

**Communication From Cllr Stephen Giles-Medhurst OBE, the Leader of Three Rivers District Council, to Housing Minister Matthew Pennycook MP**

*Dear Minister,*

*Further to my acknowledgment letter of last Friday.*

*Thank you for your letter of 18 March 2026, upon which the Council has reflected, and for the opportunity to set out why intervention under Section 27 of the Planning and Compulsory Purchase Act 2004 would not be appropriate in this case.*

*The Council has followed the statutory process for preparing its Local Plan in full. This includes the preparation and publication of a comprehensive and up to date evidence base, extensive consultation at Regulation 18 stage, and the approval of a Regulation 19 draft Plan at Full Council. As you will recall, this process incorporated an additional call for sites in early 2025 and a further Regulation 18 consultation arising from that exercise.*

*The Council also commissioned a further Green Belt Review - our fourth - to identify areas where release for large scale development would cause harm so significant as to undermine the fundamental purposes of the Green Belt, as required by the National Planning Policy Framework.*

*The Council has engaged effectively with neighbouring authorities through the Duty to Cooperate, which will be demonstrated through signed Statements of Common Ground. The Council therefore consider the Plan to be legally compliant, and legal compliance should not form a basis for intervention.*

*The matters raised in your letter regarding housing numbers, site selection, and the scale of development to be accommodated are, in our view, matters of planning judgement. These are precisely the issues that should be tested through independent examination, where an appointed Planning Inspector can consider the Plan's soundness in the round.*

*In particular, the merits of individual sites - together with the supporting technical evidence - are best assessed through examination. This ensures decisions are made transparently and with full scrutiny, rather than through direction prior to Regulation 19 consultation, when stakeholders would ordinarily have the opportunity to comment on the draft Plan.*

*In this regard, we attach a document setting out the reasons for the exclusion of the sites referenced in your letter from the Regulation 19 draft, excluding the Batchworth site which was removed as not available some years ago. We consider that the merits or otherwise of these sites are best examined in detail at a formal Public Examination rather than by Direction at this stage. This will allow the Council, site promoters, and other stakeholders to present the necessary evidence in a fair and transparent forum.*

*The sites that have been added back into the Plan through your Direction ultimately turn on matters of interpretation and the weight to be applied to policy and evidence. For example, a large site located within an area identified in our Green Belt evidence as being of fundamental importance could reasonably be considered to undermine the purposes of the Green Belt as set out in the NPPF. In such circumstances, it would not be correct to conclude that the Plan is inconsistent with national policy; rather, these are matters of planning judgement that should properly be examined independently.*

*As you will be aware, Three Rivers is an exceptionally constrained authority, with 76% of the district designated as Green Belt and much of the remainder constrained by flood risk, ecological designations, heritage assets, landscape sensitivity, and limited infrastructure capacity. Approximately 93% of the development proposed through your Direction would need to be located within the Green Belt, as fewer than 700 dwellings can be accommodated within the existing urban area outside the Green Belt, given the district's semi rural settlement pattern and limited public transport accessibility.*

*Furthermore, as set out in our earlier explanatory note to you, the Council has undertaken a comprehensive, multi stage evidence gathering process. More than 360 sites have been fully assessed through the SHELAA, Green Belt Reviews, landscape and heritage assessments, flood risk analysis, and Sustainability Appraisal, among other evidence. This work consistently demonstrates that only a limited number of sites are suitable, sustainable, and deliverable.*

*The Council has therefore sought to balance the need to meet housing requirements with the need to protect the purposes of the Green Belt and address other constraints, in line with national policy. The Regulation 19 Plan agreed at Full Council on 27 January represents the maximum level of growth that the Council believe can be delivered in accordance with the NPPF as a whole, balancing housing need with Green Belt protection, environmental constraints, infrastructure capacity, and sustainable development principles.*

*In these circumstances, the Council does not consider that the statutory test for intervention - namely that it is "expedient" for the Secretary of State to act - is met. The Council is not failing to prepare its Local Plan; rather, it has progressed a Plan in accordance with the statutory framework and national policy, and the remaining issues are properly matters for independent examination. We feel that intervention is therefore not appropriate and would welcome you withdrawing the Detective so we can proceed to a Regulation 19 far earlier than the timeline in your letter.*

*We would welcome the opportunity to meet with you to discuss these matters, and to ensure that we can continue to work constructively towards the delivery of an up to date Local Plan for Three Rivers.*

*Should you decide to uphold the Direction, we would particularly welcome discussions with MHCLG regarding the infrastructure required to support the now directed 11,235 dwellings, as opposed to the 7,017 dwellings agreed by the Council.*

*The invitation to visit the district and see the exceptional set of circumstances we face still stands.*

*Regards*

*Stephen, Oliver, Steve, Chris, Rue*

***Cllr Stephen Giles-Medhurst OBE, Leader Three Rivers Council: Liberal Democrat Group Leader***

***Cllr Oliver Cooper, Conservative Group Leader***

***Cllr Stephen Cox , Labour Group Leader***

***Cllr Chris Mitchell, Green Party Group Leader***

***Cllr Rue Grewal, Independent Group Leader***

## **Appendix 1**

*Background reasons for exclusion from Regulation 19 as agreed by Local Plan Sub Committee:*

CFS26a The Kings Langley Estate (south) – 1,125 dwellings

Is an area assessed in Stage 4 Green Belt review as of Fundamental Importance and would undermine on three grounds its contribution to the Green Belt (a), (b) and (c). It requires the development of agricultural land to the M25, requires a new road traversing the site potentially undermining any SANG contribution. Any additional shopping core is likely undermine the viability of the Abbots Langley Town centre

CFS21 Land at Rousebarn Lane – 600 dwellings

These are greenfield agricultural sites in the Green Belt development of which would include an urban sprawl in open countryside north of Little Green Lane into the Saratt area. There remain road accessibility concerns given its distance from the main line station and local shopping centre on the Watford Road.

PCS4 East Green Street – 678 dwellings

This is a greenfield site within the Green Belt and Chilterns National Landscape. It has status within the Chilterns National Landscape. The interpretation of whether the site's location within the Chilterns National Landscape is a strong reason for its removal is given the impact on the wider National Landscape. There remain highways accessibility issues to the Chorleywood Centre due to the current road network.

PCS47 South of Little Oxhey Lane – 485 dwellings

Is an area assessed in Stage 4 Green Belt review as of Fundamental Importance and would undermine on two grounds its contribution to the Green Belt (a) and (b) and requires the development of agricultural land to the boundary with the London Borough of Harrow. Whilst there is a small shopping area with a sustainable location access is limited by a narrow road bridge over the main line railway. The Carpenders Park local centre and station is in excess of the accessible distance thresholds.

NCFS12- Land East of Oxhey Lane.- 381 dwellings

Is an area assessed in Stage 4 Green Belt review as of Fundamental Importance and would undermine its purpose on two grounds of contribution to the Green Belt (a) and (b). It requires the development of open land to the boundary with the Hertsmere Borough with a local wildlife site and adjacent flood zone 2 and 3 . It lacks pedestrian, links along Oxhey Lane and to local centres.

## NCFS6 Land to East of Watford Road – 331 dwellings

Is mainly a green field site in flood risk areas 2 and 3 with previous concerns raised by the Environment Agency. Concerns remain that the only vehicle access can be achieved via the dualled- A41 and its close proximity to junction 20 of the M25 with Highways England questioning its suitability. A neighbouring site for a motorway service was dropped due to such concerns. It remains detached from any local centre separated by both railway lines and the M25.