

BNG's GUIDANCE ON MAKING A REG 19 LOCAL PLAN SUBMISSION

TO ASSIST BNG SUPPORTERS

August 2026

Draft Local Plan publication version (Regulation 19) consultation period

Opens: Thursday 23 July 2026

Closes: Sunday 6 September 2026 at 11:59pm

IMPORTANT: The Council website encourages comments to be made via the Opus Consult online portal.

However, BNG have serious concerns that this portal is both difficult to utilise for any *general* comments (Opus require comment beside *each* specific policy or paragraph) and it is also problematic for those with limited IT skills, the elderly or even those who just have limited access to the internet.

Accordingly we recommend you write to the Council or send an email to;

Planning Policy - Buckinghamshire Council
Walton Street Offices
Walton Street
Aylesbury
HP20 1UA

EMAIL - planningpolicyteam.bc@buckinghamshire.gov.uk

BNG have made a collaborative and very detailed Reg 19 submission (A copy should be on the new BNG website by the time you read this).

Feel free to use the BNG collaborative submission as inspiration for your *own* comments to the Council but the following notes are designed to assist you in what is otherwise a very technical matter that most people don't do very often:

NOTE Supporters are strongly encouraged NOT to copy & paste but to try to use their own words when making comment however we suggest any submission you make attempts to incorporate the following points - (key words & phrases are underlined);

SUGGESTED KEY CONTENT FOR PUBLIC SUBMISSIONS:

- You are aware of the collaborative work undertaken by BNG, Chesham Renaissance CIC & The Chesham Society and of their collective response and submission to the Council made in response to the Draft Local Plan.
- You support their comments and as such you are broadly supportive of the Plan overall and specifically support the Council's assertion that they can meet their housing needs without release of any Green Belt or by designating "Grey Belt" sites, and that the Council have adopted a "brownfield first" policy, which helps to

“promote town centre regeneration” specifically in Chesham as well as elsewhere in Buckinghamshire.

- However, you share BNG’s concerns that the Plan needs minor modifications which have been proposed that will improve the soundness of the Plan by making it more justified and effective. Specifically, by;
- Reconsidering certain sites around Chesham that despite being “available” have not been allocated for housing development but which have been overlooked or incorrectly labelled as having no exceptional circumstances to justify release from Green Belt when in fact they are not Green Belt sites and actually represent brownfield or *Previously Developed Land* (PDL) .

These include;

- ✓ **Former Decco Site Latimer Road Chesham site ref # 3186**, Clearly a brownfield or PDL site (not Green Belt) with historic and redundant industrial use located within the Green Belt boundary. This is a very large site and whilst its location adjacent the river might warrant a lower building density than other town centre locations, its size makes it potentially capable of delivering an increase of between 270 – 300+ homes. It might also support other mixed uses.
 - ✓ **Chesham Station Car Park site ref #3400** , Whilst it is recognised this is currently a car park serving Chesham underground station, it is significantly underutilised now. Its location beside White Hill would enable development of dwellings above the car park without visual intrusion whilst still retaining parking facilities below that would serve both users of the station and the residents above in a desirable and sustainable location close to the town centre. Potential to increase housing delivery by at least 33 dwellings possibly more after a full assessment is conducted.
 - ✓ **Waitrose Car Park site ref # 3437** – Similar comments to the above site also apply. Its location below the White Hill centre would enable development of dwellings above the car park without visual intrusion whilst still retaining parking facilities below. Potential to increase housing delivery by at least 38 dwellings possibly more after a full assessment is conducted.
 - ✓ **Scout Hut 201-205 Botley Rd Chesham site ref # 6516** – This site has a history of having previously accommodated a commercial building which is understood to have contained deleterious materials (asbestos) and when it was demolished, much of the former building was believed to have been buried on site. Although there is a subsequently built scout hut on site, the surrounding land remains restored to grass but it is believed to be contaminated for the aforementioned reason. It is arguably PDL given its contaminated status. It fulfils none of the purposes of Green Belt designation, is not agricultural land and its development would restore what is believed to be contaminated land and in the process could increase local housing delivery by potentially 100 dwellings.
- It is necessary to include other housing sites to provide a buffer of housing supply which will further strengthen the Local Plan which is necessary as you are now

aware of at least one site already allocated in the Plan by the Council has since become “*unavailable*”.

- Recognition of these suggestions and specifically adding the overlooked PDL or brownfield sites, will reduce any risk of speculative proposals emerging that seek to obtain planning consent upon Green Belt areas that do fulfil the purposes of Green Belt designation or which represent irreplaceable good quality agricultural land. Evidence of this being realised is evidenced by the recent outline planning application for 170 home by Toscaig Ltd on Green Belt agricultural land accessed off Lycrome Road near Lye Green Chesham to which you and many others are vigorously opposed.

Please keep a copy of any submission and if sending by email it might be helpful to request a “read receipt”.

Thank you.

Phillip J Plato
Director – Brown Not Green Chesham Ltd