

Landscape & Visual Impact Assessment Addendum

Land at Carpenders Park, Watford.

On behalf of Burlington Property Group Limited.

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Author: JE



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1. INTRODUCTION

- 1.1. Pegasus Group were appointed by Burlington Property Group Ltd. to prepare a Landscape & Visual Impact Assessment¹ (hereafter referred to as the LVIA) in support of a planning application for residential development on land at Carpenders Park, Watford. The proposed development comprises the construction of up to 256 residential dwellings, a children's home and housing with care, together with the provision of open space, landscaping and associated infrastructure.

- 1.2. The application site comprises 12.7ha 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. 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 along 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 with 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 which encloses the Site. Figure 1 submitted with the LVIA shows the location and context of the site.

- 1.3. Existing tree and hedgerow vegetation associated with the Site includes overgrown hedgerows forming belts of blackthorn scrub and mature trees that follow the

¹ Landscape & Visual Impact Assessment – Land at Carpenders Park, Watford – 17/03/2025



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.

- 1.4. The landscape and visual effects set out in the LVIA 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_08B).
- 1.5. For clarity this Note should be read with the aforementioned documents and plans. The DAS submitted with the planning application provides further details on the Proposed Development in relation to amount, scale, layout, access, appearance and landscape.
- 1.6. Since submission of the planning application there have been various responses and issues raised by consultees and other parties and the submitted assessment work has been further reviewed and 'tested'. In the context of the landscape and visual assessment, comments received from the Woodland Trust and the Council's appointed Landscape Consultant (Place Services) have been considered. For ease of reference Place Services comments are included at Appendix 1.
- 1.7. Subsequently 2 No. Illustrative Landscape Sections (Drawing references: P24-2420_EN_15-01 and P24-2420_EN_15-02) – included at Appendix 2 – have been prepared to assist with understanding how the Proposed Development would potentially respond to the Site topography and the assessment judgements set out in the LVIA have been further reviewed.



- 1.8. ACD Environmental have provided a separate response to comments received from the Woodland Trust. This response is included at Appendix 3.

2. RESPONSE TO COMMENTS RECEIVED FROM THE WOODLAND TRUST

- 2.1. Examining the comments received from the Woodland Trust – as noted above – ACD Environmental have provided a separate response (see Appendix 3). The Woodland Trust comments are concerned with construction impacts on trees – including veteran trees. The ACD Environmental response notes that:

“The proposed layout has been assessed against the constraints afforded to the trees. It is reasoned that in demonstrating the subject trees are not defined or considered Veterans, with sufficient protection/mitigation identified within the supporting arboricultural package of works, the design proposals are compliant with the recommendations of BS5837:2012.”

3. RESPONSE TO COMMENTS RECEIVED FROM PLACE SERVICES

- 3.1. Examining the comments received from Place Services, the following observations can be made:

“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.”

- 3.2. A summary table for landscape effects is included at Appendix 4 of this Addendum.

Landscape Impact

- 3.3. Contrary to the methodological approach adopted for the submitted LVIA, Place Services judgments on sensitivity, do not clearly set out how sensitivity has been defined – by combining susceptibility and value.

“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.”

- 3.4. Site landform is considered in Section 4 of the LVIA which notes (inter alia) that:

“The susceptibility of the topography to the type of development proposed is Medium, which when combined with a Medium value, would result in an overall Medium sensitivity.”

- 3.5. The medium sensitivity judgement is supported by the Pegasus methodology at Table 2. In terms of value the Site topography is considered to be a distinctive landscape element which contributes to the character of the area; however, it is not rare in the context of the local landscape which has a varied topography. In terms of susceptibility, it is considered that – except for the steepest parts of the northernmost field, which are to be retained as open space, the Site has the ability accommodate the type of development proposed without undue consequences for the baseline situation.

- 3.6. To aid in understanding the level of effect arising from the Proposed Development upon the Site’s topography 2 No. Illustrative Landscape Sections have been prepared (see Appendix 2).

- 3.7. Having reviewed this additional information it is noted that a sympathetic design response could be delivered meaning that the overall gradients across the Site would still be legible with only localised changes to the landform proposed to facilitate construction of the SUDs basins, the road network, paths, parking areas and driveways, and with the digging of the new building foundations. Wholesale cut and fill operations to deliver level development plateaus would thus not be required to deliver the Proposed Development.
- 3.8. Once the construction of the proposed development is completed, the overarching pattern of topography of the Site would be maintained with landform largely retained at existing levels within the areas of public open space. The proposed residential parcels would avoid the steepest gradient land within the north-western corner of the Site, with the proposed vehicular access designed to follow a gentler gradient across the contours within the northern parcel of the Site. The magnitude of change to the overall ground profile of the Site would be medium where the topography is more challenging. With a medium sensitivity and a medium magnitude of change, the effect upon topography would be Moderate adverse at worst where noticeable level changes are anticipated. In other undeveloped areas of the Site levels will remain unchanged.

“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.”

- 3.9. The tree survey did not record any hedgerows internally within the Site, as the original hedgerows have become so overgrown that they now comprise belts of overgrown Blackthorn-dominated scrub. Similarly, the Ecological Assessment submitted with the application confirms that habitats on Site comprised:

- Other neutral grassland;

- Blackthorn scrub;
- Bramble scrub;
- Tall Forbs;
- Lowland mixed deciduous woodland; and
- Individual trees.

3.10. Other river and streams were recorded off-site.

3.11. The Blackthorn scrub and brambles encroach widely across the field parcels. Consequently, the internal hedgerows are considered to be of Low value. Hedgerows are assessed to be of Low susceptibility due to their form being neglected and highly overgrown and being more reflective of belts of scrub. Combining value and susceptibility, hedgerows are considered to have an overall Low sensitivity in landscape terms.

3.12. It is acknowledged that a section of boundary vegetation would be removed to accommodate the new vehicular access from Oxhey Lane and short sections of blackthorn scrub would be lost as the access road passes through the Site. However, new native hedgerow planting is proposed behind the visibility splays associated with the new junction and along the western boundary adjacent to Oxhey Lane as shown on the submitted Illustrative Landscape Masterplan. This would, once established define the boundary of the Site and reflect the existing character of views from along the road, softening views of new built form.

3.13. Further enhancements shown on the Illustrative would include planting of native hedgerows along the existing historic tree-line adjacent to the proposed housing with care parcel, and new mixed native hedgerow planting around the northern area of public open space along the interface with the proposed development frontage and throughout green corridors throughout the development parcels.

3.14. Taking into account the above enhancements, which would represent an overall net gain in hedgerows across the Site, it is considered that the localised losses would represent a Negligible magnitude of change and a Negligible adverse effect.

3.15. In terms of the screening function provided by the existing belts of blackthorn scrub it is considered that this would not be compromised as they would be largely retained.

“...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.”

3.16. As noted above the ACD Environmental response confirms that the trees within the Site are not defined or considered Veterans. The response notes further that:

“In reviewing the WT Ancient Tree Inventory there are no recorded Veteran/Ancient trees on the site.

A screenshot is provided as captured 10/09/25.”



3.17. Notwithstanding this it is noted that the Proposed Development is designed to be offset from the Site boundary to allow adequate space for the existing trees around the periphery of the Site to be retained and while some small areas of vegetation



may be lost, all existing mature tree cover identified within the tree survey across the Site would be retained and protected during the construction phase with measures to comply with BS: 5837 (see ADC Environmental Tree Retention and Removal Plan).

- 3.18. In terms of landscape value it is noted that Place Services do not provide a full assessment of the landscape value of the Site and its context in accordance with TGN O2/21. Landscape value is to be determined under TGN O2/21. This defines “valued landscape” as “an area identified as having sufficient landscape qualities to elevate it above other more everyday landscapes”. Thus, the landscape needs to be better than the average. This is not the case here and it is agreed that the Site is not a ‘valued landscape’ in accordance with NPPF Paragraph 187(a). The detailed analysis undertaken as part of the LVIA confirms that the value of the Site is assessed as **Medium** and the susceptibility of the Site to the type of development proposed is assessed as **Medium**, resulting in a **Medium** overall sensitivity. The Place Services comments do not dispute this finding, albeit they note that the northern part of the Site exhibits a higher sensitivity. However, the Place Services comments fail to acknowledge the neglected condition of the Site and its associated features. The proposed development offers the opportunity to bring existing grassland, trees and hedgerows back into positive management and has been designed to respect and where possible enhance the elements which define the character the Site. In particular, the local topography, views, recreational use, and transitional function, in the northern field parcel would be protected from development and enhancements would be provided in the form of new tree and hedgerow planting. Access enhancements would include retention of the existing PRow within a generous area of public open space including an equipped play area, amenity open space and a community orchard.

Visual Impact

“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.”

3.19. It is noted that Place Services do not provide a detailed analysis of the sensitivity, magnitude of change and overall effect upon the viewpoint selection. Notwithstanding this they contend that significant visual effects will occur with regard Viewpoints 3, 14 (a and b), 15, 16, and 17.

3.20. The LVIA methodology has not been criticised by Place Services, it is therefore considered that they agree that the scope and methodology of the LVIA is in accordance with Guidelines for Landscape and Visual Impact Assessment (3rd Edition) (GLVIA3).

3.21. The LVIA methodology is clear that major effects are considered to be significant. Where effects are considered to be moderate they may or may not be significant, this is for the assessor to decide. In terms of impacts on views from Viewpoints 3, 14 (a and b), 15, 16, and 17 the level of change at Year 1 – post completion – would be no worse than medium and resultant effects no worse than moderate adverse. At year 15 the proposed green infrastructure would help to reduce the overall visibility of new built development and help integrate the development into the local context – reducing the level of effect. Using professional judgement it is considered that by year 15 the level of effect for these viewpoints would not be significant and therefore unacceptable in visual terms.

“Visual effects for Viewpoints 1 & 2 Users of PRow Footpath ‘WATFORD RURAL O13’ 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.”

3.22. Whilst it is acknowledged that development will still be visible it considered that although – by year 15 – the proposals would be experienced at close range, the footpath will be augmented with new native tree and hedgerow planting providing

attractive green corridors with built development set back beyond significant areas of green infrastructure including natural green space and extensive tree and shrub planting. Adverse impacts on views from the route – arising from the proposed built development – will be ameliorated by the new planting and habitat proposals within the landscaped corridor. Whilst the nature of the views will inevitably change, as a result of the proposed development, the intervening landscaping will lessen the resulting visual effects and increasingly so as this matures in the medium and longer terms. Furthermore, PRow users would benefit from new public access to areas of open space around the existing route and in the wider Site. Consequently, it is considered that, despite a high magnitude of change, year 15 effects for these views would not all be adverse and would be reduced to moderate adverse.

“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.”

3.23. For the purposes of the LVIA, a series of publicly accessible views from the area surrounding the Site have been identified through desktop and field studies. These Viewpoints are not intended to cover every possible view of the Site, but rather they illustrate a range of receptor types at varying distances and orientations to the Application Site.

3.24. The Viewpoints demonstrate the relative visibility of the Site (and existing features or development on it) and its relationship with the surrounding landscape and built form. The selection of the Viewpoints is based on the following criteria:

- The requirement to provide an even spread of viewpoints within the visual envelope.
- The requirement to provide viewpoints that consider a human's normal field of vision (i.e. panoramic views).
- From locations offering a range of near (local views), middle, and long-distance views (where available).



3.25. Viewpoint 9 is representative of the view available from PRow Footpath ref 'BUSHEY O25' within Merry Hill, adjacent Bushey's western settlement edge. Whilst not the worst-case scenario it is noted that this is an elevated viewpoint where cross valley views to the south are available. The site is screened by extensive intervening vegetation and the existing care home is not visible in this view.

3.26. Viewpoint 7 represents a closer range view towards the Site from a bench off PRow Footpath ref 'BUSHEY O25' within Merry Hill. In this view the telecommunications mast adjacent to the care home is visible, however the care home and the Site are effectively screened by the extensive vegetation – even in winter months when the Site photography was undertaken.

“We found the 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.”

3.27. The Site is located adjacent to the eastern edge of Carpenders Park and comprises three main fields of grassland bound by mature belts of trees. 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, with properties along Carpenders Avenue to the northwest of the Site being mostly bungalows angled perpendicular to the Site. There is mature hedgerows and vegetation flanking both the eastern side of Oxhey Road along the Site's western boundary, and along the western side of the road along the boundary of the rear gardens of properties which back onto the road. The northern boundary is defined by belts of mature trees and scrub, with the eastern boundary enclosed by mature trees with 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 which encloses the Site.

- 3.28. The LVIA § 5.32 – 5.33 confirms (inter alia) that there is a strong relationship between the Site and the built edge of the settlement to the immediate west, with the modern 3-storey Care Home visually prominent immediately adjacent to the western boundary. The well-wooded character of Merry Hill to the north and east, and belts of mature trees along highways and field boundaries, limits the extent from which views into the Site are possible, to points where existing settlement is already visible. This perimeter vegetation strongly contains the Site and restricts its relationship with the wider rural context – including agricultural fields to the north and the wider Merry Hill Woodland Trust Site to the east. Furthermore, the adjacent Hartsbourne Golf Course exerts an urbanising influence on the local landscape to the south and southeast of the Site – as a developed use, distinct from natural or agricultural land, because the land has been significantly altered (graded, drained, planted) for recreational purposes.
- 3.29. It is therefore an undisputable fact that the Site is subject to urbanising influences including existing built-up areas at Carpenders Park to the west of Oxhey Lane and the adjacent, visually prominent Carpenders Park Care Home and 5G telecommunications tower – east of Oxhey Lane. Furthermore, it is physically and visually separated from the wider ‘rural’ context by extensive intervening vegetation – even in winter months when the trees and hedgerows are devoid of foliage. In the summer months the sense of containment is greater still.

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.”

- 3.30. Noting that the application is in outline form it is noted that landscape mitigation forms an integral part of the Proposed Development and is discussed in detail at § 3 of the LVIA.
- 3.31. In summary the Illustrative Landscape Masterplan shows show how an appropriate edge to the settlement can be created, addressing the interface with Oxhey Lane, neighbouring properties to the east and west of Oxhey Lane and also with the wider rural area to the north, and the Merry Hill Woodland Trust Site to the east with new homes facing onto the public realm in order to present a "fair face" and to maximise passive surveillance.
- 3.32. The key objectives of the landscape and GI proposals for the scheme are to:
- Provide new accessible open space within the development to include recreational space and new planting to create a soft settlement edge;
 - Provide a community orchard together with generous areas of Public Open Space (POS);
 - Retain and enhance existing landscape features of value and provide additional landscape features such as hedgerows and trees;
 - Create a well-designed development, sensitive to its location on the settlement edge;
 - Ensure development is in keeping with the context and character of the local area;
 - Be sensitive to the adjacent residential area – west of Oxhey Lane – and Carpenders Care Home, to ensure the retention of the privacy and light of the adjoining properties;
 - 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; and
 - Create a well landscaped development with appropriately designed gateways, open spaces, footpaths, buildings and streets which will be safe and attractive to use.
- 3.33. The design of the Site layout has been landscape led and responds positively to the identified Site-specific landscape and visual constraints whilst also having regard to



national and local design policy guidance and best practice. In summary the scheme will incorporate the following key areas and features:

- 3.34. A significant proportion of the site will be dedicated to landscape, GI, public open space, play and habitat related proposals. This will 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 generous areas of POS.
- 3.35. The proposed site layout has been carefully designed to avoid the steeply sloping topography in the northern reaches of the site where it would be more conspicuous and inconsistent with settlement character. Additionally, the easternmost part of the site – also considered to be sensitive – incorporates 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.
- 3.36. Consequently, the developable area will be contained within a robust landscape framework around the northern and western site perimeters. New native boundary woodland and woodland edge planting will be incorporated to enhance and strengthen the existing boundary hedgerows.
- 3.37. 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 which would contain scattered trees, ornamental planting and species-rich grassland. 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. Landscape gateway features are also proposed at the new site access points off Oxhey Lane.
- 3.38. It is proposed that the areas of public open space would be planted with species-rich and wildflower grass mixes, which would not only be visually pleasing but also beneficial from an ecological perspective. The lower lying areas of open space across



the southern part of the Site will also accommodate the necessary Sustainable Drainage System (SuDS) which would require minor earthworks for the creation of attenuation features such as a drainage basin and swales; the creation of such attenuation features also presents the opportunity to incorporate marginal planting on their periphery. These features will be designed to maximise biodiversity benefits.

- 3.39. In total, these landscape, ecological and public open space proposals will help to assimilate the new built development into the landscape setting and will establish an appropriate landscape edge to this part of settlement.
- 3.40. Subsequent care and attention to the detailed design, implementation and subsequent management of the landscape and associated green infrastructure proposals will be important to ensure that the likely effects are further minimised wherever possible and the identified opportunities for enhancement are maximised.



Appendix 1: Place Services Comments



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

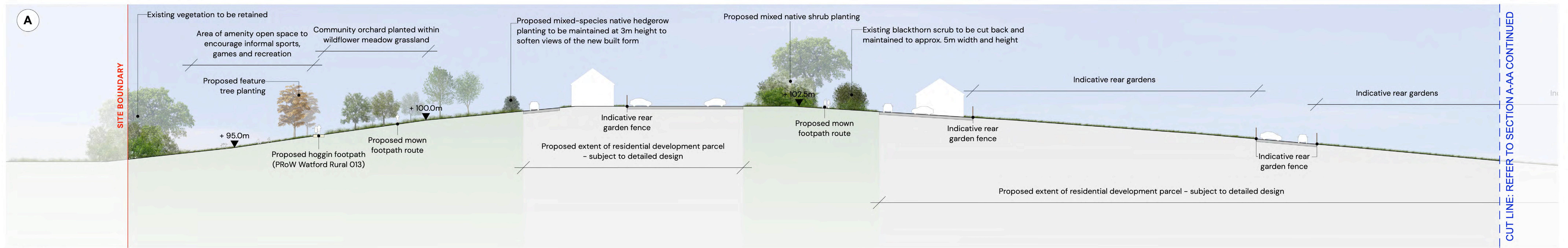


Place Services provide landscape advice on behalf of Three Rivers District Council.

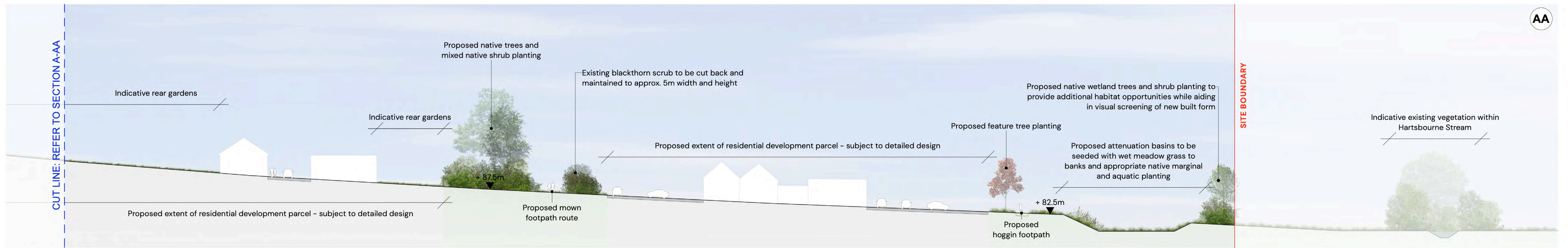
Please note: This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to this particular matter.



Appendix 2: Illustrative Landscape Sections



SECTION A-AA



SECTION A-AA CONTINUED



SITE LOCATION PLAN (NTS)

03/12/2025	-	FIRST ISSUE
DATE	NO	REVISION NOTE

ILLUSTRATIVE LANDSCAPE SECTION (SHEET 1 OF 2)

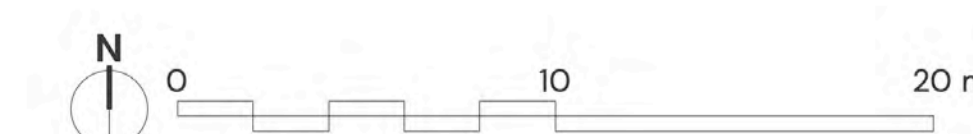
LAND AT CARPENDERS PARK

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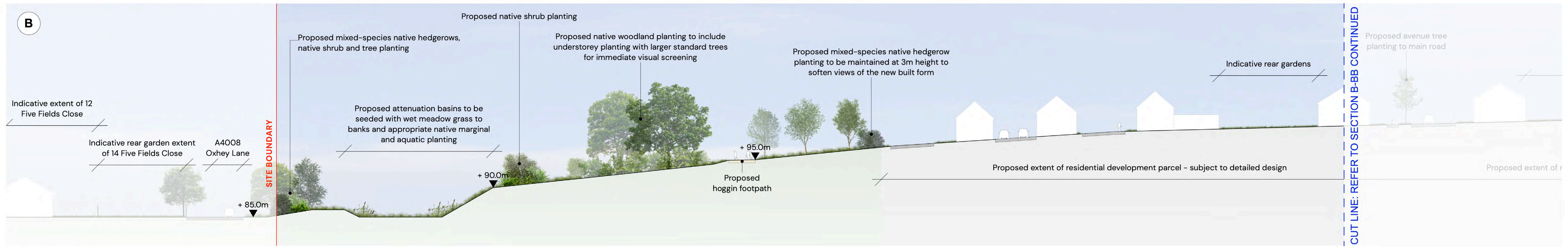
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03/12/2025	1:250 @AO	VK	JE

DRAWING NUMBER

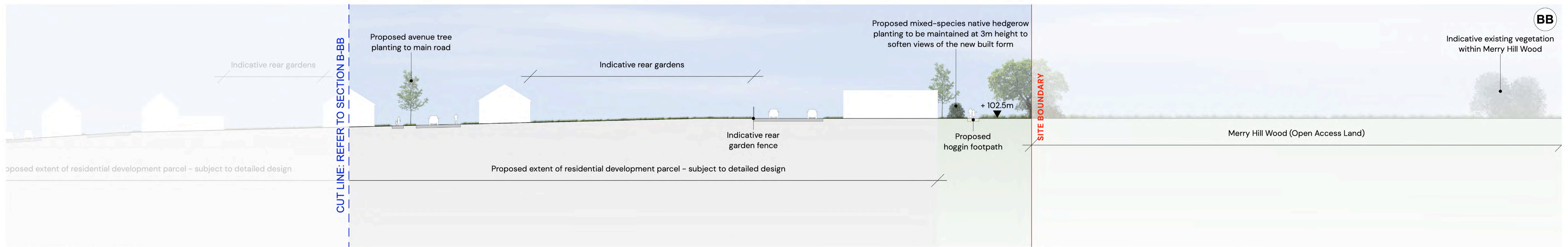
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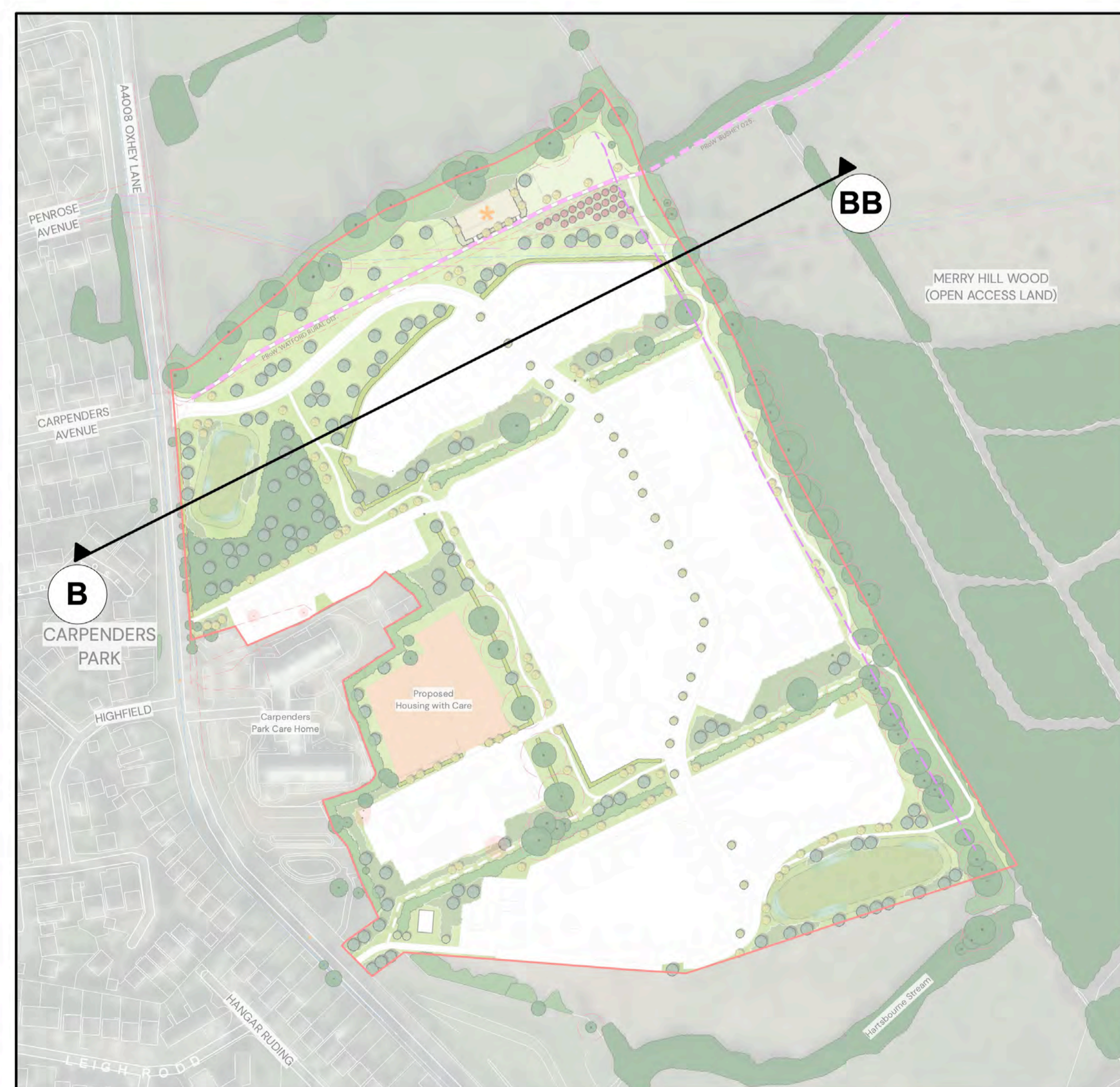
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SECTION B-BB



SECTION B-BB CONTINUED



SITE LOCATION PLAN (NTS)

03/12/2025	-	FIRST ISSUE
DATE	NO	REVISION NOTE

ILLUSTRATIVE LANDSCAPE SECTION (SHEET 2 OF 2)

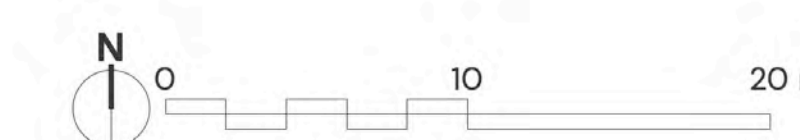
LAND AT CARPENDERS PARK

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Appendix 3: ACD Environmental Response

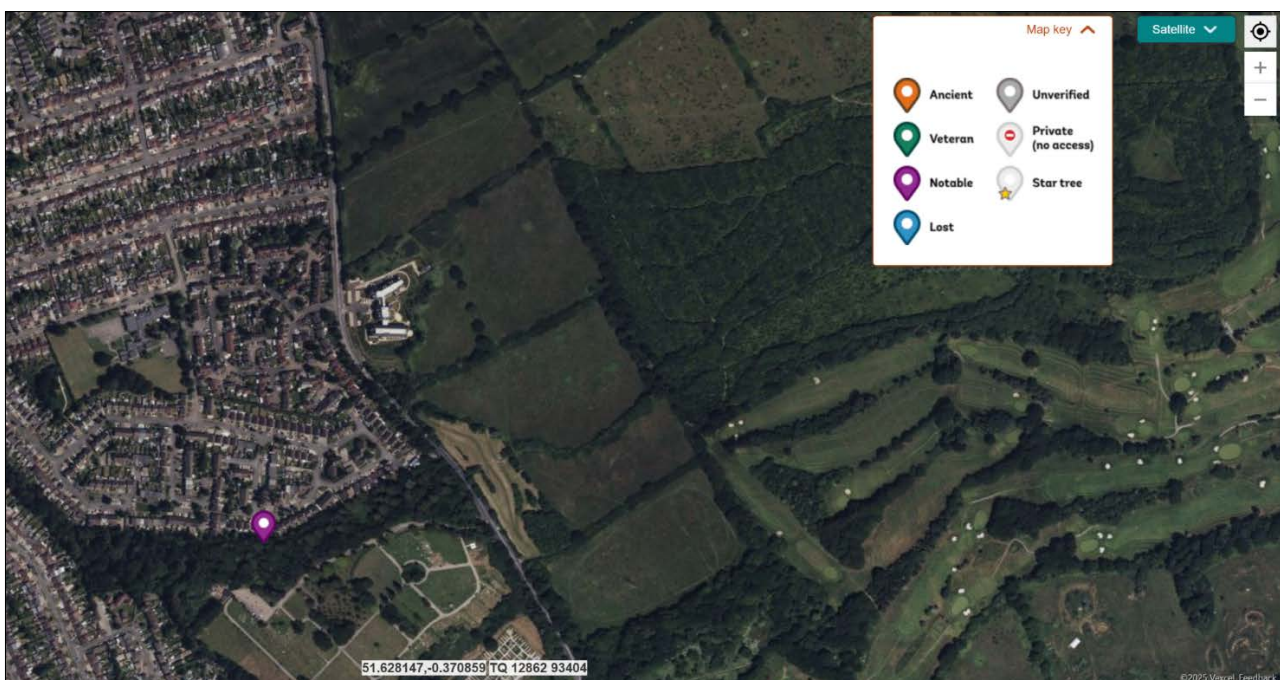
ACD ENVIRONMENTAL RESPONSE TO WOODLAND TRUST COMMENTS

The published information referenced in the Woodland Trust comments are; BS5837:2012, NPPF and Natural England (standing advice only). None are Statutory instruments, furthermore Veteran/Ancient trees are not afforded statutory protection.

The Woodland Trust (WT) comments conclude there will be deterioration of trees caused by construction impact from the design proposals. This objective assessment assumes the Natural England standing advice that Veteran trees should have an RPA calculated x15 trunk diameter (Dbh) or greater. It is an assumption to conclude there will be a significant impact to the trees as there are no means of demonstrating if there would or would not be deterioration of trees.

The survey for the site was carried out to the recommendations as recorded within BS5837:2012. Radii of tree Root Protection Areas are calculated 12x the trunk diameter at 1.5m above ground level (Dbh). RPA areas greater than 707m² in area are capped at 15m radius. The trees were not recorded or given comments for Veteran classification. Veteran age entries and 'A3' subcategory were recorded, the trees being of significant conservation value. They are large trees in prominent positions having limited or no Veteran 'indicators'. It is acknowledged that they have the potential to be assessed as Veterans in the future, however this could be said of any mature tree.

In reviewing the WT Ancient Tree Inventory there are no recorded Veteran/Ancient trees on the site. A screenshot is provided as captured 10/09/25.



Furthermore, using the standing advice in the WT publication Ancient and Other Veteran Trees: Further Guidance on Management, Section 1.2 Definition of Ancient and Veteran Trees. Figure 1.3 Chart of Girth in relation to age and developmental classification of trees captures classification based on girth. The table is provided below for reference.

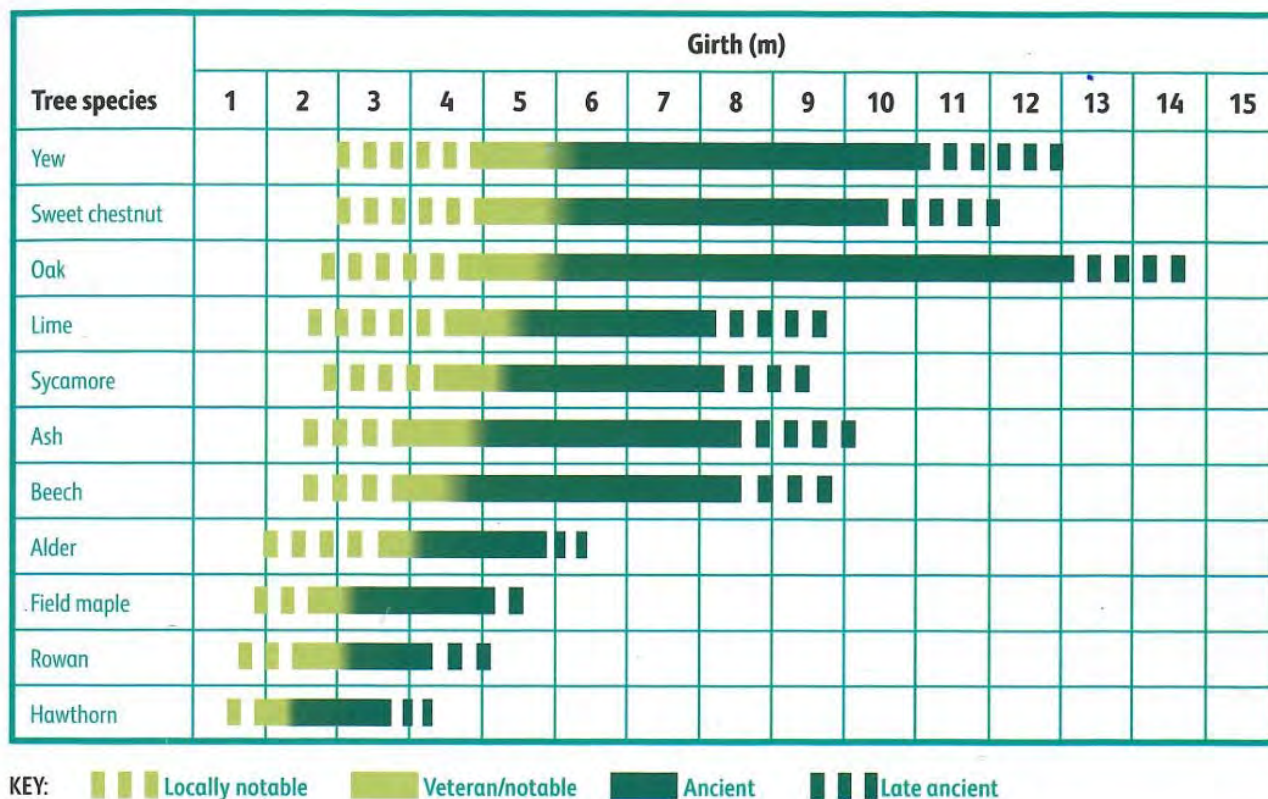


Fig 1.3: Chart of girth in relation to age and developmental classification of trees*

When calculating the RPAs of BS5837 trees girth is not calculated. The following table details the calculated girth for each listed tree in the WT list of 'trees of concern'.

Tree no.	Dbh (mm) @1.5m	Equivalent Girth (m)
21	1135	3.56
23	1025	3.22
26	1030	3.23
27	1025	3.22
41	1015	3.18
53	1100	3.45
64	1205	3.78
66	1100	3.45
68	1105	3.47

When cross referencing the calculated girth against the WT table all of the trees are bracketed in 'Locally notable'.

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 Co Reg No: 8058718 VAT No: 223 8883 86



Given the WT are not a Statutory Consultee and the received comments are considered unsolicited advice the following is concluded. The proposed layout has been assessed against the constraints afforded to the trees. It is reasoned that in demonstrating the subject trees are not defined or considered Veterans, with sufficient protection/mitigation identified within the supporting arboricultural package of works, the design proposals are compliant with the recommendations of BS5837:2012. The applicant has considered all trees throughout the design process as outlined in Figure 1 of BS5837:2012 'The design and construction process and tree care'. The submitted proposals retain all trees of high quality and value, providing adequate protection .

ACD Environmental are retained as the project Arboriculturists. All works associated with the proposed layout will be the subject of continued onsite arboricultural input.

Andrew Bigg RFS (Cert. Arb.)

Head of Arboriculture

ACD Environmental

11th September 2025

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Appendix 4: Landscape Effects Summary Table

LVIA Addendum – Land at Carpenders Park, Watford

Appendix 4 Landscape Effects Summary Tables

Sitewide Landscape Features Assessment – Summary Table

Landscape Feature/Sensitivity	Magnitude of Change	Predicted degree of effect – with embedded mitigation
Land cover and field pattern Medium Sensitivity	Medium	Moderate (adverse)
Topography Medium Sensitivity	Low – Medium	Minor (adverse) – Moderate (adverse) locally
Trees High Sensitivity	Medium	Moderate (beneficial)
Hedgerows: Low Sensitivity	Negligible	Negligible (adverse)
PRoW: High Sensitivity	No Change *	No Change *

* The PRoW Footpath ref 'Watford Rural 013' is set to be retained within the area of open space in the northern section of the Site, along its existing alignment. Effects upon the visual amenity of people using PRoW 013 and PRoW in the wider landscape are assessed in Section 6 of the submitted LVIA.

Landscape Character Assessment – Summary Table

Landscape Receptor/ Sensitivity	Magnitude of Change	Predicted degree of effect – with embedded mitigation
National		
NCA 111: Northern Thames Basin Variable Sensitivity (Medium locally)	Negligible	Negligible
County Level – Hertfordshire Landscape Character Assessment		
LCA 14: Bushey Hill Pastures Medium Sensitivity	Negligible – Low *	Negligible – Minor Adverse *
Site and Immediate Context Medium Sensitivity	High *	Major on Site – quickly diminishing with distance from the Site *

* Beyond the Site, all of the key characteristics would remain and the character across the wider LCA/ landscape would be unaffected by the proposals resulting in a low magnitude of change locally within LCA 14 and a negligible effect with increasing distance from the site resulting in a subsequent negligible or minor adverse effect at year 1 post completion.

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

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