

**LAND TO NORTH OF LITTLE GREEN LANE, CROXLEY GREEN
APPEAL
(APPEAL REFERENCE 6004972)**

**REBUTTAL PROOF OF EVIDENCE
ON BEHALF OF THREE RIVERS DISTRICT COUNCIL**

ROY PINNOCK

DENTONS UK AND MIDDLE EAST LLP

1 SCOPE

- 1.1 This rebuttal proof of evidence addresses one point in the proof of evidence of James Bullivent dated 21 July 2026.
- 1.2 The purpose of this rebuttal proof is simply to ensure that the correspondence with registered providers which the Appellant relies on in its evidence is available to the Inquiry.
- 1.3 I do not respond to points in the Appellant's submitted evidence which I disagree with, having regard to the Planning Inspectorate's **Procedural Guide** for appeals. As such, points that I do not raise in this rebuttal proof as matters of disagreement should not be taken to be agreed.

2 RP CORRESPONDENCE

2.1 Context

- 2.1.1 Mr Bullivent refers to evidence given in the Carpenders Park Inquiry proceedings (section 3.3 of his proof of evidence)¹. He notes:

3.3.4 Burlington's evidence (Appendix 8) shows that out of eleven RPs contacted only one (Chime Housing) said they would accept a 4 to 6 month MiP clause ²³ (i.e. an MiP clause of longer than the industry standard 3 months), although that is caveated on the basis that: it is not ideal, it makes it more difficult to offer on larger schemes and that a 3 month period was acceptable to them.

- 2.1.2 Mr Bullivent's Appendix 8 provides an extract from the proof of evidence of Burlington's witness in the Carpenders Park Call In case (Nathan Stevenson). Mr Stevenson's 'Table 2' ² related to the 11 emails from Registered Providers included in his 'Appendix One'.
- 2.1.3 Mr Bullivent reproduces 1 of those 11 emails in his Appendix 8.

2.2 Comment

- 2.2.1 The 'Table 2' summary presents a largely binary position. I acknowledge it is not entirely binary, since it does note that an RP said it would accept a longer-than-3-month moratorium period³.
- 2.2.2 I also acknowledge that, in reviewing the 'Table 2' materials, Mr Bullivent already recognises⁴ that one of the new emails he presents at his Appendix 7 ⁵ conflicts with the same RP's

¹ I note that the Carpenders Park scheme was not an appeal (as stated at paragraphs 3.3.2 and 3.3.3 of Mr Bullivent's proof) – it is a Called In application.

² Which is extracted in Mr Bullivent's Appendix 8

³ " **Yes "but it is not ideal"** "

⁴ Mr Bullivent's Proof of Evidence [3.2.7-3.2.8]

⁵ Sovereign Network Group email of 1 June 2026 Appendix 7 (PDF page 579)

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previously stated position in the email extracted at Appendix 8, to which Mr Stevenson's 'Table 2' summary related ⁶.

- 2.3 While Mr Bullivent's evidence does identify fluidity and inconsistency within the correspondence he has presented, there is also some nuance in the emails omitted from his Appendix 8 that is important context to what is presented in 'Table 2'.
- 2.4 I therefore include Mr Stevenson's Appendix One as **[Appendix 1]** to this rebuttal proof in the interests of completeness. This allows the responses underlying the position summarised at Mr Stevenson's 'Table 2' to be properly understood.
- 2.5 This includes, for example:
- (a) Watford Community Housing Trust's nuanced approach⁷; and
 - (b) Hightown's concern in relation to comparative investment priority rather than any absolute barrier to investing on the basis of an EUV-SH valuation⁸.

3 AFFIRMATION

- 3.1 Insofar as the facts stated in this rebuttal proof of evidence are within my own knowledge, I have made clear what they are and I believe them to be true. The opinions expressed represent my true and complete professional opinion.
- 3.2 I understand that my duty as a witness is to the Inquiry/ Inspector and that my role is to assist the Inquiry/ Inspector on matters within the scope of my expertise. I also understand that my duty as a witness overrides any duty to those instructing me. I have complied with it in giving my evidence impartially and objectively (and I will continue to comply with that duty as required).
- 3.3 I am not instructed under any conditional fee arrangement and I do not have a conflict of interest in relation to the application.
- 3.4 This rebuttal proof of evidence has not been produced with the use of AI technology.

Roy Pinnock

Partner, Dentons UK and Middle East LLP



4 August 2026

⁶ Sovereign Network Group email of 30 April 2026 at Appendix 8 (PDF page 611-614, with the green comments added within the chain on 30 April 2026 appearing at [614])

⁷ See the email of Dan Taylor on 02 April 2026 (PDF - electronic - page 29 of this rebuttal proof)

⁸ See the email of Alison Laing on 29 April 2026 (PDF - electronic - page 14 of this rebuttal proof)

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APPENDIX 1

Nathan Stevenson 'Appendix One'

Appendix One

Responses Received from Registered Providers

Nathan Stevenson

From: Andrew McGarvie <andrew.mcgarvie@clarionhg.com>
Sent: 06 May 2026 11:00
To: Nathan Stevenson
Subject: RE: Land at Oxhey Lane, Carpenders Park (Three Rivers DC)

Nathan,

See my responses in RED below.

Best regards

Andrew McGarvie MRICS
Land and Partnerships Director - South
Latimer by Clarion Housing Group
5th Floor, Greater London House, Hampstead Road, London, NW1 7QX
M: 07500 967635
www.latimerhomes.com



LATIMER
by Clarion Housing Group

Latimer by Clarion Housing Group is the development arm of Clarion Housing Association Limited and Latimer Developments Limited.

From: Nathan Stevenson <nstevenson@burlington-uk.com>
Sent: 06 May 2026 10:58
To: Andrew McGarvie <andrew.mcgarvie@clarionhg.com>
Subject: Land at Oxhey Lane, Carpenders Park (Three Rivers DC)

You don't often get email from nstevenson@burlington-uk.com. [Learn why this is important](#)

Good Morning Andrew,

I hope this message finds you well.

We are currently promoting the above site for a landscape-led development comprising 256 new homes (50%affordable – 70%social rent and 30%shared ownership), alongside a new children's home and housing with care.

The application was recently called in by the Secretary of State following the Planning Committee's resolution to refuse permission on 19 March 2026.

Given our previous experience in Three Rivers, we anticipate that a key matter at the forthcoming Inquiry will be the length of the moratorium period within the mortgagee in possession clause, which will form part of the Section 106 agreement / Unilateral Undertaking.

Three Rivers District Council has an established position requiring a moratorium period of between 4 and 6 months and does not accept a 3-month period.

To assist us in preparing our evidence base for submission to PINS, we would be grateful if you could provide your views on the following:

1. Would Clarion accept a moratorium period of between 4 and 6 months? **No**
2. If not, could you please explain your reasoning? **It needs to be unrestricted to prevent a funder not accepting it as security against a debt facility or bond or a reduction in value of the asset.**
3. Would you still be able to make an offer at a reduced value to reflect the restriction to EUV-SH? **No.**
4. If not, could you please explain your reasoning? **As above**
5. What moratorium period would be acceptable to you? **The standard 3 months**

We would appreciate it if you could provide your response by Thursday 7 May 2026.

Thank you in advance for your assistance, and please do not hesitate to contact me if you would like to discuss this further.

I look forward to hearing from you.

Kind regards,

Nathan Stevenson

Nathan Stevenson

From: Hannah Kilner <Hannah.Kilner@peabody.org.uk>
Sent: 11 May 2026 12:42
To: Nathan Stevenson
Subject: RE: Land at Oxhey Lane, Carpenders Park (Three Rivers DC)

Hi Nathan,

I wish you the best of luck with the Secretary of State.

Peabody is not currently seeking new s106 opportunities due to the scale and commitment in our short term pipeline. However to theoretically answer your questions:

1. Would Peabody accept a moratorium period of between 4 and 6 months? **No, we require 3 months.**
2. If not, could you please explain your reasoning? **This is the requirement for our security charging. All of our lenders require wording as per the NHF guidance which includes a 3 month moratorium period.**
3. Would you still make an offer at a reduced value to reflect the restriction to EUV-SH? **No, we wouldn't**
4. If not, could you please explain your reasoning? **we would prefer to retain our resources for schemes where we can maximum charging capabilities**
5. What moratorium period would be acceptable to you? **3 months**

I hope this helps

Best
Hannah

Hannah Kilner
Head of Land & Partnerships | Development (North Counties) | Peabody

Email: hannah.kilner@peabody.org.uk
Mobile: 07989 673 774
Peabody, 45 Westminster Bridge Road, London SE1 7JB
peabodynewhomes.co.uk | Follow us on [Facebook](#), [Instagram](#), [YouTube](#) and [LinkedIn](#)

From: Nathan Stevenson <nstevenson@burlington-uk.com>
Sent: 31 March 2026 10:55
To: Hannah Kilner <Hannah.Kilner@peabody.org.uk>
Subject: Land at Oxhey Lane, Carpenders Park (Three Rivers DC)
Importance: High

Good Morning Hannah

I hope this message finds you well.

We are currently promoting the above site for a landscape-led development comprising 256 new homes (50%affordable – 70%social rent and 30%shared ownership), alongside a new children’s home and housing with care.

As you may be aware, the application was recently called in by the Secretary of State following the Planning Committee’s resolution to refuse permission on 19 March 2026.

Given our previous experience in Three Rivers, we anticipate that a key matter at the forthcoming Inquiry will be the length of the moratorium period within the mortgagee in possession clause, which will form part of the Section 106 agreement / Unilateral Undertaking.

Three Rivers District Council has an established position requiring a moratorium period of between 4 and 6 months and does not accept a 3-month period.

To assist us in preparing our evidence base for submission to PINS, we would be grateful if you could provide your views on the following:

1. Would Peabody accept a moratorium period of between 4 and 6 months?
2. If not, could you please explain your reasoning?
3. Would you still be able to make an offer at a reduced value to reflect the restriction to EUV-SH?
4. If not, could you please explain your reasoning?
5. What moratorium period would be acceptable to you?

We would appreciate it if you could provide your response by Friday 10 April.

Thank you in advance for your assistance, and please do not hesitate to contact me if you would like to discuss this further.

I look forward to hearing from you.

Kind regards,

Nathan

Nathan Stevenson
Managing Director

Mobile No: 07939 108560

Tel No: 020 7117 2077

<http://burlington-uk.com/>

Foresters Hall 25-27 Westow Street Upper Norwood London, SE19 3RY



Nathan Stevenson

From: Craig Crowley <Craig.Crowley@homegroup.org.uk>
Sent: 11 May 2026 10:26
To: Nathan Stevenson; Will Gardner
Subject: RE: Land at Oxhey Lane, Carpenders Park (Three Rivers DC)

Morning

Responses to your 5 question below

- 1 – No
- 2 – because we must be able to securitise all of our stock and the moratorium cannot be longer than 12 weeks or 3 months because it will be unacceptable to any institutional funders. This is the industry standard.
- 3 - No
- 4 – because this does not offset the issue of being unable to securitise the housing.
- 5 – it needs to be not longer than the industry standard maximum of 12 weeks or 3 months – it must be acceptable to the lender market for it to be acceptable to us

Regards

Craig Crowley
Head of Development and Delivery South

Home Group
Uncommon Liverpool Street
34-37 Liverpool Street
London
EC2M 7PP

M: 07913380740

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For any queries please contact our service desk on +44 (0) 845 155 3222.

From: Nathan Stevenson <nstevenson@burlington-uk.com>
Sent: 27 April 2026 13:51
To: Will Gardner <Will.Gardner@homegroup.org.uk>; Craig Crowley <Craig.Crowley@homegroup.org.uk>
Subject: RE: Land at Oxhey Lane, Carpenders Park (Three Rivers DC)

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Hi Craig,

Please can you help re the below?

Many thanks
Nathan

Nathan Stevenson
Managing Director

Mobile No: 07939 108560
Tel No: 020 7117 2077
<http://burlington-uk.com/>

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From: Nathan Stevenson
Sent: 09 April 2026 10:39
To: 'will.gardner@homegroup.org.uk' <will.gardner@homegroup.org.uk>; 'Craig Crowley' <Craig.Crowley@homegroup.org.uk>
Subject: RE: Land at Oxhey Lane, Carpenders Park (Three Rivers DC)

Dear Will and Craig,

I hope you are both well.

I would be grateful if you could respond to the below at your earliest convenience.

Kind Regards

Nathan

Nathan Stevenson
Managing Director

Mobile No: 07939 108560

Tel No: 020 7117 2077

<http://burlington-uk.com/>

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From: Nathan Stevenson

Sent: 31 March 2026 10:57

To: 'will.gardner@homegroup.org.uk' <will.gardner@homegroup.org.uk>; 'Craig Crowley' <Craig.Crowley@homegroup.org.uk>

Subject: Land at Oxhey Lane, Carpenders Park (Three Rivers DC)

Importance: High

Good Morning Will and Craig

I hope this message finds you well.

We are currently promoting the above site for a landscape-led development comprising 256 new homes (50% affordable – 70% social rent and 30% shared ownership), alongside a new children's home and housing with care.

As you may be aware, the application was recently called in by the Secretary of State following the Planning Committee's resolution to refuse permission on 19 March 2026.

Given our previous experience in Three Rivers, we anticipate that a key matter at the forthcoming Inquiry will be the length of the moratorium period within the mortgagee in possession clause, which will form part of the Section 106 agreement / Unilateral Undertaking.

Three Rivers District Council has an established position requiring a moratorium period of between 4 and 6 months and does not accept a 3-month period.

To assist us in preparing our evidence base for submission to PINS, we would be grateful if you could provide your views on the following:

1. Would Home Group accept a moratorium period of between 4 and 6 months?
2. If not, could you please explain your reasoning?
3. Would you still be able to make an offer at a reduced value to reflect the restriction to EUV-SH?
4. If not, could you please explain your reasoning?
5. What moratorium period would be acceptable to you?

We would appreciate it if you could provide your response by Friday 10 April.

Thank you in advance for your assistance, and please do not hesitate to contact me if you would like to discuss this further.

I look forward to hearing from you.

Kind regards,

Nathan

Nathan Stevenson
Managing Director

Mobile No: 07939 108560
Tel No: 020 7117 2077
<http://burlington-uk.com/>

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Nathan Stevenson

From: Alison Laing <Alison.Laing@hightownha.org.uk>
Sent: 29 April 2026 09:12
To: Nathan Stevenson
Subject: Re: Land at Oxhey Lane, Carpenders Park (Three Rivers DC)

Hello Nathan

The simple answer to your questions is that we would only accept a maximum moratorium period of 3 months, as a longer period is unacceptable to our lenders.

We wouldn't offer on the basis of EUV-SH as prevents us delivering other schemes which we could charge at MV-STT

Hope that helps.

Alison Laing
Head of Projects, Development Department
DDI: 01442 292369 alison.laing@hightownha.org.uk
Mob : 07584 342586



Hightown

Hightown Housing Association Ltd Hightown House Maylands Avenue Hemel Hempstead HP2 4XH
T01442 292300 Web: www.hightownha.org.uk

A Charitable Housing Association



From: Nathan Stevenson <nstevenson@burlington-uk.com>
Sent: Wednesday, April 29, 2026 8:26 AM
To: Alison Laing <Alison.Laing@hightownha.org.uk>
Subject: Land at Oxhey Lane, Carpenders Park (Three Rivers DC)

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Good Morning Alison

I hope this message finds you well.

We are currently promoting the above site for a landscape-led development comprising 256 new homes (50%affordable – 70%social rent and 30%shared ownership), alongside a new children’s home and housing with care.

The application was recently called in by the Secretary of State following the Planning Committee’s resolution to refuse permission on 19 March 2026.

Given our previous experience in Three Rivers, we anticipate that a key matter at the forthcoming Inquiry will be the length of the moratorium period within the mortgagee in possession clause, which will form part of the Section 106 agreement / Unilateral Undertaking.

Three Rivers District Council has an established position requiring a moratorium period of between 4 and 6 months and does not accept a 3-month period.

To assist us in preparing our evidence base for submission to PINS, we would be grateful if you could provide your views on the following:

1. Would Hightown HA accept a moratorium period of between 4 and 6 months?
2. If not, could you please explain your reasoning?
3. Would you still be able to make an offer at a reduced value to reflect the restriction to EUV-SH?
4. If not, could you please explain your reasoning?
5. What moratorium period would be acceptable to you?

We would appreciate it if you could provide your response by Thursday 30 April given the urgency.

Thank you in advance for your assistance, and please do not hesitate to contact me if you would like to discuss this further.

I look forward to hearing from you.

Kind regards,

Nathan

Nathan Stevenson
Managing Director

Mobile No: 07939 108560

Tel No: 020 7117 2077

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Nathan Stevenson

From: Tamsin Griem <tgriem@lqgroup.org.uk>
Sent: 24 April 2026 13:17
To: Nathan Stevenson; Angie Hooper
Subject: RE: Land at Oxhey Lane, Carpenders Park (Three Rivers DC)

Hi Nathan

Thank you for your email. I'm afraid this is outside our current patch for new schemes – we did used to operate in the counties region but the focus is currently within London boroughs and North West UK

Kind regards

Tamsin



Tamsin Griem
Head of New Business
Property & Investment

Direct: 020 8189 2580

29-35 West Ham Lane,
Stratford, London E15 4PH
www.lqgroup.org.uk

From: Nathan Stevenson <nstevenson@burlington-uk.com>
Sent: 23 April 2026 16:27
To: Tamsin Griem <tgriem@lqgroup.org.uk>; Angie Hooper <ahooper@lqgroup.org.uk>
Subject: Land at Oxhey Lane, Carpenders Park (Three Rivers DC)
Importance: High

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Dear Tamsin and Angie

I hope this message finds you well.

We are currently promoting the above site for a landscape-led development comprising 256 new homes (50% affordable – 70% social rent and 30% shared ownership), alongside a new children's home and housing with care.

As you may be aware, the application was recently called in by the Secretary of State following the Planning Committee's resolution to refuse permission on 19 March 2026.

Nathan Stevenson

From: Adam Wadsworth <Adam.Wadsworth@mtvh.co.uk>
Sent: 12 May 2026 13:46
To: Nathan Stevenson
Subject: RE: Land at Oxhey Lane, Carpenders Park (Three Rivers DC)

Hi Nathan,

This has been passed to me.

Please see below our responses in red.

Thanks,

Adam

Adam Wadsworth, Senior Land Manager
m: 07738 714 215 | e: adam.wadsworth@mtvh.co.uk
www.mtvh.co.uk | Follow us: @MetTVH



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From: Nathan Stevenson <nstevenson@burlington-uk.com>
Sent: 08 May 2026 08:30
To: Thomas Ruse <Tom.Ruse@mtvh.co.uk>; Tim Preston <tim.preston@mtvh.co.uk>
Cc: Guy Burnett <Guy.Burnett@mtvh.co.uk>
Subject: Land at Oxhey Lane, Carpenders Park (Three Rivers DC)
Importance: High

CAUTION: This message is from an external sender. If you think it is suspicious, click 'Report Phishing' in Outlook.

Good Morning Tom and Tim

I hope you are all well. I have been in touch with Guy Burnett who suggested you would be able to assist on the below request.

We are currently promoting the above site for a landscape-led development comprising 256 new homes (50%affordable – 70%social rent and 30%shared ownership), alongside a new children's home and housing with care.The application was recently called in by the Secretary of State following the Planning Committee's resolution to refuse permission on 19 March 2026.

Given our previous experience in Three Rivers, we anticipate that a key matter at the forthcoming Inquiry will be the length of the moratorium period within the mortgagee in possession clause, which will form part of the Section 106 agreement / Unilateral Undertaking.

Three Rivers District Council has an established position requiring a moratorium period of between 4 and 6 months and does not accept a 3-month period.

To assist us in preparing our evidence base for submission to PINS, we would be grateful if you could provide your views on the following:

1. Would Metropolitan Thames Valley accept a moratorium period of between 4 and 6 months? **No we wouldn't**
2. If not, could you please explain your reasoning? **because we need to be able to charge the properties in line with our funding requirements**
3. Would you still be able to make an offer at a reduced value to reflect the restriction to EUV-SH? **No we wouldn't**
4. If not, could you please explain your reasoning? **see Q2 response**
5. What moratorium period would be acceptable to you? **Three months as this is the accepted standard.**

We would appreciate it if you could provide your response by Monday 11 May 2026 given the urgency of the matter and need to submit our Proofs of Evidence

Thank you in advance for your assistance, and please do not hesitate to contact me if you would like to discuss this further.

I look forward to hearing from you.

Kind regards,

Nathan

Nathan Stevenson
Managing Director

Mobile No: 07939 108560

Tel No: 020 7117 2077

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Nathan Stevenson

From: Jenny Grote <Jenny.Grote@sng.org.uk>
Sent: 30 April 2026 17:30
To: Nathan Stevenson
Subject: Land at Oxhey Lane, Carpenders Park (Three Rivers DC)

Hi Nathan,

Please see our responses to your questions in green text at the bottom of this email. Best of luck with the site.

Kind Regards,

Jenny Grote
Land & New Business Director – South
01635 277428
07776 225332



Sovereign House, Basing View, Basingstoke, RG21 4FA
Jenny.grote@sng.org.uk

On 1 October, Sovereign and Network Homes merged to become SNG (Sovereign Network Group).

Working hours: Monday – Friday at 12 noon

From: Nathan Stevenson <nstevenson@burlington-uk.com>
Sent: 29 April 2026 14:32
To: Jenny Grote <Jenny.Grote@sng.org.uk>
Subject: RE: Land at Oxhey Lane, Carpenders Park (Three Rivers DC)

Hi Jenny,

Thank you for your response and I look forward to hearing from you as soon as possible.

Many thanks
Nathan

Nathan Stevenson
Managing Director

Mobile No: 07939 108560
Tel No: 020 7117 2077

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From: Jenny Grote <Jenny.Grote@sng.org.uk>
Sent: 29 April 2026 13:54
To: Nathan Stevenson <nstevenson@burlington-uk.com>
Subject: RE: Land at Oxhey Lane, Carpenders Park (Three Rivers DC)

Hi Nathan,

I'm just checking with my sales colleague and will come back to you.

Many thanks,

Jenny Grote
Land & New Business Director – South
01635 277428
07776 225332



Sovereign House, Basing View, Basingstoke, RG21 4FA
Jenny.grote@sng.org.uk

On 1 October, Sovereign and Network Homes merged to become SNG (Sovereign Network Group).

Working hours: Monday – Friday at 12 noon

From: Nathan Stevenson <nstevenson@burlington-uk.com>
Sent: 28 April 2026 14:17
To: Jenny Grote <Jenny.Grote@sng.org.uk>
Subject: RE: Land at Oxhey Lane, Carpenders Park (Three Rivers DC)

Dear Jenny,

I hope all is well.

Did you receive my email below? It would be great if you could respond to the questions.

Many thanks

Nathan

Nathan Stevenson
Managing Director

Mobile No: 07939 108560

Tel No: 020 7117 2077

<http://burlington-uk.com/>

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From: Nathan Stevenson
Sent: 23 April 2026 16:29
To: 'jenny.grote@sng.org.uk' <jenny.grote@sng.org.uk>
Subject: Land at Oxhey Lane, Carpenders Park (Three Rivers DC)

Dear Jenny,

Longtime no speak and I hope this message finds you well.

We are currently promoting the above site for a landscape-led development comprising 256 new homes (50%affordable – 70%social rent and 30%shared ownership), alongside a new children's home and housing with care.

As you may be aware, the application was recently called in by the Secretary of State following the Planning Committee's resolution to refuse permission on 19 March 2026.

Given our previous experience in Three Rivers, we anticipate that a key matter at the forthcoming Inquiry will be the length of the moratorium period within the mortgagee in possession clause, which will form part of the Section 106 agreement / Unilateral Undertaking.

Three Rivers District Council has an established position requiring a moratorium period of between 4 and 6 months and does not accept a 3-month period.

To assist us in preparing our evidence base for submission to PINS, we would be grateful if you could provide your views on the following:

1. Would Sovereign Network Group accept a moratorium period of between 4 and 6 months? **No**
2. If not, could you please explain your reasoning? **We can't see a reason for Lenders to be willing to accept a longer period than 3-months, so SNG also need to adopt this position**
3. Would you still be able to make an offer at a reduced value to reflect the restriction to EUV-SH? **No**
4. If not, could you please explain your reasoning? **We need to Charge our properties to raise further funding for affordable housing**
5. What moratorium period would be acceptable to you? **A period of 3 months in line with the NHF MIP.**

We would appreciate it if you could provide your response by Tuesday 28 April 2026 given the urgency of the matter.

Thank you in advance for your assistance, and please do not hesitate to contact me if you would like to discuss this further.

I look forward to hearing from you.

Kind regards,

Nathan

Nathan Stevenson
Managing Director

Mobile No: 07939 108560

Tel No: 020 7117 2077

<http://burlington-uk.com/>

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Nathan Stevenson

From: Becky King <Becky.King@ParadigmHousing.co.uk>
Sent: 23 April 2026 18:27
To: Nathan Stevenson
Subject: RE: Land at Oxhey Lane, Carpenders Park (Three Rivers DC)

Hi Nathan

Responses below in red. NB – this does not necessarily mean we would make an offer should the moratorium period be acceptable.

regards

Becky

Becky King
Head of New Business
01628811995
07885 892487
www.SettleParadigm.co.uk
1 Glory Park Avenue, High Wycombe, HP10 0DF

settle.Paradigm

From: Nathan Stevenson <nstevenson@burlington-uk.com>
Sent: 23 April 2026 16:25
To: Becky King <Becky.King@ParadigmHousing.co.uk>
Subject: Land at Oxhey Lane, Carpenders Park (Three Rivers DC)
Importance: High

Good Afternoon Becky,

I hope this message finds you well.

We are currently promoting the above site for a landscape-led development comprising 256 new homes (50% affordable – 70% social rent and 30% shared ownership), alongside a new children's home and housing with care.

As you may be aware, the application was recently called in by the Secretary of State following the Planning Committee's resolution to refuse permission on 19 March 2026.

Given our previous experience in Three Rivers, we anticipate that a key matter at the forthcoming Inquiry will be the length of the moratorium period within the mortgagee in possession clause, which will form part of the Section 106 agreement / Unilateral Undertaking.

Three Rivers District Council has an established position requiring a moratorium period of between 4 and 6 months and does not accept a 3-month period.

To assist us in preparing our evidence base for submission to PINS, we would be grateful if you could provide your views on the following:

1. Would Paradigm accept a moratorium period of between 4 and 6 months? **No**
2. If not, could you please explain your reasoning? **Not suitable for charging at MV-STT**
3. Would you still be able to make an offer at a reduced value to reflect the restriction to EUV-SH? **No**
4. If not, could you please explain your reasoning? **We require the ability to charge at MV-STT**
5. What moratorium period would be acceptable to you? **3 months**

We would appreciate it if you could provide your response by Tuesday 28 April given the urgency of this matter.

Thank you in advance for your assistance, and please do not hesitate to contact me if you would like to discuss this further.

I look forward to hearing from you.

Kind regards,

Nathan

Nathan Stevenson
Managing Director

Mobile No: 07939 108560

Tel No: 020 7117 2077

<http://burlington-uk.com/>

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From: Philip Pearson <Philip.pearson@placesforpeople.co.uk>
Sent: 08 May 2026 14:39
To: Nathan Stevenson
Subject: FW: Land at Oxhey Lane, Carpenders Park (Three Rivers DC)

Hi Nathan,

Apologies for the delay and long time no speak!

I've been trying to get a definitive response but ultimately it's less of a point for PFP and more one for our funders. Please see below:

1. Would Places for People accept a moratorium period of between 4 and 6 months? **No. We have also previously flagged concerns about this approach with MHCLG and the Nat Fed due to impact on valuations and funding. Both our valuers and legal advisors would advise us against agreeing an extended period without significant DD being undertaken with our lenders. We also don't feel it would be an individual lender matter but that the whole funding market generally would need to be agreeable to a departure from 3 months before any individual lender took the plunge so to speak.**
2. If not, could you please explain your reasoning? **As explained above. We are also unable to determine the risk appetite of future funders so there is no guarantee that a departure from current industry standard would still be acceptable in the future. There is also a disclosure risk as any departure from the industry position of 3 months would need to be disclosed on an annual basis to our valuers and the chance of accidental non-disclosure in such a large portfolio probably wouldn't be worth the risk.**
3. Would you still be able to make an offer at a reduced value to reflect the restriction to EUV-SH? **No.**
4. If not, could you please explain your reasoning? **Because this will affect the chargeable value of the properties and our ability to secure finance.**
5. What moratorium period would be acceptable to you? **3 months is widely accepted as industry standard and any movement on this would likely need to be a decision by the funding markets as a matter of policy and not a specific decision for PFP and our individual funders.**

Hope that helps.

Kr,

Phil

Philip Pearson
Development Director – Places for People Developments



e: philip.pearson@placesforpeople.co.uk m: 07736 276717 w: placesforpeople.co.uk

Nathan Stevenson

From: Conan Farningham <Conan.Farningham@sanctuary-housing.co.uk>
Sent: 08 May 2026 10:38
To: Nathan Stevenson
Subject: Re: Land at Oxhey Lane, Carpenders Park (Three Rivers DC)

Morning Nathan,

Hope you are well.

Apologies for the delay in responding.

Please see my responses in **red** below.

Conan

Conan Farningham
Development Director – London
07738628917

The logo for Sanctuary, featuring the word "Sanctuary" in a green, sans-serif font.

From: Nathan Stevenson <nstevenson@burlington-uk.com>
Sent: Tuesday, April 28, 2026 2:17 PM
To: Conan Farningham <conan.farningham@sanctuary-housing.co.uk>
Subject: RE: Land at Oxhey Lane, Carpenders Park (Three Rivers DC)

You don't often get email from nstevenson@burlington-uk.com. [Learn why this is important](#)

[EXTERNAL EMAIL] This email is from an external source – be careful when opening attachments or clicking links.

Hi Conan,

How you doing?

Just checking that you received my email below, it would be great if you could respond to the questions.

Many thanks
Nathan

Nathan Stevenson
Managing Director

Mobile No: 07939 108560

Tel No: 020 7117 2077

<http://burlington-uk.com/>

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From: Nathan Stevenson

Sent: 23 April 2026 16:26

To: 'conan.farningham@sanctuary-housing.co.uk' <conan.farningham@sanctuary-housing.co.uk>

Subject: Land at Oxhey Lane, Carpenders Park (Three Rivers DC)

Importance: High

Good Afternoon Conan

I hope this message finds you well.

We are currently promoting the above site for a landscape-led development comprising 256 new homes (50%affordable – 70%social rent and 30%shared ownership), alongside a new children's home and housing with care.

As you may be aware, the application was recently called in by the Secretary of State following the Planning Committee's resolution to refuse permission on 19 March 2026.

Given our previous experience in Three Rivers, we anticipate that a key matter at the forthcoming Inquiry will be the length of the moratorium period within the mortgagee in possession clause, which will form part of the Section 106 agreement / Unilateral Undertaking.

Three Rivers District Council has an established position requiring a moratorium period of between 4 and 6 months and does not accept a 3-month period.

To assist us in preparing our evidence base for submission to PINS, we would be grateful if you could provide your views on the following:

1. Would Sanctuary Housing accept a moratorium period of between 4 and 6 months? **No, we would require no more than 3 months**
2. If not, could you please explain your reasoning? **GLA and National Housing Federation support 3 month periods**
3. Would you still be able to make an offer at a reduced value to reflect the restriction to EUV-SH? **No**
4. If not, could you please explain your reasoning? **As per Question 2 above, 3 months is industry standard**

5. What moratorium period would be acceptable to you? **We would expect 3 months as this would be the standard timeframe**

I would be extremely grateful if you could assist with the above questions and provide a response by Tuesday 28 April 2026.

Thank you in advance for your assistance, and please do not hesitate to contact me if you would like to discuss this further.

I look forward to hearing from you.

Kind regards,

Nathan

Nathan Stevenson
Managing Director

Mobile No: 07939 108560

Tel No: 020 7117 2077

<http://burlington-uk.com/>

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Nathan Stevenson

From: Dan Taylor <Dan.Taylor@wcht.org.uk>
Sent: 02 April 2026 10:21
To: Nathan Stevenson
Subject: RE: Land at Oxhey Lane, Carpenders Park (Three Rivers DC)

Follow Up Flag: Follow up
Flag Status: Flagged

Hi Nathan,

All good thank you.

1. Would Watford Community Housing accept a moratorium period of between 4 and 6 months? **Yes we have done albeit it is not ideal given the deviation from the standard 3 month clause and the charging implications thereof.**
2. If not, could you please explain your reasoning? **N/A**
3. Would you still be able to make an offer at a reduced value to reflect the restriction to EUV-SH? **Yes this is what we typically do in Three Rivers subject to our board approvals. As schemes get larger however, the charging implications are amplified and therefore it is more difficult to justify the investment vs. other schemes with non-defective MiP clauses.**
4. If not, could you please explain your reasoning? **N/A**
5. What moratorium period would be acceptable to you? **Well the standard 3 month is preferred in line with industry standards.**

I hope this helps but if you need anything else, please let me know.

Best regards,



Dan Tayl
or
Land and Partnerships Team Man
ager
Watford Community Hous
ing

+44 1923 209192

+44 7702 515111

@ Dan.Taylor@wcht.org.uk

www.wcht.org.uk

Gateway House, 59 Clarendon Road, Watford, Hertfordshire, WD17 1LA

From: Nathan Stevenson <nstevenson@burlington-uk.com>
Sent: 31 March 2026 11:16
To: Dan Taylor <Dan.Taylor@wcht.org.uk>
Subject: [EXTERNAL MESSAGE] Land at Oxhey Lane, Carpenders Park (Three Rivers DC)
Importance: High

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Good Morning Dan,

I hope this message finds you well.

We are currently promoting the above site for a landscape-led development comprising 256 new homes (50%affordable – 70%social rent and 30% shared ownership), alongside a new children's home and housing with care.

As you may be aware, the application was recently called in by the Secretary of State following the Planning Committee's resolution to refuse permission on 19 March 2026.

Given our previous experience in Three Rivers, we anticipate that a key matter at the forthcoming Inquiry will be the length of the moratorium period within the mortgagee in possession clause, which will form part of the Section 106 agreement / Unilateral Undertaking.

Three Rivers District Council has an established position requiring a moratorium period of between 4 and 6 months and does not accept a 3-month period.

To assist us in preparing our evidence base for submission to PINS, we would be grateful if you could provide your views on the following:

1. Would Watford Community Housing accept a moratorium period of between 4 and 6 months?
2. If not, could you please explain your reasoning?
3. Would you still be able to make an offer at a reduced value to reflect the restriction to EUV-SH?
4. If not, could you please explain your reasoning?
5. What moratorium period would be acceptable to you?

We would appreciate it if you could provide your response by Friday 10 April.

Thank you in advance for your assistance, and please do not hesitate to contact me if you would like to discuss this further.

I look forward to hearing from you.

Kind regards,

Nathan

Nathan Stevenson
Managing Director

Mobile No: 07939 108560
Tel No: 020 7117 2077
<http://burlington-uk.com/>

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