

How Three Rivers ran the Local Plan consultation — a public audit

A six-page briefing for residents. Save Our Fields, September 2026.

The Regulation 19 consultation on the Three Rivers Local Plan 2026–2042 ran from **31 July to 25 September 2026**¹. It is the final stage at which the public can comment before the Plan goes to a government Inspector. This briefing sets out how it was run — and does so **fairly**, reporting what the council did well as well as what it did not.

Every statement here is drawn from the council's own published documents. Sources are numbered in the order they first appear, and listed at the end.

What the council did well

It is right to say so first:

- It ran the consultation for **eight weeks** — more than the **six-week minimum** the Government directed and the six weeks the council's own policy treats as typical^{1,2,3}.
- Its consultation PDFs are **properly built for screen readers and accessibility tools** — tagged, language-tagged and titled⁴. That is good practice, and unusual.
- It placed a **public notice** and issued a **press release** on launch day^{5,6}.

The scorecard

#	Question	Verdict
1	Was the consultation at a formative stage?	Met
2	Was there enough information to respond?	Partly
3	Was there adequate time?	Partly
4	Were responses conscientiously taken into account?	Not yet assessable
5	Was it clear and in plain English?	Not met
6	Was the holiday period handled fairly?	Not met
7	Were affected people actually reached?	Not met
8	Was it accessible?	Met
9	Was the council's own consultation policy followed?	Partly
10	Was it clear which rules applied?	Not met
11	Could you find the site from the documents?	Partly

The rest of this briefing explains the "Partly" and "Not met" rows.

1. The plan is very hard to read

We measured the council's own published text⁴:

Document	Words	Words per sentence	Reading grade
Part I (Policies)	78,378	30	17
Part II (Site Allocations)	43,328	45	22

For comparison, plain English is written at roughly **reading age 9**, and quality newspapers sit around grade 12. **Part II — the part that decides which green belt fields are built on — reads at post-graduate level, with sentences averaging 45 words.** Together the two documents run to **more than 120,000 words**, with no plain-English summary of what changed⁴.

How much is there to read?

Measured against two neighbouring authorities' plans on the same timetable⁴:

Document	Words	Reading grade
Three Rivers — Part I (Policies)	78,378	17
Three Rivers — Part II (Site Allocations)	43,328	22
Three Rivers — total	121,706	19
Dacorum (pre-submission, 2024)	18,975	13
St Albans (Regulation 19 policies, 2024)	55,216	17

Three Rivers' consultation is about **six times longer than Dacorum's whole plan**, and its Part II is harder to read than either neighbour's. (Plans differ in scope, so this is indicative, not exact — but the direction is the same against both.)

Readability formulas are rough tools, and we say so. But a **122,000-word consultation at post-graduate difficulty, with no plain summary**, is not a consultation most people can take part in. The Government's own principles ask for plain English and for avoiding lengthy documents⁷.

2. It ran through the school summer holidays — with no extension

The consultation opened on 31 July 2026, **during the Hertfordshire school summer holiday**, and its **first five weeks fell inside the holiday**^{1,8}. It ran on to 25 September, and the deadline was **not extended**¹.

The Government's own *Consultation Principles* say that when a consultation spans a holiday period, the authority should **consider mitigating action — such as extending the deadline**⁷. Nothing suggests that was done here.

3. One response per policy

The council's own notice says:

"You will need to submit a separate response for each paragraph or policy (including site allocation) of the plan or policies map you want to comment on."⁹

So a resident who wants to comment on the main site, the green belt, the roads *and* the housing numbers does not fill in one form — they fill in **four separate ones**^{1,9}. This is a real barrier, and the council's guidance neither explains nor softens it.

4. Were you actually told?

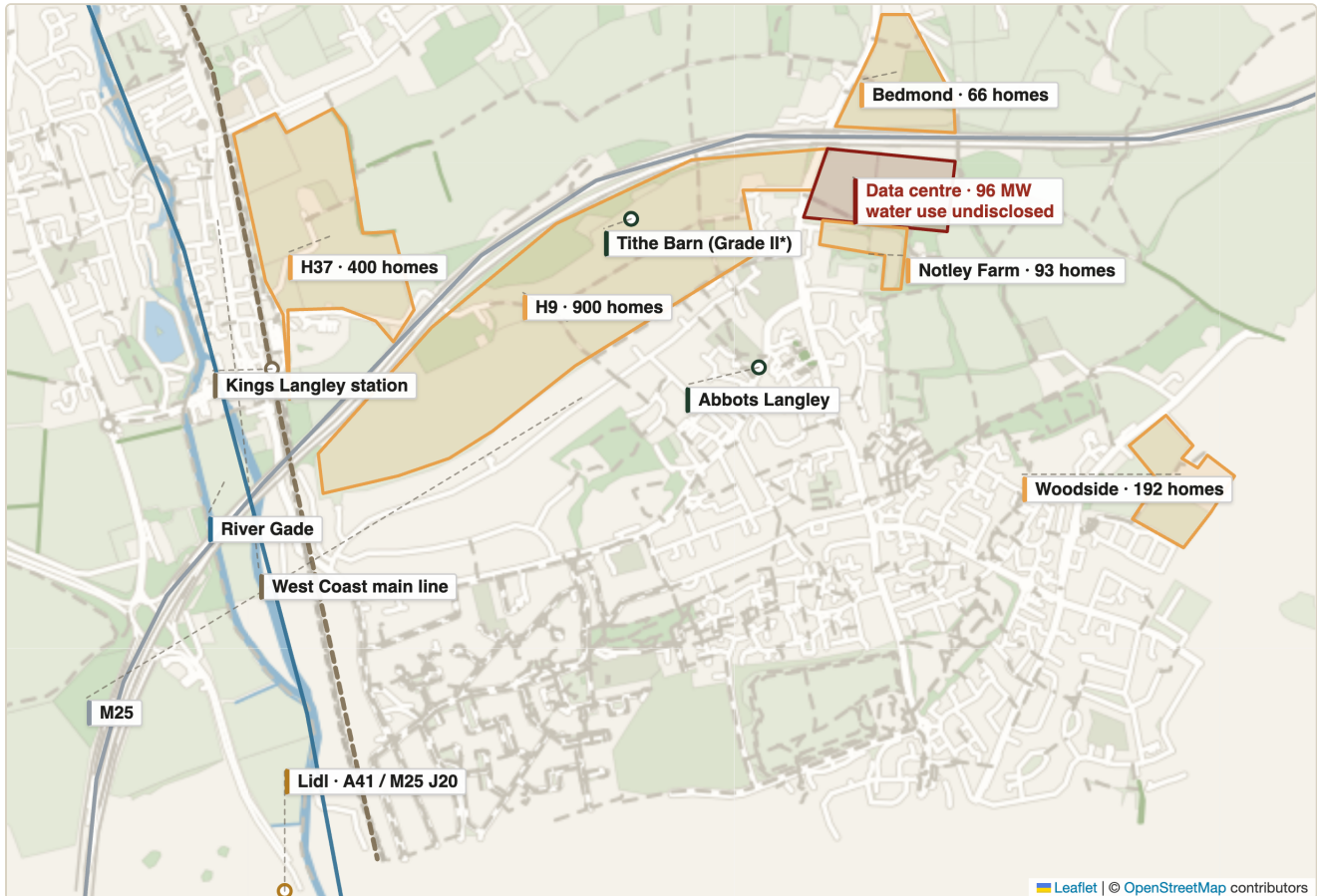
The council publishes the consultation online and in a newspaper notice^{5,6}. But to be **notified** of consultations, the council's own statement tells residents to **email and ask to be added to a database**¹. In other words, the burden of being told falls on the resident.

For a plan that proposes **1,300 homes and a data centre**¹⁰ beside a community, the difference between "published" and "brought to the attention of those affected" is the whole ball game. On the public record we can see the publication. We cannot see that affected households were individually told.

5. Finding the site is hard from the documents

The allocation behind Abbots Road is given three labels — **H9, CFS26a** and, in the plan's marketing language, "**The Kings Langley Estate.**"¹⁰ Residents know it as **Abbots Road Fields**. The documents give a site-plan image and **no coordinates or landmark description**¹⁰, so identifying exactly which fields are affected means leaving the documents and using the council's separate interactive map¹¹.

We had to reconstruct the site on a map ourselves — the map on the next page — to reconcile it with the real world. **We make no allegation of concealment:** whether by design or oversight, the effect is that a resident cannot readily tell which fields are allocated.



The site planned behind Abbots Road (H9), reconstructed from the map data. It took independent mapping to place it against the fields, the roads and the village edge.

6. Which rules even apply?

This is the most tangled part, and it is not the council's fault that the rules changed — but it did not explain them.

- The Regulations that govern the process (the **2012 Regulations**) were **scrapped in March 2026**¹² — but **kept alive** for plans submitted by 31 December 2026¹³. Three Rivers will submit by 30 November, so the old rules still apply. The council is **right** to use them.
- A **brand-new National Planning Policy Framework** was published on **17 August 2026** — **in the middle of the consultation.**¹⁴ Its transitional rules mean the plan will still be judged against the **December 2024** version^{15,16}.
- The legal "**duty to co-operate**" between councils was **abolished in March 2026**¹³ and does **not** apply here. (Anyone arguing it was breached would be wrong.)

None of this is explained to residents. It took us research across three sets of regulations and two versions of national policy to work out — and an ordinary household could not reasonably be expected to do the same.

7. The council's own consultation policy is out of date — and its promises unmet

The council's **Statement of Community Involvement** — its own rulebook for how it consults — was adopted in **June 2020**³. The law requires it to be **reviewed every five years**¹⁷, so a review was due by **June 2025**. No completed review is published^{3,17}.

That same rulebook **promises to "report back"**³ after each consultation — setting out who was consulted, how, how many responses came in, and how the issues were addressed. The council **has not yet published such a report for this consultation** — it is not finally due until the plan is submitted, by **30 November 2026**¹⁸. But it has not, as far as we can tell, published one for any earlier stage either¹⁹. The very policy this consultation should be measured against is overdue, and the earlier promise at its heart is unmet.

8. What the council's own officers said

This matters, because it is not our view — it is the council's own:

"Officers are concerned that this puts the plan at risk of being found unsound... **the plan is likely to be thrown out at examination.**" — Officers' report to Full Council, 27 January 2026²⁰

Before the Government's direction, the council's own members voted to **remove** this site²¹, and its officers confirmed the land was **not** formally identified as "grey belt"^{10,22} — that status depended on work still incomplete. The site is in the plan because it was **directed in**, not because the council's evidence supported it.

And the plan itself

This briefing is about the **process**. The **plan** has its own problems — the council's own green belt review rated this land of "**fundamental importance**"²³ before the Government directed it into the plan, and the plan secures **no funded water, wastewater, school, health or transport capacity** for 1,300 new homes. Those are set out, fully sourced, in our report: saveourfields.com/abbots-road-report.

What we're asking for

1. **Extend the deadline** past the school holidays, or run a term-time period.
1. **Tell affected residents directly**, and publish how many were told.
1. **Publish a plain-English summary** of what changed.
1. **Say plainly which rules apply** to the plan and its examination.
1. **Describe each site in plain terms** so residents can find it.
1. **Complete the overdue review** of the council's consultation policy.
1. **Publish the "report back"** the council's own policy promises.

What we could not verify

We say this openly, and invite the council to answer:

- Whether affected households received individual notice.
- Whether the council's free magazine, delivered to every home, carried the consultation.
- Whether the five-year review of the consultation policy has been done but not published.
- What the council's "Local Plan FAQs" page contains — we could not retrieve it.

References

Every statement in this briefing is drawn from the council's own published documents and the applicable legislation and government guidance. Sources are numbered in the order they first appear in the text. Readability figures and word counts are our own measurement of the council's published plan text.

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