

Three Rivers District Council

# **Local Plan Sub-Committee Report**

25 November 2025

## **LOCAL PLAN SUB-COMMITTEE - 25 November 2025**

### **PART I**

#### **LOCAL PLAN – PART 5 ‘NEWLY SUBMITTED SITES AND NEW POLICIES’ CONSULTATION SUMMARY**

#### **1 Summary**

- 1.1 This report provides a summary of the Regulation 18 consultation on the Council's Newly Submitted Sites and New Policies (Part 5).

#### **2 Introduction**

- 2.1 From 16 July to 31 August 2025 the Council consulted on newly submitted sites and new policies. This concluded its Regulation 18 stage consultations. We are now working towards the Regulation 19 'Publication' stage of Local Plan preparation.

Prior to the 2025 consultation, TRDC undertook four Town and Country Planning (Local Development) (England) Regulations 2012 (Regulation 18) consultations, as detailed below:

- Local Plan 'Issues & Options and Call for Sites Consultation Document', July 2017
- Local Plan "Preferred Policy Options" (Part 1) and "Sites for Potential Allocation (Part 2)" Document, June 2021
- Local Plan "Additional Sites for Potential Allocation" (Part 3), January 2023
- Local Plan "Preferred Local Plan Lower Housing Growth Option Protecting More Green Belt Land" (Part 4)

#### **3 Background**

- 3.1 Full Council in December 2024 adopted an updated Local Development Scheme (LDS) setting out the timetable for Local Plan preparation. This new LDS set out expected Regulation 19 publication of the Local Plan in February / March 2026. It was agreed to complete additional evidence work to bring the local plan in line with changes to national planning policy.
- 3.2 An extraordinary Full Council in January 2025 resulted in Members requesting an accelerated timetable to publish the Regulation 19 plan in early November 2025.
- 3.3 This additional evidence work included a call for sites to ensure that we had considered all of the suitable and available site options going forwards. As a result of this call for sites over 30 new sites were submitted, which are currently being assessed as part of the Strategic Housing and Employment Land Availability Assessment.

- 3.4 It was officers' view that the council could proceed straight to Regulation 19 publication of the plan without further Regulation 18 consultation as the council had already consulted on different levels of growth through its previous Regulation 18 consultations, and its approach to delivering that growth had not changed. However, as it had not consulted on the individual new sites submitted from the call for sites, officers suggested seeking Counsel advice on whether to proceed straight to Regulation 19 publication or whether to undertake a further round Regulation 18 consultation.
- 3.5 Considering Counsel advice, officers recommended undertaking an additional Regulation 18 consultation on the newly submitted sites. Although officers understand that there is no requirement to consult on individual new sites at Regulation 18 stage, it was clear from Counsel advice there is a risk of the plan being found unsound at examination if a Regulation 18 consultation on these sites was not completed.
- 3.6 It is imperative that the Council reduces the risk of the plan being found unsound at every opportunity. Should the Local Plan be found unsound at examination this would result in further work on the plan being required. The costs of examination can run into the hundreds of thousands of pounds, so if the plan is found unsound this money is effectively wasted and we would have to incur those costs again to bring a new plan to examination at a later date. It would also lead to delays (18 months to two years) in the plan being adopted as further evidence work and consultation would be required before a new plan can be brought to examination. This would increase the period of time the Council is susceptible to speculative planning applications being successful at appeal.
- 3.7 The additional Regulation 18 consultation included the newly submitted sites that the council considered deliverable (suitable and available) seeking views on them, as well as those that it does not consider deliverable.

#### Regulation 18 Part 5 Newly Submitted Sites and New Policies Consultation Summary

- 3.8 A detailed summary of the consultation can be viewed in Appendix 1 to this report. A few of the key points from the summary report will be covered in the forthcoming paragraphs.
- 3.9 A total of 7,448 formal responses were received from 592 respondents. Respondents included residents, statutory and non-statutory consultees and other interested groups and organisations. 984 responses were received by post or email and 6,464 responses were received through the online consultation form (Have Your Say).
- 3.10 In terms of demographics, there was a large generational disparity between respondents. Well over half of all public responses (from Have Your Say) came from those born prior to 1970 and as few as 23 respondents came from those born after 1990. It is clear that further efforts need to be made to encourage young people to comment given that they may have differing viewpoints and priorities. We will continue to endeavour to engage more young people and other hard to reach groups going forwards.
- 3.10.1 Have Your Say respondents were also asked what the beginning of their postcode was to ascertain which specific areas in the district responses were coming from. Additionally, to be accepted letters and emails had to include the address of the respondent. As set out in Figure 9 below, the area with the largest number of

responses was Chorleywood, with a total of 135. Rickmansworth and Carpenders Park also provided a high number of responses with 86 and 99 respectively. A total of 58 responses originated from outside of the district.

#### 3.11 Statutory Consultee Responses

3.12 Statutory consultees include Hertfordshire County Council, HWE ICB, National Highways, the Environment Agency and Historic England. Many of these responses were specific to certain policies and sites. A full and in-depth summary of Consultee Responses can be found in Appendix 1.

#### 3.13 Landowner/Promoter Responses

3.14 A full summary of Landowner and Promoter Responses can be found in Appendix 1. A number of key themes are summarised below.

3.15 The main concerns raised in relation the policies were the challenges regarding not following the 2023 Written Ministerial Statement in terms of net-zero. Additionally, many responses were concerned with viability of the plan in terms of meeting the required housing targets.

3.16 Landowners and Promoters generally did not respond to the sites section of the consultation.

#### 3.17 Public Responses

3.18 A full summary of Public Responses can be found in Appendix 1. A number of key themes are summarised below.

3.19 Public responses were generally supportive of all the policies with all receiving more 'yes' responses than 'no' when asking if they were correct approach. Public responses often mentioned the importance of protecting the environment and fighting climate change.

3.20 In terms of sites, a vast majority of public responses were in favour of protecting the Green Belt and many specifically mentioned the loss of open space, impact on wildlife and loss of rural character. Many also mentioned the lack of infrastructure including highways, transport, schools, medical facilities and sewage. Most sites received more 'no' responses to whether they were considered to be suitable. The three sites that received more 'yes' responses than 'no' were NCFS15 Chorleywood Library, NCFS26 Meresworth Care Home, Field Way and NCFS34 Pinewood Lodge.

## 4 **Recommendation**

4.1 That the Local Plan Sub Committee:

- Note the contents of the report

Report prepared by: Michael Davey, Planning Policy Officer

## **Background Papers**

### **Appendix 1** – Summary of the Three River's Local Plan Newly Submitted Sites and New Policies (Part 5) Regulation 18 Consultation

National Planning Policy Framework (2024)

Regulation 18 Part 1: Preferred Policy Options (2021)

Regulation 18 Part 2: Sites for Potential Allocation (2021)

Regulation 18 Part 3: Additional Sites for Potential Allocation (2023)

Regulation 18 Part 4: Lower Housing Growth Option (2023)

Potential Sites consultation (2018)

Regulation 18 Part 5: Newly Submitted Sites and New Policies (2025)

Regulation 18 Issues & Options consultation (2017)

