

**STATEMENT OF CASE
ADDENDUM**

Site: Land East of Oxhey Lane
Carpenders Park
Hertfordshire

Appeal Ref:
APP/P1940/V/26/3378268

Date: May 2026

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1.0 **Introduction**

1.1 This Statement of Case Addendum has been produced following the Case Management Conference (CMC) held (yesterday) on the 18 May 2026, in response to the email from the Applicant to PINS dated the 12 May 2026.

1.2 Whilst the Applicant emailed PINS on 12 May 2026, they did not copy the Council into that email, nor did they respond to the Council's request of 15 May 2026 for sight of the email. As a result, the Council only received the email during the CMC on 18 May 2026.

1.3 It follows that this Statement of Case Addendum is not to be taken as acceptance of all of the criticisms set out in the Applicant's 12 May 2026 email. In the time available, this Statement of Case Addendum focuses on confirming the scope of the Council's case for the inquiry, to facilitate the finalisation of draft Statements of Common Ground (SoCG) and the preparation of evidence.

1.4 The Council reserves the right to respond further to the criticisms set out in the Applicant's 12 May 2026 email as necessary in due course, once it has had proper opportunity to consider those points with its team (some members of which have limited availability over 18 and 19 May 2026).

1.5 The 12 May 2026 email complains that the Council's statement of case (SoC) contains factual inaccuracies, including in respect of the events leading to the call-in of the application. Any incorrect reference in the Council's SoC to the order of events was unintentional and the correct order of events is set out in the (main) SoCG that is being finalised between the Council and the Applicant. Similarly, references in the Council's SoC to "Appellant" rather than

“Applicant” and to “appeal” rather than “application” are likewise unintentional.

2.0 **The Council's Case**

Planning Policies and Guidance

2.1 The Council's suggested reasons for refusal, prior to the Application being called-in clearly set out the policy basis upon which the Council relies. For the avoidance of doubt, the key policies are as follows:

Core Strategy LDD (adopted October 2011)

Policy CP1: Overarching Policy on Sustainable Development

Policy CP4: Affordable Housing

Policy CP8: Infrastructure and Planning Obligations

Policy CP9: Green Infrastructure

Policy CP10: Transport and Travel

Policy CP11: Green Belt

Development Management LDD (adopted July 2013)

Policy DM2: Green Belt

Policy DM6: Biodiversity, Trees, Woodland and Landscaping

Policy DM10: Waste Management

Policy DM12: Community, Leisure and Cultural Facilities

2.2 Additional reference will be made to the Council's Green Belt Assessments:

Green Belt Review (Stage 1) 2017

Stage 2 Green Belt Assessment for Three Rivers and Watford Borough 2019

Stage 4 Green Belt Review 2026

2.3 Reference will be made to the Hertfordshire Landscape Character Assessment (2005)

2.4 The following Chapters of the National Planning Policy Framework will also be referenced:

Chapter 2: Achieving Sustainable Development

Chapter 4: Decision Making

Chapter 5: Delivering a Sufficient Supply of Homes

Chapter 8: Promoting Healthy and Safe Communities

Chapter 9: Promoting Sustainable Transport

Chapter 12: Achieving Well-designed Places

Chapter 13: Protecting Green Belt Land

Chapter 15: Conserving and Enhancing the Natural Environment

Annex 2: Glossary

Green Belt Considerations

2.5 To assist the Applicant in understanding the Council's position, we comment as follows:

2.6 The Council will show that the site does not fall to be classed as grey belt due to the location's performance against the purposes of the Green Belt, as set out in NPPF Paragraph 143. As stated in the main Statement of Case (paragraph 5.7), this will be based on the site's strong contribution to Green Belt purpose (a).

2.7 Following on from this position, the Council do not consider that the proposal accords with NPPF Paragraph 155 a).

2.8 Paragraph 155 a) has two tests:

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

2.9 The Council's case is that the development would not utilise grey belt land (because the site is not grey belt). It follows that the Council's case is that the scheme does not satisfy paragraph 155 a) of the NPPF. However (and for the avoidance of doubt) it is no part of the Council's case that the development would "fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan".

2.10 Additionally, whilst the definition of "grey belt" in the NPPF is not concerned with Green Belt purpose (c), it is the Council's case that the scheme would cause harm in terms of Green Belt purpose (c) (safeguarding the countryside from encroachment). (The Council notes that the Applicant appeared to agree during the CMC that this would be the position if - contrary to the Applicant's primary case - the site is not grey belt.) The Council's case is that the harm to Green Belt purpose (c) is material to the '*very special circumstances*' assessment referenced in the main Statement of Case, paragraph 5.9.

2.11 Turning to NPPF paragraph 155 c) there is a requirement for the site to be in a sustainable location, having regard to NPPF paragraphs 110 and 115.

2.12 The Applicant is intending to provide a contribution towards bus provision and a bus stop along Oxhey Lane. This is in response to the HCC Local Highway Authority's comments that Carpenders Park Railway Station is about

1km from the site and the nearest bus stop is circa 700m. This will provide for a bus travelling in one direction only, with limited-service provision and it will not enter the site. As set out in paragraph 5.11 of the Council's Statement of Case, it is not considered that this will improve the accessibility of the site, such that it will not result in a material benefit that improves the sustainability of the site when considered as a whole. The Council does not consider that the development would be in a sustainable location and does not consider that paragraph 155 c) of the NPPF is satisfied.

Landscaping

2.13 The Council have published comments from Place Services on the online portal in response to the Application. Two consultation responses were issued, the initial response on 13th November 2025 and the second on 16th January 2026. (See appendices.)

2.14 Recommendations provided within the consultation response dated 16th January 2026, included specific reference to reducing the impact of development across site, specifically in relation to the site's topography.

2.15 Para 3.4 *"We consider that the following recommendations should still be taken forward, as they would improve the scheme and lessen notable visual impacts:*

- *Exclusion of development from the northern parcel, particularly in relation to the new access road. Consideration should be given to relocating the new access road closer to the existing care home development."*

- 2.16 The Council raised no objection to the methodology used in producing the Landscape Visual Impact Assessment. It is not advancing any dispute on GLVIA.
- 2.17 The Council are considering landscape harm as part of the overall balancing exercise, either as part of the 'very special circumstances' assessment or (if, contrary to the Council's primary case, the site is not grey belt) as part of the 'tilted balance' assessment under paragraph 11d)(ii). The Council is not advancing any evidence that suggests that landscaping matters would amount to an individual reason for refusal.
- 2.18 As a result of this position, the Council's landscape evidence will be largely dealing with landscaping in the context of Green Belt impact, focusing on purposes (a) and (c).
- 2.19 The parties agree that the proposal will result in residual effects and as set out in the LVIA. The embedded mitigation of the development, both on site and immediate context (local landscape character) will reduce the visual impact. However, effective screening would only be achieved once the woodland has reached maturity. This was reflected in the Place Services January 2026 consultation response, Paragraphs 1.11 and 1.12 which stated:

"The visibility of the northern parcel of the site as a result of the site's topography is mentioned throughout the LVIA. One of the key objectives of the landscape and GI proposals within section 3 of the LVIA include to "Minimise any potential adverse landscape and visual effects of the development through careful layout design of the proposed development and location of public open space and screening vegetation;" Still, development has been proposed within the higher points on site, despite this location been identified as the most visible and sensitivity part of the site,

requiring substantial new native woodland planting to screen the built form. This is reflected in para 5.34 of the LVIA "...significant amount of proposed new woodland and tree planting, particularly throughout the area of open space in the northern parcel, in order to mitigate the more sensitive parcel of the Site in terms of views of new built.

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

- 2.21 The site falls within the 'Bushey Hills Pastures' Landscape Character Area (LCA). The area consists of the eastern and undeveloped slopes of Bushey Hill, a distinctive east-west ridge extending from Merry Hill to Caldecote Hill. Despite being enclosed on the majority of its perimeter by built development, the area maintains a comparatively rural and tranquil atmosphere. The majority of the land use is grazing, with considerable new areas of planting encouraged by the Watling Chase Community Forest and the Woodland Trust. A good number of mature oak trees make a strong contribution to the character of the area.
- 2.22 Key characteristics and distinctive features include strong containments by urban settlement, although generally visually well screened and benefitting from distant views as far as Windsor.
- 2.23 Having regard to the characteristics, including topography, it is considered that the site functions as a transitional edge between the urban settlement of Carpenders Park and the rural landscape of Merry Hill, with the edge being not only spatial but experiential, offering a gradual shift in character,

vegetation structure, and land use. The existing hedgerows, trees and open views contribute to a layered transition. Such that when considered alongside the proposed development, it will be demonstrated that the proposal will result in an incongruous pattern of development and encroachment into the countryside, through the location of the site which is within an important part of the Green Belt between three settlements, on the opposite side of Oxhey Lane from the built up area and the ongoing siting of development on higher parts of the site.



APPENDIX 1

Place Services Landscape Comments November 2025





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

Date: 13 November 2025
Our ref: 10680

For the attention of: Matthew Roberts

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

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

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

Site Context

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

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

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

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

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

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

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

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

Rarity and distinctiveness is described as:

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

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

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

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

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

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

Planning Context

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

Development Management Policies Local Development Document (2013)

- DM7: Landscape character

Core Strategy (October 2011)

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

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

Review of the proposal/submitted information

Landscape and Visual Impact Assessment

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

Landscape impact

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

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

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

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

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

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

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

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

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

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

Visual impact

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

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

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

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

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

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

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

Mitigation measures

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

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

The proposal

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

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

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

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

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

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

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

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

Policy CP12 requires that development:

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

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

Policy DM7 includes:

“...b) Landscape Regions

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

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

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

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

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

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

Summary

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

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

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

"Substantially:

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

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

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

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

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

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

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

Place Services – Landscape Team

Email: landscape@essex.gov.uk



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

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





APPENDIX 2

Place Services Landscape Comments January 2026





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

Our ref: 10680
Date: 16 January 2026

For the attention of: Matthew Roberts

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

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

1.0. LVIA Addendum

General comments

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

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

Landscape Impact

Topography

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

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

Hedgerows

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

Visual impact

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

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

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



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



Visual context

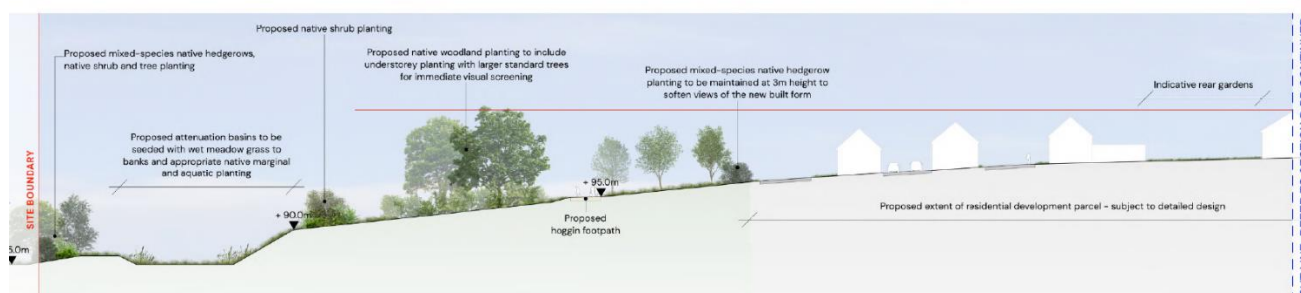
The relationship between the site and the built edge of settlement is not questioned. But we consider that the site also has a visual connection with the rural landscape with views to the south from the mid and southern site parcels, although we acknowledge these are not publicly accessible locations.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

Mitigation measures

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

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

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



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

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

3.0. Conclusion

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

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

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

4.0. Summary

4.1. [Insert Text]

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

5.1. [Insert Text]

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

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

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

Place Services – Landscape Team

Email: landscape@essex.gov.uk



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

Please note:

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

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