

Three Rivers District Council Local Plan Explanatory Note

1 Introduction

- 1.1 This note explains the council's decision to plan for 7,017 dwellings over the plan period, representing approximately 56% of the Standard Method housing need figure. It sets out the evidential basis for this position, the spatial strategy underpinning the emerging Local Plan, and the constrained nature of the district.
- 1.2 The focus of this explanatory note is on housing need, reflecting the reason for the Minister's intervention and the specific questions raised regarding the council's approach to meeting the standard method target. However, it is recognised that the Local Plan addresses a wide range of other policy areas, and each of these areas is supported by its own robust evidence base, demonstrating that the Plan as a whole is underpinned by comprehensive, proportionate, and transparent technical work beyond housing alone.
- 1.3 Three Rivers is an exceptionally constrained authority. Approximately 76% of the district lies within the Metropolitan Green Belt. The remaining land is subject to a range of environmental and infrastructure constraints, including flood risk, ecological designations, heritage assets, and landscape sensitivity, including land within and contributing to the setting of the Chilterns National Landscape. The settlement pattern is predominantly semi-rural, characterised by small towns and villages with varying levels of services and public transport accessibility. There are no large urban brownfield regeneration opportunities comparable to those available in more urban authorities.
- 1.4 It is this exceptionally constrained nature of the district that justifies a deviation from the standard method in establishing a locally appropriate housing requirement. The scale and extent of Green Belt coverage, combined with multiple overlapping environmental, heritage and landscape constraints, significantly limit the realistic supply of deliverable land. When all national and local policy constraints are applied, there is a clear lack of sites that are both suitable and available for development at the scale assumed by the standard method. As such, a rigid application of the standard method would not reflect the district's genuine capacity to accommodate growth in a sustainable and policy-compliant manner. A positively prepared plan must therefore respond to these constraints by aligning housing provision with what can be sustainably delivered, rather than relying solely on a theoretical, unconstrained assessment of need

2 Regulation 18 consultations

- 2.1 The council has undertaken a thorough and iterative plan-making process through multiple Regulation 18 stages. These have included early Issues and Options consultation, a more detailed draft plan consultation, and consultation on a low growth strategy. Each stage has been supported by updated evidence, including the Strategic Housing and Economic Land Availability Assessment (SHELAA), Sustainability Appraisal, Local Housing Need Assessment (LHNA), Urban Capacity Study, Access to Services Study and Green Belt Reviews. Five "Call for Sites" exercises were undertaken to ensure that all potential land supply options were identified and assessed. Every promoted site was evaluated for suitability, availability and achievability through the SHELAA process, and its sustainability performance tested through the Sustainability Appraisal framework.

- 2.2 The Issues and Options Regulation 18 consultation (2017) considered three housing growth options based around an Objectively Assessed Need (OAN) figure of 514 dwellings per annum as calculated in the councils Strategic Housing Market Area Assessment. These were 'Low Growth' of 411 dwellings per annum (20% below OAN), 'Moderate Growth' of 514 dwellings per annum (OAN) and 'High Growth' of 617 dwellings per annum (20% above OAN). It should be noted that the current standard method figure of 832 dwellings per annum is well above the high growth figure and as such can be considered exceptionally high growth for Three Rivers, a heavily constrained semi-rural district.
- 2.3 In 2021 the Council consulted on its Regulation 18 draft Local Plan. The document considered preferred policy options and set out the sites that could potentially be allocated for development in the Local Plan. These sites provided 8,973 dwellings which was 1,705 dwellings short of the standard method housing requirement at the time.
- 2.4 It should be noted that since then further work has been undertaken on dwelling capacities resulting in reduced dwelling capacities across potential sites. This was due to the previous methodology applying a 50 dwellings per hectare housing density without factoring how much of the site may not be developable as it would be needed for other uses such as amenity space and BNG. The housing density is now only applied to the developable area of the site to avoid housing densities that in reality would be much higher than 50 dwellings per hectare, dwarfing existing densities across the district and negatively eroding the character of the area. The updated approach still results in a significant uplift in housing densities across the district in line with national policy. The adjustment in housing densities in the updated plan has resulted in a reduced number of dwellings being planned for, however the sites are now considered to be more realistically deliverable.
- 2.5 Since the 2021 Regulation 18 consultation, a number of sites have been removed from the emerging supply for reasons beyond the council's control. For example, the proposed allocation at Batchworth Golf Course, which was expected to deliver 618 dwellings, was withdrawn as the site was no longer available, owing to unresolved issues relating to the long-term lease of the golf club. In addition, a site with capacity for 319 dwellings was removed after being prioritised for a data centre. This site was removed following the decision by the Secretary of State to grant permission for the data centre.
- 2.6 Following the publication of the 2023 version of the NPPF, which clarified that the standard method is an advisory starting point rather than a mandatory requirement and confirmed that Green Belt boundaries are not required to be reviewed except in exceptional circumstances, the council undertook a Regulation 18 consultation on a low-growth strategy. This strategy proposed the delivery of 4,852 new homes over the plan period—less than half of the housing need identified through the standard method.
- 2.7 The **overwhelming majority of public respondents supported the council's proposed approach of not seeking to meet the standard method target** in full. In total, 91.6% of respondents expressed agreement with this position, compared with 8.4% who disagreed. Similarly, 90.3% of respondents supported the council's preferred 'Low Growth and Green Belt Restraint' option as the most appropriate strategy for the district, with 9.7% expressing an alternative view. In this context, it is reasonable to question the purpose and value of undertaking Regulation 18 consultation if the clearly expressed views of the local community are subsequently to be disregarded.

3 Evidence Base

- 3.1 The council considers that its emerging Local Plan is underpinned by a comprehensive and robust evidence base which clearly justifies its approach to site selection and overall housing provision. The Council has undertaken extensive technical work to ensure that proposed allocations are deliverable, environmentally responsible and aligned with national policy. The evidence has been prepared proportionately but rigorously, with each study informing and cross-referencing the others to create a coherent and defensible strategy for growth in a highly constrained district.
- 3.2 The Stage 4 Green Belt Review was a key piece of evidence, providing a detailed parcel-level assessment of land across the district against the purposes of the Green Belt. The Review also identified Areas of Fundamental Importance where the contribution to Green Belt purposes is particularly strong at a strategic level. In addition, the study identified areas of *provisional* grey belt land, recognising parcels where Green Belt characteristics may have been compromised. However, the identification of provisional grey belt was not determinative. The council retained responsibility for making final judgements at the individual site level, taking into account not only Green Belt performance but also wider planning considerations. **Even where land was identified as grey belt in principle, it was only considered suitable for allocation where it was located in a sustainable settlement, aligned with the spatial strategy, and free from overriding environmental, physical or infrastructure constraints.** This work enabled the council to distinguish between land that performs strongly against Green Belt purposes and land where harm would be more limited, thereby informing decisions about where exceptional circumstances might justify boundary amendments. Sites selected for allocation were those assessed as causing the least harm to Green Belt purposes and openness, and which were sustainable and deliverable in planning terms.
- 3.3 The Strategic Housing and Economic Land Availability Assessment (SHELAA) provides a systematic assessment of all promoted sites. Each site was evaluated for suitability, availability and achievability, taking into account environmental constraints, access considerations, infrastructure capacity, policy designations and deliverability. The SHELAA drew upon other technical studies ensuring that conclusions were not reached in isolation. It established a realistic picture of deliverable supply and filtered out sites that were undeliverable, heavily constrained, or fundamentally unsuitable in planning terms. The SHELAA assessments are separated by area and can be viewed together with the covering SHELAA report and appendices.
- 3.4 The council's rejected sites table provides a clear and accessible summary of all sites that were promoted but ultimately not taken forward for allocation in the Local Plan. It sets out the key reasons for rejection, including Green Belt harm, environmental constraints, flood risk, infrastructure limitations, unsustainable location, and deliverability concerns. This table is intended to be read alongside the SHELAA, which provides a more detailed technical assessment of each site's suitability, availability and achievability. Together, the rejected sites table and the SHELAA offer a comprehensive and transparent record of the site selection process, demonstrating the evidence-led approach taken by the council in identifying which sites could contribute to meeting housing needs while ensuring that growth is directed to the most sustainable and least harmful locations.
- 3.5 The New Settlement Scoping Study considered whether the delivery of a new, standalone settlement within the district could provide a sustainable mechanism for

accommodating future growth. The assessment examined potential broad locations against a range of strategic considerations, including infrastructure requirements, environmental constraints, Green Belt performance, viability, and the capacity to establish a genuinely self-sustaining community with appropriate services and facilities.

- 3.6 The study concluded that the scale of Green Belt coverage, **significant infrastructure constraints—most notably limited road capacity and access—**together with fragmented land ownership patterns that would necessitate extensive use of compulsory purchase powers, present substantial barriers to delivery. In these circumstances, a new settlement would not represent a more sustainable, viable, or deliverable alternative to the preferred spatial strategy.
- 3.7 The Urban Capacity Study assessed the realistic potential for accommodating development within existing settlement boundaries, with a particular focus on previously developed land. It reviewed redevelopment opportunities, intensification potential and infill capacity across the district's towns and villages. The findings confirmed that, due to the district's semi-rural character and limited stock of large brownfield sites, **fewer than 700 dwellings could reasonably be delivered on previously developed land over the plan period.** This evidence was critical in demonstrating that meaningful housing delivery would require large scale release of Green Belt land.
- 3.8 The 2024 Local Housing Needs Assessment (LHNA) for South West Hertfordshire, which includes Three Rivers District Council, was prepared to provide a robust and up-to-date evidence base on housing needs across the area and in Three Rivers specifically. The LHNA confirms that the local housing market functions as part of a broader South West Herts Housing Market Area, with strong links to London and surrounding authorities, and that existing housing delivery has consistently lagged behind what might be expected in a high-demand area. It outlines how housing affordability has deteriorated over time, contributing to declines in home ownership and a growing private rented sector, and highlights that house price and rental levels are high relative to local incomes, reinforcing barriers to accessing housing for many residents. **The report emphasises that while household growth is moderate, significant affordability pressures mean that the standard method figures represent an important starting point for assessing need but must be balanced with environmental and policy constraints through the plan-making process.** Which is what the council has done.
- 3.9 The LHNA also provides detailed analysis of affordable housing need and housing mix, identifying that there is considerable unmet demand for rented affordable homes in Three Rivers and across the South West Herts area. It quantifies both the need for rented affordable homes and the requirement for affordable home ownership products, and highlights the range of different housing types and sizes required to meet demographic change and the needs of specific groups, including older and disabled people. The report's findings demonstrate a particularly acute need for rented affordable housing and support a policy emphasis on delivering a range of tenures and dwelling sizes. While the LHNA identifies the standard method figures for overall need, it also clearly states that these figures should be taken forward as an advisory starting point rather than a policy target, and must be considered alongside other constraints, including Green Belt, environmental factors and infrastructure capacity. This evidence has directly informed the council's approach to housing provision and site selection in the Local Plan.

- 3.10 The Council's housing mix policy places clear emphasis on the delivery of 1, 2 and 3-bedroom homes, reflecting identified local needs and the objective of improving affordability and access to the housing market. This approach seeks to prioritise smaller and mid-sized dwellings over larger 4+ bedroom executive homes, which have historically formed a notable component of market delivery but do not align as closely with the district's evidenced needs. In parallel, the affordable housing policy focuses on maximising the provision of social and genuinely affordable rented homes, in accordance with the needs identified in the LHNA. This emphasis is intended to address acute affordability pressures, support lower-income households and those in housing need, and rebalance supply towards tenures that are most effective in meeting the district's identified requirements.
- 3.11 The Strategic Flood Risk Assessment (SFRA) provides a detailed understanding of fluvial and surface water flood risk across the district. It applies the sequential and, where necessary, exception tests to ensure that development is directed away from areas at highest risk of flooding. The SFRA informed site selection by identifying land within Flood Zones 2 and 3, areas susceptible to surface water flooding, and locations where mitigation would be required. Sites with significant flood constraints were either discounted or subject to capacity reductions to ensure compliance with national policy.
- 3.12 The council has undertaken comprehensive landscape sensitivity assessments as part of the Local Plan evidence base to inform the spatial strategy and site selection process. These assessments evaluated the visual, ecological, and recreational sensitivity of land across the district, considering factors such as the prominence of land in the wider landscape, the presence of key views, settlement separation, and the contribution to the character and identity of local towns and villages. **Key findings highlighted that much of the district's Green Belt and surrounding countryside is highly sensitive to development, particularly in locations that maintain settlement separation or contribute to the rural character of villages.** Sites identified as having high landscape sensitivity were generally considered unsuitable for allocation unless they were previously developed.
- 3.13 In parallel, the council has undertaken detailed heritage impact assessments to ensure that proposed growth does not adversely affect historic assets. These assessments evaluated sites in relation to listed buildings, conservation areas, scheduled monuments, historic parks and gardens, and archaeological potential. The findings identified sites where development could result in harm to the significance, setting, or visual context of heritage assets. Sites where impacts could not be mitigated or where harm would be substantial were rejected from allocation. These assessments have been integral to the site selection process, ensuring that the Local Plan balances housing delivery with the protection and enhancement of the district's historic environment, in accordance with national planning policy
- 3.14 Across the preparation of the Local Plan, the Sustainability Appraisal has been undertaken as an iterative and evolving process, accompanying each stage of plan-making and informing key decisions on spatial strategy and site selection. At the early Regulation 18 stages, the SA tested reasonable growth options, including differing spatial distributions and quantum of development, assessing their likely social, environmental and economic effects against a consistent framework of objectives. Working notes were prepared to record the appraisal of promoted sites, drawing on findings from the evidence base. As the Plan progressed, the SA was refined to reassess shortlisted allocations, cumulative impacts, ensuring transparency in how alternatives were considered and why certain sites were rejected. The Sustainability Appraisal accompanying the Regulation 19 Plan provides a comprehensive

assessment of the final proposed spatial strategy and site allocations, demonstrates how reasonable alternatives have been evaluated, and concludes that the Plan represents the most sustainable option when balancing housing delivery with protection of the Green Belt, environmental assets and settlement character within a highly constrained district.

- 3.15 Taken together, these studies demonstrate that site selection has not been arbitrary or driven by housing numbers alone. Instead, it has been informed by a layered and interrelated evidence base, ensuring that proposed allocations represent the most sustainable, least harmful and most deliverable options available within a district that is subject to substantial environmental and policy constraints.

4 Infrastructure capacity

- 4.1 The district faces a range of infrastructure capacity constraints that materially limit its ability to accommodate the full housing requirement generated by the standard method. The district's transport network is already operating under pressure, particularly at peak times, with congestion affecting key radial routes and junctions. The predominantly semi-rural settlement pattern means that many communities are reliant on the private car, while opportunities to deliver significant strategic highway upgrades are limited by land availability, environmental constraints, and funding uncertainty.
- 4.2 Rail services provide important connectivity to London; however, station capacity, parking provision, and service frequency constraints would require substantial investment to support higher levels of growth. For example, Transport for London has previously decided not to progress step-free access improvements at Rickmansworth station and Moor Park station, reflecting wider affordability and prioritisation challenges across the network. While step-free access is proposed at Croxley station, the anticipated cost of circa £20 million for this single intervention illustrates the magnitude of funding required to secure relatively modest upgrades. This context highlights the growing infrastructure funding gap and underlines the difficulty of aligning the scale of housing growth generated by the standard method with the timely delivery of necessary rail and station capacity enhancements.
- 4.3 Utilities infrastructure also presents challenges. Parts of the district are served by ageing water supply and wastewater networks, with limited headroom at Maple Lodge treatment works. Upgrades to water, sewerage, and drainage infrastructure are often complex, costly, and dependent on long-term investment programmes outside the direct control of the council. In a district where flood risk and sensitive water environments are already key considerations, accommodating significant additional development could necessitate major off-site reinforcement works, affecting both viability and delivery timescales.
- 4.4 Social infrastructure is similarly constrained. Primary and secondary school capacity in several settlements is tight, and opportunities for expansion are often limited by site boundaries and surrounding development. Healthcare provision, including GP surgeries, is also under strain, with limited premises capacity in certain locations. The delivery of new facilities to support higher growth would require land, funding, and forward planning, all of which are challenging in a tightly constrained authority with limited large-scale development sites capable of supporting on-site provision.
- 4.5 Notwithstanding these constraints, the larger site allocations at Maple Cross and Shepherds Lane are expected to incorporate on-site healthcare provision to help address identified primary care capacity pressures, and a new secondary school is proposed at Carpenders Park to assist in alleviating forecast demand for school

places. However, these measures are closely aligned to the scale and timing of specific allocations and would not, in themselves, offset the wider cumulative impacts associated with accommodating substantially higher levels of growth across the district.

- 4.6 Taken together, these infrastructure limitations—transport, utilities, education, and healthcare—mean that accommodating the full standard method target would likely require significant, and in some cases uncertain, strategic investment. In the absence of clear, deliverable infrastructure solutions aligned with the scale of growth implied by the standard method, there is a strong planning rationale for aligning housing provision with what existing and realistically planned infrastructure can sustainably support.
- 4.7 It is also worth considering that in a market where delivery is typically phased to maintain sales values and absorption rates, the development industry is unlikely to accelerate build-out to the levels implied by the standard method without clear evidence of sustained demand and infrastructure capacity. As such, **planning for a level of growth that materially exceeds realistic market absorption and delivery rates would risk creating an undeliverable strategy rather than a positively prepared and effective plan.**

5 Site selection for Regulation 19 Publication of the Local Plan

- 5.1 Across the plan-making process, **a total of 360 sites were assessed by the council for potential allocation.** These included a wide range of site categories reflecting the comprehensive and iterative approach taken: 100 sites were submitted through the initial Call for Sites, with a further 17 submitted through an additional Call for Sites and 26 identified as potential Call for Sites. Previously considered sites accounted for 34 locations, alongside 9 other sites put forward outside formal exercises. The assessment also included 70 urban capacity sites, 12 sites refused or withdrawn through planning applications, and 22 edge of settlement sites identified through the New Settlement Scoping work. The council reviewed 12 existing allocations, 1 site from the Brownfield Land Register, and 23 newly submitted sites, as well as a new Call for Sites exercise that generated 34 sites. **This extensive assessment process demonstrates the breadth of options considered in developing the Local Plan** and supports the evidence-led approach to identifying deliverable and sustainable sites.
- 5.2 Consistent with national policy, **the council has prioritised a brownfield-first approach.** The Urban Capacity Study and associated brownfield assessments demonstrate that **fewer than 700 dwellings could be delivered on previously developed land** over the plan period. This limited capacity reflects the district's semi-rural character, the absence of large redundant industrial or public sector landholdings, and the need to retain existing employment land and community uses. Consequently, any meaningful housing provision beyond this limited brownfield capacity requires release of Green Belt land. This would mean that **to meet the standard method target circa 95% of proposed development in the new Local Plan would have to be in the Green Belt. The council is unaware of any other Local Plans where 95% of planned development would be in the Green Belt,** and as such believes this can form part of the case for deviating away from the standard method figure due to the heavily constrained nature of the district.
- 5.3 The council has undertaken four detailed Green Belt Reviews to evaluate the contribution of land to the purposes of the Green Belt. The Stage 4 Green Belt Review identifies provisional grey belt and fundamental areas of importance in the Green

Belt. The emerging spatial strategy directs growth to the most sustainable settlements with access to rail stations, employment and services, while avoiding dispersed, car-dependent development in unsustainable locations. It seeks to release land that performs relatively weakly or moderately against Green Belt purposes, to avoid coalescence between settlements, and to protect Areas of Fundamental Importance in the Green Belt and the most sensitive landscapes. The Sustainability Appraisal demonstrates that this focused approach performs more strongly against environmental and social objectives than a dispersed pattern of growth.

- 5.4 **In considering housing need, the council has had full regard to the NPPF as a whole, rather than treating the standard method figure as a target to be pursued irrespective of other policy requirements.** The NPPF makes clear that plans must be positively prepared, justified, effective and consistent with national policy in its entirety. This includes policies on protecting the Green Belt, recognising countryside character, conserving the natural environment, addressing flood risk, securing sustainable transport patterns and ensuring that development is genuinely sustainable.
- 5.5 **To meet the standard method housing need in full would require the release of substantial additional Green Belt land, including parcels identified through the Stage 4 Green Belt Review as making strong contributions to Green Belt purposes. It would necessitate development in less sustainable locations, increase reliance on private car travel, risk coalescence between settlements, and result in greater harm to heritage and landscape character. Such an approach would conflict with the NPPF's Green Belt chapter, its environmental objectives, and its requirement to direct development to sustainable locations.** It would also run counter to the guidance set out in the Planning Practice Guidance, which carries the same policy status as the NPPF and must be read alongside it. The Council's position is therefore that housing need must be balanced against the full suite of national policy considerations, not elevated above them.
- 5.6 **The resulting figure of 7,017 dwellings represents the maximum level of growth that can be delivered in a manner consistent with the NPPF taken as a whole and with the council's evidence base. It reflects a judgement as to the point at which further Green Belt release would cease to be justified by exceptional circumstances and would undermine the spatial strategy.**
- 5.7 Three Rivers District Council has undertaken detailed and proportionate site assessments through its Strategic Housing and Economic Land Availability Assessment (SHELAA) process to inform the preparation of the emerging Local Plan. Each promoted site was assessed against a comprehensive set of criteria covering environmental, physical and policy constraints. This included consideration of flood risk, heritage assets, ecological designations, landscape sensitivity, access arrangements, ground conditions, utilities infrastructure and proximity to incompatible neighbouring uses. The assessment also drew directly on the council's wider evidence base, including Strategic Flood Risk Assessments, the Urban Capacity Study, Access to Services, and the Infrastructure Delivery Plan.
- 5.8 In addition to physical and policy constraints, the sustainability of each site was carefully evaluated. The Council considered accessibility to key services and facilities such as schools, healthcare, employment areas, local centres and public transport nodes, particularly rail stations. This ensured that site selection aligned with the spatial strategy of directing growth to the most sustainable settlements and avoiding dispersed, car-dependent patterns of development. The Sustainability Appraisal provided a consistent framework for comparing sites against social, environmental

and economic objectives, allowing the council to identify those locations that performed most favourably overall.

- 5.9 Sites located within the Green Belt were initially identified as unsuitable in policy terms, reflecting the presumption against inappropriate development. However, sites that were unsuitable solely due to Green Belt designation were not automatically discounted. Instead, they were considered through the lens of whether exceptional circumstances existed to justify alterations to Green Belt boundaries as part of the Local Plan process. **This approach ensured that the council did not artificially constrain its assessment of potential supply but rather applied national policy correctly by examining whether release could be justified in a plan-led context.**
- 5.10 The Stage 4 Green Belt Review played a central role in this process. It provided a detailed, parcel-level assessment of the contribution land makes to the purposes of the Green Belt and identified Areas of Fundamental Importance where harm on a strategic level could be considered to fundamentally undermine the purposes of the Green Belt as a whole. In selecting sites for allocation, the council prioritised previously developed land and so-called “grey belt” sites where openness and Green Belt function were already compromised. Thereafter, consideration was given to other Green Belt sites that performed relatively weakly or moderately against Green Belt purposes and which aligned with the spatial strategy.
- 5.11 Only a limited number of sites were ultimately rejected on the basis of Green Belt harm, more specifically harm to Areas of Fundamental Importance identified in the Stage 4 Review. These were locations where release would undermine settlement separation, significantly erode openness, or compromise the strategic function of the Green Belt. This structured and evidence-led methodology demonstrates that the council has not applied a blanket restriction but has carefully balanced housing delivery against protecting the Green Belt, selecting those sites that represent the least harmful and most sustainable options within a heavily constrained district.
- 5.12 **The vast majority of rejected sites were rejected for reasons other than Green Belt. Reasons for rejection included, unsustainable locations, access, highway impact, sites no longer being available, flood risk, and overdevelopment of unsustainable village locations.** In each case, the rejected sites table sets out the technical reasons for non-allocation, drawing on Green Belt assessment findings, Sustainability Appraisal scoring, infrastructure evidence and deliverability considerations. The removal of these sites was consistent with an integrated reading of the NPPF and PPG, ensuring that housing provision was balanced against environmental protection, sustainability and deliverability.

6 Conclusion

- 6.1 It should be noted that **identifying further sites at this stage to increase overall housing numbers would require additional technical work**, including further Sustainability Appraisal testing, transport modelling, infrastructure capacity analysis and viability appraisal. This would likely **delay plan progress by three to four months**, if not longer. Any additional consultation would also **need to take account of forthcoming local elections and the pre-election period**, creating further programme risk. Given the urgent need to progress to submission and reduce exposure to speculative development, further delay would not be in the public interest.
- 6.2 More importantly, **adding additional sites beyond those identified through the council’s evidence-led process would not accord with the NPPF when read as a whole and would be likely to result in demonstrably poor planning outcomes.**

The **remaining unallocated sites are predominantly in less sustainable locations, with limited access to services, employment and public transport, and would increase reliance on private car travel contrary to national policy objectives on sustainable transport** and climate change. Many also perform strongly against Green Belt purposes or lie within Areas of Fundamental Importance, meaning their release would cause significant harm to openness, settlement separation and landscape character. **Allocating such sites simply to increase overall housing numbers would undermine the spatial strategy, erode the character of the countryside, and conflict with the NPPF's environmental objectives.** In these circumstances, additional allocations would prioritise numerical housing provision over sustainable development principles and would therefore fail to represent sound, plan-led decision making.

- 6.3 It is the council's view that **the most appropriate and expedient course of action is to proceed to Regulation 19 publication** of the Local Plan, followed by submission for independent examination. **This will provide key stakeholders, including statutory consultees, residents, landowners and developers, with the formal opportunity to make representations specifically on the Plan's soundness and legal compliance.** The independent Inspector will then test the evidence base, housing provision, Green Belt justification and overall spatial strategy in a transparent public forum, ultimately determining whether the Plan is sound or requires modification. **Progressing in this way represents the fastest and most robust route to securing an up-to-date Local Plan for the district,** thereby reducing policy uncertainty and the risk of speculative development, and ensuring that future growth is genuinely plan-led.
- 6.4 In conclusion, Three Rivers District Council has followed a comprehensive, evidence-led and iterative process in preparing its Local Plan. The district's exceptional constraints — notably its 76% Green Belt coverage and limited brownfield capacity — materially limit its ability to accommodate the full standard method target without breaching other core principles of national policy. The proposed provision of 7,017 dwellings represents the maximum sustainable and deliverable level of growth when the NPPF and PPG are considered in the round. The approach is justified, proportionate, consistent with national policy taken as a whole, and capable of being found sound at examination.