



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

Date: 13 November 2025
Our ref: 10680

For the attention of: Matthew Roberts

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

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

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

Site Context

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

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

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

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

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

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

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

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

Rarity and distinctiveness is described as:

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

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

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

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

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

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

Planning Context

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

Development Management Policies Local Development Document (2013)

- DM7: Landscape character

Core Strategy (October 2011)

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

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

Review of the proposal/submitted information

Landscape and Visual Impact Assessment

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

Landscape impact

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

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

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

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

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

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

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

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

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

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

Visual impact

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

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

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

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

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

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

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

Mitigation measures

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

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

The proposal

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

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

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

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

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

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

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

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

Policy CP12 requires that development:

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

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

Policy DM7 includes:

“...b) Landscape Regions

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

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

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

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

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

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

Summary

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

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

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

"Substantially:

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

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

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

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

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

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

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

Place Services – Landscape Team

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

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

