

TOWN AND COUNTRY PLANNING ACT 1990

LAND SOUTH OF BARROW GREEN ROAD, OXTED

APPEAL BY CROUDACE HOMES LTD

PINS REF. APP/M3645/W/25/3372747

PROOF OF EVIDENCE

IMPACTS ON RIGHTS OF WAY

OXTED & LIMPSFIELD RESIDENTS GROUP AND OXTED PARISH COUNCIL

EVIDENCE OF: TONY PEARSON, THE RAMBLERS ASSOCIATION

1. I am Tony Pearson. I have a B.A (Hons) degree in Landscape Studies, University of Sussex, 2007 and am a Local Footpaths Secretary of The Ramblers Association, of which I have been a member for 30 years. One of the objectives of The Ramblers is to assist in the protection and enhancement of the beauty of the countryside for the benefit of the public, including by encouraging the provision, preservation and extension of public access to land on foot. The land which is the basis for the planning appeal is within the Green Belt, adjacent to the Surrey Hills National Landscape, and not designated for development.
2. I have been asked by Oxted and Limpsfield Residents Group and Oxted Parish Council to provide a Proof of Evidence explaining the importance of the site for local recreation. The Ramblers objected to the planning application and my evidence is given on behalf of The Ramblers.
3. Having been a resident in the Oxted area for over 50 years, I have run and walked through Stoney Field on many occasions. I have seen it in the summer when the field is full of crops. I have seen it in the winter when the frost is on the ground. It has a natural beauty of varying kinds all year round. It is a tranquil haven in contrast to the nearby town.
4. The bridleway is regularly used by walkers, cyclists, and horse riders. Many are local residents but there are also a considerable number of visitors. Walkers arriving in

Oxted use footpath 98 to link up with Bridleway 97 and then progress onwards into the Surrey Hills.

5. The Appeal proposal would have significant adverse impacts on the Surrey Hills National Landscape which benefits from special protections under both national and local planning policies. One of the most striking aspects when one walks into the field are the views across it towards the North Downs. These are uninterrupted and provide walkers with an exceptional vista of the chalk ridge and rolling hills and a sense of openness and breadth. These elements make a most important contribution to walkers' enjoyment. The site contributes greatly to the National Landscape, especially to its natural beauty through outstanding views both into and out of the area from Public Rights of Way and public viewpoints. Government policy affirms that National Landscapes are to receive the highest level of protection. Building housing on this land would violate national policy and irreversibly damage its natural beauty.
6. In June 2025, Natural England included the land in its proposed expanded Surrey Hills National Landscape, due to its comparable natural beauty and significant contribution to the area. An independent assessment confirmed the site's quality matches that of the existing landscape, warranting its inclusion in the designation. The fact that the site has been recommended for inclusion in the Surrey Hills National Landscape would suggest that this cannot in any way be regarded as possible 'Grey Belt' land.
7. Public Bridleway 97 Oxted crosses the site from near St Mary's Church to Barrow Green Road and is a key link between Oxted and the Surrey Hills National Landscape. The surrounding landscape includes the North Downs Way and a number of other long distance walking trails.
8. At the Barrow Green Road end of the bridleway most walkers tend to continue along Chalkpit Lane and into the Surrey Hills. Going west, Public Footpath 576 Oxted (North Downs Way and Pilgrims Way) will take walkers up onto the North Downs and numerous paths around Woldingham. Going east from Chalk Pit Lane Public Footpath 75a Oxted (North Downs Way and Pilgrims Way) also provides access to the permissive paths of the Titsey Plantation whilst Public Footpath 94 Oxted

ascends Oxted Downs to join the Vanguard Way heading north to Woldingham. From public viewpoints on these paths, some including benches to sit and enjoy the views, the eye is drawn to the open landscape of Stoney Field and to St Mary's Church.

9. Horse riders tend to use Public Bridleway 97 to turn southwest along Barrow Green Road towards Tandridge Priory Stables. Thus the bridleway provides access from the town to a wide array of local paths that are well used for recreational purposes.
10. The rural nature of the route would be completely lost if replaced by a metalled path and urbanised corridor running across a substantial housing estate. Views across to the North Downs would be lost were the proposal to be approved. The line of the bridleway can be seen when walking on the North Downs and would be replaced with a view of a housing estate.
11. Near St Mary's Church, the bridleway turns east towards the junction with Barrow Green Road which then leads to Bluehouse Lane and Church Lane. Where the bridleway turns east it meets Public Footpath 98 Oxted going south to Master Park recreation area.
12. At this point, the Bridleway is uneven due to the roots of large old trees and it is often very muddy especially during winter months. The appellant states improvements will be made but details are lacking. To become an all-purpose and all-season footpath/bridleway/cycleway capable of safe and convenient use at any time day or night, as an extension to the route proposed through the housing development, extensive improvements would be needed. They could potentially require a boardwalk or raised platform, together with lighting, or a surfaced path with lighting. This would have adverse effects on the trees, potentially on wildlife such as bats, urbanise the area and have a detrimental effect on the character of this part of the public right of way compared to its appearance now.
13. The appellant has not referred to any discussion with Surrey County Council's rights of way team about such extensive improvements. A number of key questions are, therefore, left unanswered. How will the improvements be funded? Who will be responsible for doing the works? How will the works be phased in with the

development of the site? Will any other statutory consents be required? Without answers to these questions, the Ramblers Association would argue there must be doubts about the use of the public right of way as part of the development and the benefits, particularly sustainability benefits, that the appellant seeks to attribute to this part of a non-car route into Oxted town centre.

14. The Inspector should also be aware that an application to create new public footpaths around the perimeter of Stoney Field was submitted to Surrey County Council by local residents in 2022 and has yet to be considered for approval. Guidelines indicate that the surveying authority should make a decision within 12 months from receipt of application.