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**Matter 9, Development Framework - Rural Areas**  
**RUR1 - Land South of Finings Road, Lane End**

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## **SAVE GOLDEN GOUGH**

Why The WDC Local Plan Matter 9 RUR1, Land south of Finings Road Lane End, is neither justified nor consistent with National Policy

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This site, known locally and historically as the Golden Gough or Guff, is within the Chilterns AONB. A housing development comprising 19 or more dwellings here will neither conserve nor enhance the Chilterns AONB. **Contrary to the NPPF, para 115 requirement, this allocation fails to give great weight to conserving and enhancing the natural beauty of the AONB.**

It is attractive, undulating, rural pasture used primarily for grazing cattle. In a highly sensitive location, between Ancient Woodland and a Conservation Area and a Listed Building, it is valuable in terms of its natural and historic environment as well as having a strong landscape character and high biodiversity.

This much cherished site with its bordering woodland and hedgerow provides a habitat for insects, owls, bats (protected by Law), fallow deer, muntjacs and amphibians, including great-crested newts (protected by Law) that have been observed for at least sixty years as well as natterjacks (protected by Law).

Approach to the site, via the B482, is uphill all the way from Marlow Road, through the village centre until Fining Wood. The Golden Guff is accessed via an uphill, service driveway leading to the water tower. It is therefore situated above the level of the village at practically the highest point, below the water tower. The site is not level, sloping away to the North, East and South.

The underlying terrain of this open-grazing grassland pasture is unusual, an upland, aquiferous mire, which is both boggy and, therefore, unsuitable and undesirable for building development.

Water retained from precipitation percolates underground from this aquifer, irrigating a pond in the southeast corner of the Golden Guff and another nearby and streams around the Golden Guff, including Moor Common SSSI and the adjacent Fining Wood, south of Finings Road, with a mire / swilly pool. After prolonged rainfall, freshwater springs rise from the Golden Guff, water runs off, downhill, to Finings Road where, in winter, it can freeze over as dangerous 'black' ice.

Within the vicinity of the site, a number of properties have suffered subsidence, necessitating remedial shoring up and, ultimately, demolition due to sink-hole formation. The geological process causing sink-holes is complex, but can be exacerbated when an aquifer is no longer recharged by natural precipitation as would be the case with extensive development on the type of terrain underlying the Golden Guff.

A residential development would greatly reduce the natural recharge of this upland aquifer, decreasing irrigation of ponds and streams while increasing the risk of water run-off causing localised flooding of Finings Road and neighbouring properties. Bordering Ancient woodland and hedgerow, a housing development is likely to cause disturbance to the woodland that would not be safeguarded by a 15 metre buffer. Furthermore, there is no defensible boundary to prevent the pressure of further, ribbon development of the rest of the Golden Guff. Any improvements to the access on to Finings Road or introduction of footways into the village would adversely alter the rural character of the village.

In the Wycombe District Council Draft Housing and Economic Land Availability Assessment of November 2015, SLE0017 (Land South of Finings Road), the site is said to have been **previously known as Golden Guff**, within the AONB and SSSI buffer and a range of 50-67 dwellings, and "would also need to improve highway visibility from the site."

No indication is given as to the nature of these planned dwellings. If this development is not for

social or affordable housing, it is simply another opportunity for landowners and property developers to make money.

In [Appendix 4 - Site Assessment Proformas](#) (Housing, Employment and Mixed Use, 2017) – the source of this Greenfield, rural site is listed as a Developer Promoted Site of Size 2.24 Ha that WDC has proposed as a phased development of 19 units in 2020-2021 and a further 9 units in 2021-2022. Based on the WDC assessment, the dwelling number could amount to 28 units.

Appendix 4 states that the, *Site is partially suitable for residential development AND Southern part of site unsuitable due to landscape constraints.*” Whatever those *landscape constraints* may be for the Southern part, in terms of the undulating pasture and boggy terrain, the Northern part of the Golden Guff, as currently allocated, is similarly *unsuitable* while the inclined location of the Northern part is probably more constrained for reasons that are set out in our representation.

The above reports and assessments include two-dimensional maps or plans with no contour lines nor any indication that the Golden Guff, the established name for RUR1, stands (about 200m above sea level) **at practically the highest area in and overlooking the village of Lane End and its surroundings**, apart from the water tower. The WDC Landscape Assessment Draft Report of July 2016 (Part 2, paragraph 3.39) states that *“The site is enclosed to the west by ancient woodland and to the east by existing housing which overlook it”*. It is important to note that, whilst some surrounding houses adjacent to the Golden Guff, in particular those in the recent development (Oakwood Place) *overlook* the Golden Guff from their second storey, **all are built on ground well below the level of the Golden Guff**. Therefore any proposed buildings on the Golden Guff would dominate all adjacent buildings and the old Lane End Village centre, including the church; they would block out the view of the church while obscuring the view of the Golden Guff and the woodland from adjacent properties. **This is at odds with the stated aims of 5.5.3 and 5.5.4, doing little to maintain the rural character of Lane End.**

Section, PRINCIPLES FOR RURAL AREAS, 3a, Foster Economic Growth, talks about “supporting rural enterprise and diversification by allowing farms and business centres within the Area of Outstanding Natural Beauty and/or Green Belt to have similar opportunities to be flexible..” The Golden Guff is currently used for non-intensive, open grazing by a local tenant farmer, traditionally on a long term lease. If developed, as proposed, this land would be no longer available to them for grazing their award winning, pedigree herd. Over several generations, this farming community has successfully expanded production of high quality Guernsey milk, cream and derived dairy products that have penetrated markets over a wide area in and around Lane End, from Stokenchurch to Marlow and High Wycombe and beyond. The quality and yield of the milk is, in part, attributable to open grazing on the nutrient-rich grassland of the Golden Guff and fields further southwest. To take out open grazing of non-intensive farmland as a primary ruminant feed, from the top of the dairy supply chain, would do nothing other than compromise a thriving and expanding, local enterprise that would be forced to find open grazing land elsewhere in order to maintain and increase productivity.

There is reference, (4.b 111) in the plan to enable *“safer walking.”* The Golden Guff is a popular place for dog walkers as it supports cows. (Sheep pasture is not dog friendly). This facility would almost certainly be lost.

Furthermore, there is no provision for safe-access to or from any proposed development on the Golden Guff by pedestrians who would have to rely on motor vehicles to make regular journeys to the village centre for shopping or bus journeys. It would be of particular concern for children

going to local schools or relying on bus transport to schools in High Wycombe or Marlow or Stokenchurch. Any other pedestrian access to connect with the church and village is impossible since construction of the dwellings at Oakwood Place.

Para. 5.5.11 states that RUR1 is “close to sensitive environmental areas in terms of both the historic and natural environment” and indicates the need to create a buffer to preserve the setting of the nearby area. Trees are to be planted. In order to be assured that protection is afforded from day one of the development, clearly, there is a need to know what type or types of tree are proposed, presumably indigenous, and the anticipated growth rate of those trees. The topography of the Golden Guff with its unusual geology, hydrology and unique ecology are important factors that will need to be assessed, vigorously, as a matter of high priority before any further work is carried out for development planning purposes.

### **Historical**

At least two planning proposals to build on the Golden Guff, submitted within the past fifty years, were decisively rejected on the grounds *inter alia* that, (1) the proposal would constitute ribbon development in the green belt /AONB, (2) vehicular issues with traffic entering from the site on to the busy B482 (Finings Road) nearly opposite the Lammas Way junction, which is approached by a long, curved, section of the road through Fining Wood and, (3) requirement for appropriate and adequate vision splays.

Whatever the issues were in the past, traffic into and out of Lane End has increased relentlessly and substantially. The B482 Marlow to Stokenchurch highway is notoriously dangerous with a history of numerous accident black spots and fatalities.

This section of the Finings Road had been, hitherto, relatively trouble-free (due to measures to restrict the speed of traffic entering the 30mph zone). However, about 150 yards to the East of the entrance of the existing access to the Golden Guff and water tower, a recently completed housing development at Oakwood Place (formerly Culver Graphics & Essex Works) has been the scene of two road accidents due to vehicles entering Finings Road from Oakwood Place.

It is abundantly clear that vehicular access on to the busy B482 is a very serious matter indeed, not just *visibility of the Finings Road*, and should be taken seriously by WDC planners.

### **Current policy**

WDC’s stated principles (*to cherish the Chilterns*, etc) have to be applauded. The word ‘cherish’ is repeated 13 times throughout the published Regulation 19 document.

However, the plans as outlined for consultation, seem less than clear as to how or indeed if, the stated principles are to be met. Certainly, Lane End stakeholders who have, over many years, lived in close proximity to the Golden Guff, genuinely cherish this undulating farmland, with its open grazing for dairy produce, its natural beauty, its biodiversity and its wildlife that thrives in close harmony with the non-intensive agriculture practised here for generations.

### **Infrastructure**

While several housing developments have taken place in Lane End already, it should be noted, however, that the current proposals for even more housing development in this rural location do not appear to be matched by any clear strategy to proportionately increase the supporting infrastructure in terms of local schools, medical facilities, public transport, recreational facility,

car parking, or indeed, the provision of affordable housing.

Significantly, what has been omitted in the Regulation 19 from the draft Plan of 2016 are:

1. To preserve the setting of the Lane End conservation area using a 25m buffer.
3. To reflect the special character, layout and form of adjoining residential areas. If the current, published proposals do not *preserve the setting of the Lane End conservation area* and do not *reflect the special character, layout and form of the adjoining residential areas*, then the Plan is flawed and should be withdrawn from allocation forthwith. With a recent development of the former Culver Graphics / Essex Works site at Oakwood Place, the country cottage character of White Gable, the delightful listed building, risks being sandwiched by the proposed Golden Guff housing plan.

Note re above: "The site is allocated for residential development. Development of the site is required to: (points 1-5)". The curious phraseology seems to suggest that **development of the site is required** for these objectives when the better option (in order to preserve the settings, etc.) would be not to develop the site at all. While the above points focus on the area adjoining the Golden Guff, there is no mention whatsoever about the unique character of the Golden Guff itself, which is very worthwhile preserving for reasons outlined in the following comments, below.

### **Observations**

The Golden Guff has a unique geology, shared to some extent with Lane End and surroundings, in that it is an upland boggy area because of remnants of Reading Beds (sandy/gravel) and London Clay on top of the underlying Chalk. There is a complex hydrology, a groundwater system that effectively irrigates the Ancient Woodland, especially the woods on both sides of the Finings Road leading from Lane End to Bolter End. Further afield there are Sites of Special Scientific Interest (SSSIs) in relation to which the Golden Guff is, geographically, centrally located, i.e., Moor End Common, which is on London Clay (unusual for the Chilterns), Frieth Meadows and Widdenton Park Wood, which supports a varied flora including several uncommon species. The most important feature of the Widdenton Park Wood SSSI is a number of extensive, spring-fed mires, dominated by willow and birch. This feature is shared by the Golden Guff and adjacent woodland where mires, especially on the South side of the Finings Road, are boggy all year round. Any development of the Golden Guff could potentially put at risk the very Ancient Woodland that the policy seeks to preserve (point 4) by means of a buffer.

Given the upland location of the Golden Guff with its unusual geology, it is a rich habitat for much wildlife, including rare amphibian species, such as the natterjack toad (protected by Law), crested newts and great-crested newts (protected by Law). Fallow deer and muntjacs regularly graze the pasture in the early morning while the hedgerows and Ancient woodland in close proximity to the Golden Guff afford an ideal habitat for bee-friendly wild-flowers making an important contribution to the prevention of bee-colony collapse. For more than 60 years, bats (protected by Law) have frequented the Golden Guff at night-time. This habitat would be put at risk by the proposed development, because of construction activities, extra traffic noise and light pollution being detrimental to the Golden Guff's wildlife, hitherto completely undisturbed.

Any future proposals will be vigorously challenged by the Lane End community, supported by powerful evidence of the importance of the Golden Guff in relation to the adjacent Ancient

Woodland, its importance to the local economy, the existing residential areas, safety of the main road through the village, and, not least, the potential impact on local and national Sites of Special Scientific Interest (SSSIs). Indeed, the Golden Guff and its adjacent Ancient Woodland that is fed by springs from the Golden Guff, the high biodiversity of the area, rare amphibian species, for which the Golden Guff is an ideal habitat, all point towards the Golden Guff as a potential Site of Special Scientific Interest that has been overlooked hitherto.

The proposed access road to the northwest corner of the Golden Guff does not seem to have been considered prudently as that would add considerably to the volume of traffic entering the busy B482 (Finings Road) with traffic also entering from Lammas Way opposite thereby creating a potentially dangerous junction, which could only be remedied by altering the rural character of this part of the village. Finings Road is already very busy, especially during the morning and afternoon rush hours. The junction would be approached by a bend, which is obscured by woodland (Fining Wood). As commented above, there is no safe pedestrian access to or from the village.

Under POLICY RUR1 – LAND SOUTH OF FININGS ROAD, LANE END

2. States the need for “*satisfactory access*” from Finings Road. It is unclear how “*satisfactory*” is to be defined: satisfactory to whom? Finings Road is already busy. The village has little ability to cope with existing traffic and it is questionable that it could cope with additional traffic from this and another proposed development at Chalky Fields.

Para. 5.5.3 talks of, “*aims for rural areas to stay rural and for towns and villages to keep their unique identities while benefiting from improved access to services and better public transport and facilities.*” The proposals for access to Finings Road would seem to contradict these aims.

5. Creation of a 'landscape edge' to the Southern aspect of the site cannot be described as 'robust' by any meaning of the word while 'connectivity to Ancient Woodland and hedgerows' may not be realised for generations to come, if ever. The Golden Guff is a treasured gem that has been ignored. To build a new development of residential dwellings on the scale envisaged on this precious upland area would be, to paraphrase an appropriate quote, “like a monstrous carbuncle on the face of a much loved and elegant friend.” (HRH Prince Charles, May 1994).

**Current view of Golden Guff and Ancient Woodland from existing, neighbouring properties.**

**The current, published proposals do not *preserve the setting of the Lane End conservation area* and do not *reflect the special character, layout and form of the adjoining residential areas*; the development of the Golden Guff is neither justified nor consistent with national (and indeed WDC's own) planning policy so the Plan is flawed. Accordingly, the allocation should be deleted forthwith.**