site Visit Itinerary Plan

4.17. A Site Visit Itinerary Plan has been prepared for the Inspector. It is agreed between the parties that this forms a suitable route for the Inspector to gain an appreciation of the Site and its context in connection with landscape and visual matters. For ease of reference the plan is included at Appendix 2.



5. Matters on which the parties disagree

- 5.1. There is a difference in professional judgement between the parties concerning the level of some landscape and visual effects.
- 5.2. There is disagreement between the parties as to whether Place Services landscape advice constitutes an objection to the Proposed Development. For the avoidance of doubt the Place Services consultation responses are included at Appendix 3.



Appendix 1: Landscape and Visual Impact Assessment Methodology

APPENDIX 1: LANDSCAPE AND VISUAL IMPACT ASSESSMENT METHODOLOGY



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1. Landscape and Visual Impact Assessment Methodology

- 1.1. The Analysis is based on this methodology which has been undertaken with regards to best practice as outlined within the following publications:
- Guidelines for Landscape and Visual Impact Assessment (3rd Edition, 2013) – Landscape Institute / Institute of Environmental Management and Assessment;
 - Notes and Clarifications on Aspects of Guidelines for Landscape and Visual Impact Assessment Third Edition (GLVIA3) – Technical Guidance Note LITGN-2024-01 (2024);
 - Visual Representation of Development Proposals (2019) – Landscape Institute Technical Guidance Note 06/19;
 - An Approach to Landscape Character Assessment (2014) – Natural England;
 - An Approach to Landscape Sensitivity Assessment – To Inform Spatial Planning and Land Management (2019) – Natural England.
 - Reviewing Landscape Visual Impact Assessments (LVIAs and Landscape and Visual appraisals (LVAs) Technical Guidance Note 1/20 Landscape Institute.
 - Assessing Landscape Value Outside National Designations, Technical Guidance Note 02/21 – Landscape Institute (2021).
- 1.2. GLVIA3 states within paragraph 1.1 that “Landscape and Visual Impact Assessment (LVIA) is a tool used to identify and assess the significance of and the effects of change resulting from development on both the landscape as an environmental resource in its own right and on people’s views and visual amenity.”¹
- 1.3. GLVIA3 also states within paragraph 1.17 that when identifying landscape and visual effects there is a “need for an approach that is in proportion to the scale of the project that is being assessed and the nature of the likely effects. Judgement needs to be exercised at all stages in terms of the scale of investigation that is appropriate and proportional.”²
- 1.4. GLVIA3 recognises within paragraph 2.23 that “professional judgement is a very important part of LVIA. While there is some scope for quantitative measurement of some relatively objective matters much of the assessment must rely on qualitative judgements”³ undertaken by a landscape consultant or a Chartered Member of the Landscape Institute (CMLI).
- 1.5. GLVIA3 notes in paragraph 1.3 that “LVIA may be carried out either formally, as part of an Environmental Impact Assessment (EIA), or informally, as a contribution to the ‘appraisal’ of development proposals and planning applications”⁴ Although the proposed development is not subject to an EIA requiring an assessment of the likely significance of effects, this

¹ Para 1.1, Page 4, GLVIA, 3rd Edition

² Para 1.17, Page 9, GLVIA, 3rd Edition

³ Para 2.23, Page 21, GLVIA, 3rd Edition

⁴ Para 1.3, Page 4, GLVIA, 3rd Edition

assessment is also titled as an LVIA rather than an 'appraisal' in the interests of common understanding with other planning consultants.

1.6. The effects on cultural heritage and ecology are not considered within this LVIA.

Study Area

1.7. The study area for this LVIA covers a 3km radius from the site. However, the main focus of the assessment was taken as a radius of 1km from the site as it is considered that even with clear visibility the proposals would not be perceptible in the landscape beyond this distance.

Effects Assessed

1.8. Landscape and visual effects are assessed through professional judgements on the sensitivity of landscape elements, character and visual receptors combined with the predicted magnitude of change arising from the proposals. The landscape and visual effects have been assessed in the following sections:

- Effects on landscape elements;
- Effects on landscape character; and
- Effects on visual amenity.

1.9. Sensitivity is defined in GLVIA3 as "a term applied to specific receptors, combining judgments of susceptibility of the receptor to a specific type of change or development proposed and the value related to that receptor."⁵ Various factors in relation to the value and susceptibility of landscape elements, character, visual receptors or representative viewpoints are considered below and cross referenced to determine the overall sensitivity as shown in Table 1:

Table 1, Overall sensitivity of landscape and visual receptors

		VALUE		
		HIGH	MEDIUM	LOW
SUSCEPTIBILITY	HIGH	High	High	Medium
	MEDIUM	High	Medium	Medium
	LOW	Medium	Medium	Low

1.10. Magnitude of change is defined in GLVIA3 as "a term that combines judgements about the size and scale of the effect, the extent over which it occurs, whether it is reversible or irreversible and whether it is short or long term in duration."⁶ Various factors contribute to

⁵ Glossary, Page 158, GLVIA, 3rd Edition

⁶ Glossary, Page 158, GLVIA, 3rd Edition



the magnitude of change on landscape elements, character, visual receptors and representative viewpoints.

- 1.11. The sensitivity of the landscape and visual receptor and the magnitude of change arising from the proposals are cross referenced in Table 11 to determine the overall degree of landscape and visual effects.

2. Effects on Landscape Elements

- 2.1. The effects on landscape elements includes the direct physical change to the fabric of the land, such as the removal of woodland, hedgerows or grassland to allow for the proposals.

Sensitivity of Landscape Elements

- 2.2. Sensitivity is determined by a combination of the value that is attached to a landscape element and the susceptibility of the landscape element to changes that would arise as a result of the proposals – see pages 88–90 of GLVIA3. Both value and susceptibility are assessed on a scale of high, medium or low.
- 2.3. The criteria for assessing the value of landscape elements and landscape character is shown in Table 2:

Table 2, Criteria for assessing the value of landscape elements and landscape character

HIGH	<p>Designated landscape including but not limited to World Heritage Sites, National Parks, National Landscapes (formerly Areas of Outstanding Natural Beauty) considered to be an important component of the country’s character or non-designated landscape of a similar character and quality.</p> <p>Landscape condition is good and components are generally maintained to a high standard.</p> <p>In terms of seclusion, enclosure by land use, traffic and movement, light pollution and absence of major built infrastructure, the landscape has an elevated level of tranquility.</p> <p>Rare or distinctive landscape elements and features are key components that contribute to the landscape character of the area.</p>
MEDIUM	<p>Undesignated landscape including urban fringe and rural countryside considered to be a distinctive component of the national or local landscape character.</p> <p>Landscape condition is fair and components are generally well maintained.</p> <p>In terms of seclusion, enclosure by land use, traffic and movement, light pollution and some major built infrastructure, the landscape has a moderate level of tranquility.</p> <p>Rare or distinctive landscape elements and features are notable components that contribute to the character of the area.</p>
LOW	<p>Undesignated landscape including urban fringe and rural countryside considered to be of unremarkable character.</p> <p>Landscape condition may be poor and components poorly maintained or damaged.</p> <p>In terms of seclusion, enclosure by land use, traffic and movement, light pollution and significant major built infrastructure, the landscape has limited levels of tranquility.</p> <p>Rare or distinctive elements and features are not notable components that contribute to the landscape character of the area.</p>

- 2.4. The criteria for assessing the susceptibility of landscape elements and landscape character is shown in Table 3:

Table 3, Criteria for assessing landscape susceptibility

HIGH	<p>Scale of enclosure – landscapes with a low capacity to accommodate the type of development being proposed owing to the interactions of topography, vegetation cover, built form, etc.</p> <p>Nature of land use – landscapes with no or little existing reference or context to the type of development being proposed.</p> <p>Nature of existing elements – landscapes with components that are not easily replaced or substituted (e.g. ancient woodland, mature trees, historic parkland, etc).</p> <p>Nature of existing features – landscapes where detracting features, major infrastructure or industry is not present or where present has a limited influence on landscape character.</p>
MEDIUM	<p>Scale of enclosure – landscapes with a medium capacity to accommodate the type of development being proposed owing to the interactions of topography, vegetation cover, built form, etc.</p> <p>Nature of land use – landscapes with some existing reference or context to the type of development being proposed.</p> <p>Nature of existing elements – landscapes with components that are easily replaced or substituted.</p> <p>Nature of existing features – landscapes where detracting features, major infrastructure or industry is present and has a noticeable influence on landscape character.</p>
LOW	<p>Scale of enclosure – landscapes with a high capacity to accommodate the type of development being proposed owing to the interactions of topography, vegetation cover, built form, etc.</p> <p>Nature of land use – landscapes with extensive existing reference or context to the type of development being proposed.</p> <p>Nature of existing features – landscapes where detracting features or major infrastructure is present and has a dominating influence on the landscape.</p>

- 2.5. Various factors in relation to the value and susceptibility of landscape elements are assessed and cross referenced to determine the overall sensitivity as shown in Table 1.
- 2.6. Sensitivity is defined in GLVIA3 as “a term applied to specific receptors, combining judgments of susceptibility of the receptor to a specific type of change or development proposed and the value related to that receptor.”⁷ The definitions for high, medium, low landscape sensitivity are shown in Table 4:

⁷ Glossary, Page 158, GLVIA, 3rd Edition

Table 4, Criteria for assessing landscape sensitivity

HIGH	Landscape element or character area defined as being of high value combined with a high or medium susceptibility to change.
	Landscape element or character area defined as being of medium value combined with a high susceptibility to change.
MEDIUM	Landscape element or character area defined as being of high value combined with a low susceptibility to change.
	Landscape element or character area defined as being of medium value combined with a medium or low susceptibility to change.
	Landscape element or character area defined as being of low value combined with a high or medium susceptibility to change.
LOW	Landscape element or character area defined as being of low value combined with a low susceptibility to change.

Magnitude of Change on Landscape Elements

- 2.7. Professional judgement has been used to determine the magnitude of change on individual landscape elements within the site as shown in Table 5:

Table 5, Criteria for assessing magnitude of change for landscape elements

HIGH	Substantial loss/gain of a landscape element.
MEDIUM	Partial loss/gain or alteration to part of a landscape element.
LOW	Minor loss/gain or alteration to part of a landscape element.
NEGLIGIBLE	No loss/gain or very limited alteration to part of a landscape element.

3. Effects on Landscape Character

- 3.1. Landscape character is defined as the “distinct, recognisable and consistent pattern of elements in the landscape that makes one landscape different from another, rather than better or worse.”⁸
- 3.2. The assessment of effects on landscape character considers how the introduction of new landscape elements physically alters the landform, landcover, landscape pattern and perceptual attributes of the site or how visibility of the proposals changes the way in which the landscape character is perceived.

Sensitivity of Landscape Character

- 3.3. Sensitivity is determined by a combination of the value that is attached to a landscape and the susceptibility of the landscape to changes that would arise as a result of the proposals – see pages 88–90 of GLVIA3. Both value and susceptibility are assessed on a scale of high, medium or low.
- 3.4. The criteria for assessing the value of landscape character is shown in Table 2.
- 3.5. The criteria for assessing the susceptibility of landscape character is shown in Table 3.
- 3.6. The overall sensitivity is determined through cross referencing the value and susceptibility of landscape character as shown in Table 1.

Magnitude of Change on Landscape Character

- 3.7. Professional judgement has been used to determine the magnitude of change on landscape character as shown in Table 6:

Table 6, Criteria for assessing magnitude of change on landscape character

HIGH	Introduction of major new elements into the landscape or some major change to the scale, landform, landcover or pattern of the landscape.
MEDIUM	Introduction of some notable new elements into the landscape or some notable change to the scale, landform, landcover or pattern of the landscape.
LOW	Introduction of minor new elements into the landscape or some minor change to the scale, landform, landcover or pattern of the landscape.
NEGLIGIBLE	No notable or appreciable introduction of new elements into the landscape or change to the scale, landform, landcover or pattern of the landscape.

⁸ Glossary, Page 157, GLVIA, 3rd Edition

4. Effects on Visual Amenity

- 4.1. Visual amenity is defined within GLVIA3 as the “overall pleasantness of the views people enjoy of their surroundings, which provides an attractive visual setting or backdrop for the enjoyment of activities of the people living, working, recreating, visiting or travelling through an area.”⁹
- 4.2. The effects on visual amenity considers the changes in views arising from the proposals in relation to visual receptors including settlements, residential properties, transport routes, recreational facilities and attractions; and representative viewpoints or specific locations within the study area as agreed with the Local Planning Authority.

Sensitivity of Visual Receptors

- 4.3. Sensitivity is determined by a combination of the value that is attached to a view and the susceptibility of the visual receptor to changes in that view that would arise as a result of the proposals – see pages 113–114 of GLVIA3. Both value and susceptibility are assessed on a scale of high, medium or low.
- 4.4. The criteria for assessing the value of views are shown in Table 7:

Table 7, Criteria for assessing the value of views

HIGH	Views with high scenic value within designated landscapes including but not limited to World Heritage Sites, National Parks, National Landscape (formerly Areas of Outstanding Natural Beauty), etc. Likely to include key viewpoints on OS maps or reference within guidebooks, provision of facilities, presence of interpretation boards, etc.
MEDIUM	Views with moderate scenic value within undesignated landscape including urban fringe and rural countryside.
LOW	Views with unremarkable scenic value within undesignated landscape with partly degraded visual quality and detractors.

- 4.5. The criteria for assessing the susceptibility of views are shown in Table 8:

Table 8, Criteria for assessing visual susceptibility

HIGH	Includes occupiers of residential properties and people engaged in recreational activities in the countryside using public rights of way (PROW).
MEDIUM	Includes people engaged in outdoor sporting activities and people travelling through the landscape on minor roads and trains.
LOW	Includes people at places of work e.g. industrial and commercial premises and people travelling through the landscape on major roads and motorways.

- 4.6. Sensitivity is defined in GLVIA3 as “a term applied to specific receptors, combining judgments of susceptibility of the receptor to a specific type of change or development

⁹ Page 158, Glossary, GLVIA3

proposed and the value related to that receptor.”¹⁰ The definitions for high, medium, low visual sensitivity are shown in Table 9:

Table 9, Criteria for assessing visual sensitivity

HIGH	Visual receptor defined as being of high value combined with a high or medium susceptibility to change.
	Visual receptor defined as being of medium value combined with a high susceptibility to change.
MEDIUM	Visual receptor defined as being of high value combined with a low susceptibility to change.
	Visual receptor defined as being of medium value combined with a medium or low susceptibility to change.
	Visual receptor defined as being of low value combined with a high or medium susceptibility to change.
LOW	Visual receptor defined as being of low value combined with a low susceptibility to change.

Magnitude of Change on Visual Receptors

4.7. Professional judgement has been used to determine the magnitude of change on visual receptors as shown in Table 10:

Table 10, Criteria for assessing magnitude of change for visual receptors

HIGH	Major change in the view that has a substantial influence on the overall view.
MEDIUM	Some change in the view that is clearly visible and forms an important but not defining element in the view.
LOW	Some change in the view that is appreciable with few visual receptors affected.
NEGLIGIBLE	No notable change in the view.

¹⁰ Glossary, Page 158, GLVIA, 3rd Edition

5. Significance of Landscape And Visual Effects

- 5.1. The likely significance of effects is dependent on all of the factors considered in the sensitivity and the magnitude of change upon the relevant landscape and visual receptors. These factors are assimilated to assess whether or not the proposed development will have a likely significant or not significant effect. The variables considered in the evaluation of the sensitivity and the magnitude of change is reviewed holistically to inform the professional judgement of significance.
- 5.2. Within Table 11 below, the major effects highlighted in grey are considered to be significant in terms of the EIA Regulations. It should be noted that whilst an individual effect may be significant, it does not necessarily follow that the proposed development would be unacceptable in the planning balance. The cross referencing of the sensitivity and magnitude of change on the landscape and visual receptor determines the significance of effect as shown in Table 11:

Table 11, Significance of landscape and visual effects

		Sensitivity		
		HIGH	MEDIUM	LOW
Magnitude of Change	HIGH	Major	Major	Moderate
	MEDIUM	Major	Moderate	Minor
	LOW	Moderate	Minor	Minor
	NEGLIGIBLE	Negligible	Negligible	Negligible

6. Typical Descriptors of Landscape Effects

6.1. The typical descriptors of the landscape effects are detailed within Table 12:

Table 12, Typical Descriptors of Landscape Effects

MAJOR BENEFICIAL	<p>Substantially:</p> <ul style="list-style-type: none"> - enhance the character (including value) of the landscape; - enhance the restoration of characteristic features and elements lost as a result of changes from inappropriate management or development; - enable a sense of place to be enhanced.
MODERATE BENEFICIAL	<p>Moderately:</p> <ul style="list-style-type: none"> - enhance the character (including value) of the landscape; - enable the restoration of characteristic features and elements partially lost or diminished as a result of changes from inappropriate management or development; - enable a sense of place to be restored.
MINOR BENEFICIAL	<p>Slightly:</p> <ul style="list-style-type: none"> - complement the character (including value) of the landscape; - maintain or enhance characteristic features or elements; - enable some sense of place to be restored.
NEGLIGIBLE	<p>The proposed changes would (on balance) maintain the character (including value) of the landscape and would:</p> <ul style="list-style-type: none"> - be in keeping with landscape character and blend in with characteristic features and elements; - Enable a sense of place to be maintained.
NO CHANGE	<p>The proposed changes would not be visible and there would be no change to landscape character.</p>
MINOR ADVERSE	<p>Slightly:</p> <ul style="list-style-type: none"> - not quite fit the character (including value) of the landscape; - be a variance with characteristic features and elements; - detract from the sense of place.
MODERATE ADVERSE	<p>Moderately:</p> <ul style="list-style-type: none"> - conflict with the character (including value) of the landscape; - have an adverse effect on characteristic features or elements; - diminish a sense of place.
MAJOR ADVERSE	<p>Substantially:</p> <ul style="list-style-type: none"> - be at variance with the character (including value) of the landscape; - degrade or diminish the integrity of a range of characteristic features and elements or cause them to be lost; - change a sense of place.

7. Typical Descriptors of Visual Effects

7.1. The typical descriptors of the visual effects are detailed within Table 13:

Table 13, Typical Descriptors of Visual Effects

MAJOR BENEFICIAL	Proposals would result in a major improvement in the view.
MODERATE BENEFICIAL	Proposals would result in a clear improvement in the view.
MINOR BENEFICIAL	Proposals would result in a slight improvement in the view.
NEGLIGIBLE	The proposed changes would be in keeping with, and would maintain, the existing view or where (on balance) the proposed changes would maintain the general appearance of the view (which may include adverse effects which are offset by beneficial effects for the same receptor) or due to distance from the receptor, the proposed change would be barely perceptible to the naked eye.
NO CHANGE	The proposed changes would not be visible and there would be no change to the view.
MINOR ADVERSE	Proposals would result in a slight deterioration in the view.
MODERATE ADVERSE	Proposals would result in a clear deterioration in the view.
MAJOR ADVERSE	Proposals would result in a major deterioration in the view.

8. Nature of Effects

- 8.1. GLVIA3 includes an entry that states *"effects can be described as positive or negative (or in some cases neutral) in their consequences for views and visual amenity."*¹¹ GLVIA3 does not, however, state how negative or positive effects should be assessed, and this therefore becomes a matter of professional judgement supported by site specific justification within the LVIA.

¹¹ Para 6.29, Page 113, GLVIA 3rd Edition

Town & Country Planning Act 1990 (as amended)
Planning and Compulsory Purchase Act 2004

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Appendix 2: Inspectors Site Visit Itinerary Plan



- KEY**
- Site Boundary
 - Viewpoint Location
 - Public Rights of Way
 - Walking Route
 - CFS11 Proposed Education Allocation

1. Start at Carpenders Park overground rail station – walk west along Gibbs Couch and cross Delta Gain.
2. Turn right and then left into Carpenders Avenue.
3. Walk west along Carpenders Avenue taking in Viewpoints 15 and 14 – upon reaching Oxhey Lane.
4. Cross Oxhey Lane and enter site on Public Right of Way (Footpath Watford Rural O13).
5. Walk PRoW from west to east across site taking in Viewpoints 1 and 2.
6. Continue east along PRoW into Merry Hill Wood. Walk to Viewpoint 7 and look back towards site – then continue east and appreciate views across landscape to east and southeast in direction of Bushey and Hartsbourne golf course.
7. Retrace steps to northern site field.
8. Walk south along Oxhey Lane to Carpenders Park Lawn Cemetery taking in Viewpoints 13 and 10.
9. Return to Carpenders Park rail station.

REV	DATE	DESCRIPTION

INSPECTORS SITE VISIT ITINERARY PLAN

LAND AT CARPENDERS PARK
 BURLINGTON PROPERTY GROUP LTD

DATE	SCALE	DRAWN	APPROVED
03/06/2026	1:15,000@A3	EN/AB	JE
SHEET	REV	N	0
-	B	▲	0.5KM

DRAWING NUMBER
 P24-2420_EN_16



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Appendix 3: Place Services Consultation Responses



Three Rivers District Council
Development Management
Three Rivers House
Northway
Rickmansworth
Hertfordshire
WD3 1RL

Date: 13 November 2025
Our ref: 10680

For the attention of: Matthew Roberts

Application ref: 25/1020/OUT
Location: Land East of Oxhey Lane, Oxhey Lane, Carpenders Park, Hertfordshire
Proposal/Description: Outline planning application for up to 256 homes (C3 use class) (including affordable and self/custom build housing), housing with care (C2 use class), a children's home (for looked after children) (C2 use class) together with associated access (including off-site highway works), parking, open space and landscaping (appearance, layout, landscaping and scale as reserved matters)

Thank you for consulting with Place Services on the above Outline planning application. This letter sets out our consultation response on the landscape impact of the application and how the proposal relates and responds to the landscape setting and context of the site.

This review is based on a desktop study with a site visit of the above-referenced application and its submitted documents. Site visit carried out on the 28/10/2025. Our Landscape comments are as follows:

Site Context

The site is situated on the eastern edge of Carpenders Park, immediately to the east of the A4008 Oxhey Lane. It comprises three grassland fields, separated by two hedgerows. The northern boundary is defined by a treeline, whilst the southern boundary is currently open to the field parcel to the south. However, mature trees and scrub vegetation follow the course of Hartsbourne Stream, which provides enclosure to the Site.

The eastern boundary adjoins Merry Hill Woodland, and the western boundary is lined with trees and hedgerow, beyond which lies the existing settlement of Carpenders Park. A historic tree line runs north–south through the centre of the site. Adjacent to the western boundary is the three storey high Carpenders Park Care Home. There are several notable feature trees within the site, including veteran specimens located along the northern boundary.

A Public Rights of Way (Footpath Watford Rural 013) runs east–west across the northern part of the site, providing a connection between Carpenders Park and Merry Hill Wood.

The site’s topography varies significantly. The northern field features a steep incline from west to east, rising from 83.71 metres to 104.23 metres. The remaining fields exhibit a gentler slope from north to south. The highest point on the Site is located in the northeast at 104.23 metres, while the lowest point lies in the southwest at 77.61 metres. The elevated areas of the site offer long-distance views towards the west and south.

There are no statutory or non-statutory landscape protection designations within the site.

The surrounding landscape to the north, east and south of the site is of rural character. It features a high density of landscape features including woodland, golf course, riparian vegetation and trees, set within a layered field pattern and rolling topography.

The site is located within National Character Area (NCA) 111: Northern Thames Basin, and The Hertfordshire Landscape Character Assessment (2005) ‘Bushey Hill Pastures’ Landscape Character Area (LCA). Key characteristics of the LCA include:

- strong rising slopes up towards Merry Hill
- extensive grazing and equestrian activity
- considerable new planting
- surprisingly rural and panoramic views to the west
- parkland areas at Haydon Hill
- golf courses
- strong containment by urban settlement although generally visually well screened

Rarity and distinctiveness is described as:

“The area is relatively unusual in the county. The main distinctive quality is the maintenance of rural and pastoral character within a wider urban context.”

The ‘Strategy and Guidelines for Managing Change’ relevant to the development include:

- expand the network of new tree planting to the west of the A4008 to soften the surrounding residential areas
- maintain and enhance public access to and over the entire area
- ensure that the distinctive long-distance views are framed and not lost by emerging woodland areas

The site is also identified as parcel CFS69 within the Three Rivers District Council Landscape Sensitivity Assessment. The document identifies parcel CFS69 as having a ‘Medium High’ sensitivity for residential use. Amongst the key sensitive elements are:

- the undulating landforms,
- landscape features
- strong perceptual quality,

- views from the public footpath running through the centre of the site towards natural features to the north east and urban landscape towards the south west,
- views in to the site from South Oxhey and footpaths.

Planning Context

The site lies within the Green Belt, and any proposed development must have regard to current green belt policies, specifically Policy CP11 of the Core Strategy (October 2011) and Policy DM2 of the Development Management Policies Local Development Document (2013). In landscape terms, the following policies are also relevant:

Development Management Policies Local Development Document (2013)

- DM7: Landscape character

Core Strategy (October 2011)

- CP1: Overarching Policy on Sustainable Development
- CP9: Green Infrastructure
- CP12: Design of Development
- Core Strategy Strategic Objective: S1, S9, S12

The site forms part of allocation parcels CFS69 and CFS69a, both of which were deemed undevelopable in the Strategic Housing & Employment Land Availability Assessment (SHELAA) 2023, primarily due to the very high level of harm to the Green Belt.

Review of the proposal/submitted information

Landscape and Visual Impact Assessment

A Landscape & Visual Impact Assessment (LVIA) has been submitted with the outline application. While the assessment includes a detailed assessment of the visual effects from the identify visual receptors alongside tables, the assessment of the effects on landscape receptors is somehow lost within the report as no summary table for landscape receptors is included.

Landscape impact

We concur with the high magnitude of change on landscape character (“Introduction of major new elements into the landscape or some major change to the scale, landform, landcover or pattern of the landscape”, as described in the LVIA methodology), giving a significant landscape effect of major adverse.

We have identified discrepancies between our judgements and the LVIA regarding the sensitivity and magnitude of change for landscape receptors.

The LVIA assigns medium sensitivity to the site’s topography. However, given that steep topography is a defining characteristic of this Landscape Character Area (LCA), we consider this to be an underestimation. While the LVIA states that changes to the landform will be

minor, the proposal lacks sufficient supporting detail. No existing or proposed contour plans or cross-sections have been provided to illustrate the impact of the new access track, residential development, and attenuation area across the steepest slopes.

In reality, the residential development will be situated on sloping ground, requiring cut and fill operations and regrading to accommodate roads, driveways, and private gardens with usable gradients. We consider the site's topography to be of high sensitivity, and the magnitude of change to be medium, resulting in a major adverse significance of effect. Therefore, we do not agree with the LVIA's conclusion that the overall effect on topography would be minor adverse.

We also disagree with the LVIA's assessment of the site's hedgerows as having low value and low sensitivity. These features are recorded in historic mapping, have a positive and meaningful contribution to the wider green infrastructure and biodiversity, and provide important screening benefits. Although the fragmentation of these green corridors may be localised, it is not negligible. Contrary to the LVIA's judgment, we consider the magnitude of change to be low (minor loss), resulting in a minor adverse effect.

Paragraph 5.26 says that the site lacks rare or unique landscape features. We disagree and refer to the LCA's description of rarity and distinctiveness:

“The area is relatively unusual in the county. The main distinctive quality is the maintenance of rural and pastoral character within a wider urban context.”

In addition, the Site contains several feature trees, including veterans, and retains historic landscape structure through its hedgerows. While the Site may not be designated as a 'valued landscape' under the National Planning Policy Framework (NPPF), it clearly contains elements of value. It reflects the character of the Bushey Hill Pastures LCA and functions as a transitional space between Carpenders Park and Merry Hill. We strongly disagree with the LVIA's assertion that the Site represents an unremarkable settlement edge. The northern part of the Site, in particular, exhibits high sensitivity due to its topography, views, perceptual quality, recreational use, and transitional function, and should be protected from development and enhanced through appropriate management.

Generally, the LVIA portrays the Site as having a strong relationship with the built edge of the settlement to the west and says it is well-contained by vegetation. However, it fails to adequately consider the Site's relationship with the wider undeveloped character of Merry Hill and the surrounding landscape to the north and south. This omission weakens the assessment of landscape impacts.

Visual impact

The LVIA appears to downplay the recreational value of the Site. The PRoW is well-used by the public and provides access to the countryside and Merry Hill Woodland. Development in the northern part of the Site will have a significant visual effect, as demonstrated in Viewpoints 3, 14 (a and b), 15, 16, and 17. While new planting could potentially filter views of the built form from some locations, the road and play area will remain visible. The infrastructure associated with the development - not just the buildings - will have a

detrimental effect. We cannot concur with the LVIA's assessment of effects at Year 15 of minor adverse, and we question if mitigation will reduce the adverse effects to acceptable levels.

We disagree with the negligible effects for Viewpoint 17 at Year 1. We consider the visible part of the site (northern parcel) contributes to the rural and undeveloped character of the wooded horizon line from South Oxhey.

Visual effects for Viewpoints 1 & 2 Users of PRow Footpath 'WATFORD RURAL 013' within the Site, are assessed as major adverse at Year 1, which we agree with, but we don't agree with the moderate adverse effect at Year 15. We consider the magnitude of change will remain high for this receptor: "Major change in the view that has a substantial influence on the overall view." The new built form and access road will remain defining elements in the view.

Viewpoint 9 is misleading and does not represent the worst-case scenario for visual impact along the PRow. Although vegetation currently screens parts of the Site, the existing care home is visible, raising concerns about the potential visibility of new development on the site, including on the higher ground.

We found that the LVIA uses Carpenders Park care home as a precedent to justify the acceptability of the proposed development, suggesting it will be viewed within the context of existing built form. However, we consider that the assessment does not account for the influence of the site's rural character and its wider undeveloped countryside setting.

Unlike the proposed development, the care home was constructed on previously developed land. In contrast, the current proposal represents an expansion of built form into a rural landscape. This will further erode the rural character of the site and alter the character of the settlement edge of Carpenders Park. The LVIA should more fully consider these contextual differences and the resulting landscape and visual impacts.

Mitigation measures

The LVIA does not include a dedicated section outlining mitigation measures to inform development principles or a landscape strategy. Although the application is in outline form with details to be addressed at the reserved matters stage, the absence of clear mitigation proposals is concerning.

We consider that the illustrative masterplan does not adequately respond to the site's topography, landscape character, or visual sensitivity. Instead, it appears to retrofit mitigation measures to justify a predetermined layout, rather than being informed by a landscape-led design approach. This undermines the potential to minimise adverse effects and integrate the development more sensitively within its rural and visually prominent context.

The proposal

An Illustrative Landscape Masterplan and Design and Access Statement (DAS) have been submitted. In isolation, the proposals include several positive elements such as the retention of most existing vegetation, new planting to reinforce existing green corridors, community orchard and areas of public open space. However, when considered in relation to the site's topography, landscape character and visual sensitivity, the proposals appear to result from a reactive design approach. Rather than being informed by the site's constraints and opportunities, mitigation measures seem to have been retrofitted to justify a predetermined layout, primarily aimed at visual containment, with limited regard for impacts on landscape character.

Paragraph 5.19 of the LVIA acknowledges the landform, landscape features, and perceptual qualities as having high sensitivity, yet asserts that these elements will remain unaltered. This is inconsistent with the proposed development outlined in the masterplan, which includes a new access road, built form, a Locally Equipped Area for Play (LEAP), and an attenuation basin in the northwest. These interventions will alter both the perceptual experience along the Public Rights of Way (PRoW) and the site's topography - key characteristics that contribute to its landscape value. Additionally, the introduction of vehicular access will fragment existing green corridors.

While we recognise that development within the central and southern parts of the site may be less visually dominant, the northern portion is considered inappropriate for development. As previously noted, this area exhibits the highest sensitivity in terms of both visual and character susceptibility to change.

Page 33 of the DAS includes a diagram identifying site opportunities and constraints, including key views and a proposed 15m buffer along the northeastern boundary. However, the illustrative masterplan does not appear to have adequately responded to these constraints. The main views identified in the DAS are not reflected in the layout, and the 15m buffer has been altered in the masterplan, resulting in development being positioned closer to existing vegetation than originally indicated.

Furthermore, the transition between the proposed development and the surrounding countryside is abrupt. We recommend that this interface is softened by introducing a gradual change in character from development to countryside, which would better respond to the site's boundaries and wider landscape setting.

The development is fragmenting three of the existing green corridors with the new access road. This is contrary to Policy CP9, which states:

“Development will not compromise the integrity of the Green Infrastructure network, by causing fragmentation, damage to, or isolation of Green Infrastructure assets including natural habitats and species.”

The fragmentation of these corridors undermines the continuity and ecological function of the site's green infrastructure, which plays a vital role in supporting biodiversity and landscape connectivity.

Policy CP12 requires that development:

“a) Have regard to the local context and conserve or enhance the character, amenities and quality of an area.”

We consider that the proposal does not demonstrate sufficient regard for the local context. The introduction of built form into this rural setting will erode the character of the settlement edge of Carpenders Park, diminishing its rural qualities and altering its landscape identity.

Policy DM7 includes:

“...b) Landscape Regions

In all landscape regions, the Council will require proposals to make a positive contribution to the surrounding landscape. Proposals that would unacceptably harm the character of the landscape in terms of siting, scale, design or external appearance will be refused planning permission. The Council will support proposals that:ii) Enhance public access and recreation opportunities without detriment to the landscape or wildlife.”

We consider that the introduction of development and associated infrastructure does not enhance the existing recreation opportunities on site without detriment to the landscape character. The existing rural character and distinctiveness will be lost and replaced with urban character. While we acknowledge the inclusion of new pedestrian links around the site perimeter and along existing green infrastructure, some sections are positioned very close to the development edge. This proximity reduces their amenity value and limits their potential for multifunctionality.

The provision of Locally Equipped Area for Play (LEAP) although positive, is not considered to have been sensitively integrated within the development layout. Its location detached from the main residential area and positioned within a sensitive part of the site raises concerns on impact on landscape character.

To mitigate the moderate adverse effects of the proposed built form on the northern parcel from Carpenders Park, the development is offset from the western boundary by a large area of open space. The illustrative masterplan indicates that this area will include extensive new woodland planting and a large attenuation basin. For the attenuation basin to be considered usable open space it must be carefully designed to ensure year-round multifunctionality and integration with the wider landscape. Key design considerations include:

- Gentle slopes, with gradients no steeper than 1 in 4 to ensure accessibility and safety
- Naturalistic design, to reflect the surrounding landscape character
- Benching profiles, to manage health and safety risks effectively
- Omission of fencing, to maintain openness and permeability
- Inclusion of natural and incidental play elements, to support informal recreation
- Diverse planting, including trees and varied vegetation, to enhance visual amenity and ecological value

Without these design principles, the attenuation basin risks functioning solely as engineered infrastructure rather than contributing meaningfully to the site's green infrastructure and public amenity.

Summary

It is considered that the proposals do not demonstrate a clear response to the site's opportunities and constraints, nor do they reflect its valued characteristics or the surrounding local context. The site functions as a transitional edge between the urban settlement of Carpenders Park and the rural landscape of Merry Hill. This edge is not only spatial but experiential, offering a gradual shift in character, vegetation structure, and land use. The existing hedgerows, veteran trees, and open views contribute to a layered transition that should be preserved and enhanced.

The introduction of new roads, residential development, and a LEAP will result in the loss of the site's rural character, particularly as experienced along the Public Rights of Way (PRoW). While we acknowledge the biodiversity benefits of new planting and the enclosed nature of parts of the site, the overall impact of the development is considered significant and detrimental to the landscape character and the edge of Carpenders Park.

Para 3.2 of the LVIA suggests that the proposed development "could deliver a cohesive and high-quality green infrastructure network that would respect local landscape character to enhance visual amenity and promote a sense of place." However, the LVIA itself assessed the impact of the development on landscape character as major adverse. According to the LVIA methodology, this level of significance is described as:

"Substantially:

- be at variance with the character (including value) of the landscape;
- degrade or diminish the integrity of a range of characteristic features and elements or cause them to be lost;
- change a sense of place."

We consider that the proposal is in conflict with the following key policies:

- CP9 – due to fragmentation of green infrastructure
- CP12 – due to lack of contextual sensitivity
- DM7 – due to impact to the landscape character

The following mitigation measures should be considered by the applicant to:

- Exclusion of development from the northern parcel,
- Restoration of historic hedgerows, and enhancement of green corridors.
- Topographic-sensitive design avoiding cut-and-fill on steep slopes and use contour-following paths.
- A gradual change in character from development to countryside (urban-rural transect) should be adopted to guide landscape design and development layout.
- Integration of the areas of play within the development layout.

- Multifunctional green corridors with wider buffer areas between pedestrian routes and built form, including roads.

Please do not hesitate to contact us if you have any queries in relation to this advice.

Place Services – Landscape Team

Email: landscape@essex.gov.uk



Place Services provide landscape advice on behalf of Three Rivers District Council.

Please note: This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to this particular matter.





Three Rivers District Council
Development Management
Three Rivers House
Northway
Rickmansworth
Hertfordshire
WD3 1RL

Our ref: 10680
Date: 16 January 2026

For the attention of: Matthew Roberts

Application ref: 25/1020/OUT
Location: Land East Of Oxhey Lane, Oxhey Lane, Carpenders Park, Hertfordshire
Proposal/Description: Outline planning application for up to 256 homes (C3 use class) (including affordable and self/custom build housing), housing with care (C2 use class), a children's home (for looked after children) (C2 use class) together with associated access (including off-site highway works), parking, open space and landscaping (appearance, layout, landscaping and scale as reserved matters.)

This letter is in response of the recently submitted documents 13 Jan 2026.

1.0. LVIA Addendum

General comments

- 1.1. A table for landscape effects is included in Appendix 4 of this Addendum. This is welcomed.
- 1.2. As clarification to paragraph 3.18, the Three Rivers District Council Landscape Sensitivity Assessment (2019) predates the publication of Natural England's Technical Guidance Note TGN 02/21. Nevertheless, the assessment was informed by 'An Approach to Landscape Sensitivity Assessment' (Natural England), which at the time represented the relevant national guidance. While the published report does not present detailed criteria and assessment of susceptibility or landscape value, these factors were fully considered and evaluated during the field survey work undertaken as part of the sensitivity assessment process, however they were not captured in the recorded outputs.
- 1.3. Whilst acknowledging the ACD Environmental response, the ACD Tree Survey (PRI24711ts) identified a number of trees with a 'V' under 'Life stage' column. The notes

footnote does not define what V stands for, but we would assume 'V' almost certainly represents Veteran.

Landscape Impact

Topography

We consider that the topography of the site is reflective of the key characteristic of Bushey Hill Pastures LCA. While not rare, it is distinctive. High value criteria as per Table 2 within the Methodology says "Rare or distinctive landscape elements and features are key components that contribute to the landscape character of the area"

- 1.4. Using the methodology from the submitted LVIA, we considered value to be **high** and susceptibility to be **medium**, when combined it results in a **high** sensitivity, and with a magnitude of change of **medium**, resulting in a **major adverse** effect. We recognise that the steepest parts of the site are more susceptible than the southern parts.
- 1.5. A **moderate adverse** effect (locally) can be considered acceptable on the basis that the access road across the steepest slopes is designed without the need for retaining walls or significant alterations to existing gradients. The residential parcels should also be delivered in a manner that avoids the introduction of retaining structures and prevents the formation of landforms that would appear engineered or out of character with the surrounding topography. However, the construction of the proposed attenuation basin will result in discernible alterations to the existing landform, giving rise to a notable, but localised, change in topographical character.

Hedgerows

- 1.6. We recognise the overgrown condition of the existing hedgerows within the site giving a **low** value, however we still consider that their contribution to the green infrastructure and historic field pattern results in a **medium** susceptibility and a combined **medium** sensitivity. We concur with the **minor beneficial** effect predicted with the embedded mitigation within Appendix 4 from the LVIA Addendum.

Visual impact

- 1.7. We consider that Viewpoint 14 (a and b) will experience the greater effects as a result of the new access road. For clarification, we do not disagree with the **medium** sensitivity, but magnitude of change for this viewpoint only is considered **high**. As per our previous comments and from our professional judgement, the proposed green infrastructure will help to reduce the overall visibility of the new built development, the access road and associated infrastructure will remain visible, and the change in the rural experienced

character arising from urbanising elements is considered to be “a major change in the view that has a substantial influence on the overall view”. Based on the provided methodology within the LVIA, we consider that even after embedded mitigation the effects will remain **moderate adverse** for this particular viewpoint.

- 1.8. Visual effects for Viewpoint 1 are also judged as **moderate adverse** in the LVIA. While we note the justifications from the applicant, when reviewing the indicative layout, we find the alternative access point, marked-up on image below, more acceptable, with, potentially, a reduction of the visual effects for Viewpoints 1 and 14. Given the proposed road feeding the new dwellings, the continuation of this road connecting with Oxhey Lane is seen as feasible. This approach will remove road network away from the public footpath and will sit closer to the care home. It is still our recommendation that the access road into the site is reconsidered.



- 1.9. During our site visit, we found open views along the PRoW ‘BUSHEY 025’ where the communications tower is visible with only limited views of the roof’s care home. See photo below taken along the PRoW in between Viewpoint 9 and 7. We anticipate occasional view of the rooftops from the development within the higher points of the site from this viewpoint, based on the indicative landscape proposals. Overall, we consider that with additional embedded mitigation to the eastern boundary, effects can be reduced to **negligible**.



Visual context

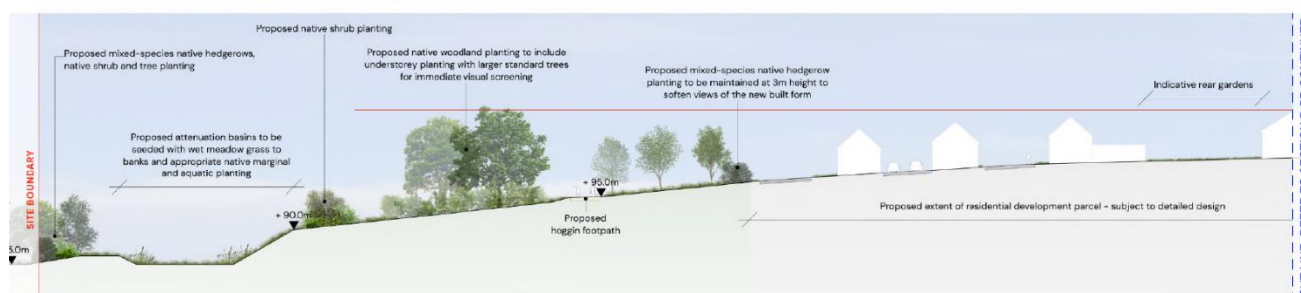
The relationship between the site and the built edge of settlement is not questioned. But we consider that the site also has a visual connection with the rural landscape with views to the south from the mid and southern site parcels, although we acknowledge these are not publicly accessible locations. The LVIA has recognised open views to the west and panoramic views southeast.

Mitigation measures

- 1.10. LVIAs usually include primary and secondary mitigation. On consideration, we would assume that the LVIA has been used as an iterative planning and design tool, allowing all necessary and desirable mitigation to be incorporated into the project design, and brought forward within section 3 of the LVIA, omitting specific reference to primary and secondary mitigation chapter.
- 1.11. The visibility of the northern parcel of the site as a result of the site's topography is mentioned throughout the LVIA. One of the key objectives of the landscape and GI

proposals within section 3 of the LVIA include to “Minimise any potential adverse landscape and visual effects of the development through careful layout design of the proposed development and location of public open space and screening vegetation;” Still, development has been proposed within the higher points on site, despite this location been identified as the most visible and sensitivity part of the site, requiring substantial new native woodland planting to screen the built form. This is reflected in para 5.34 of the LVIA “...significant amount of proposed new woodland and tree planting, particularly throughout the area of open space in the northern parcel, in order to mitigate the more sensitive parcel of the Site in terms of views of new built”.

- 1.12. In our professional judgement, effective screening would only be achieved once the woodland has reached maturity. This is illustrated in the provided Section B-BB within Appendix 2 of the LVIA Addendum (marked-up extract below), where the horizontal red line marks the highest point in relation to the proposed trees’ mature height.



2.0. Site Visualisations – P24-2204 (December 2025)

- 2.1. Site visualisations have been submitted to provide an indication of the anticipated filtering effect of the proposed planting mitigation strategy. The visuals suggest a verdant street scene, which is welcomed, noting visual for Viewpoint 3 (site western edge). To ensure the delivery and long-term establishment of street trees, these should be located within public realm rather than within private gardens – as currently outlined. We advise that this is considered carefully during the detail design stages for the full application.

3.0. Conclusion

- 3.1. While the relationship between the site and the built edge of settlement is not questioned, we still consider the site functions as a transitional edge between the urban settlement of Carpenders Park and the rural landscape of Merry Hill. This edge is not only spatial but experiential, offering a gradual shift in character, vegetation structure, and land use. The existing hedgerows, trees, and open views contribute to a layered transition.
- 3.2. We acknowledge the biodiversity benefits of new planting and the enclosed nature of parts of the site. The introduction of new roads, residential development, and a LEAP will result

in the loss of the site's rural character, particularly as experienced along the PRow 'BUSHEY 025'.

- 3.3. Overall, we accept that the proposal will result in residual effects, and concurrent with the LVIA, the effects with embedded mitigation of the development on the site and immediate context (local landscape character) will be major adverse. With regards visual effects, the residual effects are limited to only a reduced number of viewpoints.
- 3.4. We consider that the following recommendations should still be taken forward, as they would improve the scheme and lessen notable visual impacts:
- Exclusion of development from the northern parcel, particularly in relation to the new access road. Consideration should be given to relocating the new access road closer to the existing care home development.
 - Restoration of historic hedgerows through appropriate hedgerow management, and enhancement of green corridors.
 - Street trees should be located within public realm rather than within private gardens.
 - Ensure the 15m buffer zone is implemented, avoiding any elements that require excavation or ground compaction within this zone.
 - Topographic-sensitive design avoiding cut-and-fill on steep slopes and use contour following paths.
 - A gradual change in character from development to countryside (urban-rural transect) should be delivered to guide landscape design and development layout.
 - Relocation of the areas of play within the development layout for better integration and passive surveillance.
 - Multifunctional green corridors with wider buffer areas between pedestrian routes and built form, including roads.
 - Design of the attenuation basins considering the following:
 - Gentle slopes, with gradients no steeper than 1 in 4 to ensure accessibility and safety
 - Naturalistic design, to reflect the surrounding landscape character.
 - Benching profiles, to manage health and safety risks effectively.
 - Omission of fencing, to maintain openness and permeability.
 - Inclusion of natural and incidental play elements, to support informal recreation.
 - Diverse planting, including trees and varied vegetation, to enhance visual amenity and ecological value.

4.0. Summary

4.1. [Insert Text]

5.0. Recommended Submission Document(s): *(if pre-app or outline)*

5.1. [Insert Text]

6.0. Recommended Condition(s): *(if full)*

6.1. If minded for approval, we would recommend the following conditions for your consideration:

Please contact us if you have any queries in relation to this advice.

Place Services – Landscape Team

Email: landscape@essex.gov.uk



Place Services provide landscape advice on behalf of Three Rivers District Council

Please note:

This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to this particular matter.

We are unable to respond directly to applicants/agents or other interested parties. Any additional information, queries or comments on this advice that the applicant/agent or other interested parties may have, must be directed to the Planning Officer at the relevant LPA, who will seek further advice from us where appropriate.