



Land East of Oxhey Lane, Carpenders Park

Planning Statement

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Prepared on behalf of Burlington Developments London Ltd | May 25

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1. EXECUTIVE SUMMARY

- 1.1 This planning application seeks outline consent for up to 256 homes (including affordable and self/custom build housing), housing with care, a children's home (for looked after children) together with associated access, parking, open space and landscaping at Land East of Oxhey Lane, Carpenders Park 'the Site'. All matters are reserved for later consideration, save for access; however, a parameters plan has been submitted to show how the Site would be developed.
- 1.2 The proposed development would deliver a mixed, integrated community to the eastern edge of Carpenders Park, which will provide a range of much-needed housing for a variety of age groups. The development will be sustainably located at the edge of the settlement, within close proximity to various services, amenities and public transport links, along with access to the wider countryside.
- 1.3 The Site falls outside of the existing defined urban area of Carpenders Park, and is located within the Metropolitan Green Belt. The new NPPF identifies that development would not be considered inappropriate where the criteria of paragraph 155 are satisfied (i.e. the site can be considered Grey Belt and that the Golden Rules are met). Where the criteria of paragraph 155 are not met the proposals would be considered inappropriate development which, by definition, would be harmful and should not be approved except in very special circumstances.
- 1.4 This Planning Statement demonstrates that the proposed development is not 'inappropriate development' as the Site meets the 'Grey Belt' definition and can follow the Grey Belt route given that it meets the relevant tests, including the 'Golden Rules'.
- 1.5 In the event that the Council do not agree with this conclusion, it has been demonstrated that the proposed development will deliver various benefits which together constitute 'Very Special Circumstances'. These benefits are summarised as follows here:
 - The delivery of up to 256 new homes on a site which is both available and deliverable, which will make an immediate, significant & valuable contribution to the supply of housing the district;
 - Of the new homes (C3 use class) 50% will be affordable, of which a total of 70% would be social rent and 30% shared ownership;
 - 10% of all market housing as self/custom build, providing an opportunity for local people to build their own homes;
 - Provision of Housing with Care, to accommodate increasing demand across Hertfordshire;
 - Provision of a children's homes to address the need for additional bedspaces across Hertfordshire;
 - Delivery of a significant level of high-quality public open space throughout the Site;
 - Enhanced connectivity for existing & future residents by through improvements to the PROW and connection to an orbital pedestrian route around the Site, providing access to the wider countryside;

- Enhancements to transport infrastructure to support sustainable travel; and
- Provision of economic benefits in relation to construction of the Site and longer-term local spending & jobs.

1.6 The Council currently has a significant need for housing, with the current housing land supply position at 1.7 years. In addition to this, the Council's latest Housing Delivery Test (HDT) (2023) score is only 30%. It is therefore evident that there is a significant and serious shortfall in the Council's housing land supply and delivery. There is also a significant need for affordable and self/custom build housing across the district. Alongside traditional housing, two other forms of housing are proposed; housing with care and a children's home. These forms of housing will provide much-needed specialist accommodation, for which there is an identified need.

1.7 Other site-specific social, environmental and economic benefits will arise from the proposed development. On this basis and for the reasons set out in this Statement, we consider that the following weight should be attached to the benefits.

Benefit of Proposal	Weight
Market Housing	Very substantial
Affordable Housing	Very substantial
Self / custom build housing	Substantial
Housing with care	Substantial
Children's home	Significant
Economic benefits	Significant
Compliance with Golden Rules	Significant
Public open space	Moderate
Connectivity enhancements / Sustainable transport initiatives	Moderate

1.8 The suitability of the weightings has been informed by relevant appeal decisions, particularly Burlington's recent appeal success at Church Lane, Sarratt in May 2024 (ref: APP/P1940/W/22/3311477).

1.9 In summary, it is considered that that the principle of the proposed development is justified and appropriate. On this basis, the presumption in favour of sustainable development (as set out in paragraph 11(d)(ii) of the NPPF) is applicable. The supporting technical work has informed a detailed understanding of the current site conditions along with likely impacts of new development. Whilst the proposals would result in some impacts these would be outweighed by the significant benefits and as such, we consider that planning permission should be granted without delay.

2. INTRODUCTION

- 2.1 This Planning Statement has been prepared in support of an outline planning application submitted on behalf of Burlington Developments London Ltd ('the Applicant') at Land at East of Oxhey Lane, Carpenders Park, Three Rivers District Council ('the Site').
- 2.2 The planning application seeks permission for the following description of development:
- "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, parking, open space and landscaping".*
- 2.3 The Site was formerly proposed for allocation in the Council's 2021 draft Local Plan, however it was subsequently removed when the Council decided to reduce the extent of proposed Green Belt release in 2023. The Site has been submitted for consideration again as part of the Council's Call for Sites undertaken earlier this year.
- 2.4 An EIA Screening Opinion Request was submitted on 6th January 2025 (ref: 25/0021/EIA). A response was received by Three Rivers District Council ('the Council', 'TRDC') on 28th January 2025 which confirmed that an Environmental Impact Assessment would not be necessary.
- 2.5 This Planning Statement assesses the proposal against the development plan and other material considerations relevant to the consideration and determination of the application and demonstrates why planning permission should be granted. The Statement is structured as follows:
- Section 3 – describes the Site & surrounding context;
 - Section 4 – provides details of the proposal;
 - Section 5 – provides an overview of relevant planning policy & guidance;
 - Section 6 – assesses the proposal against the development plan; and
 - Section 7 – provides a conclusion.
- 2.6 A number of technical reports have been prepared to support this application which are listed in the accompanying Cover Letter.

3. SITE AND SURROUNDING CONTEXT

- 3.1 The Site, which totals approximately 12.7 ha, is situated immediately to the east of the A4008. The Site falls outside of the existing defined urban area of Carpenders Park, which is a suburb of Watford, within Three Rivers District. The Site is wholly within the Green Belt.
- 3.2 The Site comprises open grassland fields. The topography of the Site varies, with the northern field rising from west to east. The remaining fields have a more gentle slope from north to south. There are trees along the northern, eastern and western boundaries, as well as two belts of hedgerow across the Site.
- 3.3 The Site surrounds a substantial modern care home which has recently been built to the east of Oxhey Lane (Carpenders Park Care Home). The western boundary of the Site comprises the A4008 whilst the Merry Hill Wood (owned by the Woodland Trust) borders the Site to the east. The eastern edge also forms the administrative boundary between Three Rivers and Hertsmere (the Site is solely within Three Rivers). A stream and associated flood zone are located beyond the Site's southern boundary, whilst to the north it borders land owned by Hertfordshire County Council (HCC) who have plans to develop the site for a new school.
- 3.4 There is one Public Right of Way, footpath ref 'Watford Rural 013' which passes broadly east to west through the northern section of the Site into Hertsmere District, through Merry Hill Wood.
- 3.5 The Site is located within a sustainable location to the edge of Carpenders Park, and is within easy walking distance (c. 1,050m to the west; a 14-minute walk) of Carpenders Park Overground Station which is served by the Lioness Line, providing frequent services to Watford/Central London. The closest bus stop is c. 450m from the Site on Wood Road.
- 3.6 There are also a range of services and facilities in Carpenders Park within walking distance. These include primary schools and pre-schools, a doctor's surgery, post office, places of worship, South Oxhey Leisure Centre, open spaces and various shops, restaurants and pubs. Table 3.3 of the Transport Assessment provides a summary table of the distance to various leisure, education, retail and healthcare facilities, demonstrating that many local facilities are within a short walking or cycling distance.
- 3.7 In respect to heritage, the Site does not contain any statutorily or locally listed structures. The closest heritage assets are three Grade II listed buildings and structures further to the south on Oxhey Lane (opposite Grims Dyke Golf Club), Grim's Ditch (a Scheduled Monument) and Grims Dyke (a Grade II listed park and garden). The closest of these is approx. 700m (at the closest point). Additionally, Carpenders Park has no conservation area, and the closest is the 'Brookshill Drive and Grimsdyke Estate' Conservation Area within Harrow, approximately 900m to the southeast.
- 3.8 The Site lies within Flood Zone 1 (low probability of flooding). A small area running vertically through the south of the Site is at risk of surface water flooding. Beyond the southern boundary is a river watercourse and the Hartsbourne Flood Storage Area lies to the south.

4. PROPOSED DEVELOPMENT

- 4.1 The Proposed Development will comprise a mixed-use development comprising market, affordable and self/custom build housing (up to 256 homes), housing with care (60 homes), a children's home (for looked after children) together with associated parking, open space, landscaping and vehicular access.
- 4.2 The proposals are landscape-led approach and seek to deliver an integrated, sustainable residential community with a sensitive relationship to Carpenders Park, as well as providing a positive new edge to the wider landscape.
- 4.3 The proposals will comprise a mix of detached, semi-detached and terraced housing along with new apartment buildings, ranging between 2 and 3 storeys. Car parking will typically be provided on-plot with some on-street parking whilst equipped play areas will be provided within new areas of public open space. Alongside this a SuDS scheme will be delivered comprising two attenuation basins close to the vehicular access and to the south of the Site.
- 4.4 A new primary access is proposed off Carpenders Avenue into the northern section of the Site, and two new pedestrian and cycle accesses are proposed (including one emergency vehicle access). The main vehicular access will be via a signalised crossroad junction from Oxhey Lane, opposite Carpenders Avenue. The access is located to the north-western corner of the Site and will extend eastward across the northern section of the Site, then run vertically to the south.
- 4.5 The development has been designed to prioritise walking and cycling, with a circular pedestrian route around the Site, linking with the existing Public Right of Way (PROW). Dedicated and direct cycleway and footpath linkages will be provided throughout the development, creating a permeable network of streets for pedestrians and cyclists.
- 4.6 The design rationale that has informed the scheme is set out within the accompanying Design and Access Statement, alongside which this Statement should be read. As the application is outline, save for access, an illustrative masterplan has been prepared to demonstrate how the Site could be developed. Indicative layouts of elements of the scheme such as housing with care and the children's home are provided within the Design and Access Statement.
- 4.7 In summary, the proposals comprise the following elements which will deliver key benefits, namely:
- The delivery of up to 256 new homes on a site which is both available and deliverable, which will make an immediate, significant & valuable contribution to the supply of housing the district;
 - Of the new homes (C3 use class) 50% will be affordable, of which a total of 70% would be social rent and 30% shared ownership;
 - 10% of all market housing as self/custom build, providing an opportunity for local people to build their own homes (this level of provision is in addition to the proposed affordable housing offer);

- Provision of Housing with Care (Use Class C2), to accommodate increasing demand across Hertfordshire;
- Provision of a 4-bed children's home (Use Class C2) to address the need for additional bedspaces across Hertfordshire (as identified by the South West Hertfordshire Housing Needs Update (March 2024));
- Delivery of a significant level of high-quality public open space throughout the Site;
- Enhanced connectivity for existing & future residents by through improvements to the PROW and connection to an orbital pedestrian route around the Site, providing access to the wider countryside;
- Enhancements to transport infrastructure to support sustainable travel; and
- Provision of economic benefits in relation to construction of the Site and longer-term local spending & jobs.

5. POLICY CONTEXT

- 5.1 Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires that planning applications are determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 5.2 The statutory Development Plan for Three Rivers District Council comprises the following documents:
- Core Strategy (2011);
 - Development Management Policies (2013); and
 - Site Allocation Local Development Document (2014).
- 5.3 Other policy documents that are material considerations in the determination of planning applications include the National Planning Policy Framework (NPPF), National Planning Policy Guidance (NPPG) and TRDC's Supplementary Planning Documents (SPDs).

National Planning Policy

National Planning Policy Framework (2024)

- 5.4 The National Planning Policy Framework (NPPF) was updated in December 2024 and sets out the Government's planning policies for England and how these are expected to be applied. It forms part of the overall framework of national planning policy and is a material consideration in decisions on planning applications. The NPPF aims to achieve sustainable development with paragraph 8 stating that there are three dimensions to sustainable development: economic, social and environmental.
- 5.5 Paragraph 11 states that LPAs should apply a presumption in favour of sustainable development which means that, where there are no relevant development plan policies, or the policies which are most important for determining the application are out of date, permission should be granted unless any adverse impact of doing so would significantly outweigh the benefits. Footnote 7 states that this presumption does not apply in certain areas including within the Green Belt (except in circumstances where the site is considered to constitute Grey Belt).
- 5.6 In respect to housing, paragraph 61 sets out that to support the Government's objective of significantly boosting the supply of homes; it is important that a sufficient amount and variety of land can come forward where it is needed. Paragraph 64 states where a need for affordable housing is identified, planning policies should specify the type of affordable housing required, and expect it to be met on-site.
- 5.7 Chapter 8 seeks to promote healthy and safe communities and Paragraph 96 highlights the importance of promoting social interaction, including through mixed-use developments and for street layouts that allow for easy pedestrian and cycle connections within and between

neighbourhoods. It also seeks to enable and support healthy lifestyles, for example through the provision of safe and accessible green infrastructure.

- 5.8 Chapter 9, entitled 'Promoting Sustainable Transport', highlights that transport issues should be considered from the earliest stages of plan-making and development proposals, using a vision-led approach to identify transport solutions that deliver well-designed, sustainable and popular places (Para 109). Paragraph 110 emphasises the need for significant developments to be situated within sustainable locations, through limiting the need to travel and offering a genuine choice of transport.
- 5.9 Paragraph 115 requires sustainable transport modes to be prioritised; safe and suitable access for all users; the design of streets, parking areas, other transport elements and the content of associated standards to reflect current national guidance; and any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree through a vision-led approach.
- 5.10 Chapter 11 seeks to make effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Paragraph 125(a) encourages multiple benefits from both urban and rural land, including through mixed-use schemes and taking opportunities to achieve net environmental gains, such as development that would enable new habitat creation or improve access to the countryside.
- 5.11 Paragraph 131 sets out that the creation of high-quality buildings and places is fundamental, and good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Paragraph 135 states that planning decisions should ensure developments will function well and add to the overall quality of the area; are visually attractive as a result of good architecture, layout and appropriate and effective landscaping; are sympathetic to local character and history; establish or maintain a strong sense of place; optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development; and create places that *are safe, inclusive and accessible and which promote health and well-being*.
- 5.12 Paragraph 136 emphasises the importance of trees in making an important contribution to the character and quality of urban environments and also helping to mitigate and adapt to climate change. It encourages opportunities to incorporate trees elsewhere in developments and that existing trees are retained wherever possible.
- 5.13 Chapter 13 relates to Green Belt land. Paragraph 143 sets out the five green belt purposes:
- (a) To check unrestricted sprawl of large built-up areas;
 - (b) Prevent neighbouring towns merging into one another;
 - (c) Assist in safeguarding the countryside from encroachment;
 - (d) Preserve the setting and special character of historic towns; and
 - (e) Assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

- 5.14 Paragraph 153 states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Paragraph 153 also requires substantial weight to be given to any harm to the Green Belt and confirms that very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.
- 5.15 The NPPF defines 'Grey Belt' 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.
- 5.16 Paragraphs 155 confirms that the development of homes, commercial and other development in the Green Belt should not be regarded as appropriate where the following criteria are satisfied:
- (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 need for the type of development proposed;
 - (c) The development would be in a sustainable location; and
 - (d) The 'Golden Rules' are met, where applicable.
- 5.17 The Golden Rules are set out in Paragraph 156, which sets out that the following contributions should be made where development is taking place on land which has been released from Green Belt or on sites in the Green Belt permitted through development management:
- (a) affordable housing;
 - (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.
- 5.18 Paragraph 158 states that a development which complies with the Golden Rules set out above should be given significant weight.
- 5.19 Chapter 14 seeks to meet the challenge of climate change, flooding and coastal change. Paragraph 170 directs development away from areas at highest risk of flooding (existing or future). Paragraph 173 advises that a sequential risk-based approach should be taken in areas know to be at risk now or in the future from any form of flooding. Paragraph 174 clarifies that the aim of the sequential approach is to steer new development to areas with the lowest risk of flooding from any source, and development should not be permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding.
- 5.20 Paragraph 181 states that LPAs should ensure that flood risk is not increased elsewhere. It clarifies that development should only be allowed in areas at risk of flooding where, in the light of this assessment (and the sequential and exception tests, as applicable) it can be

demonstrated that within the site, the most vulnerable development is located in areas of lowest flood risk; the development is appropriately flood resistant and resilient; it incorporates sustainable drainage systems; any residual risk can be safely managed; and safe access and escape routes are included where appropriate, as part of an agreed emergency plan.

- 5.21 Chapter 15 is concerned with conserving and enhancing the natural environment. Paragraph 187 advises that decisions should contribute to and enhance the natural and local environment, including through minimising impacts on and providing net gains for biodiversity, and establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species.
- 5.22 Chapter 16 relates to conserving and enhancing the historic environment and Paragraph 207 confirms that applicants are required to describe the significance of any heritage assets affected by development, including any contribution made by their setting. Paragraph 212 advises that great weight should be given to the asset's conservation, and the more important the asset, the greater the weight should be.

Standard Methodology and Housing Land Supply

- 5.23 The updated NPPF has reinstated the need for Council's to demonstrate a minimum of five years' worth of housing. A new standard method has been introduced to identify local housing need.
- 5.24 This standard methodology represents a new 'Stock Based' approach. As a result of the revised method most LPA's have seen their housing need figures increase. In regard to TRDC the revised method has led to the annual housing requirement increasing from 640 homes to 832 homes, an increase of approximately 25%.

Local Planning Policy

Core Strategy (CS) (2011)

- 5.25 The Core Strategy provides strategic policies for the District. The relevant policies contained within the Core Strategy are summarised below.
- 5.26 Policy PSP3 (Development in Secondary Centres) sets out criteria that new development would be expected to accord with in secondary centres. It identifies the need to promote development, infrastructure, and services to meet local community and business needs, which are essential for maintaining community vitality. The policy seeks to ensure that development in secondary centres provide approximately a quarter of the District's housing requirements over the plan period.
- 5.27 Policy CP1 (Overarching Policy on Sustainable Development) sets out that all new development would be expected to contribute towards the sustainability of the District through a number of ways, for example reducing carbon emissions, building mixed and sustainable communities and sustaining the viability and vitality of existing settlements in the District.

- 5.28 Policy CP2 (Housing Supply) states that housing provision will be made primarily from within the existing urban area (approximately 75% of total housing development between 2001-2026) and also from housing sites at the most sustainable locations on the edge of existing settlements within the Green Belt (approximately 25% of total supply between 2001-2026).
- 5.29 Policy CP3 (Housing Mix and Density) aims to promote high quality residential development that respects the character of the District and caters for a range of housing needs. New development is expected to make the most efficient use of land, without compromising the quality of the environment and existing residential areas.
- 5.30 Policy CP4 (Affordable Housing) seeks to increase the provision of affordable homes in the District and meet local housing need as informed by the Strategic Housing Market Assessment. It seeks an overall provision of around 45% of all new housing. As a guide, the policy seeks that 70% of the affordable housing be provided as social rented and 30% to be of an intermediate tenure.
- 5.31 Policy CP9 (Green Infrastructure) states that the Council will seek a net gain in the quality and quantity of Green Infrastructure, through the protection and enhancement of assets and provision of new green spaces.
- 5.32 Policy CP10 (Transport and Travel) aims to promote transport measures identified in the Infrastructure Delivery Plan in partnership with Hertfordshire County Council, the Highways Agency and transport providers.
- 5.33 Policy CP11 (Green Belt) seeks to maintain the general extent of the Metropolitan Green Belt in the District. It advises that there will be a general presumption against inappropriate development that would not preserve the openness of the Green Belt, or which would conflict with the purpose of including land within it. The supporting text clarifies that 77% of the district is Green Belt, and states that future development needs cannot be accommodated entirely within the urban area. As such, it confirms that minor adjustments to the Green Belt boundary are necessary to accommodate growth in the most sustainable locations on the edge of existing settlements.
- 5.34 Policy CP12 (Design of Development) requires new development to be of a high standard of design and have regard to the local context and conserve or enhance the character and quality of the area.

Development Management Plan (2013)

- 5.35 The Development Management Policies provides detailed policy in line with the strategic policies of the Core Strategy against which planning applications are assessed.
- 5.36 The relevant policies contained within the Development Management Policies are considered to include:
- 5.37 Policy DM1 (Residential Design and Layout) which states that all applications for residential development should satisfy the design criteria as set out in Appendix 2 of the Plan to ensure that development does not lead to a gradual deterioration in the quality of the built environment,

and that landscaping, the need for privacy and amenity space and the creation of identity in housing layouts are taken into account.

- 5.38 Policy DM2 (Green Belt) states that new development within the Green Belt will not be permitted, except in Very Special Circumstances.
- 5.39 Policy DM3 (The Historic Built Environment) seeks to retain and enhance heritage assets and will only be supported where they sustain, conserve and where appropriate enhance the significance, character and setting of the asset itself and the surrounding historic environment.
- 5.40 Policy DM4 (Carbon Dioxide Emissions and On Site Renewable Energy) states that proposals will be required to demonstrate that developments will produce 5% less carbon dioxide emissions than Building Regulations Part L requirements (2013) having regard to feasibility and viability. The policy states that this may be achieved through a combination of energy efficiency measures, incorporation of on-site low carbon and renewable technologies, connection to a local, decentralised, renewable or low carbon energy supply.
- 5.41 Policy DM6 (Biodiversity, Trees, Woodland and Landscaping) seeks to ensure development does not result in any net loss of biodiversity value across the District as a whole.
- 5.42 Policy DM7 (Landscape Character) requires proposals to make a positive contribution to the surrounding landscape. The policy states that proposals that lead to unacceptable harm to the character of the landscape in terms of siting, scale, design or external appearance will be refused planning permission.
- 5.43 Policy DM8 (Flood Risk and Water Resources) states that development will only be permitted where it would not be subject to unacceptable risk of flooding; and would not unacceptably exacerbate risk of flooding elsewhere. Where practicable existing flood risks should be reduced.
- 5.44 Policy DM9 (Contamination and Pollution) states that the Council will refuse planning permission for development, including changes of use, which would or could give rise to polluting emissions to land, air and/or water by reason of disturbance, noise, light, smell, fumes, vibration, liquids, solids or other (including smoke, soot, ash, dust and grit) unless appropriate mitigation measures can be put in place and be permanently maintained.
- 5.45 Policy DM11 (Open Space, Sport and Recreation Facilities and Children's Open Space) states that Developments of 25 or more dwellings or 0.6ha (whichever is greater) should make provision on site for open space and play space. 10% of the site area should be set aside as open space, and where the development is likely to be occupied by families with children, 2% of the site area should provide formal equipped play facilities.
- 5.46 Policy DM12 (Community, Leisure and Cultural Facilities) states where development proposals are submitted for new or improved community, leisure or cultural facilities, they should be accessible by sustainable modes of transport.

- 5.47 Policy DM13 (Parking) requires that development should make provision for parking in accordance with the parking standards and the zone based reductions set out in Appendix 5 of the Plan until such time as set standards are revised.

Emerging Local Plan

- 5.48 The Council have been preparing a new Local Plan since 2018. They undertook a Reg 18 Issues & Options and Call for Sites in 2018. In 2021, the Council published a Reg 18 version of the Local Plan which proposed the Site for allocation for 485 homes (ref: CFS69a).
- 5.49 As well as this, the land to the north was proposed to be allocated for a new secondary school (ref: CFS11). It is understood that HCC intend to progress with proposals for a new school at the site.
- 5.50 In 2023, the Council decided to reduce the extent of Green Belt release proposed in the 2021 version of the draft Local Plan. A revised Reg 18 draft Local Plan was published in October 2023 which removed many of the potential Green Belt allocations, including the Site.
- 5.51 An updated Local Development Scheme was published in December 2024 in light of the updated NPPF. This indicates that the draft Local Plan is due to be published for consultation (Reg 19) in February/March 2026, with submission due in Spring 2026 and adoption targeted for late 2026. Notwithstanding this, in January 2025 the Council agreed to bring forward the Local Plan programme with Regulation 19 consultation now expected to take place in Autumn 2025. Whilst it is acknowledged that work is underway on the replacement Local Plan this is still at the early stages and currently attracts no weight.
- 5.52 The Council will need to progress its plan in line with the updated NPPF and revised standard methodology. Within its latest Regulation 18 consultation, the Council proposed a low growth housing figure, equating to 4,852 homes across the plan period (18 years), amounting to 270 dpa, against a standard methodology figure of 640dpa. However, the Council's revised standard methodology figure increases to 832dpa, meaning the Council will need to find an additional 562 dpa, a total of 8,442 homes (based on an 18-year plan period). It is therefore clear that the Council will need to find & allocate a significant number of new homes in order to meet its required housing targets.
- 5.53 The Council undertook a Call for Sites earlier this year to identify suitable and available sites. The Site has been submitted for consideration.

6. PLANNING ASSESSMENT

- 6.1 This chapter assesses the development proposal against the relevant development plan policies and other material considerations. It addresses in turn the two key issues, with the first relating to the principle of development, and secondly other technical and development management considerations.

Principle of Development

- 6.2 The Site lies within the Metropolitan Green Belt where inappropriate development is, by definition, harmful and should not be approved except in very special circumstances. One of the exceptions for inappropriate development is in relation to the Grey Belt. It is considered that the Site meets the definition and Golden Rules and can therefore follow the Grey Belt route. In the event that the Council do not agree with these conclusions and consider the proposed development to be inappropriate, this section also identifies that 'Very Special Circumstances' exist.

Grey Belt

- 6.3 Firstly, it must be established whether the Site comprises Grey Belt land. This is defined as PDL and/or any other land that does not strongly contribute to Green Belt purposes (a), (b) or (d) (excluding land where the application of the policies relating to assets in footnote 7 would provide a strong reason for refusing or restricting development).
- 6.4 The Council's Stage 1 Green Belt Review (2017) was prepared by Amec Foster Wheeler and strategically reviewed 83 Green Belt parcels across Three Rivers and Watford. The Site formed part of parcel E3, which extended along the eastern boundary of Carpenders Park up to the boundary with Hertsmere. The Council concluded that the parcel had a significant contribution to purposes (a) and (b), and a limited contribution to purpose (d).
- 6.5 The Stage 2 Review was prepared by LUC in 2019. The Site formed parcel SO3, which was slightly smaller than parcel E3 as it excluded the area to the south. With regard to the impact on Green Belt purposes, the review found that it had a significant contribution to purpose (a), and a moderate contribution to purpose (b). Purpose (d) was not considered, but the previous review confirmed that parcel E3 had a limited contribution.
- 6.6 A full account of the assessment of the Site in each of these reviews is provided in Section 3 of Pegasus' Green Belt Assessment. It should be noted that both Parcels E3 and SO3 included a much larger area of land than the Site, as they included areas of land to the north and south. As such, the conclusions are not directly applicable to the Site itself.
- 6.7 As such, a Green Belt Assessment has been prepared by Pegasus which assesses the Site's contribution to purposes (a), (b) and (d) based on the February 2025 PPG criteria for assessment. This concludes that the Site does not contribute strongly to any of these Green Belt purposes, and therefore it is a candidate for consideration as 'Grey Belt'.

6.8 A comparison of the various assessments is provided below.

Green Belt Purpose	Stage 1 Green Belt Review (2017) – Parcel E3	Stage 2 Green Belt Review (2019) – Parcel SO3	Pegasus Green Belt Assessment – the Site
(a) to check the unrestricted sprawl of large built-up areas	Significant	Significant	Moderate
(b) to prevent neighbouring towns merging into one another	Significant	Moderate	Moderate
(d) to preserve the setting and special character of historic towns	Limited	-	No contribution

6.9 With regards to Footnote 7 of the NPPF, none of the assets within this footnote of the NPPF are relevant. Whilst a small part of the site is at risk from surface water flooding based on the findings of the accompanying Sequential Test this does not represent a strong reason for refusal. As such, it is concluded that the Site constitutes Grey Belt land.

6.10 To follow the Grey Belt route, the tests set out in Paragraph 155 must also be met. These are considered each in turn below:

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

6.11 The Green Belt Assessment prepared by Pegasus identifies that the site does not strongly contribute to purposes (a), (b) and (d) and will not undermine the purposes of the remaining Green Belt across Three Rivers. Therefore, Paragraph 155(a) is satisfied.

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

6.12 Three Rivers has a very poor record of housing delivery and supply. The Council’s latest Housing Delivery Test (HDT) (2023) score is 30%, meaning that less than one third of the required homes have been delivered over the past three years. The presumption therefore applies.

6.13 With regards to housing land supply, the Council’s Housing Land Supply Update (December 2024) confirmed that the Council’s housing land supply position is 1.7 years. It should be noted that this position is based on the old standard method which generated a requirement for 640 dwellings per annum (dpa). However, the new NPPF requires a new standard method to be used, which generates a requirement of 832 dpa; a 30% increase. Therefore, the Council’s housing land supply position has worsened when taking into account the new standard method.

- 6.14 It is therefore evident that there is a significant and serious shortfall in the Council's housing land supply and delivery, meaning that there is a demonstrable need for the housing proposed on site.
- 6.15 The proposals also involve the delivery of housing with care and a children's home (for looked after children). It has been established through engagement with Hertfordshire County Council (HCC) that there is a need for additional children's homes across the district (which is currently unmet). This is set out in the Statement of Common Ground agreed with HCC, enclosed at Appendix 1.
- 6.16 In respect of the proposed housing with care homes, Carterwood have undertaken an assessment of supply and need for this type of specialist accommodation. This assessment of net need concludes that there are substantial shortfalls of 953 housing with care homes in a 4-mile market catchment and a shortfall of 301 homes within Three Rivers District Council as at 2028 (the earliest date in which the proposed new housing with care homes would be available). This assessment includes all planned provision (both extant permission and pending decision) and therefore the shortfall may be greater as some of these schemes may not be delivered.
- 6.17 In light of the above, in addition to the demonstrable unmet need for general needs housing there is also a demonstrable unmet need for both the proposed Children's home (for looked after children) and housing with care homes thereby satisfying Paragraph 155(b) of the NPPF.
- c. The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of this Framework; and*
- 6.18 Paragraph 110 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.
- 6.19 The Site is in a sustainable location, approx. 1km east of Carpenders Park London Overground station, which operates regular services between Watford and London Euston on the Lioness line. The Transport Assessment confirms that the Site's distance from the London Overground means that the opportunities to use public transport are excellent, with regular services to key workplace and leisure destinations, alongside a large proportion of journeys being undertaken by walking and cycling. A Travel Plan has been prepared to promote and deliver sustainable transport initiatives.
- 6.20 There are also a range of everyday services and facilities in Carpenders Park within walking distance of the Site. These include primary schools and pre-schools, a doctor's surgery, post

office, places of worship, South Oxhey Leisure Centre, open spaces and various shops, restaurants and pubs.

6.21 Safe and suitable access will be provided direct from Oxhey Lane designed to cater for all road users with dedicated connections and crossings for pedestrians. A Travel Plan will support the Development to promote travel by sustainable transport modes. The Transport Assessment confirms that the vehicle movements generated by the development are acceptable and there will be no significant impacts on highway safety.

6.22 The proposal is therefore in a sustainable location and would comply with Paragraph 155(c).

d. Where applicable the development proposed meets the 'Golden Rules' requirements

6.23 The Golden Rules relate to affordable housing, necessary improvements to local or national infrastructure, and the provision of public open space.

(a) Affordable Housing

6.24 With regards to affordable housing, the requirement is 15% above the highest affordable housing requirement which would apply, subject to a cap of 50%. Policy CP4 seeks an overall provision of around 45% of all new housing as affordable housing. As such, the requirement in this case for the general needs housing element (C3 use class) is 50%.

6.25 In summary, the proposals will deliver 50% affordable (C3 use class). In terms of tenure, this translates into a total of 70% would be social rent and 30% shared ownership. On this basis it is considered that this Golden Rule is met.

(b) Necessary Improvements to Local or National Infrastructure

6.26 The proposals will secure necessary improvements to local infrastructure via s106 contributions. The provision of financial contributions alone to deliver necessary infrastructure upgrades was found to satisfy para 156(b) in two recent appeal decisions¹. As such, we consider a similar approach in this case will satisfy this criterion.

(c) Open Space

6.27 Finally, the proposals involve large areas of green infrastructure, including a large area of open space in the northern part of the Site, which altogether totals 6.2Ha. This will be accessible for future residents, as well as existing residents within Carpenders Park. The Illustrative Landscape Proposals prepared by Pegasus provide full details of the open space proposed on site, which will comprise of the following elements:

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

¹ Paragraph 25, PINS ref: 3348677 and Paragraph 34, PINS ref: 3346228

tree planting throughout the areas of public open space whilst Tree-lined streets will 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 are 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 will 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.
- 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.

6.28 As such and in accordance with Paragraph 159 of the NPPF, the improvements to green space will contribute positively to the landscape setting of the development, support nature recovery and will meet local standards for green space provision. Policy DM11 requires that 10% of the site area is set aside for open space, which equates to a need for 1.27 ha on the Site. The proposals will significantly exceed this requirement. Overall, it is considered that the scheme would meet the objectives of the Golden Rules in respect of the provision of greenspace

Grey Belt Summary

6.29 Given the fact that the development would utilise Grey Belt land, would satisfy the criteria set out in Paragraph 155 and would meet the Golden Rules set out in Paragraphs 156 and 157, it is concluded that the proposed development would not be inappropriate development in the Green Belt and is therefore acceptable in principle.

Very Special Circumstances

6.30 In the event that the Council do not agree with the above conclusions and consider the proposed development to be inappropriate, the relevant test set out in NPPF Paragraph 153 is that Very Special Circumstances must be demonstrated, which will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposals, is clearly outweighed by other considerations.

6.31 Before considering whether VSCs exist, it is important to understand the level of harm to the Green Belt caused by the development proposals. To do so, the impact of the proposals on openness has been assessed, along with the purposes of including land in the Green Belt. This is summarised below and expanded upon within the accompanying Green Belt Assessment.

Green Belt Purposes

6.32 As discussed, the Site forms part of parcel SO3 in the Council’s Stage 2 Green Belt Review, although this formed a much larger parcel of land extending to the north and south of the site boundary. To support the planning application, Pegasus have prepared their own Green Belt Assessment which assesses the Site specifically. The table below summarises the assessment of the Site against the 5 Green Belt purposes and provides a comparison of the findings of the Stage 2 Green Belt Review against the assessments made in the Pegasus Green Belt Review.

Green Belt Purpose	Stage 1 Green Belt Review (2017) – Parcel E3	Stage 2 Green Belt Review (2019) – Parcel SO3	Green Belt Assessment – the Site
(a) to check the unrestricted sprawl of large built-up areas	Significant	Significant	Moderate
(b) to prevent neighbouring towns merging into one another	Significant	Moderate	Moderate
(c) to assist in safeguarding the countryside from encroachment	Contribution	Significant	Slight Impact
(d) to preserve the setting and special character of historic towns	Limited	-	No contribution

(e) to assist in urban regeneration, by encouraging recycling of derelict and other urban land	Limited	-	No contribution
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6.33 It is therefore considered that overall, aside from the definitional harm caused by development in the Green Belt, the level of harm to the purposes of including land within the Green Belt is generally limited and can be considered to be no more than moderate.

Openness

6.34 Paragraph 142 of the NPPF highlights that the essential characteristics of Green Belt are their openness and permanence. The Green Belt PPG confirms in Paragraph 001 that assessing the impact of a proposal on openness requires a judgement based on the circumstances of the case. It also advises that openness is capable of having both spatial and visual aspects.

6.35 Spatially, the site is free from built development and so as a consequence of the proposals there would be a reduction in existing openness simply by the extent of the proposed built development. Notwithstanding this, recent case law such as the ‘R v North Yorkshire County Council (February 2020)’ has recognised that there is a visual dimension associated with openness as the sense of openness is most readily appreciated by people’s visual senses, i.e., visibility. If something is not visible, it cannot be readily appreciated nor perceived to be having any effect upon the sense of openness, i.e., the undeveloped countryside that characterises the Green Belt.

6.36 As explained by the supporting Green Belt Assessment the Site benefits from a physical and visual containment. The Site is well screened due to the mature hedgerows and trees along its boundary, along the internal field boundaries, with the woodland at Merry Hill to the immediate east screening views from the east, and built development associated with the existing residential development at Carpenders Park screening views from points to the west. As such it is considered that development of the Site is only likely to have a bearing upon openness locally and not affect the wider surrounding countryside, thereby limiting the extent of harm.

6.37 The Green Belt Assessment finds there would be an inevitable effect upon the spatial aspect of Green Belt openness, however the Site would only cover 0.01% of the Green Belt within Hertfordshire and 0.19% of the Green Belt within Three Rivers; would be physically well related and connected to the existing built form of the Care Home and residential area to the west; comprise a logical extension to Carpenders Park; include notable areas of undeveloped land and public space, incorporating existing retained vegetation and substantial new planting.

6.38 With regards to visual aspects, the Site has limited public access and the wooded character of the surrounding landscape, combined with the gently undulating landform limit points from which views of the Site are possible. A detailed of assessment of viewpoints surrounding the site is provided in the Green Belt Assessment and LVIA.

Summary on Green Belt Harm

- 6.39 In summary, aside from the definitional harm caused by development in the Green Belt, given the characteristics of the site, the level of harm to the Green Belt is generally limited and can be considered to be no more than moderate. Notwithstanding this, in accordance with the NPPF, this harm must be given substantial weight.

Landscape

- 6.40 A Landscape and Visual Impact Assessment (LVIA) has been prepared by Pegasus which follows best practice guidance.
- 6.41 Other than being located within the metropolitan Green Belt and part of the Watling Chase Community Forest, the Site is not subject to any statutory or non-statutory landscape protection designations. There are no listed buildings or structures on or immediately adjoining the Site, the closest of which is approximately 740m to the southeast. Carpenders Park has no conservation area, and the closest is the 'Brookshill Drive and Grimsdyke Estate' Conservation Area approximately 900m to the southeast. Due to the intervening-built form and belts of woodland and mature hedgerows and trees along the Site and surrounding field boundaries, there is no intervisibility of the Site with the listed buildings or conservation areas.
- 6.42 The adjacent settlement of Carpenders Park is located on land situated between 60-100m AOD, rising towards the eastern and western edges of the settlement. High points in the immediate surroundings reach over 130m AOD approximately 2.5km to the west at Eastbury and reaching 150m AOD approximately 2km to the northeast at Bushey Heath. The landform of the Site itself is between 77-104m AOD, with the lowest point at approximately 77m AOD along the southern boundary, up to 104m AOD along the northeastern boundary adjacent to Merry Wood. A localised low point along the course of Hartsbourne Stream is located to the south of the Site, however there are no waterbodies or watercourses within the Site itself.
- 6.43 On this basis Pegasus conclude that the landscape character of the Site has a Medium overall sensitivity to the type of development proposed. As set out in the LVIA, Pegasus then carry out an assessment against each landscape consideration reaching a view on impact at years 1 and 15.
- 6.44 Having regard to the assessment undertaken by Pegasus, it is considered that the proposed development has the potential to respect the surrounding landscape context and relationship to the existing settlement edge of Carpenders Park, and the receiving landscape has the capacity to accommodate the proposed development without causing unacceptable harm to the existing landscape and visual resource. On this basis, we consider that whilst there would be harm to the landscape character, however this would be limited.

Very Special Circumstances

6.45 The proposals would deliver a number of benefits. These are summarised as follows:

(1) Housing Provision

6.46 The delivery of housing is supported at all levels of policy. Paragraph 60 of the NPPF sets out the Government's objective to significantly boost the supply of homes. As discussed, TRDC has a very poor record of housing delivery and supply, with a HDT score of 30% and a housing land supply position of 1.7 years based on the old standard method. The new standard method increases this figure by 30% to 832 dpa, which highlights the necessity of housing delivery in the district.

6.47 The emerging Local Plan is currently at a relatively early stage. The Council are currently preparing the Evidence Base before the Reg 19 Local Plan is due to be published later in 2025. Adoption remains years away. As such, there is still a considerable period of time before the plan will be adopted, which is likely to further worsen the supply and delivery of housing in the district in the short and medium term.

6.48 The proposals would deliver up to 256 new homes which will make a significant contribution to the desperate need for more housing in the district. Overall, given the context of very poor housing supply and delivery, significant unmet housing need in the district and little prospects of this being improved in the foreseeable future, the delivery of proposed new market housing is a significant benefit of the proposal and will make a valuable contribution to the supply of housing in Three Rivers. In our view it is considered that this benefit should attract **very substantial** weight.

6.49 The suitability of this weighting is informed by the recent Appeal Decision at Church Lane, Sarratt, in which Burlington were also the Applicant (ref: APP/P1940/W/22/3311477). This case involved the delivery of 92 homes across two sites and the Inspector confirmed in their decision (May 2024) that the benefits of market housing attracted very substantial weight, which was based on a housing land supply position of 1.9 years and 92 dwellings. Given that Three Rivers' housing supply position has deteriorated since this and the proposal will be delivering significantly more homes than were approved at Sarratt, it is evident that this benefit should carry at least the same weight.

(2) Affordable Housing

6.50 An Affordable Housing Needs Assessment has been prepared by Tetlow King which confirms that there is a clear and on-going pressing need for more affordable homes in Three Rivers, which each successive needs assessment identifying a higher level of needs.

6.51 The district has a very poor record of affordable housing delivery, as illustrated on page 14 of the Affordable Housing Needs Assessment. The latest Annual Monitoring Report (AMR) covering the period 2023-24 confirms that only 3 affordable homes were completed between 1st April 2023 and 31st March 2024, amounting to 1.1% of the total completions (276) in the same period. This was a reduction from 28% the previous year. Since monitoring began in

2001, 1,226 gross affordable homes have been delivered; amounting to 21.6% of the total housing delivery. This is significantly below the target requirement in Policy CP4 of 45% of all new housing to be affordable, particularly the last year (1.1%).

- 6.52 Furthermore, as set out in the Affordable Housing Needs Assessment, the gross affordable completions do not take into account any losses from the affordable housing stock through demolitions or Right to Buy. In the 23-year monitoring period of the Core Strategy, affordable housing delivery (net of Right to Buy) represented only 15% of overall housing delivery, equating to 33 dpa. This represents an average annual shortfall of 470 affordable dwellings in the latest 4-year period.
- 6.53 The Affordable Housing Needs Assessment therefore concludes that there is a well-established, genuine and acute need for the proposed affordable homes now. In light of these circumstances, the delivery of 50% affordable housing (exceeding policy requirements) is an important benefit of the scheme. The AHNA confirms that **very substantial** positive weight should be attributed to the provision of affordable housing.
- 6.54 This is supported by the recent Appeal Decision at Sarratt (ref: APP/P1940/W/22/3311477) which was allowed in May 2024 involved a similar context with regards to affordable housing provision and need. The Inspector in this case attached very substantial weight to the delivery of affordable housing.

(3) Self / Custom Build Housing

- 6.55 It is proposed to deliver 10% of all market housing as self/custom build. Central Government has been consistent in seeking to boost the supply of Self-Build and Custom Housebuilding for the past decade, starting with the 2011 Housing Strategy for England, and it is clear that there is national demand for this type of housing.
- 6.56 Local authorities are required to address this through granting sufficient development consents to meet the demand for Self-Build and Custom Housebuilding arising within their administrative area and examining secondary data sources in addition to their Register numbers to obtain a robust assessment of demand.
- 6.57 In Three Rivers the Council apply a local connection test, an initial registration fee and an annual retainer fee to remain on Part 1 of the Register. The entry fee onto both Part 1 or Part 2 of the Register is currently £230 and thereafter there is an annual retainer fee of £201 to remain on Part 1 of the Register. It is particularly relevant to consider the fact that of the 51 local authorities in the country that charge self-build register fees, Three Rivers charge some of the most expensive fees in the entire country with no guarantee of a serviced plot becoming available.
- 6.58 On this basis it is not surprising that these high fees suppress demand however secondary data sources, such as Buildstore's Plot-Search and Custom Build Register platforms illustrate a demand for at least 1,199 serviced plots in Three Rivers in January 2023. Other secondary data sources indicate that as many as 1,504 people may be interested in building their own

home in the foreseeable future and that annual needs could fall in the range of 45 to 64 plots per annum, equivalent to 900 to 1,280 plots over the 20-year Plan period.

- 6.59 The Council has a very poor record of custom and self-build homes, with none previously delivered in the district. The need for new self/custom build housing was underlined in the recent Appeal Decision at Sarratt with the Inspector stating at paragraph 80 of that decision:

“Furthermore, there is a statutory requirement for local authorities to keep a register of those seeking to acquire plots for custom and self-build housing and to grant sufficient permission to meet demand. In the case of these appeals, there are no development plan policies that relate to custom and self-build homes. It is accepted by the Council that demand for this type of housing in the District significantly exceeds supply.”

- 6.60 In light of this substantial weight was given to the delivery of 10% self/custom build housing by the Inspector. Given that there continues to be a significant need for self/custom build housing, it is considered likewise that this benefit should attract **substantial** weight.

(4) Housing with Care

- 6.61 The proposals include 60 housing with care homes which will be sited to the rear of the Carpenders Park Care Home, located to the immediate west of the Site.
- 6.62 Carterwood have undertaken an assessment of net need of this type of accommodation which concludes that there are substantial shortfalls of 953 private housing-with-care units in the 4-mile market catchment and 301 in the Three Rivers District Council local authority area, as at 2028, the earliest the proposed private housing-with-care at Carpenders Park could be made available.
- 6.63 The Caterwood assessment includes all planned provision (both with extant permission and pending a decision) and therefore the undersupply could well be greater, on the basis that some schemes may not be delivered. The shortfalls are projected to increase significantly in line with the ageing demographic.
- 6.64 The Adult Social Care strategy provides strong evidence of the need for housing with care in Hertfordshire where, to meet need, significant growth is required. The Council is ambitious to ensure there is a suitable and sustainable pipeline of accommodation for older people citing an estimated demand for 251 units of market extra care in the Three Rivers District by 2030.
- 6.65 The South West Hertfordshire Local Housing Needs Assessment (LHNA) Update (2024) provides two scenarios for specialist older persons housing provision. Based on existing and planned supply in 2022, it advises that the net need for market housing with care to 2041 in the Three Rivers District ranges between 473 and 693 units.
- 6.66 The qualitative benefits of the proposed scheme are numerous and include improvements to the health and wellbeing of residents, reduced reliance on, and costs to, the NHS, benefits to families having difficulty meeting the care of loved ones, a reduced overall need for care staff with care being provided on one site (compared with domiciliary care in the wider community), together with the freeing up of family sized housing.

- 6.67 Most importantly the scheme will enable older people to 'right size' from their existing homes (which may no longer be suitable for their needs), into a welcoming, attractive, specifically designed extra care scheme where they can benefit from social interaction and improved wellbeing and remain close to family and friends. While this is intangible, it is an important benefit of the proposal.
- 6.68 The proposals would therefore assist in addressing the existing significant shortfall and the increasing future need for private housing-with-care in both the 4-mile market catchment and Three Rivers District. As such, the delivery of a care home constitutes a benefit of the scheme and is considered to attract **substantial** weight.

(5) Children's Home

- 6.69 A Statement of Common Ground has been prepared with HCC and is provided at [Appendix 1](#). This confirms the need for children's homes across Hertfordshire, with a need in Three Rivers for 24 new bedspaces in children's homes up to 2041, as confirmed in the South West Hertfordshire Local Housing Need Assessment (LHNA) Update (March 2024).
- 6.70 It has been established through discussions with HCC that the desired delivery for meeting this need is via 4-bed homes distributed across the district, which would each accommodate three children and one carer. Given the scale of development proposed, one house is proposed on the Site, a position that has been agreed with HCC. The property will be integrated into the proposed layout and an indicative location has been discussed with HCC, with the final location to be agreed through engagement with HCC at reserved matters stage.
- 6.71 The SoCG confirms that given the identified need for children's homes across Three Rivers, the delivery of a children's home is an element of the proposed development which is supported by HCC. As confirmed in the Written Ministerial Statement (WMS) prepared by the Minister of State for Housing and Planning on 23rd May 2023, LPAs should give due weight to applications for accommodation for looked after children in their area that reflect local needs, to ensure that children in need of accommodation are provided for in their communities. On that basis, it is agreed by the Applicant and HCC that this is a benefit of the proposed development, the weighting to be attached to which is a matter for the decision maker.
- 6.72 Given the identified need for children's homes, it is considered that this benefit should attract **significant** weight.

(6) Public Open Space

- 6.73 There will be a variety of green infrastructure across the Site, totalling 6.2Ha. New planting and trees within this part of the Site will create an attractive place and a green settlement edge, as well as providing biodiversity enhancements. Play space will also be provided in this part of the Site. This open space will be available for both residents of the proposed development and the public. This quantum of space significantly exceeds policy requirements and is therefore a significant benefit of the scheme, which should attract **moderate** weight.

(7) Connectivity Enhancements / Sustainable Transport Initiatives

- 6.74 The proposals retain and enhance the PRoW across the northern part of the Site to maintain a connection to the woodland to the east. As discussed, the PRoW will link to a circular pedestrian route around the perimeter of the Site, creating opportunities for informal recreation and encouraging active lifestyles.
- 6.75 The main site access junction will provide a signalised pedestrian crossing on Oxhey Lane to link to the footway on the western side of the carriageway. This will provide a much improved and safer alternative to the two existing uncontrolled crossings.
- 6.76 We note that a secondary school (CFS11) directly north of the site was proposed for allocation within the draft Local Plan (Part 2: Sites for Potential Allocation) in 2021. We understand that Hertfordshire County Council own this land and continues to promote it for a new school.
- 6.77 There is currently no dedicated crossing of A4008 Oxhey Lane except for an uncontrolled signalised crossing near the Carpenders Park Care Home and an uncontrolled pedestrian crossing near the junction with By-The-Wood, which would be wholly unsuitable for a high-level of pedestrian footfall (particularly that of school pupils). Although any future access to the school would include provision for pedestrians, the signalised crossroad arrangement for the proposed development would offer a safe and dedicated pedestrian crossing of Oxhey Lane from Carpenders Avenue and would also act to slow vehicle speeds along the carriageway on approach to the signals.
- 6.78 We note that the SW Herts Growth and Transport Plan has identified areas for improvement to the active travel infrastructure within the Watford South area as part of Package 8. Specifically for Carpenders Park, a set of interventions are proposed to enhance connectivity between South Oxhey and Carpenders Park and to improve the pedestrian and cycle environment on Delta Gain in the centre of Carpenders Park. Further information on this is set out within the accompanying Transport Assessment.
- 6.79 Package 8 does not include any specific details of improvements and enhancements, but instead sets out the principle of potential improvements, which are then used to inform the routes identified in the Three Rivers Local Cycling & Walking Infrastructure Plan (LCWIP). The Three Rivers LCWIP identifies Walking Route 4 as a key route to Carpenders Park with potential improvements including an informal crossing of Carpenders Avenue; provision of continuous footways over all side roads; footway improvements on both sides of Carpenders Avenue and public realm improvements on Delta Gain and Gibbs Couch.
- 6.80 The proposals seek to support active travel improvements along this route and so our clients are willing to make a proportionate contribution to the delivery of these benefits by way of a Section 106 contribution.
- 6.81 Overall, when considered collectively it is considered that these connectivity / sustainable travel initiatives should attract **moderate** weight.

(8) Economic Benefits

- 6.82 The proposals will deliver economic benefits during both the construction and operational phases of the development. These are quantified in the Economic Benefits Infographic which is appended to this Statement at [Appendix 2](#). Given the scale of development, it is considered that the economic benefits attract **significant** weight.

VSCs Summary

- 6.83 Overall, it is considered that the limited harm to the openness of the Green Belt, and any other impacts of the development are clearly outweighed by the significant benefits of the proposal. The provision of new market, affordable and self/custom build housing will make a valuable need to the desperate need for more homes in Three Rivers. The care home and children's homes will also contribute towards an identified need for these facilities. The public open space and transport improvements will benefit not only proposed residents, but the wider public living in Carpenders Park. Taken together, these benefits are considered to constitute Very Special Circumstances.

Green Belt Summary

- 6.84 In summary, it is considered that the proposed development meets the Grey Belt definition and can follow the Grey Belt route given that it meets the relevant tests, including the Golden Rules. In the event that the Council do not agree with this conclusion, it has been demonstrated that the proposed development will deliver various benefits which together constitute VSCs. As such, whichever approach is taken it is considered that in principle the proposed development at the site is acceptable.

Technical and Other Considerations**Illustrative Layout**

- 6.85 As the application is outline, detailed matters relating to the layout, appearance, landscaping and scale of new development will be the subject of a subsequent reserved matters application. Notwithstanding this, an illustrative layout has been prepared to show how the site could be developed to provide up to 256 new homes, as well as housing with care (60 homes) and a children's home (for looked after children). This layout has evolved and has taken into account the various technical assessments which has informed the design process.
- 6.86 The illustrative design of development has been informed by relevant local plan policies which is explained within greater detail within the supporting Design & Access Statement.

Heritage

- 6.87 A Heritage Impact Assessment has been prepared by Handforth Heritage which confirms that there are no statutory or locally listed buildings within the Site, although there are several heritage assets in the wider area, approximately 700m away. The location of these is illustrated on page 11 of the Heritage Impact Assessment. Due to the intervening distance and built form

and woodland and vegetation between, there is virtually no to extremely limited visibility between the Site and these heritage assets.

- 6.88 As such, the HIA concludes that the Site is considered to contribute a neutral amount to the identified heritage assets, and there is no heritage reason why the proposals should not be viewed favourably by the Council. The proposals therefore conserve the setting of heritage assets and the surrounding historic environment, in accordance with Policy DM3 and Paragraph 207 of the NPPF.

Arboriculture

- 6.89 In accordance with the requirements of Policy DM6, the developable area has been informed by the existing trees and vegetation on site and has been landscape-led, ensuring that the built form has been carefully considered to work with the existing trees and landscaping on site.
- 6.90 An Arboricultural Impact Assessment (AIA) and Method Statement has been prepared by ACD Environmental. This confirms that no individual trees are identified for removal to facilitate the design proposals, with removals limited to the selective removal of the extensive network of Blackthorn clumps, as well as two large dead standing wood/monoliths. The built development has been carefully considered to be sited a sufficient distance from retained trees, with only a single section of proposed permanent hard surfacing into some of the RPAs of retained trees. No dig surface solution will be implemented in these areas to ensure that the impacts on these trees is acceptable.
- 6.91 During construction, the AIA finds that adequate protection can be provided to ensure all retained trees are protected throughout development in the form of barriers and/or ground protection. The Method Statement and Tree Protection Plan provide full details which will ensure that trees will be suitably protected.

Ecology

- 6.92 An Ecological Assessment has been prepared by Ecology Solutions to support the application. This confirms that there are no statutory sites within or adjacent to the Site. There are several Local Wildlife Sites and Sites of Importance for Nature Conservation in proximity of the Site, however any impacts on these areas and the tributary of the River Colne during the construction phase can be appropriately mitigated via a CEMP. It is therefore expected that there will be no adverse effects on any statutory or non-statutory sites.
- 6.93 Habitats on site are to be retained and enhanced where possible including the boundary vegetation. With regards to ecological enhancements, the landscape strategy has been designed with a focus on ecological and green infrastructure principles in order to deliver long-term benefits for nature conservation. This will include native species to maintain and improve foraging opportunities for bats, birds and invertebrate species as well as supporting small mammals, reptiles and amphibians. As well as this, boxes for birds, bats and invertebrates and log piles will be provided.

- 6.94 The BNG Report confirms that whilst retention and enhancement of the habitats of greatest value has been sought, the proposed scheme would result in a net loss of 33.97% in habitat units, so the mandatory 10% net gain will be achieved via off-site biodiversity units. These will be secured via the legal agreement.
- 6.95 The Ecological Assessment recommends some additional survey work to clarify the presence of protected species, but subject to the mitigation measures suggested, the favourable conservation status of protected species will be appropriately maintained.
- 6.96 Overall, the report concludes that there are no overriding ecological reasons why the Site could not be developed, and the mitigation strategies will ensure no significant adverse effects on notable habitats and protected species identified. The proposals will therefore comply with Policies DM6, CP9 and Paragraph 187 of the NPPF.

Flood Risk and Drainage

- 6.97 A Flood Risk Assessment (FRA) and Drainage Strategy has been prepared by Ardent which confirms that the Site is located within Flood Zone 1. The report finds that the risk of flooding from groundwater is low. With regards to pluvial (surface water) flooding, the risk is very low to high across the Site, which would be reduced to a worst case of low following the development through implementing improved surface water drainage. Surface water run-off will primarily be attenuated within basins, as illustrated on the Drainage Layout.
- 6.98 Overall, the FRA concludes that the proposals are consistent with the NPPF and planning guidance as the proposed development will not be at undue risk of flooding, nor will it unduly increase flood risk downstream. It will therefore comply with Policy DM8 and Paragraph 181 of the NPPF.
- 6.99 Given the risk of surface water flooding on some parts of the Site based on the current conditions, a Sequential Test has been prepared and accompanies the planning application. The report concludes that the Sequential Test has been passed.

Sustainability and Energy Report

- 6.100 A Sustainability and Energy Statement has been prepared by Bluesky Unlimited which demonstrates how the buildings will significantly exceed the requirements of the Building Regulations Part L (2021) and policy requirements. The total reduction in carbon emissions from energy efficiency measures and low-carbon and renewable technologies is approximately 53%. As well as this, water efficiency measures within homes will ensure that water usage is less than 110 litres per person per day.
- 6.101 The Sustainability and Energy Statement provides full details of the proposed sustainability strategy which will ensure that the proposals comply with the principles set out in Policy DM4, including the requirement to produce at least 5% fewer carbon emissions than Part L requirements.

Air Quality

- 6.102 An Air Quality Assessment has been prepared by Air Quality Consultants. This assessment states that during the construction works, a range of best practice mitigation measures will be implemented to reduce dust emissions, and the overall effect will be 'not significant'. The assessment also demonstrates that future residents of the proposed development will experience acceptable air quality, with pollutant concentrations below the air quality objectives (and future targets for PM2.5).
- 6.103 Whilst the proposed development will generate additional traffic on the local road network, the assessment shows that there will be no significant effects at any existing, sensitive receptor. Overall, the construction and operational air quality effects of the proposed development are judged to be 'not significant'.
- 6.104 Overall, the proposed development will accord with Core Policy CP1(o) of the Core Strategy in that it manages and reduces risk of and from air pollution, and Policy DM9 of the Development Management Policies, in that it will not have an adverse impact on pollution levels or be subject to unacceptable levels of air pollutants from existing pollutant sources.

Utilities

- 6.105 A Utilities Statement prepared by Ardent is submitted with the planning application. This outlines that a Landmark Utilities Report was undertaken to obtain responses from various utility asset owners. The Utilities Statement identifies a strategy to ensure that gas, electricity, potable water and telecoms can be confirmed with the relevant asset owners. Overall, it is considered that the surrounding utility assets has adequate capacity for the proposed development and adequate connections are available.

Highways

- 6.106 Chapter 10 of the NPPF seeks to promote sustainable transport and prioritise sustainable transport modes and give priority to pedestrian and cycle movements, as well as ensuring that safe and suitable access can be achieved.
- 6.107 The application is supported by a Transport Assessment & Framework Travel Plan prepared by iTransport in order to demonstrate how the proposals comply with relevant policies.
- 6.108 As discussed, the Transport Assessment confirms that there are good opportunities for walking and cycling close to the Site as Carpenders Park has been identified as a core walking zone. The Site is also located within walking distance (c. 1050m) from Carpenders Park Overground Station which provides frequent services to central London and Watford. There are also a wider range of local services and amenities in the local area, with all essentials being present within Carpenders Park and Sout Oxhey.
- 6.109 The Illustrative Masterplan has been developed to ensure that safe, direct and convenient routes for pedestrians and cyclists are provided for a substantial proportion of journeys to existing services and facilities within Carpenders Park. The new signalised crossroad junction arrangement would provide improved crossing of Oxhey Lane for pedestrians.

- 6.110 With regards to traffic flows, the Transport Assessment finds that there would be a modest increase given the scale of development proposed, and the traffic impact of the proposed development would not be severe, therefore meeting the requirement of Paragraph 115 of the NPPF.

Contamination

- 6.111 A Contamination Report has been prepared by Brownfield Solutions Ltd which confirms that the Site has remained open fields since the date of earliest mapping available, and the overall risk to human health from contaminated soils is considered to be low to moderate. There is also considered to be a low to moderate risk from permanent ground gases, and a low risk to controlled waters. The report recommends intrusive investigations to confirm the risks and to confirm ground conditions in respect of the identified geotechnical and geo-environmental risks. All of these matters can be adequately addressed by appropriately worded planning conditions.

Technical Summary

- 6.112 The supporting technical work has informed a detailed understanding of the current site conditions along with likely impacts of new development. This has demonstrated that any impacts are able to be mitigated and there are no technical constraints which prohibit the development of the Site. As such, it has been demonstrated and confirmed that the proposed development is deliverable.

7. CONCLUSION

- 7.1 This application seeks outline consent for up to 256 homes (comprising market, affordable and self/custom build housing), housing with care (60 homes), a children's home (together with looked after children), together with associated access, parking, open space and landscaping (all matters reserved, save for access).
- 7.2 As discussed, it is considered that the proposal meets the necessary tests to follow the 'Grey Belt' route. As such, the proposed development is therefore appropriate development in the Green Belt, meaning that Paragraph 11(d) of the NPPF is triggered. This requires planning permission to be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits.
- 7.3 It has been demonstrated that the proposals will deliver numerous benefits through the delivery of various housing types which are all of an identified need in Three Rivers, as well as environmental and socio-economic benefits. Whilst there is some limited landscape harm caused, it is clear that this does not significantly and demonstrably outweigh the benefits identified and planning permission should be granted.
- 7.4 In the event that the Council do not agree that the proposals are appropriate development, the test set out in Paragraph 153 of the NPPF requires Very Special Circumstances to be demonstrated. This Statement has demonstrated that significant benefits will be delivered, as summarised in the table below. Taken together, the benefits clearly outweigh the harm identified to the Green Belt and the limited landscape harm, and amount to Very Special Circumstances, meaning that planning permission should also be granted for this route.

Benefit of Proposal	Weight
Market Housing	Very substantial
Affordable Housing	Very substantial
Self / custom build housing	Substantial
Housing with care	Substantial
Children's home	Significant
Economic benefits	Significant
Compliance with Golden Rules	Significant
Public open space	Moderate
Connectivity enhancements / Sustainable transport initiatives	Moderate

- 7.5 The supporting technical work has informed a detailed understanding of the current Site conditions along with likely impacts of new development. We consider that any impacts are able to be mitigated and therefore the proposed development is deliverable.
- 7.6 On this basis, the proposal accords with all the relevant national and local policies, and so we would urge that planning permission is granted for the proposal without delay.

APPENDIX ONE – HCC STATEMENT OF COMMON GROUND

STATEMENT OF COMMON GROUND

- 1.1 This Statement of Common Ground (SoCG) has been prepared in respect of the proposed children's home which forms part of the proposed development at Land East of Oxhey Lane, Carpenders Park ('the Site').
- 1.2 It sets out matters agreed between the Applicant (Burlington Developments) and Hertfordshire County Council (HCC) Growth and Infrastructure Unit (on behalf of Children Looked After) and covers the need and design requirements for children's homes, as well as considering how the proposed development would help to meet an identified need.
- 1.3 This SoCG addresses the specific matter of Children's Homes. Support from HCC is contingent on there being an appropriate location identified for delivery.
- 1.4 Other HCC statutory and non-statutory services (including but not limited to the Highways Authority, Local Lead Flood Authority and HCC service departments) will review the planning application separately and respond accordingly. The SoCG does not fetter HCC in its ability to act on behalf of its statutory functions and should not be taken as any form of support for the application from such services.

Need for Children's Homes

- 1.5 The South West Hertfordshire Local Housing Need Assessment (LHNA) Update (March 2024), prepared by Iceni, provides an assessment of overall housing need in SW Hertfordshire. This includes an assessment of need for children's homes for children in need of social services care.
- 1.6 Hertfordshire's Plan for Children and Young People 2021-26 sets out the County Council's vision to support children and young people to be happy, loved and thrive in their family and the community. It seeks to provide sufficient placements for looked after children in the County, by increasing both in-house foster carers (through HCC's Fostering Strategy) and residential homes which can support a range of complex needs.
- 1.7 The LHNA confirms that supply is managed on a Hertfordshire-wide basis and finds that around 80 per 10,000 children aged 11-17 are in care, of which currently 11% are accommodated in existing children's homes in Hertfordshire, 6% in homes outside of the county and 83% in foster care. It highlights that there are clear benefits from being able to accommodate most children in communities they know, and which are close to their families, in particular to support family reunification.
- 1.8 As such, the strategy is to accommodate future growth at a local level and broaden the locations within Hertfordshire where children's home places are available. In order to reduce the percentage of children living out of the county, the LHNA sets out that 16% of the current need should be accommodated in children's homes.
- 1.9 The current and projected gross need is summarised in the table below, with a total of 24 bedspaces in Three Rivers up to 2041.

Table 10.11 Current and Projected Gross Need for Childrens' Home Spaces to 2041, SW Herts

	Estimated Current Need (Gross) at 16%	Estimated Need (Gross) at 33%, 2041
Dacorum	17	38
Hertsmere	13	28
St Albans	19	39
Three Rivers	11	24
Watford	11	26
SW Herts	72	155

- 1.10 The Written Ministerial Statement (WMS) prepared by the Minister of State for Housing and Planning on 23rd May 2023 confirmed that Local Planning Authorities should give due weight to and be supportive of applications for accommodation for looked after children in their area that reflect local needs. This ensures that children in need of accommodation are provided for in their communities.

Design Considerations

- 1.11 With regards to the type of homes required to meet this need, the LHNA confirms that children's homes typically accommodate between 1-4 children in a home, as well as provision for staff to sleep and a number of communal rooms. Outdoor space is also required, as well as provision for staff parking.
- 1.12 This is reiterated in [HCC's Service Provision and Place Making Guide](#) which states that children's homes must no longer reflect the outdated model of HMOs and should instead be a single dwelling which resembles a family home, offering a safe and loving environment to improve the experiences and outcomes of young people in care. It also specifies a preference for detached homes which allow for privacy for staff and children. The minimum bedroom requirement is a 3-bed home which would cater for 1 child. It confirms that a 5-bedroom home could accommodate 4 children.
- 1.13 With regards to location, HCC's guidance highlights the importance of a suitable location as this is a key factor when determining which home to place a child in. Some key locational requirements are that children's homes must be in a residential area; not in an area of social deprivation; should be located on through roads in suburban environments; should be located away from railways and major roads; should be located close to local amenities including shops, schools, community centres, doctors and dentists; should be in proximity of a bus route and pedestrian walkways; and must have access to outdoors areas (garden or located close to public open space).


Land East of Oxhey Lane


- 1.14 The proposed development at the Site involves the delivery of up to 257 homes, housing with care as well as associated parking, landscaping and public open space.
- 1.15 The proposals include the provision of one 4-bed children's home (Use Class C2), capable of accommodating up to three children, and providing facilities for staff to stay on site. The proposals at the site will be the subject of an outline planning application, with all matters reserved save for access.
- 1.16 Although the planning application will be in outline, the Applicant has shared indicative plans with HCC demonstrating the potential layout of the site. The signatories to this document have had meaningful engagement on the proposed layout. The suggested locations of where a single children's home would be appropriate is illustrated on the parameter plan appended in [Appendix 1](#).
- 1.17 HCC appreciate that the position of the proposed new children's homes is not fixed; however, the parameter plan(s) accompanying the application provide an indication on location. The details of which will be the subject of a subsequent reserved matters application. Notwithstanding this, it is agreed that the final location of the proposed new children's home will be determined through engagement with HCC and will be in line with the table below:

<i>Must Not</i>	<i>Must</i>
Be near or in areas of deprivation	Have access to outdoor areas, such as garden or green space
Be next to another Children's Home, unless pairing two solo users in adjacent properties	Be a detached property (min. 4-bed)
Share a driveway with neighbouring property	Have parking space suitable for 4-5 vehicles for carers and visiting professionals
Be in a position where they are overlooked or the centre of focus in a residential development.	Be relatively dispersed among the development and away from existing Children's Homes and/or social housing
<i>Should Not</i>	<i>Should</i>
Be near: <ul style="list-style-type: none"> • Railway lines • Dual carriageways • Motorways • Bodies of water • Retail/industrial areas 	Have access to local amenities, such as, local convenience stores and community facilities
Be located in a Cul-de-Sac	Be on a through road (ideally not on a main road)
Be next to a school	Be in proximity of a bus route and pedestrian walkways

- 1.18 Given the identified need for children's homes across Three Rivers, the delivery of a children's home is an element of the proposed development which is supported by HCC's Growth and Infrastructure Unit (on behalf of Children Looked After). As confirmed in the WMS, LPAs should give due weight to applications for accommodation for looked after children in their area that reflect local needs, to ensure that children in need of accommodation are provided for in their communities. On that basis, it is considered by the Applicant and HCC that this is a benefit of the proposed development, the weighting to be attached to which is a matter for the decision maker.

This Statement of Common Ground has been agreed by:

Hertfordshire County Council	
Signed	
Name	SARAH MCLAUGHLIN
Dated	03/04/25

Boyer (on behalf of Burlington Developments)	
Signed	
Name	Philip Allin
Dated	17/04/25

APPENDIX ONE – PARAMETER PLAN

Issue:
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- KEY: PARAMETER PLAN
- SITE BOUNDARY
 - PROPOSED VEHICULAR ACCESS
 - PROPOSED PEDESTRIAN ACCESS
 - PROPOSED EMERGENCY ACCESS
 - PRIMARY ACCESS ROAD
 - OPEN SPACE (INCLUDING EXISTING VEGETATION AND PROPOSED INDICATIVE PLANTING)
 - INDICATIVE SURFACE WATER ATTENUATION BASIN
 - INDICATIVE DEVELOPMENT PARCELS / ROAD ALIGNMENT CAN DEVIATE BY UP TO 10M UPON DETAILED DESIGN (UP TO 3 STOREYS)
 - INDICATIVE DEVELOPMENT PARCELS / ROAD ALIGNMENT CAN DEVIATE BY UP TO 10M UPON DETAILED DESIGN (UP TO 2 STOREYS)
 - HOUSING WITH CARE
 - INDICATIVE LOCATION FOR A CHILDREN'S HOME (FOR LOOKED AFTER CHILDREN)
 - LEAP



LAND AT CARPENDERS PARK - PARAMETER PLAN



APPENDIX TWO – SOCIO-ECONOMIC INFOGRAPHIC

ECONOMIC BENEFITS

Carpenders Park

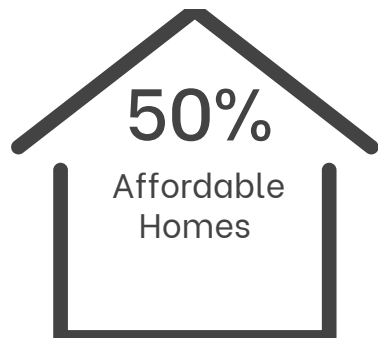
Three Rivers District Council

Outline application for the erection of up to 256 homes (including affordable and self/custom build housing) (Class C3), housing with care homes (Class C2) and a children's home (Class C2), together with associated landscaping, open space and access.



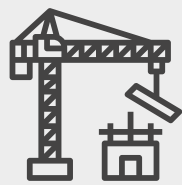
*based on proposed market housing provision

The Proposal



Construction Benefits

Based on 5 year Construction Phase



£65 million

Estimated construction cost



179 FTE jobs



216 FTE indirect and induced jobs



£11.86 million GVA

Per Annum

Operational and Expenditure Benefits

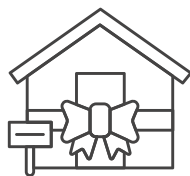
*This is on the basis of 256 dwellings

£632k



Construction workers direct spending

£2.01* million



First Occupation Spending

60 FTE jobs



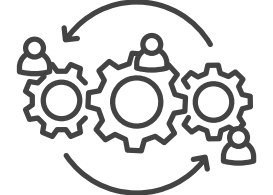
From yearly household spend

£5.34* million



local spending in Three Rivers
Per Annum

18 FTE jobs



Operational staff

Local Authority Revenue Benefits



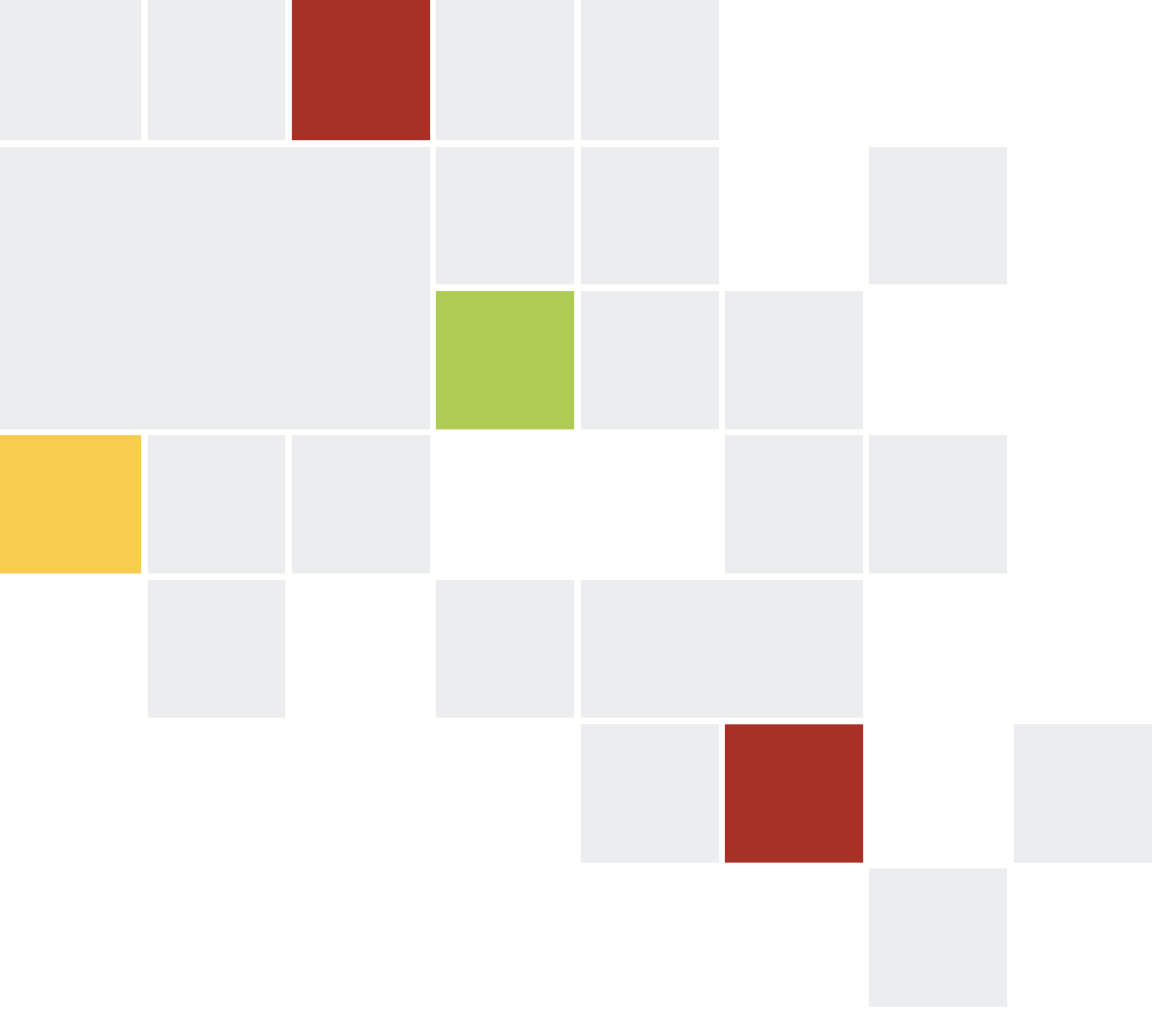
£1.03 million
£106 Contributions



£555k
Council Tax

Per Annum in perpetuity





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