

Green Belt Assessment

Land at Carpenders Park, Watford

On behalf of Burlington Property Group Limited

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1. Introduction

- 1.1. This report has been prepared on behalf of Burlington Property Group Limited, to support an outline application for a mixed-use development at Land at Carpenders Park, Watford, lying to the east of the A4008 Oxhey Lane and the eastern edge of Carpenders Park (hereafter known as the 'Site'). The Site is located within the administrative area of Three Rivers District Council as illustrated by **Figure 1: Site Location Plan**.
- 1.2. The Site is located within the Green Belt and as such, this report considers the Site's potential to be reclassified as 'Grey Belt' as defined by the National Planning Policy Framework (NPPF, December 2024), and to assess whether any future residential development at the Site might be regarded as 'appropriate development' under the Grey Belt exception (PPG, February 2025). The accompanying **Figure 2: Environmental Designations Plan** illustrates where Green Belt land beyond the Site coincides with environmental designations that may indicate a higher landscape value.
- 1.3. The report should be read in conjunction with the Planning Statement prepared by Boyer Planning, that covers the planning need, sustainability, and footnote 7 tests that are required to determine whether the proposal is a Grey Belt exception as illustrated as a flowchart at **Appendix 1**.
- 1.4. The report has been prepared via an examination of current national policy and review of relevant baseline documents that form the evidence base supporting the adopted Three Rivers Local Plan and the Local Plan review. This includes a review of the Site's performance within the Three Rivers District Council & Watford Borough Council Green Belt Review Strategic Analysis (2017) (Stage 1) and the Stage 2 Green Belt Assessment for Three Rivers District and Watford Borough (2019).

Grey Belt Exception

- 1.5. The following steps are undertaken to determine whether the Grey Belt exception can be applied to the Site. These steps will be followed throughout this report to assess whether development on this Site could qualify as appropriate development within the Green Belt.
- 1.6. The Grey Belt definition, set out in the NPPF (2024) at Annex 2: Glossary, is:

"For the purposes of plan-making and decision-making, 'grey belt' is defined as land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. 'Grey belt' excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development."

- 1.7. Green Belt purposes (a), (b) and (d) are set out in paragraph 143 of the NPPF. These relate to the following purposes:

(a) To check the unrestricted sprawl of large built-up areas;

(b) To prevent neighbouring towns merging into one another; and

(d) To preserve the setting and historic character of historic towns.



- 1.8. Footnote 7 identifies the following elements:
- i. Habitat sites which consist of any site falling within a definition at regulation 8 of the Conservation of Habitats and Species Regulations 2017 including existing and proposed Special Areas of Conservation, Sites of Community Importance, existing and potential Special Protection Areas and any relevant Marine Sites, listed or proposed Ramsar sites and sites identified or required as compensatory measures for adverse effects on habitat sites;*
 - ii. Sites of Special Scientific Interest;*
 - iii. Local Green Space;*
 - iv. National Landscapes;*
 - v. National Parks or Defined Heritage Coast;*
 - vi. Irreplaceable habitats;*
 - vii. Designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 75);*
 - viii. Areas at risk of flooding or coastal change.*
- 1.9. This assessment then concludes on whether the site falls within the definition of Grey Belt.
- 1.10. Following this, for the proposal to be considered as 'appropriate' development, it is necessary to satisfy all the criteria a) to d), listed in paragraph 155 of the NPPF. Paragraph 155 of the NPPF states that the development of homes, commercial and other development in the Green Belt should not be regarded as inappropriate where:
- (a) Development would utilise Grey Belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;*
 - (b) There is a demonstrable need for the type of development proposed;*
 - (c) The development would be in a sustainable location with particular reference to paragraphs 110 and 115 of this framework; and*
 - (d) Where applicable the development proposed meets the 'Golden Rules' requirements set out in paragraphs 156–157 below.*
- 1.11. The final step, in meeting with the requirements of criterion d, is to conclude whether the site and proposal meets the 'Golden Rules' set out in paragraphs 155–157 of the NPPF. If the site and the proposed development does comply with the golden rules, paragraph 158 of the NPPF states such a development should be given significant weight in favour of the grant of planning permission.
- 1.12. Each of the above steps will be followed and assessed in sections of this report and the Planning Statement, in order to evaluate the Site's alignment with the NPPF's Grey Belt exception to Green Belt policy.



- 1.13. Final consideration is given to the impact of the proposals upon the openness of the Green Belt, in the event that decision makers disagree that the Site is a Grey Belt exception (see flow chart at **Appendix 1**) In this scenario the proposals would be considered inappropriate development and the harm weighed in the planning balance, noting that Boyer Planning in their Planning Statement, consider that exceptional circumstances can be demonstrated.

2. Overview of Published Three Rivers Green Belt Assessments.

2.1. This report draws from the following, and the relevant parcels are illustrated on **Figures 3A: Stage 1 Green Belt Plan** and **3B: Stage 2 Green Belt Plan**.

- **Stage 1 Assessment:** 'Three Rivers District & Watford Borough Council Green Belt Review – Strategic Analysis' (the 'Stage 1 GBR') prepared by Amec Foster Wheeler Environment & Infrastructure UK Limited in 2017¹.
- **Stage 2 Assessment:** 'Stage 2 Green Belt Assessment for Three Rivers District and Watford Borough' (the 'Stage 2 GBA') prepared by LUC Limited in 2019²

Stage 1 Assessment

2.2. The Stage 1 GBR assessed the whole of the Green Belt within Three Rivers and Watford in terms of contribution to the 5 purposes as set out in the NPPF. It considered 83 parcels and considered the character and role of villages within the green belt. The study identifies the Site as washed over by **Parcel E3: 'Part of the wider open countryside between Carpenders Park and Bushey, helping to prevent their merger, sprawl and broader encroachment'**.

2.3. The assessment uses a three-point scale to describe the overall contribution of the parcel to the Green Belt purposes and provides variations in contribution to each Green Belt purpose. The overall rating is based on professional judgement rather than the application of any specific formula or weighting, including:

2.4. **Significant contribution:** The parcel makes a Significant Contribution to a Green Belt purpose clearly and unambiguously against the assessment criterion.

"These parcels are principally located between and/or in the immediate vicinity of the principal settlements (and their suburbs) across the study area, reflecting the strategic purposes of preventing the sprawl of large built-up areas and the merger of towns (and other settlements).

Whilst configuration of the Green Belt is some places complex, which in turn reflects the blanket designation of undeveloped land, there are clearly contiguous areas of Green Belt, such as between Watford and Hemel Hempstead which maintain separation of the towns. The arc of Green Belt to the south of Watford also assumes particular significance in this role, as does land between Rickmansworth and Chorleywood more locally.

The limiting of sprawl from the edges of built-up areas (particularly along transport corridors, but also into open countryside) and prevention of the general encroachment of built development in open countryside through

¹ Amec Foster Wheeler Environment & Infrastructure UK (2017) – Three Rivers District Council & Watford Borough Council Green Belt Review (Stage 1)

² LUC (2019) – Stage 2 Green Belt Assessment for Three Rivers District and Watford Borough

incremental change, also assumes particular significance in the study area, notably to the south west and north west of Rickmansworth.”

2.5. **Contribution:** The parcel makes a Contribution to a Green Belt purpose against the assessment criterion, although this is more diffuse in character or has been compromised by development.

“These parcels comprise the second principal category, and relate largely to the open countryside beyond the main built-up areas where the key function of the Green Belt is to prevent encroachment by incremental development. These parcels straddle the M25 to the north west of Watford and Rickmansworth, but also extend southwards towards Harefield and north eastwards towards St Albans.

The relative accessibility of countryside within the service and employment catchment of main towns means inevitable development pressure. Where this occurs as piecemeal land release development cumulatively and progressively can create an urbanised feel, particularly in the vicinity of main roads and settlements.

Whilst change can and does occur under Green Belt policy, it does so in a relatively controlled and consistent fashion. It is likely that this effect could not be achieved to the same degree or consistency through policies relating to development in the open countryside alone.”

2.6. **Limited Contribution:** The parcel makes a Limited Contribution to a Green Belt purpose because of either performing no clear role in a particular location or has been compromised by development.

“The contribution of six parcels is considered to be relatively limited by virtue of their size and location which is strongly bounded. However, release from the Green Belt is not necessarily justified by virtue of their land use, for example as public open space of various kinds.”

2.7. A summary of this parcel’s performance is included at **Table 1** (below).

Table 1: Parcel E3 performance against the purposes of the Green Belt

	Purpose 1: <i>Checking unrestricted sprawl</i>	Purpose 2: <i>Preventing the merging of towns</i>	Purpose 3: <i>Safeguarding the countryside from encroachment</i>	Purpose 4: <i>Preserving the setting and special character of historic towns</i>	Purpose 5: <i>encouraging the recycling of derelict and other urban land</i>
Stage 1 GBR:	Significant contribution	Significant contribution	Contribution	Limited contribution	Limited contribution

2.8. Figure 3.1 in the assessment identifies parcel E3 as making a **Significant contribution** to the purposes of the Green Belt overall. The parcel is considered in further detail at Appendix B6 at page 173, which provides the detailed Stage 1 assessments of the contribution of each Green Belt parcel to the Green Belt purposes.

2.9. Parcel E3 is described as follows:



“Parcel E3 – land to the east of South Oxhey, bounded by Old Redding and Common Road to the south, the built edge of Bushey Heath/Merry Hill Road to the east and an unnamed track to the north.

Comprising pasture, woodland and a golf course, the parcel is part of open countryside to the east of Watford, between Watford and Bushey. The land is of an open character on gently undulating topography with short-distance views across from Oxhey Lane, interrupted by boundary vegetation.”

Purpose 1: To check the unrestricted sprawl of large built-up areas.

2.10. To contribute to Purpose 1, the criteria includes:

“Prevent the sprawl of a built-up area into open land where development would not otherwise be restricted by a permanent boundary. What is the role of the parcel in preventing the extension of an existing development into open land beyond established limits, in light of the presence of significant boundaries?”

2.11. The Stage 1 GBR rates Parcel E3’s contribution as ‘**Significant**’ stating:

“Forms the outer edge of Watford at South Oxhey, containing potential for sprawl across the A4008 into open countryside towards Bushey.

Purpose 2: To prevent neighbouring towns from merging into one another.

2.12. To contribute to Purpose 2, the criteria includes:

“Prevent development which would result in the merger or erosion of a gap (physically or visually) between settlements. What is the role of the parcel in preventing the merger of settlements which might occur through a reduction in the distance between them?”

2.13. The Stage 1 GBR rates Parcel E3’s contribution as ‘**Significant**’ stating:

“Part of the open countryside gap between Watford and Bushey.”

Purpose 3: To assist in safeguarding the countryside from encroachment.

2.14. To contribute to Purpose 3, the criteria includes:

“Protect the openness of the countryside and its perceived rurality. What is the role of the parcel in maintaining a sense of openness, particularly in light of proximity to a settlement edge?”

2.15. The Stage 1 GBR rates Parcel E3’s contribution as ‘**Contribution**’ stating:

“Prevents incremental change in an accessible location.”

Purpose 4: To preserve the setting and special character of historic towns.

2.16. To contribute to Purpose 4, the criteria includes:



“Preserve the setting and character of historic town. What is the role of the parcel in respect of the proximity to, and degree of intervisibility with, the core (such as a Conservation Area) of an historic town or settlement?”

2.17. The Stage 1 GBR rates Parcel E3’s contribution as ‘**Limited Contribution**’ stating:

“No role in this location.”

Purpose 5: To assist in urban regeneration, by encouraging the recycling of derelict and other urban land

2.18. To contribute to Purpose 5, the criteria include:

“Does the parcel act in concert with adjacent parcels to encourage urban regeneration, either generally or more specifically?”

2.19. The Stage 1 GBR rates Parcel E3’s contribution as ‘**Limited Contribution**’ stating:

“No role in this location.”

Stage 2 Assessment

2.20. The Stage 2 GBA identifies 152 parcels of land and considers the extent to which the release of each parcel affects the contribution to the Green Belt Purposes by loss of openness of the land released, and the impact this would have on the adjacent Green Belt, providing more specific detail on levels of harm. The study encompasses the following steps:

1. The first step of the assessment considers the impact on the contribution to the NPPF purposes.
2. The second step assessed the potential impact of release on the integrity of the remaining Green Belt, including consideration of the strength of residual Green Belt boundaries.
3. The third step assessed the overall Green Belt harm and any variations in harm within the assessment zone.

2.21. The study identifies the Site as washed over by Parcel SO3 as shown at page 349 of Appendix 1, and described as:

“Open farm land and a cluster of agricultural buildings located on the eastern inset edge of South Oxhey, the boundary of which is formed by the A4008 Oxhey Lane and a treeline / hedgerow. The slopes of Merry Hill add to the distinction from the inset edge. The boundary with the wider Green Belt to the north and east is predominantly formed of well-treed hedgerow field boundaries, although a section of the eastern boundary adjacent to the farm buildings is defined by woodland. To the south the parcel extends to the District boundary, which crosses through Grim’s Dyke Golf Club.”

2.22. Within each parcel, a rating was given for impact on contribution to three purposes, on a five-point scale, including:

- Significant
- Relatively-significant
- Moderate
- Relatively limited
- Limited or no impact

2.23. A summary of this parcel’s performance is included at **Table 2** (below).

Table 2: Parcel SO3 impact on contribution to purposes of the Green Belt

	Step 1 – Impact on contribution to purposes of Green Belt			Step 2 – Impact of release on integrity of residual green belt	Step 3 – Overall Green Belt harm
	Purpose 1: <i>Checking unrestricted sprawl</i>	Purpose 2: <i>Preventing the merging of towns</i>	Purpose 3: <i>Safeguarding the countryside from encroachment</i>		
Stage 2 GBA: Parcel SO3	Significant	Moderate	Significant	Moderate	Very High

Step 1 – Impact on contribution to purposes of Green Belt.

Purpose 1 Contribution – Check the unrestricted sprawl of large built-up areas.

2.24. The document states that to contribute to purpose 1:

“..., land must lie adjacent to, or in close proximity to, a large built-up area, and must retain a degree of openness that distinguishes it from the urban area. Land that has a stronger relationship with a large built-up area than with open land, whether due to the presence of, or containment by, existing development, the dominance of adjacent urban development, or the strength of physical separation from the wider countryside, makes a weaker contribution to this purpose and therefore development will have a less significant impact on this purpose. Vice versa, land which is adjacent to the urban edge but which, as a result of its openness and relationship with countryside, is distinct from it makes a stronger contribution and hence development will have a more significant impact on Purpose 1. Development on land which is more clearly associated with a settlement that is not a large built-up area will not have an impact on the contribution to Purpose 1.”

2.25. The study concludes that if released, Parcel SO3 would have a **Significant** effect on the contribution, stating:

“The parcel lies on the edge of South Oxhey, which is contiguous with Greater London and forms part of the large built up area. The A4008 and the landform provide strong distinction from the inset settlement edge and the parcel is open and uncontained therefore, development would constitute sprawl.”

Purpose 2 Contribution – Prevent neighbouring towns merging into one another.

2.26. The document outlines that to contribute to purpose 2:

“... land that is juxtaposed between towns makes a contribution to this purpose, and the stronger the relationship between the towns – the more fragile the gap – the stronger the contribution of any intervening open land. Physical proximity is the initial consideration, but land that lacks a strong sense of openness, due to the extent of existing development that has occurred, makes a weaker contribution. This includes land that has a stronger relationship with an urban area than with countryside, due to extent of containment by development, dominance of development within an adjacent inset area, or containment by physical landscape elements. However, where settlements are very close, a judgement is also made as to whether their proximity is such that the remaining open land does not play a critical role in maintaining a distinction between the two towns, i.e. the characteristics of the open land relate more to the urban areas themselves than to the open land in between. Where this is the case, the contribution to Purpose 2 may be reduced...”

Both built and natural landscape elements can act to either decrease or increase perceived separation, for example intervisibility, a direct connecting road or rail like or a shared landform may decrease perceived separation, whereas a separating feature such as a woodland block or hill may increase the perception of separation.”

2.27. The study concludes that if released, Parcel SO3 would have a **Moderate** effect on the contribution, stating:

“The parcel lies in the gap between Bushey and Pinner however, this is a relatively large and robust gap limiting the role of the parcel in maintaining separation.”

Purpose 3 Contribution – Assist in safeguarding the countryside from encroachment.

2.28. The document outlines that to contribute to purpose 3:

“The contribution land makes to safeguarding the countryside from encroachment can be considered in terms of the extent to which land displays the characteristics of countryside, i.e. an absence of built or otherwise urbanising use; the extent to which land physically relates to the adjacent settlement and to the wider countryside (i.e. its distinction from the urban area or the wider countryside); and its containment.

Physical landscape elements (or a lack of them), may strengthen or weaken the relationship between settlement and adjacent countryside, but there needs to be significant urban influence from adjacent land, and a degree of physical landscape containment to limit contribution to this purpose. Intervisibility between open land and an urban area is not in itself enough to constitute a significant urban influence. The urban area would need to be a dominating influence either through:

i) the scale of development; or

ii) the degree of containment of the open land by development.

In addition, the presence of landscape elements (e.g. landform or woodland) that strongly contain an area, and consequently separate it from the wider countryside, may give land a strong relationship with a visible urban area even if buildings are not particularly dominant."

2.29. The study concludes that if released, Parcel SO3 would have a **Significant** effect on the contribution, stating:

"The parcel is undeveloped and uncontained, with strong distinction from the inset urban edge and a relationship with the wider countryside. Development would therefore constitute encroachment on the countryside."

Purpose 4 Contribution – 'To preserve the setting and special character of historic towns'.

2.30. Regarding Purpose 4 the Stage 2 study did not identify any historic towns which were considered relevant to the assessment of the Green Belt purpose.

Purpose 5 Contribution – 'To assist in urban regeneration by encouraging the recycling of derelict and other urban land.'

2.31. Regarding Purpose and the Stage 2 study states that it is highly unlikely that development pressures operate at a sufficiently localised level to draw meaningful judgements on the relative contribution of discrete parcels of Green Belt land. The Stage 2 approach considers the Three Rivers latest brownfield register records 53.4ha of brownfield land suitable and available for development, and states that:

"...it is the extent to which brownfield land is used to meet development need that is of primary relevance when judging the extent to which the Green Belt contributes... Although there is more brownfield land in Three Rivers, the housing need figures indicate that significantly more land will be needed if the latest housing targets are to be met..."

The extent to which Green Belt land would, if released, be capable of redirecting development away from brownfield sites, will in theory vary spatially, but there is no evidence that development pressures operate at a sufficiently localised level for variations in contribution to be identified within Watford and Three Rivers. Therefore the contribution of all Green Belt within Watford and Three Rivers is considered to be limited,"

Step 2 – Impact of release on integrity of adjacent Green Belt and boundaries.

2.32. The document outlines that once an assessment of the potential impact to the contribution to the purposes was undertaken, the nature of boundary features was considered to determine the extent that adjacent land would incur a loss of integrity either through an increase in containment and/or a loss of distinction between development and open land. A rating was given on a four-point scale of either 'significant', 'moderate', 'minor' or 'no/negligible'. It states:

“If the new Green Belt boundary results in a less distinct boundary between settlement and countryside, the Green Belt release under assessment is likely to weaken the wider Green Belt. However, even if a strong alternative boundary can be defined, there is potential for the remaining Green Belt to be weaker, due to increased containment. However in some locations it may be possible for a clearer Green Belt boundary to be defined – e.g. through use of a feature that marks a stronger, or more widely consistent, distinction between an urban area and countryside...”

The extent of this impact is limited by the strength of adjacent Green Belt – e.g. the increased containment of land that is already largely contained by development will constitute less of an impact than the containment of land that has a stronger relationship with the wider countryside.”

- 2.33. The study concludes that if released, Parcel SO3 would have a **Moderate** impact on adjacent Green Belt, stating:

“Release of the parcel would not increase containment of any stronger performing Green Belt land however, it would result in a significantly weaker and less consistent Green Belt boundary than that currently provided Moderate by the A4008.”

Step 3 – Overall harm to Green Belt purposes from release of land

- 2.34. The level of overall Green Belt harm is rated using a seven-point scale ranging from ‘very low harm’, ‘low harm’, ‘Low-moderate harm’, ‘moderate harm’, ‘moderate-high harm’, ‘high harm’, and ‘very high harm’. The judgement combines step 1 and 2, considering the impact of release in terms of low of that land’s contribution to the Green Belt purposes, combined with the impact of the release on the remaining Green Belt, and note that professional judgement is required in each case to consider how much weight to attach to each element.

- 2.35. The study concludes that if released, Parcel SO3 would have a **Very High** impact on adjacent Green Belt, stating:

“Release of the parcel would have a significant impact on preventing urban sprawl and encroachment on the countryside and a moderate impact on preventing the merging of settlements. It would have a moderate impact on adjacent Green Belt land. Therefore, the harm to the Green Belt of releasing the parcel would be very high.”

- 2.36. Table 4.2 illustrates the levels of harm rating attributed to land within the Green Belt studied, broken down below:

- Very high: 231.7ha (9.3%)
- High: 679.4ha (27.4%)
- Moderate-high: 790.7ha (31.8%)
- Moderate: 487.7ha (19.6%)
- Low-moderate: 244.2ha (9.6%)
- Low: 49.5ha (2%)



- 2.37. The assessment notes that there are other important factors relating to release of Green Belt land, in terms of sustainability and deliverability, noting that it may be that the most sustainable locations for development would result in 'high' or 'very high' harm to the Green Belt.

3. Assessment of the Site against ‘Grey Belt’ definition

3.1. The NPPF defines ‘Grey Belt’ land at Annex 2: Glossary as:

“For the purposes of plan-making and decision-making, ‘grey belt’ is defined as land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. ‘Grey belt’ excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development.”

3.2. This section of the report therefore examines the contribution made by the Site itself in relation to Purposes a, b, and d:

(a) To check the unrestricted sprawl of large built-up areas;

(b) To prevent neighbouring towns merging into one another; and

(d) To preserve the setting and historic character of historic towns.

Purpose (a): To check the unrestricted sprawl of large built-up areas.

3.3. The criteria for assessment are set out in the PPG (Feb 2025) at Paragraph: 005 Reference ID: 64-005-20250225 and reproduced below:

Table 3: Criteria of contribution towards Purpose (a) – To check the unrestricted sprawl of large built-up areas.

Contribution	Illustrative features
Strong	<p>Assessment areas that contribute strongly are likely to be free of existing development, and lack physical feature(s) in reasonable proximity that could restrict and contain development.</p> <p>They are also likely to include all of the following features:</p> <ul style="list-style-type: none"> - be adjacent or near to a large built up area - if developed, result in an incongruous pattern of development (such as an extended “finger” of development into the Green Belt)

Moderate	<p>Assessment areas that contribute moderately are likely to be adjacent or near to a large built up area, but include one or more features that weaken the land’s contribution to this purpose a, such as (but not limited to):</p> <ul style="list-style-type: none"> - having physical feature(s) in reasonable proximity that could restrict and contain development - be partially enclosed by existing development, such that new development would not result in an incongruous pattern of development - contain existing development - being subject to other urbanising influences
Weak or None	<p>Assessment areas that make only a weak or no contribution are likely to include those that:</p> <ul style="list-style-type: none"> - are not adjacent to or near to a large built up area - are adjacent to or near to a large built up area, but containing or being largely enclosed by significant existing development

- 3.4. It is first worthwhile noting what is meant by ‘unrestricted sprawl.’ The term ‘urban sprawl’ refers to the spreading of the town or city and its suburbs over previously undeveloped land. It is sometimes used interchangeably with the word urbanisation, but urban sprawl more precisely implies an uncontrolled, unplanned, or unrestricted spreading of an urban environment, specifically a large built-up area. The term ‘urban sprawl’ is discussed in the Stage 2 study which notes that definitions vary, however, it states that planned development may not contravene this purpose, and that the role a land area plays will be dependent on its relationship with a large built-up area.
- 3.5. In terms of what is considered a ‘large built-up area,’ both the Stage 1 and Stage 2 studies are consistent in identifying Rickmansworth, Chorleywood, Northwood, Croxley Green, Watford, Hemel Hempstead, and Bushey. The study notes that South Oxhey is **‘close enough to more contiguous urban developments within the settlements outlined above to constitute part of the large built-up area extending out from Greater London’** (para 4.48). The Core Strategy (2011) identifies South Oxhey as a Key Centre, and Carpenders Park as a Secondary Centre within the settlement hierarchy, which notes that though not as sustainable as Principle and Key Centre’s, they do provide some access to services and facilities and are generally close to larger settlements. Considering the above, Carpenders Park is considered to form part of a ‘Large built-up area.’
- 3.6. The Site benefits from physical and visual separation from the adjacent settlements of Watford / Oxhey 850m to the north, Bushey / Bushey Heath over 1.1km to the east and Pinner / Harrow over 1.1km to the south. The large expanse of woodland associated with Merry Hill open access land, managed by the Woodland Trust as a parkland accessible to the public, is located immediately adjacent to the eastern boundary spreading east towards Bushey. This woodland provides a high degree of physical separation between the Site as a new settlement edge to Carpenders Park, and Bushey, that is permanent in nature. To the south, the Site boundary is offset from the course of the Hartsbourne Stream and associate flood storage area, with Mutton Wood a further 300m south of the boundary and Grim’s Dyke golf course beyond, and with Hartsbourne golf course to the southeast. These features comprise mature woodland and belts of trees which form a further physical, permanent feature to distinguish and define the boundary of the Green Belt.

3.7. To the north, there is a degree of physical openness with short-distance views possible from within the Site, across the agricultural fields. The view is limited further north towards the boundary with Merry Hill open access land which adjoins Oxhey Lane approximately 400m north of the northern boundary, and there is an element of visual enclosure created by the mature hedgerows and trees along the Site's northern boundary, and along the boundary of Merry Hill. While the northern edge is more open, the Site is still set back over 400m from the northernmost settlement edge of Carpenders Park, and there is a high degree of visual separation between the Site and Carpenders Park with Oxhey due to the belts of woodland throughout Merry Hill.

3.8. Given this association, it is considered that the Site has a **'Moderate'** contribution to Purpose a) with reference to the PPG criteria. This conclusion is reached because the Site has physical features in reasonable proximity that could restrict and contain development i.e. the topography and woodland, is partially enclosed by existing development and has urbanising influences.

Purpose (b): To prevent neighbouring towns merging into one another.

3.9. The criteria for assessment are set out in the PPG (Feb 2025) at Paragraph: 005 Reference ID: 64-005-20250225 and reproduced below:

Table 4: Criteria of contribution towards Purpose (b) – To prevent neighbouring towns merging into one another.

Contribution	Illustrative features
Strong	Assessment areas that contribute strongly are likely to be free of existing development and include all of the following features: <ul style="list-style-type: none"> - forming a substantial part of a gap between towns - the development of which would be likely to result in the loss of visual separation of towns
Moderate	Assessment areas that contribute moderately are likely to be located in a gap between towns, but include one or more features that weaken their contribution to this purpose, such as (but not limited to): <ul style="list-style-type: none"> - forming a small part of the gap between towns - being able to be developed without the loss of visual separation between towns. This could be (but is not limited to) due to the presence or the close proximity of structures, natural landscape elements or topography that preserve visual separation
Weak or None	Assessment areas that contribute weakly are likely to include those that: <ul style="list-style-type: none"> - do not form part of a gap between towns, or - form part of a gap between towns, but only a very small part of this gap, without making a contribution to visual separation

- 3.10. The NPPF is quite specific in its terminology regarding this purpose, citing towns specifically rather than types of settlements such as villages and hamlets. The Stage 2 assessment, however, states that regardless of whether a settlement can realistically be considered a 'town', smaller settlements that lie between larger ones may result in a ***“loss of separation between them may in turn have a significant impact on the overall separation between larger ‘towns’”*** (para 3.53).
- 3.11. The concept of towns 'merging' is discussed at Paragraph 3.54, which refers to the role that land plays in preventing the merging of towns is more than a product of the size and of the gap between them, and that assessments consider both the physical and visual role that is played by Green Belt land in preventing the merging of settlements.
- 3.12. The Stage 2 approach was consistent with the Stage 1 study in identifying the settlements that were considered relevant in terms of the assessment of gaps between settlements, listing the following 'neighbouring towns', which does not explicitly refer to Carpenders Park or South Oxhey:
- Watford and Hemel Hempstead;
 - Watford and St Albans;
 - Watford and Rickmansworth;
 - Rickmansworth and Northwood;
 - Watford and Northwood;
 - Watford and Pinner;
 - Watford and Bushey; and
 - Watford and Radlett.
- 3.13. Paragraph 3.61 of the Stage 2 assessment also highlights that both built form and natural landscape elements can act to increase or decrease perceived separation in terms of intervisibility, and that a direct connecting road, rail link or shared landform may decrease perceived separation, while woodland or an intervening hill might increase the perceived separation.
- 3.14. The Site is located to the eastern edge of the A4008 Oxhey Lane, which is a connecting road between Pinner in Harrow to the south, and Oxhey in Watford to the north. Carpenders Park is broadly located to the western edge of the road and is located between the two larger settlements of Watford and Pinner. The Site, however, wraps around an existing large care home development located on the eastern edge of the road. The existing settlement edge of Carpenders Park extends approximately 460m further north along the road towards Oxhey than the Site's northern boundary. Merry Hill extends north with associated woodland providing a physical and visual buffer between the Site and Oxhey to the north. The Site's southern boundary is in line with the residential development visible from along the road, although the Site is physically set back from the road by an intervening parcel of land associated with the Hartsbourne Flood Storage Area with limited visibility from along the road. The wider settlement extends further south in line with Little Oxhey Lane approximately 500m south of the Site's southern boundary and is physically and visually separated from points to the south by the Hartsbourne Stream, the flood zone and associated Hartsbourne Flood Storage Area, along with woodland at Mutton Wood to the south, and throughout the Grim's Dyke golf course.

3.15. On this basis, the Site forms part of '*a small gap between towns*' and would be '*able to be developed without the loss of visual separation between towns...*' due to '*...the presence or close proximity of structures, natural landscape elements or topography that preserve(s) visual separation*', reflective of the 'Illustrative Features' set out in the PPG. The Site is therefore judged to make a **Moderate** contribution to Purpose b).

Purpose (d): To preserve the setting and special character of historic towns.

3.16. The criteria for assessment are set out in the PPG (Feb 2025) at Paragraph: 005 Reference ID: 64-005-20250225 and reproduced below:

3.17. *"This purpose relates to historic towns, not villages. Where there are no historic towns in the plan area, it may not be necessary to provide detailed assessments against this purpose.*

Table 5: Criteria of contribution towards Purpose (d) – To preserve the setting and special character of historic towns.

Contribution	Illustrative features
Strong	Assessment areas that contribute strongly are likely be free of existing development and to include all of the following features: <ul style="list-style-type: none"> - form part of the setting of the historic town - make a considerable contribution to the special character of a historic town. This could be (but is not limited to) as a result of being within, adjacent to, or of significant visual importance to the historic aspects of the town
Moderate	Assessment areas that perform moderately are likely to form part of the setting and/or contribute to the special character of a historic town but include one or more features that weaken their contribution to this purpose, such as (but not limited to): <ul style="list-style-type: none"> - being separated to some extent from historic aspects of the town by existing development or topography - containing existing development - not having an important visual, physical, or experiential relationship to historic aspects of the town
Weak or None	Assessment areas that make no or only a weak contribution are likely to include those that: <ul style="list-style-type: none"> - do not form part of the setting of a historic town - have no visual, physical, or experiential connection to the historic aspects of the town

3.18. The Stage 2 assessment outlines that this purpose makes specific reference to 'historic towns', and not individual historical assets or smaller settlements such as villages and hamlets. It concedes in Paragraph 3.83 that there are historic aspects to towns and smaller settlements within the study area, however states that there needs to be significant relationship between Green Belt land and historic aspects of settlements settings which leads to a special character. The Stage 2 assessment refers to Rickmansworth and Watford in terms of numerous conservation areas and historic cores, and did not refer to Carpenders



Park, or any of the settlements within the context of the Site. Paragraph 3.87 of the assessment highlights that the focus of the purpose is still with potential harm to the national Green Belt purposes, while the 'local context' is considered to be relevant to landscape or cultural heritage sensitivity assessments, and that particular relationships of Conservation Areas with open land would form part of Conservation Area designations. The assessment therefore did not identify any historic towns which were considered relevant to this Purpose.

- 3.19. On this basis, the Site does **'not form part of the setting of a historic town'**, and has **'no visual, physical, or experiential connection to the historic aspects of the town'** reflective of the 'Illustrative Features' set out in the PPG, and is therefore judged to make **No contribution** to Purpose D.
- 3.20. The Site does not perform strongly against any of Purposes (a), (b) or (d). It is therefore considered that the Site is a candidate for consideration as 'Grey Belt' under the definition provided by Paragraph 007 Reference ID: 64-007-20250225 of the PPG, subject to the NPPF footnote 7 tests.

Footnote 7 Constraints

- 3.21. The second part of the NPPF definition of 'Grey Belt' notes that: ***"Grey belt' excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development."***
- 3.22. The Planning Statement sets out the detailed consideration of Footnote 7 and concludes there are no strong reasons for refusing or restricting development.
- 3.23. Footnote 7 notes that the policies referred to within Paragraph 11 are those in the Framework (rather than those in development plans) relating to the following areas or assets of particular importance when assessing Grey Belt sites:
- *Habitats sites (and those sites listed in Paragraph 194 – potential Special Protection Areas (SPA); possible Special Areas of Conservation (SAC); listed or proposed Ramsar sites; and sites identified, or required, as compensatory measures for adverse effects on habitats sites) and/or designated as Sites of Special Scientific Interest;*
 - *Land designated as Local Green Space;*
 - *Land designated as a National Landscape;*
 - *Land designated as a National Park (or within the Broads Authority);*
 - *Land designated as Heritage Coast;*
 - *Irreplaceable habitats;*
 - *Designated heritage assets (and other heritage assets of archaeological interest referred to in Footnote 75 – i.e. non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments); and*
 - *Areas at risk of flooding or coastal change.*



- 3.24. The Site does not contain any habitat sites; however, there is a small area identified on the interactive policies map as a Local Wildlife Site within the Hartsbourne Flood Storage Area south of the site, to the immediate east of Oxhey Lane. The mapping also identifies the open access land associated with the Merry Hill Woodland Trust site to the east and far north. The woodland to the immediate east of the site boundary is also Priority Habitat Inventory – Deciduous Woodland. This woodland would be protected by a substantial landscape buffer along the eastern edge of the Site of at least 15m from the proposed new built form and would therefore not provide a strong reason for refusing or restricting development.
- 3.25. The Site is not subject to any landscape designations, and there are no such designations in proximity of the Site.
- 3.26. The Site does not include any designated or non-designated heritage assets.
- 3.27. The site is located within Flood Zone 1 (low probability of flooding); however, the Hartsbourne Flood Storage Area is located to the immediate south of the Site. A chance of surface water flooding has been identified along the southern edge of the Site, along with the southern boundary of the Site identified as being subject to reservoir flood risk. These risks could be mitigated within design measures, and a full drainage strategy would be implemented including sustainable urban drainage features.

Summary

- 3.28. When considered in the round, including an assessment of the Site’s contribution to Purposes (a), (b), and (d) of the Green Belt, and the Footnote 7 areas or assets of particular importance, the Site is judged to satisfy the definitional requirements to be classified as ‘Grey Belt’.

Table 6: Site-specific performance against Purposes (a), (b), and (d) of the Green Belt

	Purpose A: <i>Checking unrestricted sprawl</i>	Purpose B: <i>Preventing the merging of towns</i>	Purpose D: <i>Preserving the setting and special character of historic towns</i>
The Site	Moderate	Moderate	No Contribution

4. Are the GB Purposes fundamentally undermined?

4.1. Paragraph 155 of the NPPF states that the development of homes, commercial and other development in the Green Belt should not be regarded as inappropriate where **all** the following apply:

“a. The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;

b. There is a demonstrable unmet need for the type of development proposed⁵⁶;

c. The development would be in a sustainable location, with particular reference to [paragraphs 110 and 115 of this Framework]⁵⁷; and

d. Where applicable the development proposed meets the ‘Golden Rules’ requirements set out in paragraphs 156–157 below.”

4.2. Refer to Planning Statement for (b), (c) and (d) apart from the elements relating to green space in (d).

4.3. In relation to Purpose a) ‘to check the unrestricted sprawl of large built-up areas’ it is considered that Carpenders Park can be considered a ‘large built-up area’, and that the Site has a Moderate contribution to checking the unrestricted sprawl of large, built-up areas. With the proposed development in place, existing permanent physical features including woodland at Merry Hill to the immediate east and to the north, with vegetation along the Hartsbourne Stream to the south, would not be altered. It is therefore considered that the proposed development would have **No impact** on the contribution of the remaining Green Belt on its contribution towards this Purpose.

4.4. In relation to Purpose b) ‘to prevent neighbouring towns merging into one another’ it is considered that the Site itself does not form a large part of a gap between towns or make a significant contribution to visual separation. It is judged that the Site itself would have a limited contribution to the merging of towns as there would be a limited reduction of the gap between the neighbouring towns of Watford and Pinner or Watford and Bushey identified within the Stage 1 and 2 assessments. The addition of the proposed development on the Site would consequently have a **Slight Impact** on the contribution of the remaining Green Belt towards this purpose.

4.5. In relation to Purpose C ‘to assist in safeguarding the countryside from encroachment’ it is considered that while the Site itself contains the characteristics of open countryside (i.e. an absence of built or otherwise urbanising uses in Green Belt terms), it more strongly relates to the large-scale care home building immediately adjacent to the Site boundary which forms an urbanising influence readily discernable from within the Site and the surrounding landscape within the Green Belt. The proposed development would extend the eastern settlement edge of Carpenders Park an additional 250m northeast towards Bushey Heath in Bushey, however the westernmost edge of the settlement would remain over 1km to the east of the Site’s eastern boundary at its closest point. The Site would remain physically and visually separated by the permanent landscape element of the existing woodland within Merry Hill open access land. The woodland is located immediately adjacent to the Site’s eastern boundary, with mature trees along the Site boundary forming a strong defensible



edge to prevent any further encroachment east towards Bushey, and with more established woodland at Little Hartsbourne Wood and belts of mature trees throughout Hartsbourne golf course. With the proposed development in place, the proposed mitigation planting around the boundary and throughout the substantial areas of open space, would mature and limit the urbanising influence over the surrounding remaining Green Belt. The extent from which the proposed development would be visible would be limited due to the enclosed nature of the Site, and with the establishment of the proposed green infrastructure elements. It is therefore considered that the proposed development would have a **Slight Impact** on the contribution of the remaining Green Belt to this Purpose. However, it should be acknowledged that the most sustainable locations for development will invariably be adjacent to existing settlements that typically comprise countryside. Therefore, in the interests of promoting sustainability, there is an almost inevitable conflict with this Green Belt purpose. It is relevant to note this Purpose is specifically omitted from the NPPF (2024) glossary definition of Grey Belt.

- 4.6. In relation to Purpose d) 'to preserve the setting and special character of historic towns' it is considered that while there are heritage designations within the context of the Site, there are none which share any intervisibility with the Site or comprise locations from which the proposed development could be seen. There are no historic towns identified within the Stage 1 or 2 assessments. It is considered that the proposed development would therefore have **No impact** on the contribution of the remaining Green Belt to this Purpose.
- 4.7. In relation to Purpose e) 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land' it is agreed with the Stage 1 and Stage 1 Green Belt Assessments that all parcels, including the Site, make a limited contribution to this purpose given the limited availability of Brownfield land, and the available land not being able to meet housing needs. In relation to the Site itself, it is therefore considered that the proposed development would have **No impact** on the contribution of the remaining Green Belt to this purpose.
- 4.8. It is the judgment of this assessment that the Site does not strongly contribute to Purposes (a), (b), or (d) of the Green Belt. It is therefore considered to qualify as Grey Belt under the definition provided within the Glossary of the Framework. Further, the removal of the Site from the Green Belt would not fundamentally undermine the five purposes when taken together with the remaining Green Belt within the wider plan area.
- 4.9. **Paragraph 155 (d) – Can the 'Golden Rules' be met?**
- 4.10. It is noted that paragraphs 156–157 of the NPPF describes the new 'Golden Rules' requirements as:

"156. Where major development involving the provision of housing is proposed on land released from the Green Belt through plan preparation or review⁵⁸, or on sites in the Green Belt subject to a planning application⁵⁹, the following contributions ('Golden Rules') should be made:

a. affordable housing which reflects either: (i) development plan policies produced in accordance with paragraphs 67–68 of this Framework; or (ii) until such policies are in place, the policy set out in paragraph 157 below;

b. necessary improvements to local or national infrastructure; and

c. the provision of new, or improvements to existing, green spaces that are accessible to the public. New residents should be able to access good quality green spaces within a short walk of their home, whether through onsite provision or through access to offsite spaces.

157. Before development plan policies for affordable housing are updated in line with paragraphs 67–68 of this Framework, the affordable housing contribution required to satisfy the Golden Rules is 15 percentage points above the highest existing affordable housing requirement which would otherwise apply to the development, subject to a cap of 50%⁶⁰. In the absence of a pre-existing requirement for affordable housing, a 50% affordable housing contribution should apply by default. The use of site-specific viability assessment for land within or released from the Green Belt should be subject to the approach set out in national planning practice guidance on viability.”

4.11. From a landscape planning perspective, the ability of the proposed development to meet the NPPF Golden Rules is set out below:

4.12. Paragraphs 156 (c) and 159 of the NPPF advocates for improvements to green spaces which is a requirement as part of the Golden Rules, and that such improvements should contribute positively to the landscape setting of the development in question. It goes on to note that such improvements should support nature recovery and meet local standards for green space provision where these exist in the development plan. Where no locally specific standards exist, development proposals should meet national standards relevant to the development (these include Natural England standards on accessible green space and urban greening factor and Green Flag criteria).

4.13. The proposed development is capable of meeting any local (or national) standards for publicly accessible green space.

4.14. The online National Planning Practice Guidance (NPPG), at Paragraph: 002 Reference ID: 64-002-20190722³, advises on how plans might set out ways in which the impact of removing land from the Green Belt can be offset by compensatory improvements:

“Where it has been demonstrated that it is necessary to release Green Belt land for development, strategic policy-making authorities should set out policies for compensatory improvements to the environmental quality and accessibility of the remaining Green Belt land. These may be informed by supporting evidence of landscape, biodiversity or recreational needs and opportunities including those set out in local strategies...”

4.15. The following examples of improvements to the areas of open space within the Site that would form part of the remaining Green Belt are reflected within the Landscape Proposals for the development (See Appendix 2):

- **new or enhanced green infrastructure:** Existing overgrown blackthorn scrub to be brought under management and hedgerows to be planting around the Site boundary and along the interface between development parcels and areas of open space. Significant areas of new tree planting throughout the areas of public

³ <https://www.gov.uk/guidance/green-belt>
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open space. Tree-lined streets provide an attractive setting to the new dwellings and aid in breaking up new built form.

- **woodland planting:** A significant area of native woodland planting proposed within the area of public open space within the northern parcel, across the rising landform to enhance visual screening of proposed new built form. Scattered native tree planting also proposed to reflect the character of the adjacent Merry Hill Wood, with fruit trees of local provenance proposed within the community orchard adjacent to the existing public right of way within the Site, accessible to both the existing and proposed community.
- **landscape and visual enhancements (beyond those needed to mitigate the immediate impacts of the proposal):** Native hedgerow along the Site boundary to be supplemented with blocks of mixed species native shrub planting and hedgerow trees, to bolster green infrastructure and provide habitat connectivity through the Site. Feature trees planted at key nodes within the Site to aid in wayfinding, with marginal and aquatic planting to proposed attenuation basins and
- **improvements to biodiversity, habitat connectivity and natural capital:** Existing species-rich grassland to be retained where possible, and seeded with species-rich wildflower meadow grass of local provenance where disturbed. Wildflower meadows to be seeded beneath community orchard to aid in pollination. Mixed-species native shrub planting and native hedgerows to be reinstated around the Site boundary, throughout areas of open space and around the attenuation basins to provide shelter and foraging for a broader range of species.
- **new or enhanced walking and cycle routes:** New circular footpath connections through the areas of open space around the periphery of the Site and throughout green corridors amongst development parcels, creating new connections with the existing public right of way network, to new equipped play spaces and to the adjacent pavements along Oxhey Lane.
- **improved access to new, enhanced or existing recreational and playing field provision:** Walking routes throughout the Site, with natural-style timber equipped play space within walking distance to both existing and proposed residents. An area of amenity grassland maintained adjacent to the play space to allow for informal sports and leisure activities, along with a community orchard with mown routes through the wildflower meadow grassland allowing for a variety of informal recreation opportunities throughout the development.

4.16. Table 5.1 from the Stage 2 GBA sets out a range of potential measures to mitigate harm to the Green Belt. The following outlines how the proposed development reflects the mitigation measures highlighted within table 5.1 are listed below:

- **Use landscaping to help integrate new Green Belt boundary with the existing edge, aiming to maximise consistency over a longer distance:** wide landscape buffers to be retained where new built form would be offset from around the Site boundary. Significant areas of new woodland and scattered tree planting, connecting with the woodland associated with Merry Hill adjacent to the eastern boundary.



- **Strengthen boundary at weak points – e.g. where ‘breached’ by roads.** The proposed new Green Belt boundary would be strengthened by the new green infrastructure proposed with significant areas of new planting.
- **Define Green Belt edge using a strong, natural element which forms a visual barrier – e.g. a woodland belt.** The proposed new Green Belt boundary would reflect existing green infrastructure features including existing belts of trees along the Site boundary, which would be bolstered by native hedgerow and shrub planting,
- **Create a transition from urban to rural, using built density, height, materials and landscaping to create a more permeable edge.** The adjacent Carpenders Park care home development is currently large and dominant in views across the Site and surrounding context. The proposed development locates the housing with care adjacent to the existing care home building, with residential development proposed within the Site and buildings located where their maximum heights would have the less impacts or visibility from the surrounding context. Proposed landscape elements including woodland planting, native hedgerows and native shrub planting is proposed towards the outer edges of the Site to aid in bolstering the Green Belt boundary and reflecting the character of the surrounding landscape. More uniform avenue tree planting is proposed along the internal road network, with ornamental feature trees located at key focal areas.
- **Consider ownership and management of landscape elements which contribute to Green Belt purposes.** All existing and proposed vegetation and landscape features including SUDs features and footpath routes throughout areas of public open space would be maintained to ensure longevity.
- **Enhance visual openness within the Green Belt.** Proposed new built form will be offset from the existing PRoW route within the northern parcel. While new tree planting would be implemented, this would help in screening and softening more dominant views of built form and would reflect the wooded character of the surrounding open access land within Merry Hill to the east and north. New built form would be offset from the boundary to allow for new planting to bolster the boundary vegetation to mitigate effects on openness from the surrounding landscape by screening built form.
- **Enhance access within the Green Belt.** Improved access throughout the Site and around the proposed new boundary to the Green Belt, including circular footpath routes connecting to the surrounding PRoW network, areas of wildflower and amenity grassland for informal recreation, natural style equipped play space and community orchard.
- **Improve management practices to enhance countryside character.** All green infrastructure and amenity open spaces would be maintained to ensure longevity and safe access through landscape management plans.
- **Design and locate buildings, landscaping and green spaces to minimise intrusion on settlement settings.** The development has been designed so that new built form along the highest points of the Site would comprise properties limited to 2-storey buildings, with 3-storey buildings elsewhere to be flat-roofed to reduce maximum heights and located to more enclosed parts of the central and southern sections of the Site. A significant area of open space is proposed within the more elevated and steeply sloping landform within the northern parcel to reduce visibility from the surrounding context and allow for significant areas of new woodland and tree planting to aid in screening.



- **Maintain / create separation between existing washed-over settlement and new inset settlement.** The proposed development would not impact washed over settlement.
- **Design road infrastructure to limit perception of increased urbanisation associated with new development.** A single vehicular access point is proposed into the development from Oxhey Lane. The route of the road is designed to avoid the steepest landform within the northern parcel and incorporates an appropriate design to allow for pedestrian access with a pavement along one side and located to prevent conflicts with the existing Public Right of Way which retains its original alignment adjacent to the northern boundary.
- **Use sustainable drainage features to define / enhance separation between settlement and countryside.** New attenuation basins to be included to both the northwestern edge and the southern section of the Site, within the areas of public open space, adjacent to the proposed new Green Belt boundary, enhanced with new native shrub, tree and marginal and aquatic planting to aid in providing definition to the new Green Belt edge.

4.17. The **Illustrative Landscape Masterplan** within **Appendix 1** outlines the proposed green infrastructure elements associated with the development. A large area of public open space is proposed within the northern section of the Site. The space is proposed to be enhanced with a significant amount of new tree planting with areas of woodland, scattered tree planting, a community orchard, and ornamental tree planting around the play space. This both reflects the character of the adjacent Merry Hill and provides a robust new boundary to the Green Belt. To the south, an area of open space with tree planting surrounding the proposed SUDs basin also acts as a robust boundary to the Site and new Green Belt. New footpath routes traverse the perimeter of the Site and open spaces, helping to define the new edge.

Summary

4.18. In view of the above it has been demonstrated that from a landscape planning perspective the proposal meets with the 'Golden Rules'. Paragraph 158 of the NPPF then concludes that a development which complies with the 'Golden Rules' should be given significant weight in favor of the grant of planning permission.

5. Openness

Introduction

- 5.1. This section of the report considers how the removal of the Site, and the addition of the proposed development would have a bearing upon the openness of the Green Belt and as such, considers several factors including spatial and visual aspects, and the degree of activity, in addition to the baseline, likely to be generated by the proposed development.
- 5.2. A conclusion is then reached on whether, in accordance with paragraph 155a of the NPPF, the proposed development would result in a fundamental undermining of the purposes (taken together) of the remaining Green Belt land. The overall judgement is set out in Section 4 of the report considering the mitigation measures proposed, including the redefinition of the Green Belt boundary.

NPPF and PPG

- 5.3. Green Belt is addressed in the NPPF (2024) in section 13 of the document. The essential characteristics of Green Belts are their openness and their permanence. Further guidance is provided as to what factors can be considered when assessing the potential impact of development on the openness of the Green Belt which is documented in the National Planning Practice Guidance at Paragraph: 013 Reference ID: 64-013-20250225. This paragraph notes that assessing the impact of a proposal on the openness of the Green Belt, requires a judgement based on the circumstances of the particular case. By way of example, the courts have identified several matters which may need to be considered in making this assessment. These include, but are not limited to:

“Openness is capable of having both spatial and visual aspects – in other words the visual impact of the proposal may be relevant, as could its volume.

The duration of the development, and its remediability – taking into account any provisions to return land to its original state or to an equivalent (or improved) state of openness; and

The degree of activity likely to be generated, such as traffic generation”

(underlined – our emphasis)

Pegasus assessment approach

- 5.4. A field assessment of the local landscape and visual context was undertaken in February 2024 by Chartered Landscape Architects to provide a more informed analysis concerning visual openness.
- 5.5. An Environmental Designations Plan at **Figure 2** illustrates where Green Belt land beyond the Site coincides with environmental designations that may indicate a higher landscape value. A Zone of Theoretical Visibility (ZTV) at **Figure 5** and viewpoint location plan at **Figure 6** is accompanied by annotated Photoviews at **Figure 7**. This evidence base informs the judgements on the baseline visual openness of the Site and enables professional judgements to be made concerning the effects upon the openness of the Green Belt with the proposed development in place.



5.6. The report summarises the baseline perception of the existing openness of the Site, from all directions within the surrounding landscape. Conclusions are then reached on how this baseline openness would be affected by the removal of the Site from the Green Belt and the development of up to 257 dwellings including 50% affordable, with apartments and extra care housing (residential buildings typically 2–storey at 9m height, with apartments at 3–storey up to 10.5m height).

Spatial Aspect of Openness

5.7. The spatial aspect, as it relates to the sense of openness with regard to the Site, is informed by several factors including the relationship of the Site to the existing settlement and the robustness of any revised boundaries to the Green Belt, following removal of the Site from the designation.

5.8. The Site at 12.7ha comprises approximately 17% of Parcel E3 (74ha) from the Stage 1 GBR, and 27% of Parcel SO3 (47ha) from the Stage 2 GBA.

5.9. Paragraph 1.3.8 within the Stage 1 GBR states: ***‘Green Belt within Three Rivers District and Watford Borough covers virtually all land which is not defined as part of a contiguous built-up area.’*** The area of Green Belt land within the Three Rivers District is approximately 6719 hectares, of which the Site (12.7ha) comprises approximately 0.19%.

5.10. In the wider context, the Stage 1 GBR reports at para 1.3.6 that the Green Belt coverage for Hertfordshire is approximately 90,000ha, with the Site at 12.7ha comprises only 0.01% of the Green Belt within the County.

5.11. The density of the proposed development is slightly higher than the density of the existing housing estates on the eastern edge of Carpenders Park. This is to be expected given the NNPF direction at paragraph 128 that development should make efficient use of land. Proposed building heights of up to 3 stories would be similar to some of the larger buildings in the locality, namely Carpenders Park Care Home and further north along By The Wood. It is anticipated that most of the proposed dwellings would be 2–storeys in height, reflective of the scale of the existing housing in the locality.

5.12. In conclusion, the removal of the Site from the Green Belt would have an inevitable effect upon the spatial aspect of Green Belt openness within the Site, however the proposal would:

- a) cover only 0.01% of the Green Belt within Hertfordshire and approximately 0.19% of the Green Belt within Three Rivers;
- b) be physically well related and connected to the existing built form of the Care Home to the immediate west and residential areas along the wider settlement edge;
- c) comprise a logical extension to Carpenders Park which considers existing densities and building heights,
- d) include notable areas of undeveloped land as public open space, incorporating existing retained vegetation and substantial new woodland, hedgerow and tree planting enhancing green infrastructure with improved public access to open space; and

- e) the new Green Belt boundaries would follow existing features on the ground including road corridors, along the existing woodland located along the eastern boundary and new tree planting around the proposed attenuation basin within the public open space along the southern boundary, and with existing mature trees along the northern boundary to be reinforced by significant areas of new woodland and tree planting. New pedestrian footpath routes throughout the areas of open space around the perimeter of the Site would reinforce the proposed new Green Belt boundary to both the north, east and southern edge of the Site.

Visual Aspect of Openness

- 5.13. The visual openness of the Green Belt considers the visual links of a Site or area such as a Green Belt parcel, to the wider Green Belt, intervisibility between settlements, and potential impacts on wider ranging views across the Green Belt.
- 5.14. The Site has limited public access, restricted to the Public Right of Way footpath ref 'Watford Rural O13' which passes through the northern section of the Site. The wooded character of the surrounding landscape, with mature trees along much of the Site perimeter, combined with the gently undulating landform to limit points from which views into the Site are possible. The visual aspect of the perception of openness as it relates to the Site can be most readily appreciated from locations where members of the public have access and are able to pass through this environment and therefore this relates primarily to Public Rights of Way and adjacent highways. Mindful of this, it is considered that an evidence base is required, informed by a field survey, to document how the sense of openness is appreciated from both public highways and rights of way in the locality.
- 5.15. The Zone of Theoretical Visibility (ZTV) in **Figure 5** has modelled a maximum built development envelope within the proposed development cells on the Site of mostly 2-storey, 9m height dwellings, and a maximum of 3 storey, 10,5m height apartment buildings. The ZTV model does not account for existing hedgerow vegetation or tree cover beyond woodland blocks, and consequently the resulting ZTV plan provides an exaggerated depiction of likely visibility that requires review in the field. It should also be considered that most land covered by the ZTV within the Green Belt is private farmland, whereas the Green Belt assessment is necessarily focussed on publicly accessible locations where a perception of openness associated with the Site may be available. The field survey, undertaken in winter/early spring when intervisibility is least restricted, recorded a range of photoviews, the location of which are illustrated at **Figure 6** with the annotated photoviews reproduced within **Figure 7**.

Visual aspect of openness as perceived from the north

- 5.1. PRoW Footpath ref 'Watford Rural O13' passes through the northern field parcel within the Site, from the A4008 Oxhey Lane through the northwestern boundary, and out through the northeastern boundary into Merry Hill along PRoW Footpath ref 'Bushey O25'. **Viewpoint 1** is taken from within the Site adjacent to the northwestern boundary from the lower ground adjacent to the road, with the steeply rising landform within the Site enclosing the view east, with the roof of the adjacent Carpenders Park Care Home visible south of the route above the boundary vegetation. **Viewpoint 2** is taken from the higher landform within the Site from the PRoW adjacent to the northeastern boundary. From this point, the view west across the adjacent settlement is open, with a degree of enclosure from the mature trees along the northern boundary, and the overgrown hedgerow enclosing the view to the east. The care home and communications tower are visible above the intervening landform. With the

proposed development in place, the view northeast from the route would become more enclosed with the proposed new built form. The view southwest from the route would retain a sense of openness as proposed new built form is to be set back from the route and away from the northwestern corner of the Site. While the view would become more enclosed to the south, the view north and west would remain open and longer-distance views across the settlement edge to the west would remain possible.

- 5.2. Perceptions of openness from the settlement edge to the north of the Site are illustrated by **Viewpoint 3**, taken from the pavement at the corner of Greenfield Avenue and Penrose Avenue. The bungalows along Penrose Avenue are visible to the south, and traffic along Oxhey Lane. The view southeast allows for some partial views into the Site, with the rising landform of the northern field parcel visible above the hedgerow and through the trees along Oxhey Lane, and through the mature trees along the northern field parcel. The central and southern sections of the Site are not visible, however the communications tower and roof top of the care home adjacent to the Site's western boundary is visible on the higher landform. The view south from PRoW Bridleway ref 'Watford Rural O31' within Merry Hill open access land is illustrated by **Viewpoint 4**. The view is partially enclosed by the mature trees along the field boundary to the south of the route, and by the scattered mature trees within the intervening field parcels and along the Site's northern boundary, however a glimpsed view of the rising landform within the northern field parcel is visible above the intervening vegetation and through the trees. The 3-storey block of flats off By the Wood are visible beyond Oxhey Lane through a gap in the trees along the road. The introduction of the proposed development would have a minor effect upon the perception of openness of the Site from these points. Views across the open fields north of the Site would remain possible, and as the proposed new planting within the northern section of the Site establishes, it will obscure views of new built form to reduce the sense of enclosure by softening the view with trees, while reducing the sense of openness slightly, yet would be consistent with the wooded character already experienced in the view.
- 5.3. **Viewpoint 5** is also taken from Merry Hill from adjacent to a bench along an internal informal footpath route. From this point, the Site is screened from view by the maturing woodland within Merry Hill. Perceptions of openness from here and most points within Merry Hill to the north of the Site would remain unaltered with the proposed development in place, due to the lack of intervisibility and screening by intervening woodland.

Visual aspect of openness as perceived from the east

- 5.4. Merry Hill open access land is located immediately adjacent to the Site's eastern boundary, extending to the east towards Bushey Heath and north towards Merry Hill Road. The land is managed by the Woodland Trust and has become increasingly more wooded over the past 13 years. The woodland to the immediate east of the Site is young, although connects with the mature trees along the Site's eastern boundary
- 5.5. There are several informal footpath routes through Merry Hill to the east of the Site, including immediately adjacent the Site's eastern boundary. There are some limited points where partial views into the Site are possible from gaps in the boundary vegetation from these routes, where views west are possible across the settlement of Carpenders Park. **Viewpoint 6** looks west from the boundary, and Carpenders Park care home and communications tower is visible adjacent to the Site's western boundary, with glimpsed views of roof tops of the residential settlement visible beyond the intervening trees within the Site and along the Site's



western boundary. With the proposed development in place, perceived openness would be reduced from some limited points where views of new built form would shorten the view.

- 5.6. PRoW Footpath ref 'BUSHEY 025' traverses northeast through Merry Hill towards Bushey Heath, with several benches located along the route which look out across the sloping landform to the southeast towards Hartsbourne golf course. **Viewpoint 7** looks southwest from adjacent to one of the benches adjacent to the footpath. The view is most open towards the southeast, and the view southwest towards the Site is more enclosed with hedgerows, scrubby young woodland and trees within Merry Hill open access land obscuring the view towards the ground level of the Site. Glimpsed views of Carpenders Park Care Home and communications tower are somewhat visible above the intervening vegetation. With the proposed development in place, perceptions of openness would be largely unaltered from most points along the route, and only slightly reduced where glimpsed views of new built form may be possible above the intervening vegetation, limited to points along the route near the Site's eastern boundary.
- 5.7. From more distant locations, perceptions of openness within the Site are more limited due to a lack of intervisibility. **Viewpoint 8** looks southwest from a bench off an internal footpath route within Merry Hill, where the intervening young woodland and larger mature trees within the open Woodland Trust Site obscures the view towards the Site. PRoW Footpath ref 'BUSHEY 025' extends east to meet Merry Hill Lane in Bushey, and **Viewpoint 9** is taken within Merry Hill from the route adjacent to Bushey's western settlement edge, looking southwest towards the Site. The view is much more enclosed from this point with more dense young woodland located throughout Merry Hill. With the proposed development in place, perceptions of openness are unlikely to be altered from these more distant points due to a lack of intervisibility with the proposed new built form.

Visual aspect of openness as perceived from the south

- 5.8. The landscape to the south of the Site is also well wooded which contributes to a lower sense of openness with limited views into the Site possible. Belts of trees are located along the course of Hartsbourne Stream which runs along the lower landform approximately 20–40m south of the Site boundary. Beyond that, Mutton Wood spreads between the northern edge of Grim's Dyke golf course and the western edge of Hartsbourne golf course, with belts of mature trees throughout both courses and along field boundaries and Oxhey Lane to the south of the Site. **Viewpoint 10** looks north from the pavement along the A4008 Oxhey Lane. From this point, there is a filtered view into the southern field parcel of the Site where the landform rises above the intervening field boundary vegetation. The view is generally well enclosed due to the vegetation along both sides of the road, and only glimpsed, filtered views of the existing 3-storey care home development west of the Site are visible through the trees along the road and along the Site's southern boundary. Perceptions of openness would be slightly reduced with the proposed development in place, with only filtered views possible from along the road. The development would be offset from the road and a perception of openness across the intervening fields would remain. Once proposed tree planting along the southern boundary and area of open space has established, perceived openness would largely reflect the existing experience from points along the road.
- 5.9. Carpenders Park Lawn Cemetery is located to the western edge of Oxhey Lane, with internal vehicular access tracks, seating, notice boards and regular visitors. **Viewpoint 11** looks north from the access road within the cemetery, and the dense belt of trees along the road and evergreen trees to the northern edge of the cemetery obscures the view towards the Site.



Heavily filtered glimpsed views of the rising landform within the central field parcel of the Site are possible through the intervening vegetation. It is unlikely that perceptions of openness associated with the Site would be affected because of the proposed development, due to a lack of intervisibility possible from this point.

- 5.10. **Viewpoint 12** looks northwest from PRow Footpath route 'HARROW 37' / London Loop long distance route from a high point within Grim's Dyke Golf Course. The view northwest and west from the route is quite open, however the mature trees along the northeastern boundary of the golf course, throughout the golf course and within Mutton Wood, actively obscure the Site from view. This substantially inhibits any perceptions of openness associated with the Site from both this route and PRow Footpath ref 'Harrow 38'. It is therefore considered that perceptions of openness would remain unaltered with the proposed development in place from this point.

Visual aspect of openness as perceived from the west

- 5.11. The recent 3-storey development of Carpenders Park Care Home is immediately west of the Site boundary along Oxhey Lane. **Viewpoint 13** looks east from the pavement along Oxhey Lane adjacent to Highfield and illustrates how the building is visually prominent restricts opportunities for an appreciation of the openness of the Site. A small part of the ground level of the Site is visible above the boundary wall to the north of the care home beyond the busy car park. Existing mature trees and other overgrown hedgerow vegetation along the Site's western boundary obscures the view into the Site from the road. **Viewpoint 14** looks southeast from the pavement along the A4008 Oxhey Lane adjacent Carpenders Avenue. The dense overgrown hedgerow vegetation along the road encloses the view, save for some heavily filtered views of the rising landform within the northern field parcel which is visible through the vegetation. A steel kissing gate provides access to the PRow footpath route 'Watford Rural 013' through the Site, visible from the road. The roof top of the care home development is just visible above the boundary vegetation along the road.
- 5.12. Some residential streets within Carpenders Park are oriented towards the highest point of the Site within the northern field parcel. The view from Carpenders Avenue is shown in **Viewpoint 15**, which looks east towards the Site from the pavement along the road. Partial views of the rising landform of the northern part of the Site are possible above the bungalows on the southern side of the road. The central and southern part of the Site are not visible from this location, nor is the care home adjacent to the western boundary.
- 5.13. With the proposed development in place, an appreciation of the openness of the Site would be further limited in time with the establishment of the proposed areas of new woodland, hedgerow and tree planting around the western boundary and throughout the northern area of public open space. From these locations within proximity to the Site from the west, visual openness would be more limited by the proposed hedgerow, native woodland and tree planting throughout the northern area of open space, with glimpsed views of new residential built form potentially possible from some points, however, would become increasingly restricted by the tree planting as it continues to establish over time.
- 5.14. There are other locations along high points within the settlement where views southeast comprise a perceived element of openness with glimpsed views into the northern field parcel possible above the intervening properties. **Viewpoint 16** looks southeast from the pavement along Greenfield Avenue adjacent to On the Hill, and a glimpsed view of the high landform in the northern field parcel is visible above the bungalows on the southern side of the road,



through the Site's northern boundary vegetation. There are some distant points along higher landform within South Oxhey to the far west where an appreciation of the openness of the Site are possible. **Viewpoint 17** looks east from Fairfield Avenue within South Oxhey, through the intervening built form of blocks of flats and across Carpenders Park towards the Site. A distant, glimpsed view of the steeply sloping, high landform within the northern field parcel is visible above the intervening built form and trees. The central and southern field parcels are not visible from this point. With the proposed development in place, perceptions of openness will be only slightly altered, with a degree of enclosure created by the establishment of the significant areas of woodland and tree planting within the northern area of public open space, however this tree cover would filter and obscure views of new built form over time. Views of open fields would still be possible to the north of the Site.

6. Summary and Conclusions

Is there an Unmet Need for the Proposals?

- 6.1. A separate Planning Statement by Boyer Planning determined that there is a clear and significant demand for new housing in Three Rivers.

Is the Site in a Sustainable Location?

- 6.2. The Planning Statement determined that the Site is in a sustainable location, offering easy access to a range of essential services and transport options, reducing the reliance on private cars and promoting environmentally friendly travel. Proximity to schools and healthcare facilities ensures that daily needs can be met locally, enhancing convenience for residents. The close availability of public transport—including railway stations, bus services, and pedestrian routes—further supports sustainable commuting and reduces carbon emissions associated with travel. All of these factors together create a sustainable location for residential development.

Overview of Published Green Belt Assessment

- 6.3. At Stage 1 the Green Belt Review identifies the Site as washed over by Parcel E3, with a **Very High** overall contribution to the purposes. A summary of this parcel’s performance is included at **Table 7** (below):

Table 7: Parcel E3 performance against the purposes of the Green Belt

	Purpose 1: <i>Checking unrestricted sprawl</i>	Purpose 2: <i>Preventing the merging of towns</i>	Purpose 3: <i>Safeguarding the countryside from encroachment</i>	Purpose 4: <i>Preserving the setting and special character of historic towns</i>	Purpose 5: <i>encouraging the recycling of derelict and other urban land</i>
Stage 1 GBR: Parcel E3	Significant contribution	Significant contribution	Contribution	Limited contribution	Limited contribution

- 6.4. The Stage 2 Green Belt Assessment located the Site within parcel SO3 and was judged to have a **Very High** harm rating if released.

Table 8: Parcel SO3 performance against the purposes of the Green Belt

	Step 1 – Impact on contribution to purposes of Green Belt			Step 2 – Impact of release on integrity of residual green belt	Step 3 – Overall Green Belt harm
	Purpose 1: <i>Checking unrestricted sprawl</i>	Purpose 2: <i>Preventing the merging of towns</i>	Purpose 3: <i>Safeguarding the countryside from encroachment</i>		
Stage 2 GBA: Parcel SO3	Significant	Moderate	Significant	Moderate	Very High

Assessment of the Site against 'Grey Belt' definition

- 6.5. When considered in the round, including an assessment of the Site's contribution to Purposes (a), (b), and (d) of the Green Belt, and the Footnote 7 areas or assets of particular importance, the Site is judged to satisfy the definitional requirements to be classified as 'Grey Belt'.

Table 9: Site-specific performance against Purposes (a), (b), and (d) of the Green Belt

	Purpose A: <i>Checking unrestricted sprawl</i>	Purpose B: <i>Preventing the merging of towns</i>	Purpose D: <i>Preserving the setting and special character of historic towns</i>
The Site	Moderate	Moderate	No Contribution

Are the GB Purposes fundamentally undermined?

- 6.6. It is the judgment of this assessment that the Site does not contribute to Purposes (a), (b), or (d) of the Green Belt. It is therefore considered to be Grey Belt under the definition provided within the Glossary of the Framework. Further, the removal of the Site from the Green Belt would not fundamentally undermine the five purposes when taken together of the remaining Green Belt within the wider plan area. On this basis, paragraph 155 (a) is satisfied.

Table 10: Effects of the proposed development on the contribution of remaining Green Belt towards purposes.

	Purpose A: <i>Checking unrestricted sprawl</i>	Purpose B: <i>Preventing the merging of towns</i>	Purpose C: <i>Safeguarding the countryside from encroachment</i>	Purpose D: <i>Preserving the setting and special character of historic towns</i>	Purpose E: <i>encouraging the recycling of derelict and other urban land</i>
Effects of proposed development	No impact	Slight impact	Slight impact	No impact	No impact

- 6.7. Furthermore, the removal of the Site from the Green Belt would have a limited effect upon the appreciation of the openness of the remaining Green Belt, due to a combination of the well-wooded local landscape context, local landform and intervening built development. The perception of the loss of openness whilst moderate or notable in some cases, would be localised. Mitigation planting, including substantial areas of woodland planting and a significant amount of tree planting both throughout the development and focussed within the northern area of open space, would over time reduce the proportion of built development perceived. Whilst visual openness would be reduced, the resulting change would be consistent with the well-wooded character of the wider landscape and reduction in openness would typically only affect the Site itself, and not views across the wider Green Belt landscape overall.

Can the 'Golden Rules' be met?

- 6.8. In view of the above it has been demonstrated that from a landscape planning perspective the proposal meets with the 'Golden Rules'.

Figure 1: Site Location Plan



KEY

Site Boundary

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REV	DATE	DESCRIPTION

SITE LOCATION PLAN

LAND AT CARPENDERS PARK

BURLINGTON PROPERTY GROUP LTD

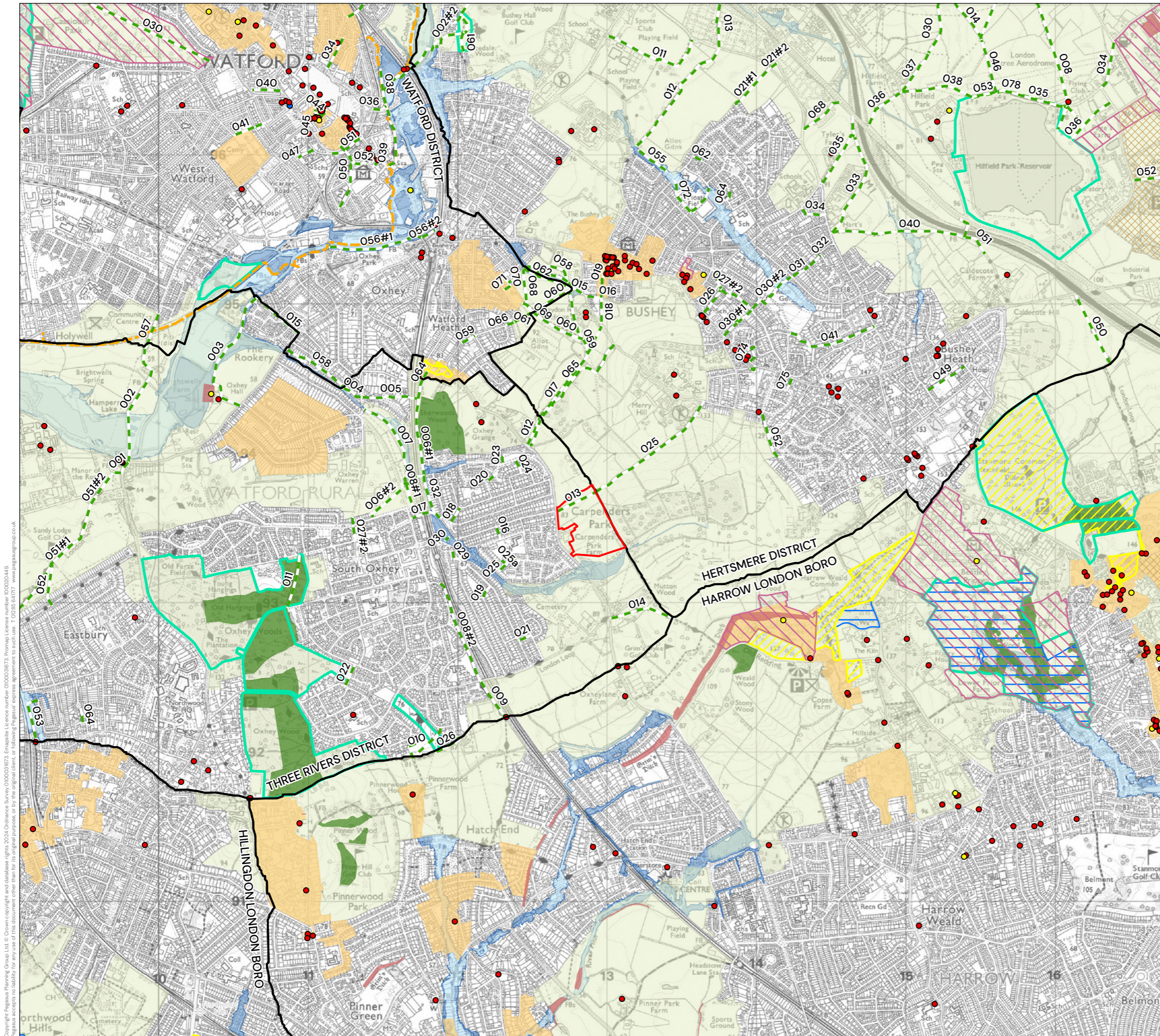
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DRAWING NUMBER
P24-2420_EN_02



Figure 2: Environmental Designations Plan



- KEY**
- Site Boundary
 - District Boundary
 - Grade I Listed Building
 - Grade II* Listed Building
 - Grade II Listed Building
 - Public Rights of Way
 - National Cycle Network
 - CRoW Access Land
 - Country Parks
 - Registered Parks and Gardens
 - Scheduled Monuments
 - Conservation Area
 - Local Nature Reserves
 - Sites of Special Scientific Interest
 - National Nature Reserves
 - Ancient Woodland
 - Green Belt
 - EA Flood Zone 3
 - EA Flood Zone 2

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REV	DATE	DESCRIPTION

ENVIRONMENTAL DESIGNATION PLAN

LAND AT CARPENDERS PARK

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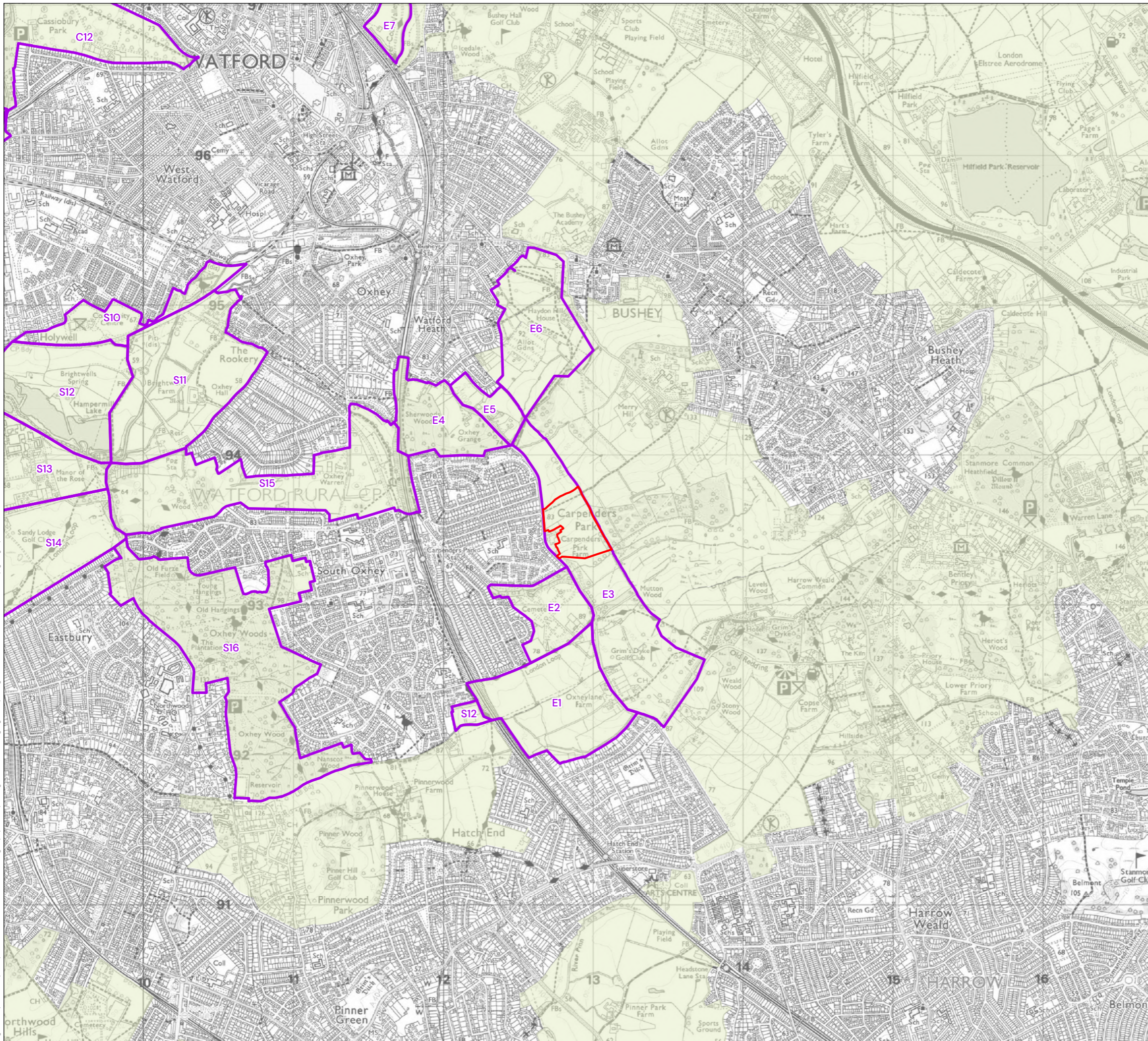
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Figure 3A: Stage 1 Green Belt Plan



- KEY**
- Site Boundary
 - Stage 1 Survey Parcels (Three Rivers District Council & Watford Borough Council - Green Belt Review 2017)
 - Green Belt

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REV	DATE	DESCRIPTION

STAGE 1 GREEN BELT PLAN

LAND AT CARPENDERS PARK

BURLINGTON PROPERTY GROUP LTD

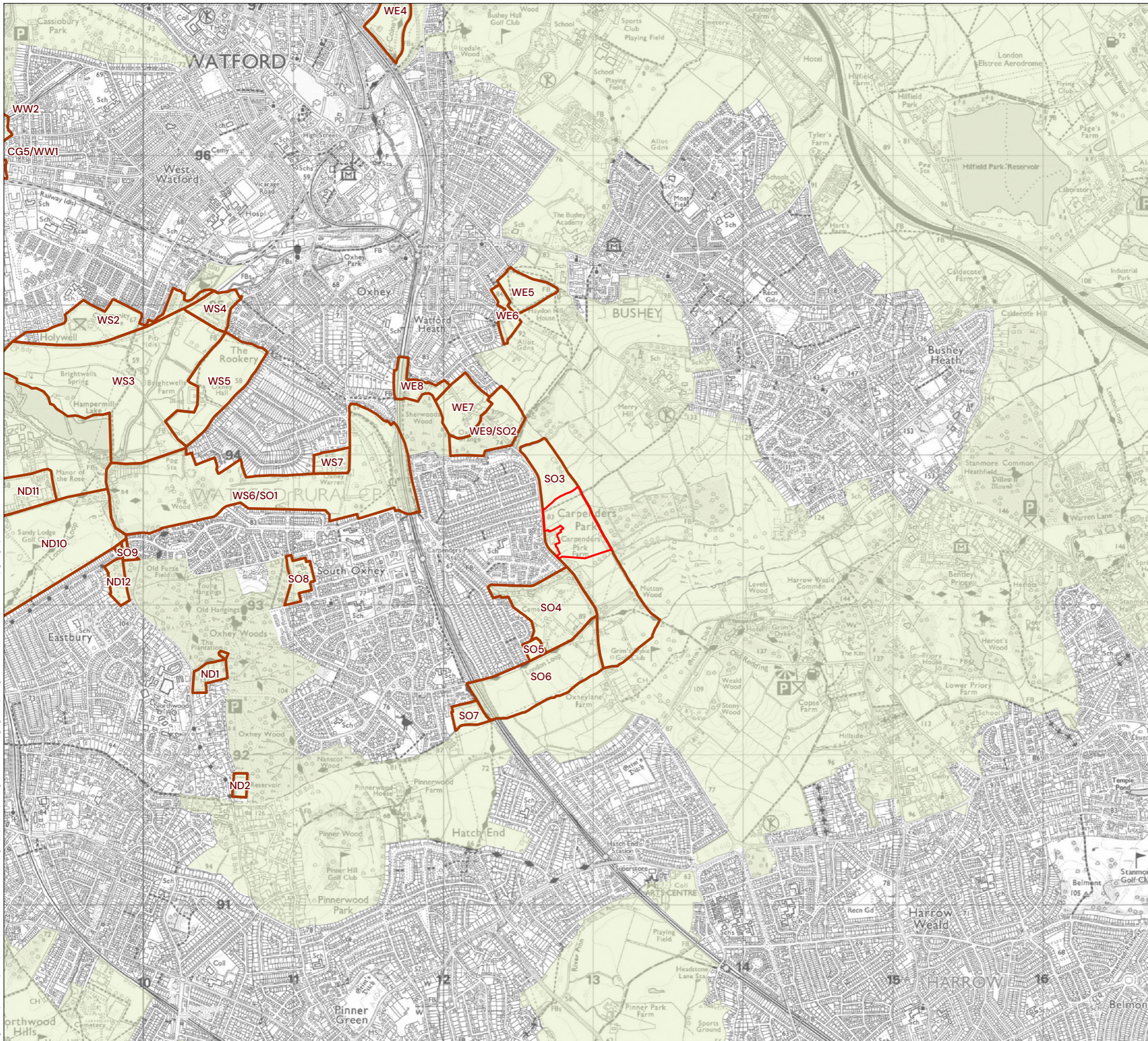
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Figure 3B: Stage 2 Green Belt Plan



- KEY**
- Site Boundary
 - Stage 2 Survey Parcels (Stage 2 Green Belt Assessment for Three Rivers District and Watford Borough 2019)
 - Green Belt

REV	DATE	DESCRIPTION

STAGE 2 GREEN BELT PLAN

LAND AT CARPENDERS PARK

BURLINGTON PROPERTY GROUP LTD

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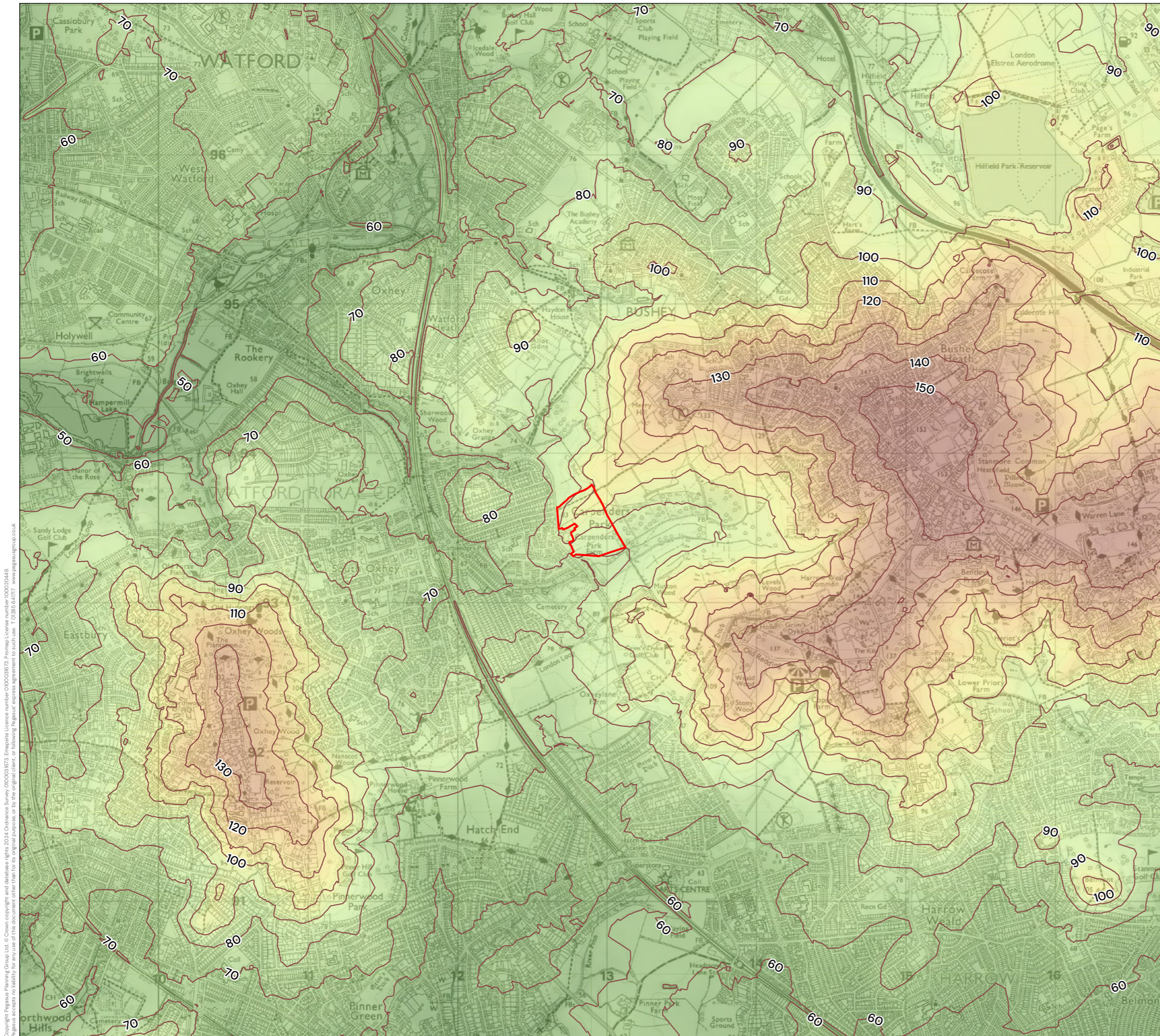
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Figure 4: Topography Plan



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KEY

- Site Boundary
- 10m Contours

OS Terrain 5 DTM

- High: 155m
- Low: 50m

REV	DATE	DESCRIPTION

TOPOGRAPHY PLAN

LAND AT CARPENDERS PARK

BURLINGTON PROPERTY GROUP LTD

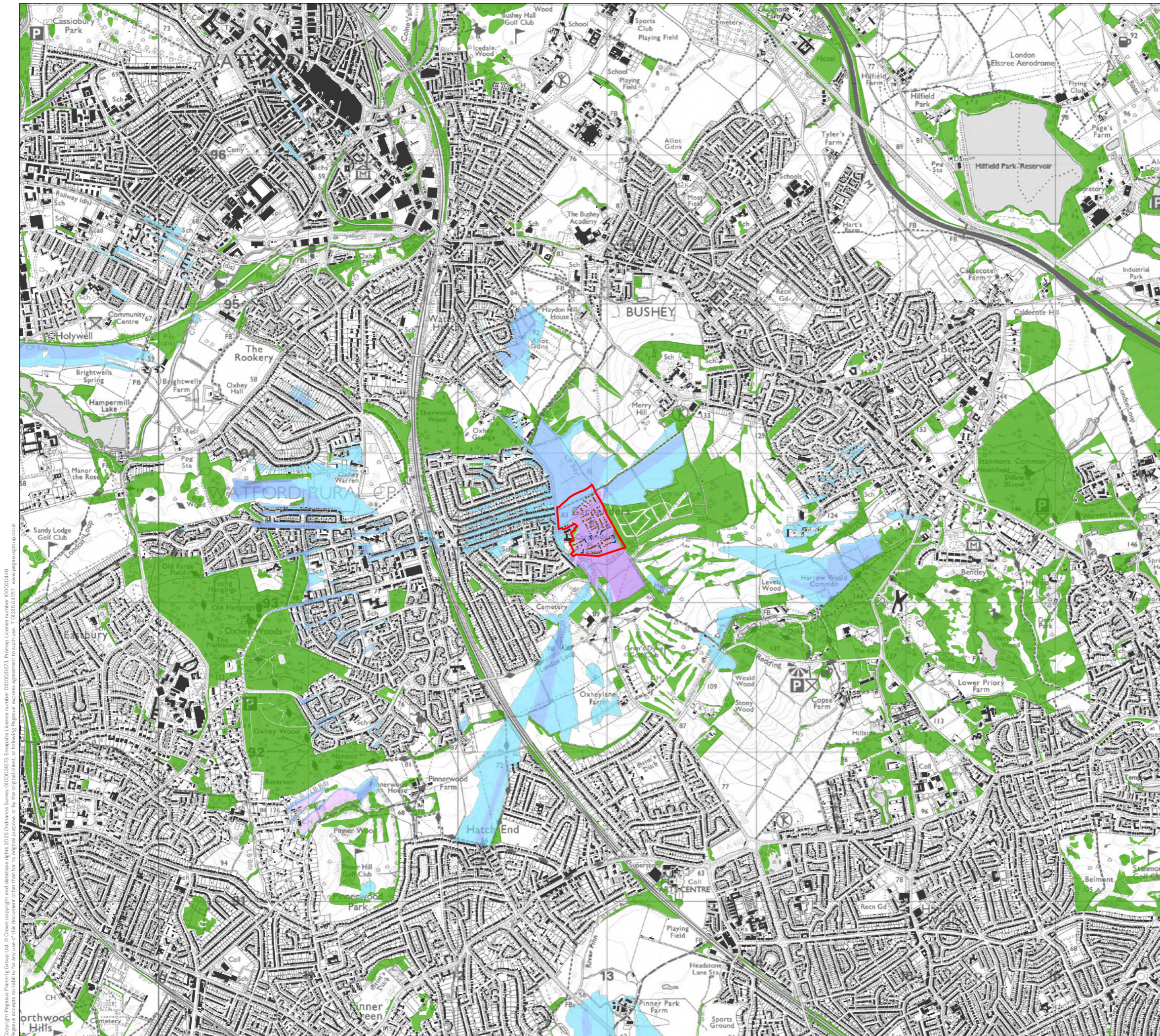
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Figure 5: Screened ZTV



- KEY**
- Site Boundary
 - OS Local Woodland
 - OS Local Buildings
- Proposed Development
- 2 Storey – 9m Development Height
 - 3 Storey – 10.5m Development Height
- Percentage Zone of Theoretical Visibility
- Less than 20% Visibility
 - 20 to 40% Visibility
 - 40 to 60% Visibility
 - 60 to 80% Visibility
 - 80 to 100% Visibility



1:9,000@A3 0 150M

Screened ZTV Production Information –

- DTM data used in calculations is OS Terrain 5 that has been combined with OS Open Map Local data for woodland and buildings to create a Digital Surface Model (DSM).
- Indicative woodland and building heights are modelled at 15m and 8m respectively.
- Viewer height set at 1.7m (in accordance with para 6.11 of GLVIA Third Edition)
- Calculations include earth curvature and light refraction

N.B. This Zone of Theoretical Visibility (ZTV) image illustrates the theoretical extent of where the development may be visible from, assuming 100% atmospheric visibility, and includes the screening effect from vegetation and buildings, based on the assumptions stated above.

REV	DATE	DESCRIPTION

PERCENTAGE SCREENED ZONE OF THEORETICAL VISIBILITY

LAND AT CARPENDERS PARK

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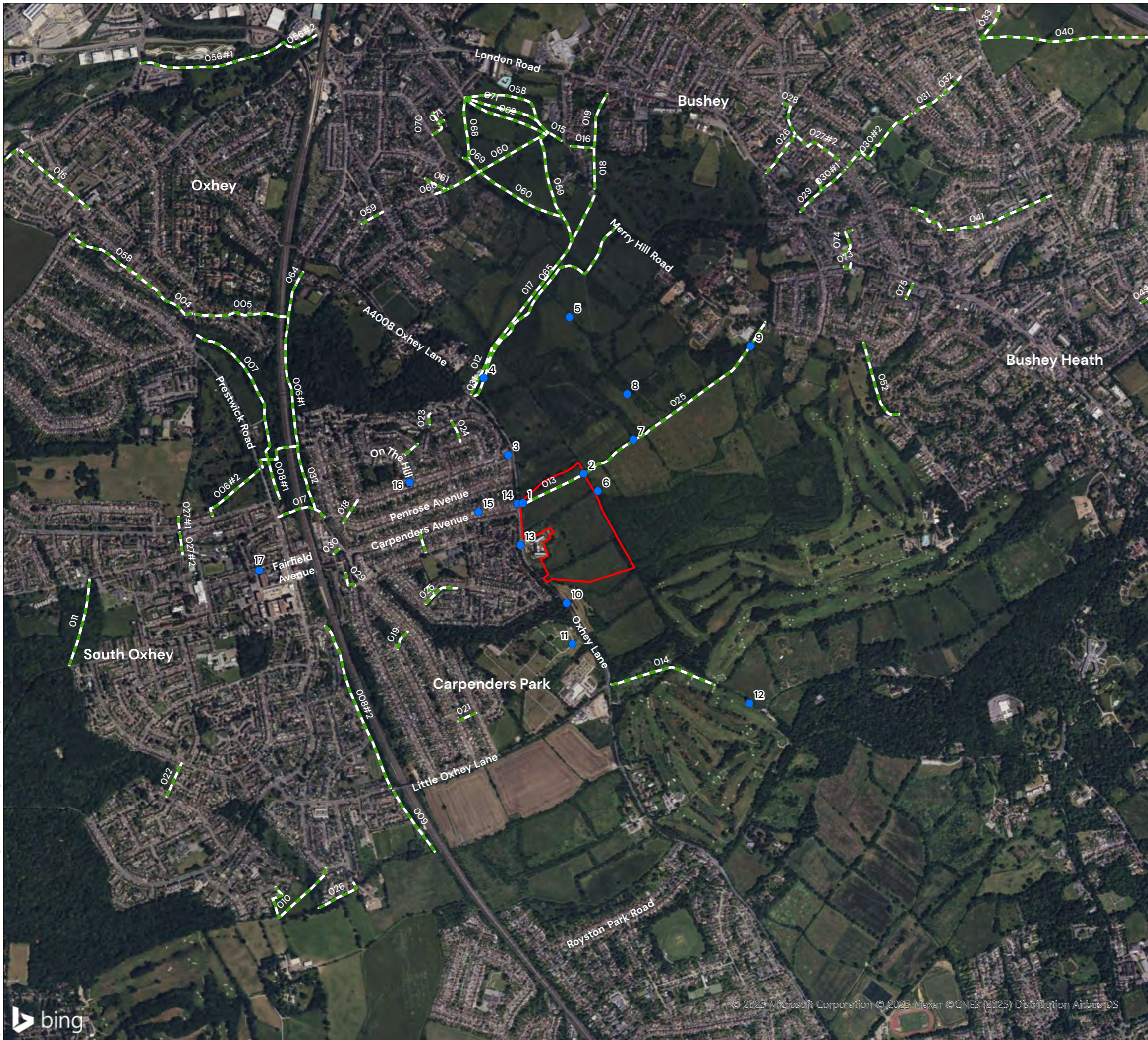
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Figure 6: Viewpoint Location Plan



KEY

- Site Boundary
- Viewpoint Location
- Public Rights of Way

REV	DATE	DESCRIPTION

VIEWPOINT LOCATION PLAN

LAND AT CARPENDERS PARK
 BURLINGTON PROPERTY GROUP LTD

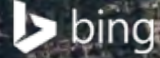
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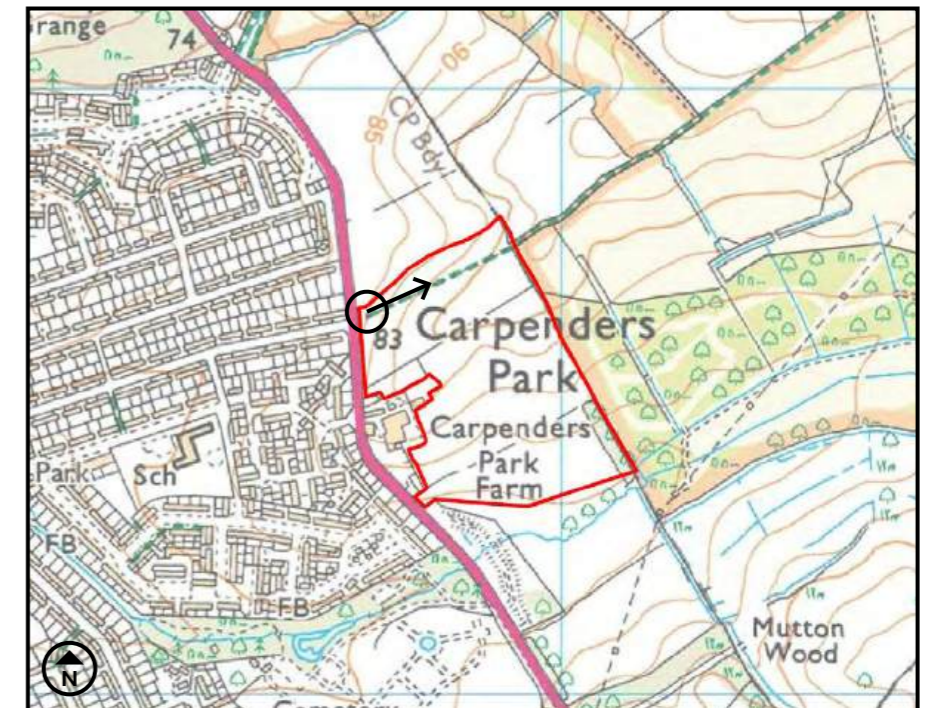
Figure 7: Photo views



Approximate Site Extent

CONTEXT BASELINE VIEWPOINT 1A

View east from PRow Footpath 'WATFORD RURAL 013' within the Site.



Camera make & model	- Canon EOS 5D Mark IV, FFS	Viewpoint height (AOD)	- 86m
Date & time of photograph	- 12/02/2025 @ 11:51	Distance from site	- 0m
OS grid reference	- 512677, 193629		

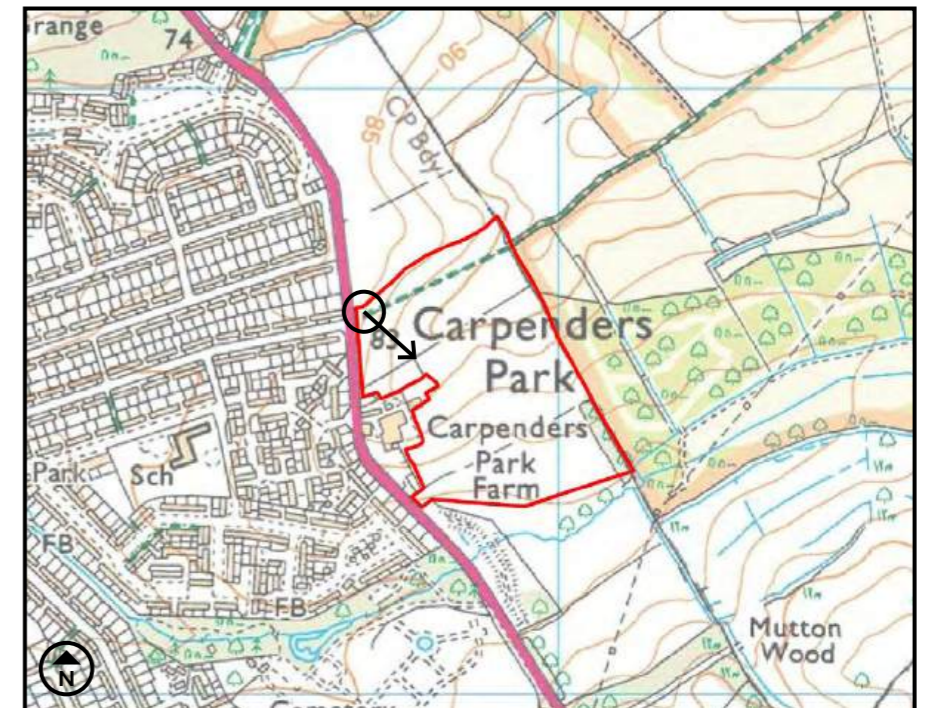


Approximate Site Extent



CONTEXT BASELINE VIEWPOINT 1B

View east from PRoW Footpath 'WATFORD RURAL 013' within the Site.

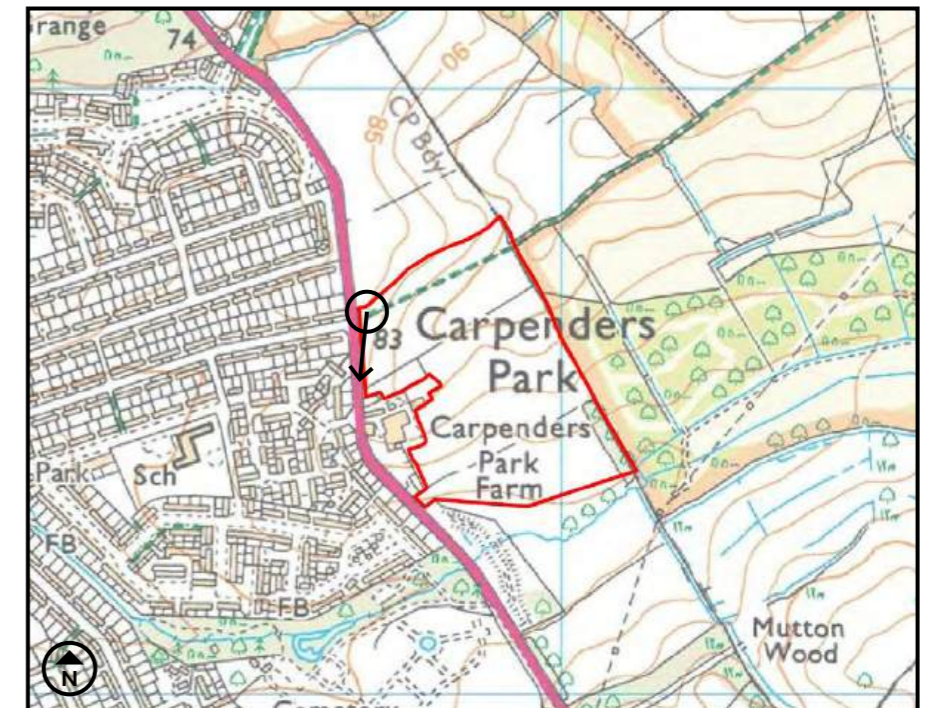


Camera make & model	- Canon EOS 5D Mark IV, FFS	Viewpoint height (AOD)	- 86m
Date & time of photograph	- 12/02/2025 @ 11:51	Distance from site	- 0m
OS grid reference	- 512677, 193629		



CONTEXT BASELINE VIEWPOINT 1C

View east from PRoW Footpath 'WATFORD RURAL 013' within the Site.



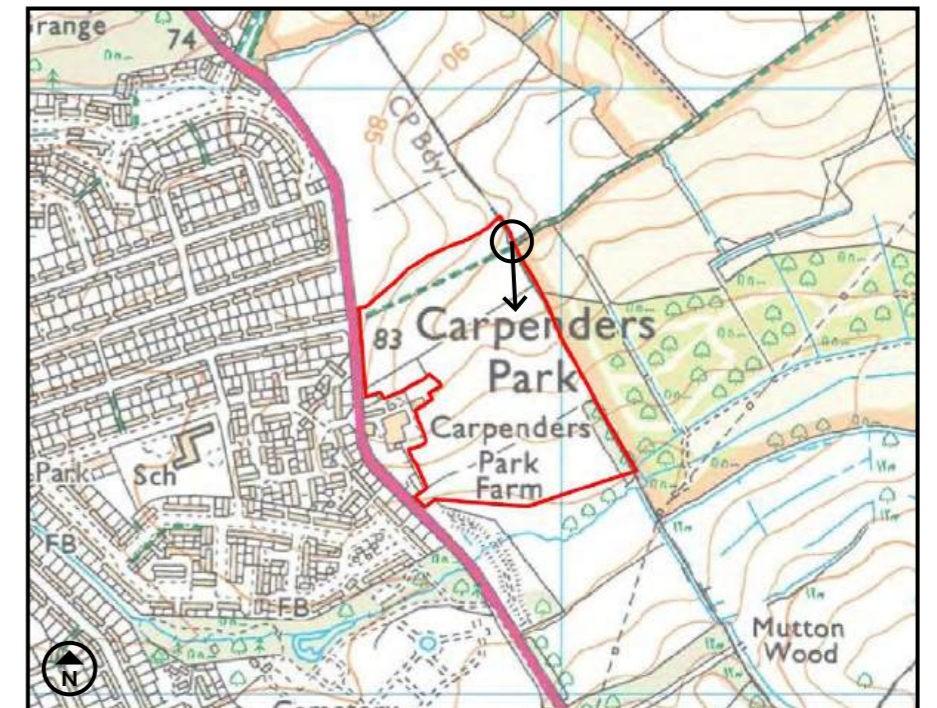
Camera make & model	- Canon EOS 5D Mark IV, FFS	Viewpoint height (AOD)	- 86m
Date & time of photograph	- 12/02/2025 @ 11:51	Distance from site	- 0m
OS grid reference	- 512677, 193629		





CONTEXT BASELINE VIEWPOINT 2A

View west from PRow Footpath 'WATFORD RURAL 013' within the Site.



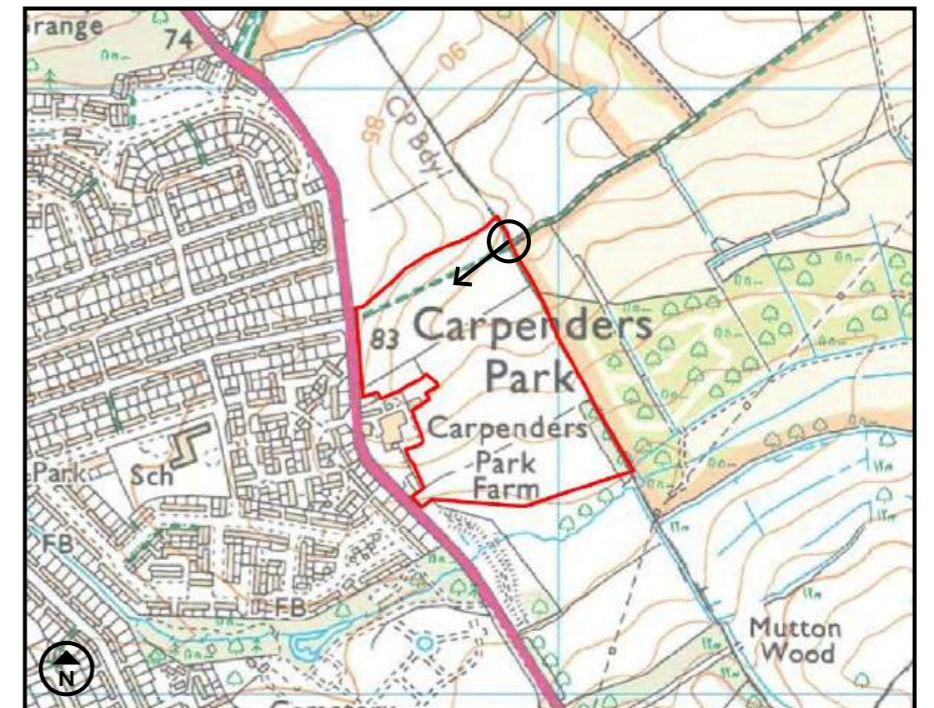
Camera make & model	- Canon EOS 5D Mark IV, FFS	Viewpoint height (AOD)	- 102m
Date & time of photograph	- 12/02/2025 @ 11:59	Distance from site	- 0m
OS grid reference	- 512919, 193746		

Approximate Site Extent



CONTEXT BASELINE VIEWPOINT 2B

View west from PRoW Footpath 'WATFORD RURAL 013' within the Site.



Camera make & model	- Canon EOS 5D Mark IV, FFS	Viewpoint height (AOD)	- 102m
Date & time of photograph	- 12/02/2025 @ 11:59	Distance from site	- 0m
OS grid reference	- 512919, 193746		

