

Subject: RE: APP/P1940/V/26/3378268 - Land East of Oxhey Lane, Carpenders Park

Dear Leanne

Thank you for the opportunity to provide the Applicant's response in relation to the emerging Three Rivers Local Plan.

The Site is a proposed allocation with an indicative capacity of 381 homes, as well as 60 extra-care housing units, a 4-bed children's home and open space (ref: H17, Land East of Oxhey Lane). We note that this quantum is significantly greater than that proposed within our application (by 125 homes) which would in practical terms require the entirety of the northern field to be developed. The delivery timescales are anticipated to be 1-10 years. It is also relevant to note that the site to the immediate north continues to be proposed for an education allocation (ref: ED1, Carpenders Park Farm), with delivery anticipated between 1-10 years. There are also further housing allocations to the north of the Site, to the south of Watford Heath (refs: H14-16), as well as to the south of Little Oxhey Lane (ref: H18). In total the proposed allocations in Carpenders Park total 1,025 dwellings. This highlights that the Council considers Carpenders Park a suitable settlement for significant expansion, both eastwards and southwards.

At the time of the Inquiry it was anticipated that the Site would be proposed for allocation in the Regulation 19 draft Plan, which is reflected in the Planning Statement of Common Ground albeit the wording was not categorical (see paragraphs 2.16 and 4.4, CD6.4). The draft allocation in the Regulation 19 Local Plan confirms this.

One of the key strategic objectives of the Local Plan is to reduce the need to travel by locating development in sustainable and accessible locations (p23). To achieve this, it notes that development will be focused on urban and edge of settlement sites to prioritise land which is well served or can be well served by public transport which has informed the proposed allocation of the Site. Furthermore, within the accompanying update to the Sustainability Appraisal (July 2026), published alongside the draft Plan, the Site (ref: NCFS12, p366) scores positively in respect of sustainability. The SA, being part of the Council's evidence base, is a material consideration in the determination of this application.

With regards to the detailed allocation requirements, the proposed development satisfies all of the key criteria. Whilst some of the criteria in respect of mitigation measures identified in the Transport Assessment (such as providing a bus service into the Site and contributing to SWHGPT Package 8), these were not sought by HCC through detailed discussions, are not necessary to achieve accessibility to bus services, and do not materially impact the sustainability of the Site.

Overall, we consider that the publication of the Regulation 19 draft Local Plan not only confirms the Council's intention to allocate the Site (for a far greater quantum of development than that currently proposed) but also that Carpenders Park is a sustainable settlement suitable for significant expansion, east of Oxhey Lane, early in the Plan period, with the recently published SA highlighting that the Site is considered to be in a sustainable location. All of these factors reaffirm the Applicant's case made at the Inquiry that the proposed development at the Site would be entirely appropriate.

On a separate matter, we note that the Regulation 19 Draft Local Plan seeks to make provision for at least 9,253 dwellings over the plan period, falling short of the standard method need of 12,032 dwellings (approximately 77% of the need). Allocations have been made with an indicative capacity of 7,947 dwellings when taking into account commitments and windfalls, resulting in a shortfall of 2,779 dwellings. The Council have concluded that exceptional circumstances exist to alter Green Belt boundaries and a number of sites are proposed for removal from the Green Belt accordingly.

In determining that exceptional circumstances exist, some of the factors that the Council list (paragraph 4.3 of the draft Local Plan) include the scale of the housing need and limited availability and capacity of brownfield sites, the worsening affordability of housing and acute need for affordable housing, and the need to provide specialist accommodation including for older people and those with specific housing needs). Whilst we acknowledge that the exceptional circumstances case is different to the very special circumstances test (which is only relevant should it be concluded that the site is not grey belt), these are all matters which the proposed development will contribute positively towards, emphasising the significant positive weight that should be attached to these scheme benefits.

In short, the proposed allocation of the Site within the Regulation 19 Local Plan demonstrates a very clear direction of travel which, together with the published evidence base (i.e. SA but also other evidence referred to at the Inquiry such as the

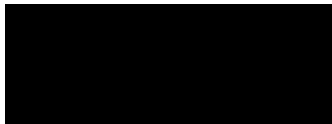
Access to Services Report (February 2026)), reiterate the appropriateness of the Site for development and therefore supports the Applicant's case made at Inquiry.

Kind regards

Alice

Alice Moore

Associate Director



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