



7<sup>th</sup> November 2025  
Our Ref: 24.5080

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Matthew Roberts  
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Dear Matthew

## Re: 25/1020/OUT – Land East of Oxhey Lane, Carpenders Park

I am writing on behalf of our client, Burlington Developments London Ltd, following the presentation of the above planning application to members at Planning Committee on 23<sup>rd</sup> October 2025. This letter responds to the comments raised by members and provides the Applicant's response in relation to the latest set of consultee comments.

We note that comments were raised in relation to the case put forward regarding whether the site constitutes Grey Belt, as well as comments regarding its sustainability. This letter provides further information regarding these matters.

In relation to both of these matters, we consider that it is relevant that the site was formerly proposed for allocation in the Council's 2021 Regulation 18 draft Local Plan for 485 homes. As well as this, the land immediately to the north was proposed to be allocated for a new secondary school (ref: CFS11) and it is understood that HCC intend to progress with proposals for a new school at the site. Whilst this version of the draft Local Plan has not progressed and therefore carries no weight, the supporting evidence that underpinned it remains relevant in the consideration of proposals at the site. This evidence is a matter that we return to below.

Also enclosed with this letter are the following documents which have been prepared to respond to the latest consultee comments:

- Updated Parameter Plan (ref: P24-2204\_DE\_003\_A\_10) – prepared by Pegasus;
- Sustainable Transport Improvements (Response to HCC Comments, Nov 2025) – prepared by iTransport;
- Updated Ecological Report (Nov 2025) – prepared by Ecology Solutions;
- Updated BNG Report (Nov 2025) – prepared by Ecology Solutions;
- BNG Metric (Nov 2025) – prepared by Ecology Solutions; and
- Consultation Summary – prepared by Thorncliffe.



## Grey Belt

As you know, our letter dated 3<sup>rd</sup> October 2025 sets out further information regarding our Grey Belt case, which includes a Green Belt Assessment Addendum and Legal Opinion from Lord Banner KC. In both cases, it is concluded that the site constitutes Grey Belt. In light of comments raised by members at Planning Committee we provide our view on the relevance of the Council's recently updated Green Belt Review.

### Council's Green Belt Review

The draft Green Belt Review was discussed at the Local Plan Sub-Committee in October. At this meeting members agreed to publish the Green Belt review on the Council's website following further advice and clarification from the consultants. The final version has not yet been published, but we understand this is due to take place soon.

We note that some members raised concerns that they could not rely on the Council's Green Belt Review to assess whether the site constitutes Grey Belt. As you know, the site forms a small part in the centre of parcel SO3, with the parcel extending along the entire eastern boundary of Carpenders Park and beyond this to the south, including part of the golf club.

As confirmed in Paragraph 9.2 of the Green Belt Assessment, the purpose of the report is to assist plan-making, however for decision-making purposes it is more relevant for officers to assess at a site-specific level:

*The parcel level identification of grey belt is helpful at a strategic level for plan-making. However, when considering the identification of grey belt in decision making or for specific sites for allocation in planmaking, it is more relevant to assess at a site-specific level to ensure the assessment outcomes reflect the site itself and is not skewed by the characteristics of land potentially some distance from the actual site. In practice, this means that development management and policy officers may need to make their own judgements where applications or potential sites only partially overlap with assessed parcels or only make up a smaller proportion of parcels. It should be noted that at a further level of granularity, assessments of sites' contribution to the Green Belt may yield differing results to those achieved by the relevant parcels in the GBR.*

Given the fact that the site only occupies approximately one third of parcel SO3 in the Green Belt Review, it is evident that the conclusions cannot be applied to the site. This view is supported by the findings of the Inspector who reached a similar conclusion in the case of Burlington's scheme at Sarratt (Appeal refs: 3311477 and 3311479, Paragraph 25 of Decision Notice).

Instead, the Green Belt Review prepared by Pegasus provides a site-specific assessment and concludes that the Site does constitute Grey Belt on the basis that it does not make a strong contribution to purposes (a), (b) and (d). Our letter dated 3<sup>rd</sup> October 2025 and the relevant appendices supplement this work, including the Legal Opinion confirming the position.



## Sustainability

In order to follow the Grey Belt route, Paragraph 155(c) of the NPPF requires that the development is in a sustainable location, with reference to paragraphs 110 and 115 of the Framework. The PPG confirms that whether locations are sustainable should be determined in light of local context and site or development-specific considerations.

Paragraph 110 of the NPPF confirms that significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. Paragraph 115 seeks to ensure that sustainable transport modes are prioritised; safe and suitable access can be achieved for all users; the design of streets, parking areas, other transport elements and the content of associated standards reflects the National Design Guide and National Model Design Code; and any significant impacts from the development on the transport network, or on highway safety, can be cost effectively mitigated to an acceptable degree through a vision-led approach.

The site is located immediately adjacent to the settlement boundary of Carpenders Park. This provides a variety of services and amenities, as confirmed in the Council's draft Settlement Appraisal, which has been prepared to inform the emerging Local Plan:

*"It is well served by facilities and transport for a settlement of its size. Only a Secondary school and library are situated outside of the settlement, with Oxhey Library within the upper threshold distance."*

The Settlement Appraisal assesses Carpenders Park as having a Sustainability Category of 'Good', the second highest category in the assessment.

As discussed, the site has previously been proposed for allocation in the draft Local Plan for 485 homes. The Council's 2021 Sustainability Appraisal provided an assessment of the site in sustainability terms, with a summary of the assessment provided below. The green ticks denote options likely to have a positive effect which is not significant, including against the 'Sustainable Locations' objective. The assessment notes *"The site is reasonably close to local facilities and services and a London overground station"*. This, and the proposed allocation itself, identify that the Council has previously considered this issue, reaching the conclusion that the site is situated in a sustainable location.

Figure: 1 Extract from Sustainability Appraisal (2021)

SA Objective	SA1 Biodiversity	SA2 Water	SA3 Flood risk	SA4 Climate change	SA5 Air quality	SA6 Soils	SA7 Resources	SA8 Historic envt.	SA9 Landscape	SA10 Health	SA11 Sust. locations	SA12 Communities	SA13 Housing	SA14 Economy	SA15 Employment
Site Location	✱	-	?	✓	-	✱	-	?	✱	✓	✓	✓	✓	-	-
Site Ref: CFS69a Land at Carpenders Park Farm - Revised Boundary	✱	-	?	✓	-	✱	-	?	✱	✓	✓	✓	✓	-	-



This was reaffirmed in the Regulation 18 Newly Submitted Sites and New Policies Consultation earlier this year, with the updated SHELAA for the site (ref: NCF512) confirming:

*“Whilst the site is not located within a settlement boundary, it directly adjoins the secondary centre of Carpenders Park. It is considered that the site is quite sustainably located (0.6 miles from Carpenders Park Station and Delta Gain), although some improvements may need to be made to the pedestrian infrastructure along Oxhey Lane.”*

Whilst the SHELAA suggests that the Site is ‘quite sustainably located’, the ‘Access to Services’ document indicates that the Site is amongst the most sustainable of the sites assessed, with primary schools, secondary schools, GP surgeries, local shops, libraries, rail stations and open space all within the suitable threshold in terms of distance to services.

### Services and Amenities

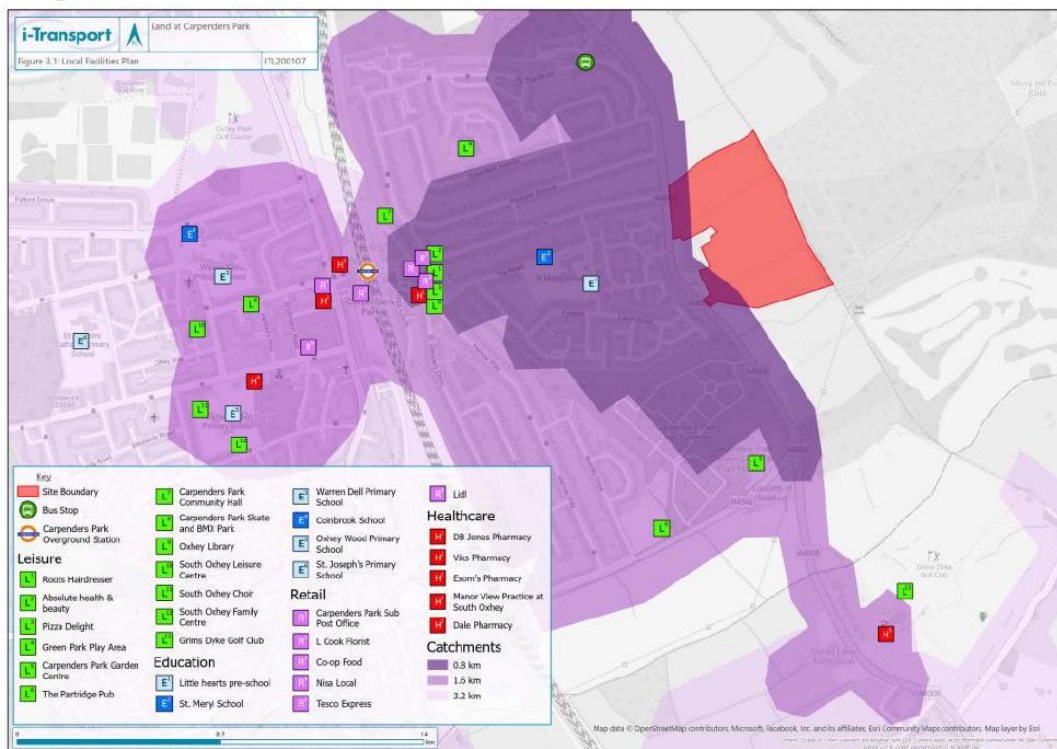
Given the site’s location immediately adjacent to the settlement boundary of Carpenders Park, it benefits from being within proximity of a range of everyday services and facilities. A list of the facilities that can be accessed via walking and cycling is set out in Table 3.3 of the Transport Statement. In summary, these include various education facilities (a pre-school and 5 primary schools), health facilities (a doctors surgery and 4 pharmacies), a post office and various retail facilities, as well as a range of leisure facilities including a community hall, library, leisure centre and open spaces.

The location of these facilities is illustrated in Image 3.5 of the Transport Assessment (extract below), which confirms that several of these key facilities are located within an 800m catchment (comfortable walking distance), and all facilities are within a reasonable distance of 1,600m. In summary, all daily essential services are present in the surrounding area within walking and cycling distance. This will therefore reduce the need to travel given the proximity to key services and facilities.

With regards to secondary schools, whilst there are none in Carpenders Park at the moment, there are accessible schools in the surrounding area including Grange Academy and Hatch End High School. Grange Academy can be accessed via existing bus services as well as being within walking and cycling distance. Hatch End High School can be accessed via the Lioness Line to Headstone Lane and is within cycling distance. It should be noted that Secondary school aged children can travel for half price on buses throughout Hertfordshire and on a flat rate £1 child fare on Lioness line.



Figure: 2 Extract from Transport Assessment (Image 3.5)



## Public Transport

Section 3 of the Transport Assessment sets out full details of the existing transport connections, which includes a summary of the key walking routes and public transport links. This sets out that there are good opportunities for walking and cycling close to the site, with Carpenders Park identified as a core walking zone.

With regards to public transport links, the site is located c. 1,000m from Carpenders Park Overground Station (equivalent to a 14-minute walk) which provides frequent and reliable Lioness Line services between Watford and London Euston which run every 15 minutes. The closest bus stop is 700m to the north which provides access to the 346 (Watford – Carpenders Park), R17 (Carpenders Park Railway – Hatch End Harrow) and R16 (Bushey Railway Station – North Watford).

The Transport Assessment identifies that the site's proximity to the London Overground means that there are genuine opportunities to use public transport, with regular services to key workplace and leisure destinations, alongside a large proportion of journeys being undertaken by walking and cycling.



### Sustainable Transport Improvements

As part of the proposed development, it is proposed to deliver a package of sustainable transport improvements to further enhance the sustainability of the site, which will benefit both future and existing residents in Carpenders Park. These are set out in detail in the i-Transport response and the improvements considered necessary to mitigate the development are:

- Improvements to Walking and Cycling Network:
  - Resurfacing and widening of the footway on Oxhey Lane to the south of the care home;
  - Installation of a controlled signalised crossing at Oxhey Lane / Carpenders Avenue (including puffin crossing for pedestrians);
  - Resurfacing of Carpenders Avenue footway;
  - Installation of tactile paving at four junctions.
- Bus Service Improvements:
  - Contribution towards bus service improvements;
  - Two new bus stops on Carpenders Avenue / Oxhey Lane.

As well as this, a package of additional improvements are proposed which go beyond the necessary improvements to mitigate the impacts of the proposed development, and therefore represent additional benefits of the scheme to support future residents and existing residents of Carpenders Park make sustainable transport choices. These are summarised as follows:

- Cycling Improvements:
  - Cycle parking shelter on the eastern side of Carpenders Park Station;
  - Beryl Bike contribution;
  - Beryl Bike dedicated parking bay within the site.

Together, these improvements would substantially improve the accessibility of the site and would prioritise sustainable means of travel.

In summary, in accordance with Paragraph 110 of the NPPF, the development is already in a sustainable location (as confirmed in the Council's assessments) and is within close proximity to local services and facilities, including bus stops and Carpenders Park Station. Nothing has materially changed since the Council's assessment that would result in a different conclusion being made with regard to the site being a sustainable location.

This will be enhanced further through the comprehensive package of improvements which will benefit existing residents living in Carpenders Park and future residents living in the development. With regards to Paragraph 115, sustainable transport modes have been prioritised and safe and suitable access can be achieved for all users, as confirmed by HCC. Equally, as confirmed by HCC, there will be no significant impacts from the development on the transport network or on highway safety.



## Other Matters

### Play Space

Following our recent discussions, we have amended the location options of the playspace following the comments received from the Leisure Development team which raised concerns about the location to the north-east of the site due to a lack of natural surveillance, distance from properties and levels in this part of the site. We also understand that you are keen to secure some playspace to the south of the site closer to the children's home.

To respond to these comments, the Parameter Plan has been updated to show three indicative play areas. The northern play area has been relocated closer to the housing, and two additional potential areas have been indicated in the central and southern areas of the site. The exact details can be secured at Reserved Matters stage.

### Highways

As discussed, a response has been prepared by iTransport to respond to the latest comments from HCC. This includes full details of the proposed sustainable transport improvements which have been summarised in this letter. These include additional benefits beyond the necessary improvements including a new cycle parking shelter by Carpenders Park Station and Beryl Bike contribution. The iTransport response concludes that the comprehensive package of improvements would substantially improve the accessibility of the site location prioritising sustainable modes of transport. These can be secured via condition and through the s106 Agreement.

### Drainage

As you know, following correspondence with the LLFA, an updated Flood Risk Assessment & Drainage Strategy (October 2025) has been prepared by Ardent to respond to the final comments, which includes minor adjustments to the drainage strategy. This has also been sent directly to the LLFA for review.

### Ecology

To respond to the comments from Herts Ecology, an updated Ecological Report and BNG Report have been prepared by Ecology Solutions, which includes details of the results of the additional surveys that have taken place over the summer. Scales have also been added to the necessary plans in the BNG Report and the BNG Metric has been provided to be shared with Herts Ecology.

### Public Consultation Summary

We note that there were some concerns raised by members regarding the consultation which had taken place. We have provided an Engagement Report from Thorncliffe which details some of the key feedback from local residents and confirms that 415 support comments have been received.



## Closing

We trust this letter assists with your assessment of the site's sustainability and the Green Belt case, as well as resolving the final technical matters. However please do not hesitate to contact me should you have any queries or require any further information.

Yours sincerely



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