

Suzanne O'Brien
Development Management
Three Rivers District Council
Three Rivers House
Northway, Rickmansworth
Herts. WD3 1RL

Our Ref:

Your Ref:

6th February 2026 (by email)

Dear Suzanne O'Brien,

**Planning application no. 25/2168/OUT
Land Adjacent Woodlands Cottages, Oxhey Lane, Carpenders Park
Outline application: Construction of up to 70 residential dwellings (Use Class C3)
with associated access onto Oxhey Lane and infrastructure
(Appearance, Layout, Landscaping and Scale as reserved matters)**

I write with regard to the above planning application to which CPRE Hertfordshire objects for the following reasons.

1. The land identified for this proposed development is designated as London Metropolitan Green Belt in the adopted Three Rivers Core Strategy where development is stated as being 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 site is not allocated for housing in the emerging Three Rivers Local Plan and it is not appropriate in our view for such a significant allocation in the Green Belt to be determined outside the Local Plan process, particularly where the Council is in the final stages of preparing a Local Plan, as in this case.
3. The Applicant's Planning Statement notes the 2024 revision of the NPPF and the introduction of the concept of grey belt as the justification for the submission of this application. The identification of 'very special circumstances' is then cited as a 'fall-back position' although no such special circumstances are identified relating to local conditions which would justify development in this location as opposed to any other Green Belt location.



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4. To suggest, in the Planning Statement, that the site should now be regarded as grey belt as introduced by the revised National Planning Policy Framework (NPPF) is entirely inappropriate due its particular nature and function with regard to the surrounding local community. Significant local community opposition continues both generally to development in the Green Belt and this specific application.
5. We entirely refute the assertion that the first two purposes of the Green Belt has no relevance in this case and that this site constitutes grey belt under the present legal definitions. In the case of the London Metropolitan Green Belt, the first purpose of the Green Belt refers as much to the effect of the urban sprawl emanating from the growth of the capital as the major development generator in this and the surrounding areas, as to the sprawl of other settlements.
6. The proposed development is clearly an extension of the significant settlement of Bushey which the Green Belt legislation was designed to prevent and aids the coalescence of the settlements of Bushey and Carpenders Park. Arguments relating to the inconsequential impact of each individual application on the Green Belt as a whole become seriously inappropriate when the cumulative effect of several applications is considered, as is occurring in Hertfordshire.
7. It is noteworthy that virtually every major planning application for residential and commercial development within the Green Belt in Hertfordshire made since 12th December 2024 has identified the site as grey belt, notwithstanding the quality and character of the landscape or local conditions in each case. This is clearly an unsustainable position and it is becoming increasingly clear that the existing definitions and guidance on grey belt are entirely inadequate to prevent the wholesale removal of highly valued and significant Green Belt protections.
8. It is undeniable that the new planning policy context created by the revised NPPF 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 purposeful 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.
9. We support fully the extensive local community opposition including Watford Rural Parish Clouncil against this application with regard to concerns relating to highways and infrastructure provision as well as the loss of Green Belt and highly valued local green space.



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10. A further concern relates to the proposed provision of low cost housing and we note the intention to provide 50% affordable housing. Given the inadequacy of the official definition to reflect the true state of the housing market in Hertfordshire this is essentially meaningless without commitments to legally binding agreements between appropriate institutions involved in the provision of truly affordable low cost housing.
11. Affordability for average earning households is generally unattainable in the County and there is significant experience in Hertfordshire and elsewhere of initial commitments to affordable housing not being maintained. This is generally due to questionable viability issues and at the very least the Council should seek robust guarantees regarding affordable housing proposals.
12. Southern Hertfordshire especially is under unrelenting pressure for development and the value of the open countryside that remains increases for local communities and visitors, notwithstanding wider environmental benefits relating to the amelioration of the effects of climate change, maintenance and enhancement of biodiversity, and physical and mental health.

This application is not supported through the Local Plan process and we urge the Council to refuse permission for this inappropriate speculative 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.