



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

Our ref: 10680
Date: 16 January 2026

For the attention of: Matthew Roberts

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

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

1.0. LVIA Addendum

General comments

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

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

Landscape Impact

Topography

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

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

Hedgerows

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

Visual impact

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

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

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



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



Visual context

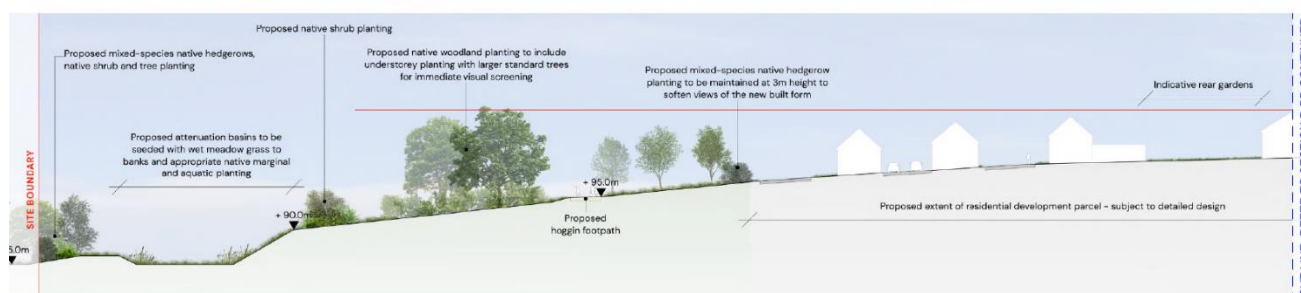
The relationship between the site and the built edge of settlement is not questioned. But we consider that the site also has a visual connection with the rural landscape with views to the south from the mid and southern site parcels, although we acknowledge these are not publicly accessible locations.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

Mitigation measures

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

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

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



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

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

3.0. Conclusion

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

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

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

4.0. Summary

4.1. [Insert Text]

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

5.1. [Insert Text]

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

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

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

Place Services – Landscape Team

Email: landscape@essex.gov.uk



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

Please note:

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

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