



Ministry of Housing,
Communities &
Local Government

Matthew Pennycook MP

Minister of State for Housing and Planning
2 Marsham Street
London
SW1P 4DF

Cllr Stephen Giles-Medhurst OBE
Leader, Three Rivers District Council
Three Rivers House
Northway
Rickmansworth
WD3 1RL

18 March 2026

Dear Cllr Giles-Medhurst,

Thank you for providing me with the full body of evidence that underpins the Three Rivers draft plan. Having considered it carefully, I am writing to inform you that the Secretary of State is now directing the Three Rivers District Council ('the Council') in respect to its emerging local plan ('the plan').

In my letter to you of 14 November 2025, I made clear that I expect Three Rivers to bring forward a plan that meets identified need as far as possible; that reflects national policy, including in relation to Green Belt release; and that is capable of being found sound at examination.

In my subsequent letter of 5 February 2026, I reiterated my concern that your emerging plan was not satisfactory and my lack of confidence that it was capable of being found sound or legally compliant at examination. In that same letter, I notified you that as a result of my reservations, I was exercising my powers under section 21A of the Planning and Compulsory Purchase Act 2004 ('the 2004 Act'), to direct the Council not to take any step in connection with the adoption of the Plan, while I considered whether to give directions under section 21 and section 27 of the 2004 Act.

Having reviewed the draft plan alongside the additional evidence you provided, it is my considered opinion that the Regulation 19 draft plan approved for consultation at the Full Council vote on 27 January has not engaged sufficiently with the concerns I have conveyed to you.

As you will know, Section 21 of the 2004 Act provides the Secretary of State with intervention powers where they think that a local plan is unsatisfactory. Section 27 of that same Act provides the Secretary of State with broad default intervention powers where they believe a local planning authority is failing or omitting to do anything that it is necessary for them to do in connection with the preparation, revision or adoption of its Local Plan.

Local planning authorities are required to publish and maintain a Local Development Scheme (LDS), as set out in section 15(1) of the 2004 Act. Section 15(4) of the 2004 Act provides that the Secretary of State may direct changes to a local development scheme where they consider that

amendments are necessary to ensure that the authority's development plan documents fully and effectively cover the whole area.

It is my firm view that the available evidence demonstrates that the Council's Regulation 19 draft plan fails to propose allocating all appropriate housing sites available that could contribute towards meeting housing need. The Council are therefore proposing a plan which is highly likely to be found unsound at examination. On this basis, it is clear that the plan is unsatisfactory and that the Council is failing to do something necessary in respect of preparing the local plan. This meets the statutory test for intervention under section 21 and 27 of the 2004 Act

I have also considered the criteria laid out in the Planning Practice Guidance (PPG), which states that intervention under S27 of the 2004 Act "*should have regard to plan progress and local development needs*":

- **Plan Progress:** The current Three Rivers Local Plan, adopted in October 2011, is now almost 15 years old. It therefore stands as one of the oldest in the country and the policies it contains are likely to be significantly out of date. Progressing an unsatisfactory plan risks failure at examination and long delays until an up-to-date adopted plan is in place, with work having to restart in the new planning system. This would continue to leave the Council vulnerable to piecemeal and speculative development, with reduced public engagement and fewer guarantees that it will make the most of the area's potential.
- **Development needs:** The Council has consistently delivered below the target set by the standard method. The latest Housing Delivery Test (HDT) 2023 is the 5th lowest in the Country with a score of 30%, putting the LPA in the presumption in favour of sustainable development. This is unlikely to change without the adoption of an up-to-date Local Plan. The Council area is also one of the least affordable in the country, with an affordability ratio of 12.3 - meaning the median house price is 12.3 times the median annual earnings - compared with the England average of 7.7. There continues to be a significant need for additional social and affordable housing delivery in the area, which is unlikely to be met whilst the Council does not have an up to date local plan.

Taking all of the above into account, I consider that the intervention criteria are met, and that intervention is justified.

Pursuant to the powers in section 21 (1)(a) of the 2004 Act I am directing the Council to:

1. **Per Section 21(1)(a): make modifications to your proposed Regulation 19 plan to include, as a minimum, the sites set out below lifting the requirement to approximately 85% of need:**

- CFS26a Kings Langley Estate south
- CFS21 Land at Rousebarn Lane
- PCS4 East Green Street
- PCS47 South of Little Oxhey Lane
- NCFS12 Land East of Oxhey Lane
- NCFS6 Land to East of Watford Road
- Additionally, OSPF22 Batchworth Golf Course should lease issues be resolved

- 2. Per Section 21(1)(a): review and update the draft plan and evidence base in readiness for Regulation 19 consultation and Submission including where necessary in order to account for the additional sites.**

I previously gave a direction to the Council under section 21A of the 2004 Act, whilst I considered whether to make a direction under section 21 of the 2004 Act. The above direction under section 21(1)(a) supersedes the previous direction given under section 21A.

In addition, per section 27 of the 2004 Act I am directing the Council as follows:

- 3. Per Section 27(2)(b): Commence a revised Regulation 19 consultation by 31 July 2026 for a minimum period of 6 weeks;**
- 4. Per Section 27(3)(b): Submit your plan by 30 November 2026 with any proposed minor modifications necessary agreed by the Head of Planning Policy and the Director of Finance in consultation with the Lead Member on the Local Plan. Should proposed modifications be more significant this should be set out to the Secretary of State, allowing him to consider whether further action is necessary;**
- 5. Per section 27(2)(b): Not to take any step to withdraw the plan and report monthly (from the date of this letter) to my officials on the progress of the plan;**
- 6. Per Section 27(2)(b): Progress the plan up to the end of the examination process;**
- 7. Per Section 27(4)(b): On conclusion of the examination, to publish the Planning Inspector's recommendations and reasons; and**
- 8. Per Section 27(5)(b): On conclusion of the examination, to consider adopting the plan, including any main modifications recommended by the Planning Inspector deemed necessary to make the plan sound.**

Pursuant to section 27(8) of the 2004 Act, the Secretary of State has issued directions under section 27(2) and section 27(5) in order to ensure that, following the modifications required by direction under section 21(1)(a), the plan is afforded the best possible opportunity to undergo independent examination. The intention is to enable the Inspector to determine whether the modified plan is legally compliant and sound.

Finally, to avoid delays to plan making and ensure the plan is submitted for examination before the December 2026 deadline, per section 15(4) of the 2004 Act, I am also directing the Council to:

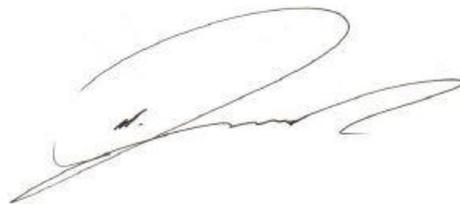
- 9. Per section 15(4) of the 2004 Act: Publish on your website a revised Local Development Scheme by 30 June 2026 to reflect directions set out above. For avoidance of doubt this should include the following milestones:**
 - Regulation 19 consultation to commence by no later than 31 July 2026
 - Submission of the plan for examination should be no later than 30 November 2026

The above directions will remain in force until withdrawn by the Secretary of State. Should you fail to comply with the directions in this letter, I will consider taking further action.

Notwithstanding this direction and the evidence you have already provided, I would like to give you an opportunity to set out by 25 March 2026 any exceptional circumstances which in your view suggest that intervention is not appropriate in this case. To be clear, this neither alters nor removes the direction set out in this letter.

I want to reiterate that I am committed to working constructively with you to ensure that Three Rivers can deliver the high-quality homes and essential infrastructure needed to underpin ambitious and sustainable growth. My officials will maintain ongoing engagement with your officers and will be in touch shortly to discuss next steps.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Matthew Pennycook', with a large, stylized flourish at the end.

MATTHEW PENNYCOOK MP
Minister of State for Housing and Planning