

REGULATION 19 SUBMISSION

Representations on the Buckinghamshire Local Plan: Market Towns Matter – Why Chesham Demonstrates the Need for a Stronger Regeneration Strategy

To: Strategic Planning Team, Buckinghamshire Council

From: Chesham Town Council &
Brown Not Green Chesham Ltd (Not for Profit community company) &
Chesham Renaissance CIC (Community Interest Company) &
The Chiltern Society &
The Chesham Society
(this collective of community groups have approved this Submission and is hereafter referred to as "The Respondents")

Date: 25 August 2026

Subject: Representation on the Draft Buckinghamshire Local Plan 2045
(Regulation 19 public consultation)

Summary: Broadly Supportive / Object in Part (Seeking Modifications for Soundness)

1. Executive Summary: The "Critical Friend" Approach

The Respondents are **broadly supportive** of the emerging Local Plan and Buckinghamshire Council's approach as Local Planning Authority (LPA) and the Respondents are **strongly supportive** towards the LPA's commitment to a **"brownfield-first" development strategy** and its pledge to safeguard the Green Belt and the Chiltern National Landscape surrounding Chesham. This alignment matches our long-held community objectives and the recently passed Chesham Neighbourhood Plan.

However, notwithstanding the above and to assist the LPA in ensuring the Local Plan is adopted, the Respondents feel they should offer the following comments collectively in the capacity of "critical friend".

Specifically, the Respondents have identified a few inconsistencies in some general evidence and particularly some errors in the specific housing allocations insofar as they relate to Chesham (a Tier 2 settlement in the Plan's strategic hierarchy). These errors are more than compensatory and actually increase the housing supply and therefore represent a "buffer" in terms of housing supply and will provide a robust argument against any speculative planning applications coming forward seeking development consent in the Green Belt. Therefore the comments offered herewith are by way of suggestion of minor modifications and corrections to the Plan that we feel are necessary to ensure the Local Plan is **sound**—specifically **justified** by robust evidence and **effective** (deliverable over the plan period) and thereby passes its independent Examination in Public.

We submit that the following comments need to be addressed and modifications made. Namely,

1. The density and housing yield assumptions on certain specific town centre brownfield allocations as detailed later herein, are **unrealistic** and present a risk of the Plan being considered as **unsound**.
2. However we feel any such errors are more than compensated for by the fact that other **available brownfield opportunities have been omitted** within the urban fabric as also detailed later herein, and such omissions are inconsistent and would offset these delivery risks and provide a buffer of housing supply.
3. If both of the above points are addressed by utilising the suggestions and **modifications proposed herein**, the Respondents believe the Local Plan (insofar as it relates to Chesham) should be sound and such modifications would reduce any scope for speculative developers promoting otherwise "*inappropriate*" proposals for Green Belt release.

4. There are **other minor points for correction** in the Evidence Base which we highlight herein to ensure that the evidence supporting the Local Plan is consistent, **justified** and **robust**.
5. These comments are offered as constructive suggestions to ensure the Plan succeeds but the Respondents should highlight that given their limited resources drawn mainly from unpaid volunteers they have not been able to scrutinise the Evidence Base for the *whole* of Buckinghamshire and are concerned that similar offsetting assumptions may have arisen elsewhere in the Plan and therefore would encourage an internal review to check for similar inconsistencies in the wider evidence.

2. Unrealistic Densities & Deliverability Risks (Test of Soundness: Effective)

The Regulation 19 Draft Plan actively prioritises town centre regeneration and underutilised urban land to meet its housing targets. This is welcomed by the Respondents. The core brownfield sites explicitly reference in the Draft Local Plan as being allocated for residential or residential-led mixed-use development in Chesham include:

- **CHS01 – Star Yard:** Located off St Mary's Way. (Note; this is *not* in Chesham “Old Town” as incorrectly stated in the Plan). This *central* site is a primary regeneration allocation targeted to supply 240 dwellings.
- **CHS02 – Albany Place Car Park:** A town centre car park currently accommodating the Elgiva theatre now being allocated to optimize urban housing density, targeted to supply 30 dwellings.
- **CHS03 – Water Meadow Car Park:** Another council-owned urban asset targeted for redevelopment and to supply 55 dwellings in the Plan period

- **Various Smaller Urban Sites:** Involving 17 small infill or brownfield plots within the Chesham area listed in Appendix K of the Regulation 19 Consultation Appendices¹. These Small Sites Policy allocations alone provide a delivery of 370 dwellings within Chesham postcodes during the Plan period.

Accordingly the total housing supply for Chesham over the Plan period is currently **695** dwellings.

While the Respondents welcome the focus on central regeneration sites, the proposed yield of approximately 695 homes across the Chesham allocations as detailed in Table A below, may not be fully achievable and thereby risk making the Plan **ineffective**.

LPA Ref #	Site Address	Area (ha)	Capacity	Density (dwellings/ha)	Site Type
CHS01	Star Yard off St Mary's Way Chesham	0.59	240	406.8	TOWN CENTRE
CHS02	Albany Place Car Park, Chesham	0.35	30	85.7	TOWN CENTRE
CHS03	Water Meadow Car Park, Chesham	0.38	55	144.7	TOWN CENTRE
TOTALS =			325	212.4	

TABLE A above – Summary of Allocated Sites in Chesham

More specifically, **CHS01 at Star Yard** is allocated to contribute 240 homes. An indicative massing study undertaken by the Respondents using the OS site plan and proposed densities, suggests that we regard this proposal as imaginative, courageous and suitably aspirational to aid regeneration of the town centre and the High Street of Chesham especially with incorporation of undercroft car parking.

Despite this site (CHS01) representing development of a major surface-level municipal car park in the town, the Respondents support this proposal because both the Regulation 19 Draft Plan and the integrated Chesham Neighbourhood Plan strictly enforce a **"No Net Loss" policy** for town centre parking spaces.

¹ See <https://www.buckinghamshire.gov.uk/planning-building-and-environment/policy-breaches-and-enforcement/buckinghamshire-local-plan/reg-19-consultation/appendices/>



However, our testing of this proposal (as illustrated in the above image) from our massing study, illustrates that the overall density of development on CHS01 Star Yard may be unrealistic as the above photographic image shows no space for provision of a service road for the delivery of goods to the rear of the shops in Chesham High Street. Such a service road is essential as the High Street is itself pedestrianised. Also, if relocation of the Elgiva Theatre & Community Centre into the former M & Co store is to be seriously considered, a rear service road *must* be retained and as such aspirations for Star Yard need to be scaled back to accommodate this.

Without detailed professional input, the practical quantum of housing allocation from CHS01 is difficult to assess accurately but we suggest that to ensure continued deliveries to shops as well as to service any relocated Elgiva theatre/community centre, and to retain an essential rear service road, the Star Yard housing allocation therefore may need to be **reduced** from 240 to c.175 dwellings (***reducing*** housing supply **by c. 65 dwellings**) and bringing density of Star Yard to a more realistic c. 296 dwellings per ha.

With regard to **CHS02 – Albany Place**, this is a town centre car park and also is currently accommodating the Elgiva centre and we note the proposed building density is only 85.7 dwellings per ha delivering just 30 dwellings.

Given proposals to relocate the Elgiva centre and that this is a town centre site, this allocation does not sound particularly aspirational especially given the density being proposed at Star Yard or even at Water Meadow (see later note).

The Respondents recommend the Council reviews whether the density should more closely reflect comparable town centre locations. In particular the density of development of Water Meadow. Potentially the allocation at this town centre location at CHS02 – Albany Place should be **increased** from 30 dwellings to **50 (ie+20)**.

With regard to **CHS03 - Water Meadow Car Park, Chesham** the Respondents have no additional comments.

With regard to the smaller sites allocations, as previously mentioned which are listed in Appendix K to the Reg 19 Draft Local Plan, included 17 sites. These are tabulated on the following page below as Table B:

HELAA Site Ref	Site Address	Area (ha)	Capacity	Density (dwellings/ha)
1076	Shelley Road, Chesham	0.81	75	92.6
1203	Preston Hill House, Preston Hill, Chesham	0.74	65	87.8
3477	UK House, Chesham	0.18	65	361.1
3506	Chesham Youth Centre, Chesham	0.13	25	192.3
1079	Tom Scott House and Pearce Road car park, Chesham	0.45	25	55.6
1072	Atlas House, Chesham	0.21	20	95.2
1080	Townfield, Chesham	0.22	20	90.9
1073	Brushmakers Court, Chesham	0.17	15	88.2
976	Five Acres, Chesham	0.08	10	125.0
1030	Ryecroft Road, Chesham	0.09	10	111.1
1063	Woodland View, Chesham	0.8	10	12.5
3475	1-9 Broad Street, Chesham	0.07	5	71.4
1035	Belmont Club, Windsor Road, Chesham	0.12	5	41.7
990	Chessmount Rise, Chesham	0.06	5	83.3
997	Elm Tree Hill, Chesham	0.07	5	71.4
3436	Land at East Street Car Park, Chesham	0.03	5	166.7
1038	Shepherds Way, Chesham	0.06	5	83.3
Totals		4.29	370	107.7

TABLE B - Summary of 17 Smaller Sites within Chesham from Appendix K of Local Plan allocated for Housing Development.

The Respondents are again broadly supportive of these proposals but have the following specific observations;

Re site Ref # 3477 UK House, Chesham - is allocated at a density of 361.1 dwellings / ha and the Respondents question if such a density is either realistic or appropriate? The Respondents feel this should be **reduced** from 65 dwelling to **c. 35 achievable dwellings (ie: - 30 dwellings)** having regard to townscape, servicing and design quality.

Whilst the Respondents have concentrated on UK House because of its exceptionally high assumed density, the Council should also review all Appendix K allocations to ensure that a consistent methodology has been applied when estimating residential capacities. The densities proposed vary considerably between sites without any clear explanation within the Evidence Base.

Given that the housing trajectory depends upon these assumptions, the Respondents recommend that the Council publishes a concise schedule explaining the assumptions applied to each allocated site including:

- net developable area;
- assumed dwelling density;
- parking provision;
- heritage constraints;
- access constraints;
- viability assumptions.

This would improve transparency and demonstrate that the housing trajectory is **robust**.

Requested Modification : Conduct rigorous, site-specific **Viability Assessments** and adjust the densities of development on these town centre plots as previously suggested, to levels that respect practical as well as heritage limits.

3. Omitted Brownfield Sites and Emerging Regeneration Opportunities (Test of Soundness: Justified & Positively Prepared)

The Local Plan asserts it is adopting a spatial distribution strategy that “*puts Brownfield first*” and which helps to “*promote town centre regeneration*” specifically in Chesham as well as elsewhere in Buckinghamshire. Such aspirations are fully supported by the Respondents.

However, a substantial number of sites advanced through the HELAA "Call for Sites" consultation or promoted by local development forums, have been excluded or deemed unsuitable for housing allocation in the final Regulation 19 draft despite being “brownfield” or Previously Developed Land (PDL):

Whilst the Respondents support the Council in not seeking to allocate “Grey Belt” sites for development, insofar as such a definition might relate to Green Belt sites

that are demonstrably not meeting the three purposes of Green Belt as defined in the NPPF, the Respondents feel this should not extend to ignoring sites that are clearly “brownfield” or PDL. To do would be inconsistent and needs to be rectified to ensure the Plan is **sound**.

In order to maintain the required housing delivery targets without lowering delivery of housing numbers or threatening other sensitive areas such as the Green Belt, the Local Plan *must* be consistent and look at all alternative previously developed land.

The Respondents have reviewed all such sites relating to Chesham listed in the HELAA (being one of the current documents open for consultation under this Regulation 19 consultation) and have summarised what appear to be inconsistencies where sites have been listed as “unsuitable” therein, which the Respondents suggest should be reconsidered as summarised in Table C on the following page.

From the *OpusConsult* website² which offers opportunity to appraise all the sites in the HELAA by area, the following sites were identified in the HELAA as “unsuitable” for inclusion within the Local Plan for allocation (insofar as they relate to Chesham – See Table C below):

LPA Ref #	Site Address	Postcode	Area (ha)	Capacity	Density (dwellings/ha)	Available Y/N	Site Assessment Conclusion
Column	Column2	Column3	Column	Column	Column6	Column	Column8
391	Asquith House Germain St Chesham	HP5 1LH	0.18	7	40	Y	Deemed unsuitable due to flood risk yet bldg already there?
1143	Coach Depot Lycrome Road Lye Green	HP5 3LF	0.39	14	35	Y	No Exceptional Circumstances but it's B-Field not GB
3186	Former Decco site Latimer Road, Chesham	HP5 1QJ	6.79	272	40	Y	No Exceptional Circumstances but it's B-Field not GB
3340	Moor Road Chesham	HP5 1SE	0.91	32	35	Y	No Exceptional Circumstances but it's B-Field not GB
3400	Chesham Station Car Park	HP5 1AG	0.66	33	50	Y	Unsuitable due to the loss of car parking serving railway station.
3437	Waitrose Car Park	HP5 1DR	0.38	19	50	N	Land not available?
3438	Land off Backs	HP5 1DB	0.07	4	50	N	Site not available ?
3475	1 to 9 Broad Street	HP5 3EA	0.07	4	50	Y	Available & Suitable for housing - why excluded?
3476	Wenzels Broad St (neighbouring 3475)	HP5 3EA	0.05	3	50	N	Site not available ?
6516	Scout Hut 201-205 Botley Road	HP5 1XS	2.96	104	35	Y	No Exceptional Circumstances but it's (PDL) or B-Field not GB
TOTALS =				489			

The Respondents highlight all these sites and suggest they should *either* be reconsidered for an allocation in the Local Plan or “safeguarded” for future development.

² See <https://buckinghamshire.oc2.uk/document/110>

It is recognised that not all sites listed in Table C above might be deliverable in the Plan period but most are already listed as “*available*” so it seems inconsistent not to allocate them. If only modest housing densities are applied to these sites, it can be seen they collectively offer an opportunity for delivery of a significant number of additional homes in Chesham that collectively could increase delivery by at least another **489 homes** in the town.

If detailed viability assessment were to be undertaken on all these other “*available*” sites, even site higher densities to those proposed herein by the Respondents may be achievable and they would provide a “buffer” of housing supply further demonstrating that the Plan as being **positively prepared**. Such a detailed review is necessary given that several brownfield sites *have* clearly been overlooked, and in this respect the Respondents are concerned that the plan is **not fully justified** as these sites represent several viable urban brownfield windfalls and under-utilised commercial spaces.

Some of the sites that have been excluded from the Local Plan allocations appear to be for reasons that are incorrect or inconsistent, specifically site ref #'s; 1143, 3186, 3340 & 6516 where it has been asserted that there are, “*no exceptional circumstances to justify removal from Green Belt*”, yet all these sites represent either PDL or brownfield land. They *all* have historic commercial uses that were subsequently washed over by the introduction of Green Belt restraint policy decades ago. As such these sites are brownfield or PDL and are NOT Green Belt and should be reconsidered and either allocated or safeguarded in the Plan in the interests of **consistency** and to ensure the overall **soundness** of the Plan.

Accordingly, we ask the Council to evaluate and allocate specifically the following alternative brownfield or PDL options:

- **Former Decco Site Latimer Road Chesham site ref # 3186**, Clearly a brownfield site with historic and redundant industrial use located within the Green Belt boundary. This is a *very* large site and whilst its location adjacent to 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 (asbestos³) 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 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**.

Recognition of these sites as PDL or brownfield 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

³ As confirmed in Planning Officers Report for historic planning application ref CH2016/1385/OA

good quality agricultural land. Evidence of this being realised is evidenced by the recent outline planning application⁴ for 170 homes by Toscaig Ltd on Green Belt agricultural land accessed off Lycrome Road near Lye Green Chesham.

The remaining smaller sites listed in Table 3 should *also* be reconsidered for similar reasons.

Conversely, whilst conducting this exercise, the Respondents noticed that site **Ref' 1203 at Preston Hill Chesham HP5 3FE** was identified as a potential brownfield site being underutilised industrial employment land that might deliver housing. But it is recommended that this site should be removed from allocation and **88 dwellings reduced** from total anticipated supply thereof as it will now be unable to deliver the homes estimated from this allocation. This is because the Respondents are aware based on discussion with the owner that the site has been acquired for continued commercial use and is therefore “*unavailable*”.

Other brownfield sites or areas of PDL that are NOT listed in the HELAA or allocated in the Local Plan which the Respondents feel should have been considered and which may need to be given an allocation are;

Chesham Football Club

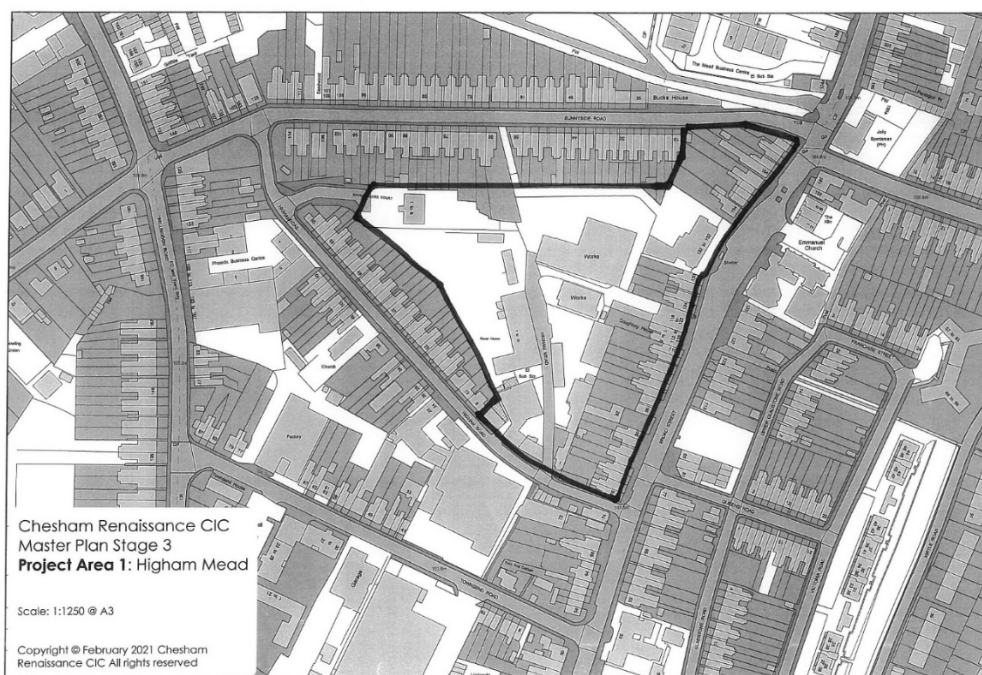
The Respondents are aware that discussions are taking place regarding the possible future relocation of Chesham Football Club to a site to the north-east of Chesham. Whilst recognising that any such proposals remain at an early stage and may not come forward within the current Plan period, they indicate that the existing football ground could represent a longer-term regeneration opportunity capable of making a significant contribution to future housing delivery.

Should relocation prove deliverable, say at any periodic review of the Plan, Buckinghamshire Council should work with the Football Club and other stakeholders to consider whether the existing site could form part of a comprehensive mixed-use redevelopment incorporating replacement community facilities, public open space

⁴ See planning application ref PL/26/05402/OA

and new housing. The Respondents therefore recommend that the Council keeps this opportunity under review and considers safeguarding the site for future review rather than dismissing its redevelopment potential.

Higham Mead



Higham Mead comprises a substantial area of previously developed land with surface parking and relatively low-density development in a highly sustainable location close to the town centre with potential for **84 dwellings**.

Whilst the Respondents acknowledge that ownership constraints and operational requirements may limit redevelopment during the current Plan period, the site represents an important long-term regeneration opportunity.

Furthermore, the Respondents also suggest that the **former Cottage Hospital site** in Chesham is reconsidered as a component towards local housing supply. This is a brownfield site and the Respondents are unclear on its current status. As of mid-2026, final planning consent has not yet been officially granted for application PL/23/2301/FA. The application remains under review and evaluation by Buckinghamshire Council. A major planning application was submitted by Ardale

Care to construct a modern residential, nursing, and dementia care home tailored for the frail elderly. Provision for Older Persons Accommodation is an increasingly important component of local housing supply. The proposed facility at that site would deliver 96 beds. Using the Standard Conversion Ratio of 1.8 bedrooms/bedspaces in a care home (Use Class C2) is equal to 1 dwelling/housing unit (Use Class C3) means this site could deliver the equivalent of **53 dwellings**. As such it is available and represents another important site for delivery of local housing need which should not be confined to the able bodied..

Accordingly the Respondents recommend that Buckinghamshire Council:

- undertakes a comprehensive capacity assessment;
- engages with landowners;
- considers safeguarding the site for mixed-use regeneration beyond the current plan period.

Given the Respondents broadly support the Local Plan, subject to the modifications proposed herein, Green Belt allocations are clearly unnecessary as the Council have recognised in the Regulation 19 consultation.

However, should any significant housing allocations in Chesham *subsequently* become proven to be unavailable (such as **Ref 1203 Preston Hil above**) and the Council are then compelled to reconsider if exceptional circumstances exist for *limited* Green Belt allocations around Chesham to maintain the **soundness** of the Local Plan, then the Respondents recommend that any such Green Belt allocations should not relate to irreplicable agricultural land especially if such land used for cultivation of crops that contribute to national food security

The Respondents further suggest that in such eventuality, only Green Belt areas that are outside National Landscape and which are underutilised in land use terms, or which fail to preserve “*openness*” or to prevent coalescence of settlements and outwards sprawl, should then be considered and as a last resort.

4. Conclusion & Request to Participate

The Respondents are broadly supportive of the draft Local Plan, subject to the aforementioned modifications proposed above and summarised as follows: ,

Narrative & Summary of Changes / Modifications suggested by Respondents	Increased Housing Supply +	Reduced Housing Supply -	= NET TOTAL Supply
Total Housing Allocations for Chesham from Local Plan as current draft Reg 19 Consultation Document = 695 dwellings	-	-	695
Reduced provision at CHS01 at Star Yard Chesham =	-	- 75	620
Increased provision at CHS02 – Albany Place Chesham =	+ 20	-	640
Reduced density at HELAA Ref # 3477 UK House, Chesham =		- 30	610
Increased (Min)* provision from allocating brownfield land at Decco Site Latimer Road Chesham HELAA ref # 3186 =	+ 270 *	-	880
Increased (Min)* provision from allocating brownfield land at Station Car Park HELAA Ref # 3400 =	+ 33 *	-	913
Increased (Min)* provision from allocating brownfield land at Waitrose Car Park HELAA Ref # 3437 =	+ 38*	-	951
Increased (Min)* provision from allocating PDL land at Botley Rd HELAA Ref # 6516	+ 100*	-	1,051
Reduced provision from Preston Hill Chesham HP5 3FE - HELAA Ref' 1203 =	-	- 88	963

Collectively these modifications illustrate that Chesham’s brownfield capacity has been materially underestimated and housing supply could be increased by 38% from 695 dwellings to 963 thereby offering a buffer whilst preserving the “*brown before green*” principle and still avoiding any loss of Green Belt.

The suggested modifications would materially strengthen the **justification**, **effectiveness** and **deliverability** of the Plan in respect of Chesham could become a model for other market towns elsewhere in Buckinghamshire.

The suggested modifications are intended to strengthen—not fundamentally alter—the Plan.

Collectively they would:

- improve the robustness of the housing evidence;
- increase confidence in housing delivery;
- maximise regeneration opportunities;
- strengthen the brownfield-first strategy;
- reduce future pressure for Green Belt release;
- improve the long-term resilience of the Local Plan.

Brown Not Green Chesham Ltd & Chesham Renaissance CIC & The Chiltern Society & The Chesham Society, all formally request to participate in the **upcoming Examination in Public hearing sessions** to expand upon these constructive alternatives with the Planning Inspector.

Thank you.