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Standing up for Hertfordshire's countryside

Matthew Roberts  
Development Management  
Three Rivers District Council  
Three Rivers House  
Northway, Rickmansworth  
Herts. WD3 1RL

Our Ref:

Your Ref:

23<sup>rd</sup> July 2025 (by email)

Dear Matthew Roberts,

**Planning application no. 25/1020/OUT**

**Land East of Oxhey Lane, Carpenders Park**

**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)**

I write with regard to the above planning application to which CPRE Hertfordshire objects, together with a nearby proposed development also in Carpenders Park (reference application number 25/1055/FUL), for the following reasons.

1. The land identified for both proposed developments is designated as London Metropolitan Green Belt in the adopted Three Rivers Core Strategy where development is inappropriate unless very special circumstances are identified which clearly outweigh the harms caused, according to criteria in the National Planning Policy Framework (NPPF).
2. The two applications presently under consideration, as noted above, constitute a very significant increase in the community of Carpenders Park through speculative development on land which has not been allocated through the Local Plan process. It is not reasonable in our view to consider these applications individually due to the cumulative impact they would have on the local environment and community services and facilities.
3. In view of the recent decision by the Council to progress to a further Regulation 18 consultation on the emerging Local Plan, we note that, although this site (25/1020/OUT) is included for the consultation, the Council has "significant concerns" regarding its suitability for development. It is suggested that these relate to the impact on open

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countryside and the high harm assessed within the Council's Stage 2 Green Belt Review and we would fully support the exclusion of the site on this basis.

4. The Applicant's Planning Statement (PS) seeks to justify the proposed development both on the basis of the recently introduced concept of grey belt and "very special circumstances" relating to the lack of housing land supply in the Core Strategy. The lack of housing land supply is now said to be exacerbated by the requirements of the revised NPPF, which specify a higher housing need for Three Rivers than previously
5. Further, this application follows the now frequent pattern of recent applications, many of which have previously been refused permission, arguing similarly that the revised National Planning Policy Framework (NPPF) has changed the basis for their determination and indicating that the three purposes a), b) and d) noted in paragraph 143 are not sufficient to prevent the granting of permission.
6. The PS introduces the concept of grey belt to add to the demonstration of very special circumstances and proceeds to assert that none of the three purposes of the Green Belt which may be identified (see NPPF Glossary definition of grey belt) where development would not be inappropriate apply in this case. CPRE Hertfordshire challenges this interpretation of the grey belt and believes that purposes a) and d) (NPPF Paragraph 143) relating to "unrestricted sprawl" and "coalescence" apply in this case.
7. In our view, the first purpose of the Green Belt refers to the effect of the urban sprawl emanating from the growth of London as the major development generator in this and the surrounding areas. The proposed development is clearly urban sprawl beyond the built-up area of the adjoining settlement which the Green Belt legislation was designed to prevent and, as such, the designation of Green Belt provides the "strong reason" required in this case to refuse development as noted in the NPPF footnote 7.
8. The proposed development also performs a crucial function in preventing the coalescence of the settlements of Carpenders Park with surrounding districts such as South Oxhey and Hatch End which constitute the southern parts of Watford and Bushey, forming almost continuous urban development immediately north of London. It is not appropriate in our view for such significant proposals in the Green Belt to be determined outside the Local Plan process.
9. Notwithstanding the Government's update to Planning Policy Guidance (PPG) in Feb 2025 (*Assessing Green Belt to identify grey belt land - Paragraph: 005 Reference ID: 64-005-20250225*) which specifically excludes villages from consideration of the merging of settlements in the Green Belt, CPRE Hertfordshire strongly believes that the Council should take account of the impact of any development proposals south of Watford.

These will have a significant impact on the vulnerable stretch of protected Green Belt countryside in the narrow gap between Watford and north London.

10. CPRE Hertfordshire will continue to campaign vigorously for changes in national planning policy and PPG to redress the imbalances that have now arisen both as a result of the revised NPPF, and in assessing the impact of the merging of Green Belt settlements, regardless of the settlement size. Unrestricted development around villages adjacent to and between towns could ultimately lead to the coalescence of larger settlements.
11. It is undeniable that the new planning policy context has provoked a disturbingly high number of new applications and re-applications for sites which were previously refused permission. Whereas a proportion of such applications may warrant consideration for various reasons, the illogicality of the revised NPPF supporting five purposes of the Green Belt (para 143) and then only permitting three purposes to be considered in applications (NPPF Glossary definition) is unsupportable in this case.
12. CPRE Hertfordshire supports fully the very wide range of concerns raised by local residents and representatives, regarding the comprehensiveness of the application, highways and pressure on local services and facilities and local environmental conditions, amongst other matters. The Green Belt in south-west Hertfordshire is under continuous and unrelenting pressure for development exerted by north London which is jeopardising the highly valued benefits which protection brings. Its continual reduction through consents for speculative development is in danger of bringing the planning system into disrepute and we urge the Council to refuse permission for this inappropriate development.

Yours sincerely,

Chris Berry  
Planning Manager

NOTE: We would request that this letter is published on the Council's website as a document relating to this application and should be grateful if you would notify us of the date of the appropriate meeting if it is to be determined by planning committee.