

Regulation 19 Part 2: Site Allocation 27/01/2026

**Full Council
27 JANUARY 2026**

PART II

**Local Plan Regulation 19 Part 2: Site Allocations
(DoF)**

This report is NOT FOR PUBLICATION because it deals with information relating to the financial or business affairs of any particular person (including the authority holding that information).

1 Summary

- 1.1 This report seeks to agree the Member recommendations on residential sites from the 25 November 2025 Local Plan Sub-Committee and the non-residential sites from the 16 July 2024 Local Plan Sub-Committee meeting.
- 1.2 The Local Plan Sub-Committee recommendations have been organised into a single coherent Local Plan Regulation 19 Part 2: Site allocations documents for Members to agree for Regulation 19 Publication and consultation.

2 Recommendation

2.1 That Full Council:

- Approve the Local Plan Regulation 19 Part 2: Site Allocations document as set out in Appendix 1 for public consultation in accordance with the regulations and the Local Development Scheme
- Grant delegated authority to the Head of Planning Policy & Conservation and the Director of Finance in consultation with the Lead Member for the Local Plan to make any subsequent changes that are required before the documents are published for consultation
- Grant delegated authority to the Head of Planning Policy & Conservation and the Director of Finance in consultation with the Lead Member for the Local Plan to propose minor modifications to the Local Plan and submit the plan to the Planning Inspectorate for examination in public.
- Agree significant proposed modifications to the Local Plan be agreed by Urgent Decision under the council's constitution prior to submission to the Planning Inspectorate for examination in public.

That public access to the report be denied until after the Policy and Resources meeting is concluded.

That public access to the decision be denied until after the Policy and Resources meeting is concluded.

Committee Decision on Public Access:-

- | | |
|------------------------------|---|
| 1. Public access to report - | immediate |
| 2. Public access to report - | denied until (date): |
| 3. Public access to report - | Council agenda publication |
| 4. Public access to report - | denied until issue resolved (see future agenda) |

5. Public access to decision - immediate or Council agenda publication

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3 Details

- 3.1 Please note that the introductory paragraphs (3.2 to 3.7) to this report are the same as in the Local Plan Regulation 19 Part 1: Policies report.

- 3.2 Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 refers to the publication of a local plan. It states that:

“Before submitting a local plan to the Secretary of State Under S.20 of the Act, the local planning authority must – (a) make a copy of each of the proposed submission documents and a statement of the representations procedure available...”

- 3.3 When publishing a plan under Regulation 19, a local authority must take the view that the local plan is ready for independent examination, which includes a decision that the local plan is sound.

- 3.4 Paragraph 36 of the NPPF sets out that Plans are sound if they are:

“a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.”

- 3.5 Regulation 19 can be considered the beginning of the examination stage of plan-making. Its publication isn’t really a consultation exercise, rather it is the mechanism by which interested persons can make representations on the draft plan to enable them to participate in the process of independent examination.

- 3.6 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.

- 3.7 An extraordinary Full Council in January 2025 resulted in Members requesting an accelerated timetable to publish the Regulation 19 plan in early November 2025. Officers endeavoured to meet this new timetable but were unable to do so as the evidence base preparation of the Local Plan is a lengthy process, there were some delays to government guidance and an additional Regulation 18 was

undertaken. As such, the council has reverted to the timetable in the adopted LDS.

3.8 Members of the Local Plan Sub-Committee (LPSC), at meetings in 2024 and 2025, agreed the final sites to be included in the Part 2 Regulation 19 Publication version of the Local Plan which can be viewed in Appendix 1 to this report.

3.9 Sites for the following uses were included:

- Housing
- Gypsy, Traveller and Travelling Showpeople
- Leavesden Studios
- Retail
- Education
- Employment
- Open Space

3.10 At the 25 November 2025 Local Plan Sub-Committee Members agreed a final list of housing sites to recommend to Policy and Resources Committee for allocation in the Local Plan Regulation 19 Part 2: Site Allocations Publication document.

3.11 57 housing sites are being recommended by Members of the Local Plan Sub-Committee, resulting in a total of 4,859 dwellings. These together with 1,508 dwellings in commitments (active planning permissions) and 660 dwellings as a windfall allowance results in 7,027 dwellings across the 15 year plan period.

3.12 In coming to their recommendations, the LPSC considered the impact on Green Belt, weighing up the sustainability appraisal findings and accessibility to existing services and facilities as well as the proposed on-site infrastructure provision on housing sites.

3.13 The indicative densities of all the housing sites, both urban and Green Belt, have been reviewed to ensure that they make the most efficient use of land and to reduce the amount of Green Belt land release that will be needed to meet the council's requirements.

3.14 As stated in previous reports to the LPSC and Policy & Resources Committee, the local housing need as calculated by the government's standard method is substantially higher than the council has had to plan for before and given the lack of urban sites and brownfield land there is a requirement to change the Green Belt boundary to accommodate that need.

3.15 Revisions to the Green Belt boundary in respect of the site allocations have been mapped and can be viewed in the appendices to this report.

3.16 Housing Need

3.17 When the latest NPPF was published in December 2024, the government published an updated standard method for calculating housing need. This set a housing target of 832 dwellings per annum in Three Rivers rising from 640

dwellings per annum under the previous version of the standard method. This equates to a total of 12,480 new homes across the plan period. It should be noted that the council is looking at a 15 year plan period rather than the previously reported 16 years due to Regulation 19 Publication of the plan and Adoption of the plan both being expected in 2026. The council is required to plan for 15 years post adoption, and the latest Local Plan start date is the Regulation 19 Publication of the plan.

- 3.18 The NPPF states that local planning authorities (LPAs) must meet housing needs by building a sufficient supply of homes, with a focus on increasing the number of new homes, especially in areas with high affordability issues and potential for growth. The government's revised NPPF emphasises mandatory, standard housing targets and requires councils to adopt up-to-date local plans to deliver this growth.
- 3.19 It may be possible to justify not meeting housing need in full with robust evidence setting out key constraints limiting development. This will be scrutinised closely through the examination process. The further housing numbers deviate from the standard method target the less likely it is that the plan will be successful at Local Plan examination.
- 3.20 The government has used a threshold of 80% of standard method in its transitional arrangements to the new planning system. Officers believe this gives an indication of the amount the government are willing to see plans deviate from the standard method figure.
- 3.21 The LPSC recommended sites would provide 7,027 dwellings, or 469 dwellings per annum. This is over 5,000 dwellings short of the standard method figure or approximately 56% of the housing target. Officers are concerned that this puts the plan at risk of being found unsound as it could be considered to fail the 'positively prepared' test of soundness as it is failing to meet its objectively assessed needs. It could also be considered to not be in accordance with national policy on meeting housing need. As such, the plan is likely to be thrown out at examination.
- 3.22 Failure at examination would be costly to the Council in terms of finances and resources. Costs can run into the hundreds of thousands of pounds. There are Inspector's fees, their accommodation and subsistence costs, room hire if needed, and costs of legal representation and a programme officer. These are huge costs to incur on a plan that is unlikely to be successful, where there would therefore need to be another examination and all these costs incurred again on a new Local Plan.
- 3.23 Should the Local Plan be unsuccessful at examination this leaves the council more susceptible to speculative planning appeals being successful at appeal for the whole period it takes to finalise the plan, take it through examination and develop a new plan.
- 3.24 There is a real threat of intervention for those authorities not seen to be progressing their plans or that have plans significantly undershooting their housing need. Intervention would mean that Three Rivers loses control of where development goes and could well mean the whole standard method target of 12,480 dwellings being imposed on the district.

Green Belt

- 3.25 Over three quarters (76%) of the district is designated as Green Belt. The remainder of the district is made up by the existing urban area consisting of small and medium sized settlements, with relatively little development potential within the urban area.
- 3.26 As previously reported to the Local Plan Sub-Committee, the council has undertaken three Green Belt Reviews with the fourth being received on 26th September. This was published with the 8th October Local Plan Sub-Committee papers as evidence for the Local Plan. Further clarifications and updates to the review were requested by Members prior to the final version being published. The final Green Belt report is being finalised and will be added to the evidence base in time for the Regulation 19 consultation. In the meantime, the updated draft report is available for Members to view in the appendices to this report.
- 3.27 The NPPF sets out that alterations to Green Belt boundaries should only be made in exceptional circumstances through the plan making process. It goes on to state that where authorities cannot meet their identified need for homes, commercial or other development through other means, then this constitutes the exceptional circumstances for Green Belt release, and that release should meet those needs in full. The NPPF, does include a caveat, adding: *“unless the review provides clear evidence that doing so would fundamentally undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the plan.”*
- 3.28 Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries the council is required to demonstrate that it has fully considered all reasonable options for meeting its development needs. We have done this by making as much use of suitable brownfield sites and underutilised land as possible, but only a small proportion of our need can be met on such land. We have also increased densities on sites. Officer therefore consider that the exceptional circumstances for Green Belt release have been met due to the level of unmet housing need together with the acute need for affordable housing and specialist accommodation in the district.
- 3.29 The NPPF also sets out that where it is necessary to release Green Belt land to meet development needs there is a sequential approach: *“plans should give priority to previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations.”* In reality, to meet the district’s development needs we will need to consider all Green Belt locations as previously developed land and grey belt locations won’t be able to provide the number of new homes required to meet the standard method target in full. That said, previously developed land and grey belt sites should be prioritised, and have been in the site assessment process.
- 3.30 The key introduction of new policy in the 2024 NPPF is this concept of grey belt, defined as:
- “land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. ‘Grey belt’ excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development.”*
- 3.31 It should be noted that a potential site being identified as falling within an area of grey belt does not preclude that it is suitable for development and automatically mean it should come forward as a potential site allocation. It is only relevant when considering the site in terms of Green Belt and the site would

need to be suitable in other planning terms. The NPPF also clearly caveats that the site needs to be in a sustainable location, and many grey belt sites have been rejected on this basis.

- 3.32 One of the primary purposes of the Stage 4 Green Belt Review is mapping out provisional grey belt. The word provisional has been used to emphasise that there still other factors to be considered prior to deciding whether land fully constitutes grey belt. The final decision on whether a site is grey belt is for the council to make. The Green Belt Review only helps inform that decision and it should be noted that if the council is considering a site at a more granular level than an assessed Green Belt parcel it could well have be determined to have a different outcome to the review.
- 3.33 When considering whether the releasing Green Belt would fundamentally undermine the purposes of the remaining Green Belt across the plan area, the review identifies areas of the district where the Green Belt was performing a role of 'fundamental importance'. These are areas that perform a strategically important role against the Green Belt purposes across the plan area. Green Belt does not necessarily need to perform strongly against all purposes to be considered fundamentally important to the Green Belt.
- 3.34 Identification of an area of fundamental importance may not, however, mean that these areas cannot accommodate some development, and it is for the council to make a balanced planning judgement based on the scale and location of the proposed land for release.

LPSC Recommended sites

- 3.35 The table below shows all the sites recommended for allocation by the Local Plan Sub-Committee. The full Local Plan trajectory can be viewed in appendix 2 to this report and the maps showing where the sites are located are in Appendix XX. The full Local Plan Regulation 19 Part 2: Site Allocations document can be viewed in Appendix 1.

Table 1: Sites recommended for Local Plan allocation

Site no.	Site Name	Indicative Dwelling Number
AB18	Garage Courts Parsonage Close	5
AB26	Garage Tibbs Hill Road	5
AB31	Garages Jacketts Field	9
AB39	Garages Rosehill Gardens	6
ACFS9b	Little How Croft, Abbots Langley	35
CFS26c	West of the Kings Langley Estate	400
CFS3	Land adjacent to Fraser Crescent and Woodside Road	249
CFS4	Land at Warren Court, Woodside Road	19
CFS6	Land at Mansion House Equestrian Centre	98
CFS7	Land South of the M25	20
H6	Hill Farm Industrial Estate, Leavesden	60
PCS21	Land at Love Lane	46
CFS56	Church Hill Road, Bedmond	102
NSS2	56 High Street	20

NSS6a	North Cott East Lane	16
CFS13	Land at Oxhey Lane, Watford Heath	98
CFS14	Land north of Oxhey Lane, Carpenders Park	96
NCFS11	Grange Wood	50
ACFS1	Heath House Rickmansworth Road	5
CFS15	Alabama and Waverley, Chenies Road	10
CFS16	Land at Chorleywood Station	81
CFS18	Hill Farm, Stag Lane	40
CFS72	Land off Solesbridge Lane, Chorleywood	14
CW9	Garages at Copmans Wick	5
NCFS15	Chorleywood Library	5
NCFS17	North Hill Farm	57
NSS23	Chorleywood Telephone Exchange Shire Lane	10
CFS20	Land at Croxley Station Watford Road	163
CFS61	Cinnamond House Cassiobridge	80
CG47	Garages off Grove Crescent	19
CG65	British Red Cross Community Way (Land at Barton Way)	8
NCFS21	Land south of Scots Hill	30
CFS65	Land north of Bucknalls Lane	144
ACFS8b	Flower House 2-3 Station Road	10
NCFS20	Lonsdale, Hyde Lane	10
NSS10	Land at Mill Place, Hunton Bridge	10
NSS20	Land adj. RES site, Egg Farm Lane	100
EOS12.2	Land to the west and south of Maple Cross	1500
EOS12.3	Land to the north of Chalfont Road, Maple Cross	130
MC11	Garages rear of Longcroft Road	5
EOS7.0	Land to the south of Shepherds Lane and east of the M25	520
H15	Garages rear of Drillyard, West Way	6
P4a	Quickwood Close Garages	16
RW31	Garden land off Uxbridge Road	6
PCS16	Vivian Gardens	8
ACFS13b	Land at Hampermill Lane (Larger Site)	100
CFS60	Affinity Water Depot, Church Street, Rickmansworth	75
ACFS10	Andrews Ley Farm, Harefield Road, Rickmansworth	18
CFS59	Land on London Road (care home)	40 (75 rooms)
H17	Former Police Station Rectory Road	18
H22a	Depot Stockers Farm Road	40
NCFS26	Meresworth (Care Home)	27 (51 rooms)
CFS47c	Adams Nurseries, Church Lane, Sarratt	15
BR20	Northwick Day Centre Northwick Road	50
CFS52a	Former Sir James Altham School (northern parcel only)	30

NCFS34	Pinewood Lodge	40
PCS18	Land south of St Josephs, South Oxhey	80
	Total:	4,859 dwellings

- 3.36 At the 25 November 2025 Local Plan Sub-Committee Members unanimously agreed to remove six officer recommended sites resulting in a reduction of 3,635 dwellings to the plan's total. The addition of the officer recommended sites would increase the total of new homes across the plan period to 10,662 dwellings of 85% of the government's standard method target. Officers advised at the LPSC meeting that although the approach of not meeting need in full was risky they believed that there was evidence to justify a reduction in numbers. They did however also advise that going below this level would increase the risks of the plan being found unsound exponentially.
- 3.37 Officers advise that Members should consider adding the removed sites back in to increase the likelihood of the plan being found sound and therefore being successful at examination.
- 3.38 The removed sites would contribute significantly to overall housing need for the area and would play an important role in helping deliver much needed affordable housing and infrastructure. All these sites will be expected to be fully policy compliant with the policies in the emerging Local Plan. As such, they will need to meet the Council's housing mix, environmental and biodiversity standards. Summaries of these sites are provided in the coming paragraphs.
- 3.39 *CFS26a The Kings Langley Estate (south) – 1,125 dwellings*
- 3.40 The site is a greenfield site in the Green Belt on agricultural land including rights of way that would be subject to the 20m buffer set out in emerging Local Plan policy. It was originally rejected from the 2023 Regulation 18 consultation due falling within an area of high Green Belt harm. It has not been identified as provisional grey belt in the 2025 Green Belt Review, although it should be noted that an updated version of the review is being finalised and will be provided prior to the committee date of 26 January. It is, however, included at the edge of an area of fundamental importance. As the site is at the edge of this area, officers do not consider that development of this site would fundamentally undermine the function of the Green Belt as a whole.
- 3.41 Although the site is not identified as grey in the 2025 Green Belt Review, it is enclosed by the M25 providing a physical feature that could be interpreted as making the site grey belt. The Green Belt consultants are undertaking further work on physical features though this is not yet complete, it is quite possible that this site will fall within a grey belt parcel when this work is complete. Ultimately, the final decision on whether the site is grey belt is for the council to make based on planning judgement considering NPPF policy and PPG guidance.
- 3.42 The site falls within the Chiltern Beechwoods Special Area of Conservation (SAC) Zone of Influence. Natural England would require further consultation and the provision of Suitable Alternative Natural Green Space (SANG). The middle section of the site would be reserved for a SANG site.
- 3.43 Access would be from Bedmond Road and Little How Croft, with a link road across the site at the northern edge of the SANG section.

- 3.44 As it is strategic in scale the site can provide local community facilities and a local centre, as well as a primary school and potential secondary school.
- 3.45 Members were concerned that as the site falls within an area of fundamental importance in the Green Belt, its development could be considered to fundamentally undermine the purposes of the Green Belt. Reasons for removing the site were not based on Green Belt alone as Members were also concerned that the link road across the site would undermine the SANG contribution and without the link road the access at Little How Croft would not be sufficient to cope with the number of proposed dwellings. They also raised concerns about additional local shops undermining the vitality of Abbots Langley town centre.
- 3.46 *CFS21 Land at Rousebarn Lane – 600 dwellings*
- 3.47 This is a greenfield site in the Green Belt. It has not been identified as provisional grey belt or falling within an area of fundamental importance. Although it is not grey belt, officers consider it still needs to be considered for Green Belt release as the council cannot meet its housing needs on previously developed land and grey belt alone.
- 3.48 Not all of the site is proposed for development with the northern and eastern sections of the site proposed for public open space in the form of a country park with new walking and cycling routes to Whippendell Woods. The network of walking and cycling routes will help promote healthy lifestyles in line with emerging Local Plan policy.
- 3.49 The site will provide infrastructure on site including local shops as part of a mixed use local centre, a primary school, a medical centre and a community/sports facility. It is considered to be in sustainable location with opportunities to walk/cycle into Croxley Green.
- 3.50 Members raised concerns about the urban sprawl into open countryside and the loss of agricultural land. They also raised that there remain road accessibility concerns given its distance from the main line station and local shopping centre.

PCS4 East Green Street – 678 dwellings

- 3.51 This is a greenfield site within the Green Belt and Chilterns National Landscape. It has been identified as provisional grey belt in the 2025 Green Belt Review. However, further consideration needs to be given to its status within the Chilterns National Landscape.
- 3.52 Any development that falls within the designations under footnote 7 of the NPPF (excluding Green Belt) and which would form a *strong* reason for refusal cannot by definition be grey belt. Footnote 7 includes National Landscapes. The application of footnote 7 will be largely dependent on the characteristics of a site, the nature of a development and/or the potential for mitigation to enable a conclusion to be reached on whether there is a strong reason for refusing or restricting development. Ultimately, this is a case of planning judgement.
- 3.53 In the interpretation of whether the site's location within the Chilterns National Landscape is a strong reason for refusal, consideration needs to be given to the impact on the wider National Landscape. There are a number of appeals demonstrating that based on site specifics development in National Landscapes can be appropriate.

- 3.54 The site is relatively enclosed limiting its visibility and impact on the wider landscape. With good design and mitigation measures the impact of the development on the National Landscape could be further reduced.
- 3.55 The site is in a highly sustainable edge of settlement location with good access to services including the Metropolitan line station at Chorleywood, and being strategic in scale it can provide additional onsite infrastructure. This includes a primary school and green infrastructure. There are open spaces proposed including a new park, green buffers and ecological corridors.
- 3.56 New pedestrian and cycling linkages are proposed helping reinforce active travel and improving links to local services, however, there remain highways concerns to be resolved, regarding vehicular access to Chorleywood centre through the narrow railway bridge and constraints of road access to Chorleywood Station.
- 3.57 Members considered its position in the National Landscape as providing a strong reason for refusal in accordance with the NPPF footnote 7. They also raised highways accessibility issues to Chorleywood town centre due the narrow railway bridge creating a bottleneck at the junction of Green Street and Station Approach.
- 3.58 *PCS47 South of Little Oxhey Lane – 485 dwellings*
- 3.59 This is a greenfield site in the Green Belt. It has not been identified as grey belt in the 2025 Green belt Review, however it has been assessed as falling within an area of fundamental importance. Although the site appears to be in the middle of this area of fundamental importance, the area would in fact continue into the London Borough of Harrow which has not been assessed as it is outside the district. As such, the site could be considered at the edge of this area, though it is acknowledged that the gap to the built up area in the London Borough is relatively small in size.
- 3.60 The site is in a sustainable location within walking distance of the services of Carpenders Park. The proposed site is at a more limited scale than originally submitted and proposed good design could limit the harm on the Green Belt. There is also a small shopping area closer to the site, but access is limited by a narrow bridge over the railway.
- 3.61 Members were concerned that as the site falls within an area of fundamental importance in the Green Belt, its development could be considered to fundamentally undermine the purposes of the Green Belt. The development would result in the loss of agricultural land to the district boundary with the London Borough Harrow. Access to local shops would be limited by narrow road bridge across the railway. Members were also concerned about the walking distance to Carpenders Park local centre.
- 3.62 *NCFS12 Land East of Oxhey Lane – 381 dwellings*
- 3.63 This site is a greenfield site in the Green Belt and has not been assessed as constituting grey belt. It has, however, been assessed as falling within an area of fundamental importance. Although the site appears to be in the middle of this area of fundamental importance, the area would in fact continue into Hertsmere which has not been assessed as it is outside the district. As such, the site could be considered at the edge of this area reducing its impact on it.

- 3.64 At 381 dwellings the site is not considered strategic and would not be expected to deliver on-site infrastructure however it still provides a meaningful contribution to meeting the council's overall housing need.
- 3.65 Members were concerned that as the site falls within an area of fundamental importance in the Green Belt, its development could be considered to fundamentally undermine the purposes of the Green Belt. They also raised concerns about the lack of pedestrian links along Oxhey Lane and to local centres.
- 3.66 *NCFS6 Land to East of Watford Road – 331 dwellings*
- 3.67 This site is a greenfield site in the Green Belt and has not been assessed as constituting grey belt and does not fall within an area of fundamental importance. At 331 dwellings the site is not considered strategic and would not be expected to deliver on-site infrastructure however it still provides a meaningful contribution to meeting the council's overall housing need.
- 3.68 Members raised concerns about parts of the site being in flood zones 2 and 3, siting previous concerns raised by the environment agency. Concerns were also raised about the vehicular access coming on to the A41, and its close proximity to Junction 20 on the M25 motorway. It was considered poorly connected for pedestrian access to local centres.

Non-residential site allocations

Employment

- 3.69 In addition to providing a significant increase in the quantum of new housing delivered, the economic development of the district needs to be considered. This includes meeting the projected need for a range of employment uses including office uses, industry and warehousing uses, public and community uses, leisure and tourism uses and main town centre uses.
- 3.70 Three Rivers has a thriving economy which has been growing at a strong rate supported by falling levels of unemployment. It has a strong creative industries sector (at Warner Bros. Studios and Langleybury) and a high concentration of knowledge-based industries, growth of these sectors should be encouraged.
- 3.71 The South West Herts Economic Study (2024) identified a need of 30,100 sqm office floorspace, however this has since been met by existing commitments at Croxley Park which delivered 36,363 sqm so there will in fact be an oversupply.
- 3.72 Although there will be an oversupply in office space during the plan period, the South West Herts Economic Study recommends that any loss of employment space be resisted due to low vacancy rates and increasing labour supply.
- 3.73 The South West Herts Economic Study (2024) sets out that demand for industrial and storage & distribution space in South West Hertfordshire is strong, driven mainly by demand for large scale storage & distribution space which increased during the pandemic. The study identifies a shortfall of 9.5 hectares across South-West Hertfordshire. There are no local need figures identified for individual authorities and the study found that there are no suitable sites identified in Three Rivers to address that shortfall.
- 3.74 In the Regulation 18 Part 2 Sites for Potential Allocation document the existing employment allocations from the adopted Site Allocations Local Development Document (2014) were retained, adding small extensions to the Croxley Park

employment area. We are not proposing any changes to this as our existing employment areas still need to be retained and protected.

- 3.75 In March 2024 the modified Article 4 Direction issued by the secretary of State came into force covering these employment sites and our town and district centres. This added the requirement for planning permission to be sought by applicants where permitted development rights otherwise would have applied, further protecting our employment areas.

An additional area covered by the Article 4 Direction is Leavesden Park employment area. Although this was not one of the previous employment allocations in the extant Local Plan, it was included in the Article 4 Direction. The evidence work in preparing the Article 4 Direction provides justification for protecting Leavesden Park for employment uses which is in line with the Economic Study findings stating that existing employment uses should be protected. Officers recommend that Leavesden Park is allocated as an additional employment area in the Local Plan. It should be noted that this allocation isn't proposing any new development, rather it is safeguarding existing employment uses.

Warner Bros. Studios

- 3.76 The 2021 Part 2 Sites for Potential allocation document included an allocation for Warner Bros Studios at Leavesden. It was considered that the importance of the Warner Bros. Studios at Leavesden (WBSL) for the local and national economy and meant future operations of the Studios were safeguarded and that the pressures from the housing industry should not put the Studios at risk. The existing Leavesden Studios Operations allocation¹ was extended to include open land to the West and North West of the Backlot as part of the new Local Plan.
- 3.77 The National Planning Policy Framework advises that planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, *creative* or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations.
- 3.78 WBSL is a base for Warner Bros. productions but the quality and size of its facilities means it is able to host productions for other film studios and for the production of other TV shows that require the same kind of facility as film.
- 3.79 WBSL is a major employer with over 600 permanent full-time equivalent staff at the Studios and the Studio Tour while film productions can bring in up to 2,500 people to work at the Studios on these days. This makes WBSL one of the largest private-sector employers in South West Hertfordshire.
- 3.80 The Studio Tour has become a nationally important tourist attraction with over 1.8 million visitors a year.
- 3.81 The South West Herts Economic Study Update (2024) considered the requirement for land to support employment and economic activity across the functional economic market area (FEMA) which comprises Three Rivers, Dacorum, Hertsmere, St Albans and Watford.

¹As allocated in the Site Allocations LDD 2014

- 3.82 It concluded that there is likely to be significant growth in demand for studio space over the next 15 years and that WBSL is therefore a key asset for South West Herts and key to the future growth of creative industries in the FEMA. Warner Bros has already invested significantly in Leavesden Studios and has further plans to expand.
- 3.83 As such, the Study recommends that as the WBSL is one of only a few locations in the UK where large scale film and TV productions can be made, is a key asset to the local and national economy and to the future growth of the creative industries in the area, the site should be expanded and developed.
- 3.84 In order not to compromise the ability of Leavesden Studios to contribute to the local and national economy, both as a local employer and as a centre to contribute to the economic growth of the District over the Local Plan period it is essential that land is allocated to allow the expansion of the studios and that a policy is in place to ensure that the land is safeguarded for that use.
- 3.85 Since the 2021 allocation some of the proposed allocation has already been built out, but the remainder of the site is recommended by Officers to remain as an allocation in the Regulation 19 document.

Town Centres and Retail

- 3.86 The South West Hertfordshire Authorities (Three Rivers, Dacorum, Hertsmer, St Albans and Watford councils) commissioned a joint Retail and Leisure^[1] Study. This evidence base study provides the Councils with an objective assessment of retail and leisure development needs and a clear understanding of retail and leisure provision.
- 3.87 The South West Hertfordshire Retail & Leisure Study (2018) shows that Three Rivers has a relatively low market share across the South West Herts area. This reflects the findings of the previous studies undertaken in 2009 and 2012.
- 3.88 The Study provides recommendations on the provision for new retail floorspace over the Local Plan period to 2036, based on the growth population scenario of an additional 630 dwellings per year. The study identifies that there is likely to be a relatively small undersupply of convenience and comparison goods.
- 3.89 As we are no longer attempting to meet the 630 dwellings per annum (now 832 dpa) standard method target it may be the case that there is a greater undersupply of convenience and comparison goods, however there will be additional convenience and comparison floorspace delivered by new development in the plan.
- 3.90 The Regulation 18 Part 2 Sites for Potential Allocation document identified town centre, district centre and local centres to be focused on town centre and retail uses giving priority to the shopping frontages. It should be noted that the Article 4 Direction covering our employment areas also covers the town and District centres.
- 3.91 Officers are not proposing any changes to the Town Centres & Retail Allocations as they consider that these uses need to be protected in order to ensure the vitality of our high streets.

Gypsies, Travellers and Travelling Showpeople

- 3.92 National Policy sets out that within the context of establishing need (housing), the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies and specifically refers to travellers as one of these groups.
- 3.93 The council will seek to meet identified needs on suitable sites in sustainable locations and to maintain a five-year supply of deliverable pitches/plots taking into account the findings of the council's Gypsy and Traveller Accommodation Assessment (July 2025) and any subsequent updates. All the identified Gypsy, Traveller and Travelling Showpeople sites/yards within the district will be 'safeguarded' to ensure that the permitted use as a traveller site is not lost through the grant of any subsequent planning permission whilst there remains a need for sites.
- 3.94 There are a range of different methods to meet identified need, and often a combination of methods is often most effective. The approaches can be categorised as a criteria-based policy approach, extension of existing sites/yards, allocating entirely new gypsy and traveller sites/travelling showpeople yards, or allocating parts of strategic general needs housing sites. A combination of approaches will be utilised in order to meet the need identified within the GTAA

Education

- 3.95 The council is in ongoing discussions with Hertfordshire County Council regarding the district's education needs. Further engagement has come through work on the Infrastructure Delivery Plan (2026).
- 3.96 From these discussions County has informed officers of identified need in Carpenders Park which will deal with local need but also help with need from Watford and to a lesser extent Hertsmere. County own a site in Carpenders Park which was a proposed secondary school allocation in the Regulation 18 Part 2 consultation. Officers recommend that this site remains a proposed allocation in the Regulation 19 Document despite falling into an area of 'fundamental importance' in the Green Belt. Officers consider the need for education is such that it outweighs the harm to the Green Belt and constitutes exceptional circumstances for the revision of Green Belt boundaries.
- 3.97 The Regulation 18 Part 2 consultation also included the existing primary school allocation at Woodside Road. This allocation from the extant Local Plan has not yet been built out so officers propose for this to be carried through to the Regulation 19 consultation.
- 3.98 The land around the Reach Free School in Mill End has also been safeguarded for future expansion of this school.
- 3.99 Additional need for new school places resulting from new development in the Local Plan will be considered in the Infrastructure Delivery Plan and will be delivered through developer contributions with potential for on-site provision of primary schools on larger strategic sites of circa 500 dwellings or more.

Open Space

- 3.100 The Open Space, Sport & Recreation Study (OSSR) determines the provision and quality of existing facilities, identifies any surplus or deficiencies of provision, and establishes the likely future needs. The Open Space Assessment formed part of this study considering the following typologies: parks and gardens,

natural and semi-natural green spaces, amenity green space, provision for children and young people, allotments, cemeteries and church yards.

- 3.101 It is important to note that only sites that are publicly accessible are included in the study (i.e. private sites or land, which people cannot access are not included).
- 3.102 In accordance with best practice recommendations, a size threshold of 0.2 hectares is applied to the inclusion of some typologies within the study. Sites of a smaller size, particularly for the typologies of amenity greenspace and natural and semi-natural greenspace tend to have a different role. Often this is for visual purposes (e.g. small incremental grassed areas such as highway verges) and is therefore considered as offering less recreational use in comparison to other forms of open space.
- 3.103 The Regulation 18 Part 2 Sites for Potential Allocation document proposed that existing open space allocations should remain as such whilst proposing two new open space allocations as parts of sites CFS28 and OSPF6 at Warner Bros. Studios in Leavesden. These can be viewed in Appendix 4.
- 3.104 Future Open Space provision will be considered against the Open Space, Play Space, Sport and Recreation policy in the emerging plan. This sets out that future development proposals will be required to contribute to new provision of open space and children's play space where justified by the scale of development. Site-specific comments on the potential housing sites in the plan will identify where a potential housing site would be required to contribute to open space and play space provision.
- 3.105 An update to the Open Space, Sport & Recreation Study has not yet been completed due to prioritisation of time and funds on other studies more critical to successfully adopting the Local Plan. The council is committed to producing an update in the near future.
- 3.106 The location of new future provision of open space and play space depends on a District Council decision on housing site allocations and on planning permissions that may be granted both for windfall sites and future allocation sites (where such provision is required). As the designation of any new open and play spaces through future development proposals is uncertain, it is intended for any new open spaces and play spaces to be allocated as public open space and be included in the Policies Map at the nearest appropriate and possible time.
- 3.107 The Local Plan Regulation 19 Part 2: Site Allocations is set out in Appendix 1.

Regulation 19 Publication of the Local Plan

- 3.108 As stated earlier in this report, the Regulation 19 consultation is the final formal consultation stage in the preparation of a Local Plan under the Town and Country Planning (Local Planning) (England) Regulations 2012. It takes place once the council has prepared what it considers to be a sound plan, ready for submission to the Secretary of State. At this stage, the Local Plan is not seeking general comments or alternative options; instead, the consultation focuses specifically on whether the Plan is legally compliant and sound in accordance with national planning policy.
- 3.109 The consultation must last for a minimum of six weeks. During this period, the council must make the proposed submission Local Plan and all supporting evidence publicly available and invite representations from statutory consultees,

stakeholders and the wider public. Representations must be submitted in writing and are limited to matters of legal compliance and soundness, assessed against the four tests set out in the National Planning Policy Framework: whether the plan is positively prepared, justified, effective and consistent with national policy.

- 3.110 The council must also consult on the Sustainability Appraisal, and any other key supporting documents, as these form part of the evidence base the Planning Inspector will consider. Following the close of the Regulation 19 consultation, the council cannot make substantive changes to the plan without further consultation. All duly made representations must be submitted unchanged to the Secretary of State alongside the Local Plan, supporting documents and a statement setting out who was consulted and how the consultation was carried out.
- 3.111 Although the council cannot make substantive changes to the plan prior to submission and can provide the examiner with proposed modifications. Should these modifications be minor, this report seeks delegated authority to the Head of Planning Policy and the Director of Finance to propose minor modifications in consultation with the Lead Member on the Local Plan and proceed to submission without returning to committee and Full Council. Should the proposed modifications be more significant than the report seeks Members agreement that this be decided through an Urgent Decision in accordance with the council's constitution. This helps ensure the Local Plan is delivered as quickly as possible by avoiding delays caused by going through the committee cycle.
- 3.112 After submission, the Planning Inspectorate will appoint an Inspector to examine the Plan. The Inspector will consider written representations and will hold hearing sessions to explore specific issues. The Regulation 19 defines the scope of issues considered at examination and ensures that the Local Plan meets statutory requirements and national policy before it proceeds to independent examination.
- 3.113 The Regulation 19 Part 1: Policies and Part 2: Site Allocations will be consulted on together with the supporting evidence base. The consultation is planned to commence on Friday 6 February, running for 6 weeks, and closing on Friday 20 March. These dates are reliant on final versions of all the evidence documents being available for consultation. At the time of writing some remain in draft form and there may therefore be minor slippage to the timeline whilst these get finalised.

4 Options and Reasons for Recommendations

- 4.1 The preparation of the Local Plan must be undertaken in accordance with the relevant regulations. This includes statutory publication of the plan in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

5 Policy/Budget Reference and Implications

- 5.1 The recommendations in this report are within the Council's agreed policy and budgets. The relevant policy is entitled Local Plan.

Equal Opportunities, Staffing, Community Safety, Public Health, and Health & Safety Implications

None specific.

6 Financial Implications

- 6.1 None specific. The costs associated with preparing, publishing and consulting on the Local Plan are included in existing budgets.

7 Legal Implications

- 7.1 The legal requirements for the preparation and consultation of Local Plans are set out in the Planning and Compulsory Purchase Act 2004 and the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). A failure to comply with the statutory requirements may result in the Local Plan being found unsound at the examination in public.
- 7.2 There is also a statutory requirement that Local Plans are subject to a Sustainability Appraisal incorporating the requirements of the Strategic Environmental Assessment. A Sustainability Appraisal will be published alongside the Local Plan Regulation 19 publication documents.

8 Environmental Implications

- 8.1 The Local Plan promotes the council's priority to maintain a high quality local environment and net zero ambitions. The Local Plan must be tested by a sustainability appraisal process so that any environmental impacts of policies can be minimised. A Sustainability Appraisal document in relation to the Local Plan Regulation 19 Publication will be published alongside the Local Plan.

9 Customer Services Centre Implications

- 9.1 The CSC will be briefed to respond to requests for information on the Local Plan and the Regulation 19 Publication.

10 Communications and Website Implications

- 10.1 The Regulation 19 consultation will be hosted on the council's 'Have Your Say' consultation platform. There will be a communications and social media push to encourage residents, businesses and other stakeholders to respond whilst also informing them of the technical nature of this consultation.

11 Risk and Health & Safety Implications

- 11.1 The Council has agreed its risk management strategy which can be found on the website at <http://www.threerivers.gov.uk>. In addition, the risks of the proposals in the report have also been assessed against the Council's duties under Health and Safety legislation relating to employees, visitors and persons affected by our operations. The risk management implications of this report are detailed below.
- 11.2 The subject of this report is covered by the Planning Policy and Conservation service plan(s). Any risks resulting from this report will be included in the risk register and, if necessary, managed within this/these plan(s).

Nature of Risk	Consequence	Suggested Control Measures	Response (tolerate, treat, terminate, transfer)	Risk Rating (combination of likelihood)
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				<i>d and impact)</i>
Failure/Delay in delivering Local Plan	May lead to uncertainty in the planning process and potential increase in planning appeals and risk of intervention of Local Plan. Failure of Local Plan at examination is costly both in terms of finances and resources.	Ensure robust evidence justifies a sound plan. Submit plan that is expected to be successful at examination.	Treat	9
Changes in National Policy & regulations	May require a significant alteration to emerging Local Plan	Keep informed on Government s changes	Tolerate	4

11.3 The above risks are scored using the matrix below. The Council has determined its aversion to risk and is prepared to tolerate risks where the combination of impact and likelihood scores 6 or less.

Very Likely Likelihood Remote	Low 4	High 8	Very High 12	Very High 16
	Low 3	Medium 6	High 9	Very High 12
	Low 2	Low 4	Medium 6	High 8
	Low 1	Low 2	Low 3	Low 4
Impact Low ----- Unacceptable				

Impact Score	Likelihood Score
4 (Catastrophic)	4 (Very Likely (≥80%))
3 (Critical)	3 (Likely (21-79%))
2 (Significant)	2 (Unlikely (6-20%))
1 (Marginal)	1 (Remote (≤5%))

- 11.4 In the officers' opinion none of the new risks above, were they to come about, would seriously prejudice the achievement of the Strategic Plan and are therefore operational risks. The effectiveness of the management of operational risks is reviewed by the Audit Committee annually.

Background Papers

National Planning Policy Framework (2024)
 Planning Practice Guidance
 Core Strategy (2011)
 Green Belt Review Strategic Analysis (Stage 1) (2017)
 Stage 2 Green Belt Assessment (2019)
 Stage 4 Green Belt Review (2025)
 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)
 Regulation 18 Part 5: Newly Submitted Sites and Policies (2025)
 Potential Sites consultation (2018)
 Regulation 18 Issues & Options consultation (2017)
 Levelling-up and Regeneration Bill: reforms to national planning policy (2022)
 Strategic Housing & Employment Land Availability Assessment (2020)
 Strategic Housing & Employment Land Availability Assessment Addendum (2023)
 Strategic Housing & Employment Land Availability Assessment Update (2026)
 Urban Capacity Study (2020)
 Settlement Appraisal (2026)
 Edge of Settlement/New Settlement Scoping Study (2020)
 South West Hertfordshire Local Housing Needs Assessment (2024)
 South West Hertfordshire Economic Study (2024)
 Gypsy and Traveller Accommodation Assessment (2025)
 Draft Sustainability Appraisal (2026)

APPENDICES

Appendix 1 – Local Plan Regulation 19 Part 2: Site Allocations
Appendix 2 – Trajectory for Regulation 19 sites
Appendix 3 – Three Rivers Settlement Appraisal
Appendix 4 – Site Accessibility
Appendix 5 – Rejected Sites
Appendix 6 – Districtwide Allocated Housing Sites
Appendix 6a – Inset Map A2 – Allocated Housing Sites
Appendix 6b – Inset Map B1 – Allocated Housing Sites
Appendix 6c – Inset Map B2 – Allocated Housing Sites
Appendix 6d – Inset Map C1 – Allocated Housing Sites
Appendix 6e – Inset Map C2 – Allocated Housing Sites
Appendix 7 – Districtwide Map Sites Not Taken Forward

Appendix 8 – Retained and Proposed Open Space Allocations
Appendix 9a – Reg 19 – SHELAA Site Assessments – Part 1
Appendix 9b – Reg 19 – SHELAA Site Assessments – Part 2
Appendix 9c – Reg 19 – SHELAA Site Assessments – Part 3
Appendix 9d – Reg 19 – SHELAA Site Assessments – Part 4
Appendix 9e – Reg 19 – SHELAA Site Assessments – Part 5
Appendix 9f – Reg 19 – SHELAA Site Assessments – Part 6
Appendix 9g – Reg 19 – SHELAA Site Assessments – Part 7

