

**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**

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**PROOF OF EVIDENCE**  
**LANDSCAPE, AMENITY AND HIGHWAYS**  
**OXTED & LIMPSFIELD RESIDENTS GROUP AND OXTED PARISH COUNCIL**  
**EVIDENCE OF: JACKIE WREN**

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**Introduction**

1. I am Jackie Wren and I have lived in Gordons Way, Oxted since 1999. Although I recently chose to reside away from this address for personal reasons, I still work from there two and a half days a week and walk the bridle path across the field which is a 3 minute walk from my house. I am a former Tandridge District Councillor.
2. I am a qualified exercise rehabilitation specialist with extensive experience supporting clients across a wide range of medical conditions and stages of recovery. My practice is rooted in evidence-based approaches and in close collaboration with healthcare professionals, ensuring that each client receives safe, effective, and individualised care. My qualifications have been obtained through Premier Fitness, YMCA and Ashtead Hospital, and I am regularly referred clients by medical consultants throughout the South East, reflecting established collaborative relationships and clinical trust in my practice.
3. I work with individuals who have received life-changing diagnoses such as cardiac conditions, stroke, Parkinson's disease, cancer, and multiple sclerosis (MS). My role extends beyond physical rehabilitation. It is equally important to nurture their mental wellbeing, as many clients experience anxiety and

depression. These mental health challenges are common reactions to significant health events and can profoundly affect recovery and quality of life.

4. My evidence will explain the adverse impact of the proposal on the landscape character of the site and its surrounds, on the wider landscape of which the site is a crucial part, and on the health and wellbeing of local residents.
5. My evidence is based on my personal experience of walking in and around the appeal site and beyond over the last 25 years and on my work as a personal and rehabilitation trainer. I will explain why the physical, psychological and emotional value of this landscape should not be underestimated.
6. I also set out our concerns about the safety of the appeal proposals in terms of the local highway network.

### **Landscape**

7. I walk through the field regularly, sometimes on my own and sometimes with my clients, and we all enjoy its very rural and peaceful character. The tranquillity and sense of rural openness, the spectacular views, and the feeling of history as you approach St Mary's Church and the parish burial ground, make these walks particularly special.
8. I choose to use Stoney Field because it is conveniently located close to my home and, more importantly, there are simply no other areas in the vicinity that offer the same sense of openness and tranquillity. Stoney Field provides a rare pocket of peace where one can truly connect with nature, away from the bustle of everyday life.
9. While Master Park is the only other open space nearby, it is frequently busy due to regular organised sports such as football and cricket. The cricket area, in particular, is fenced off, making it inaccessible for recreation, meditation, or peaceful reflection. Additionally, Master Park features a community hub and a children's playground, which, while valuable for some, can make the area less beneficial for those seeking solitude or quiet time in nature.

10. In contrast, Stoney Field is unique in what it offers. Its open, undisturbed expanse allows for a genuine experience of healing through nature. Whether one is looking for a space to meditate, reflect, or simply enjoy the sights and sounds of the outdoors, Stoney Field stands out as the perfect sanctuary for anyone in need of peace and restoration.

11. Natural England have confirmed how special this site is, recommending its inclusion in the extended National Landscape. It has high landscape sensitivity and value and, as noted by Natural England in their report of June 2025, Stoney Field *“forms part of a sweep of agricultural landscape to the north and affords dramatic views of the chalk scarp.”* Natural England have also noted that *“The landscape in this area blends seamlessly with the North Downs to the north.”*

12. An estate of 190 houses, an 80 bed care home, associated roads, and hardstanding, introduced into this very high quality rural landscape will destroy the site's character. This undeveloped landscape would be replaced by urban development, accompanied by traffic movements at all times, human activity, noise and, at night, artificial lighting.

13. The damage would extend far beyond the site because it is physically and visually a part of the wider landscape. That wider landscape includes the existing National Landscape, and the proposed development would significantly degrade the quiet and natural beauty of the National Landscape and its setting.

14. From my long experience of walking the area, I disagree strongly with the appellant's assertion that the proposal would have only a “localised landscape impact” and that adverse effects on the wider landscape would be “minor” with “negligible” effects on the Surrey Hills National Landscape.

15. On the contrary, the site is highly visible from far and wide. Its open nature means the development would be seen from multiple public and private

viewpoints. There are currently wonderful, panoramic and unspoilt views into and out of the North Downs and these would be wiped out by this proposal.

16. Paragraph 189 of the NPPF 2024 says that development within the setting of National Landscapes should be “*sensitively located and designed to avoid or minimise adverse impacts on the designated areas.*” The proposal does not do this. The proposal’s conflict with national policy relating to National Landscapes provides a clear reason for refusal in its own right (within the meaning of paragraph 11(d)(i) of the NPPF), as well as adding substantial harm to the Very Special Circumstances exercise.
17. The appeal site has been assessed by the Council as strongly fulfilling the Green Belt purposes. It checks unrestricted sprawl, safeguards the countryside from encroachment, preserves the setting and special character of an historic town and encourages the recycling of urban land. The loss of countryside and openness caused by this proposed development would result in substantial harm.

### **Health and Wellbeing**

18. I would now like to give my personal experience of the site and its surrounds and the benefits it has given to my own health.
19. I moved to Gordons Way in 1999 with my husband and two month old daughter. Unfortunately, I was suffering from postnatal depression and the health visitor and community psychiatric nurse suggested I spend an hour every day walking in nature. On speaking to my new neighbours, they suggested I went on a dog walk with them as they had been enjoying local walks around the beautiful countryside for four decades and knew the walks very well and would be delighted to show me these well-trodden paths.
20. We started the walks at Stoney Field, walking across it and beyond through the unspoilt countryside, often meeting others who were also enjoying the views and splendour of our surroundings. I carried on doing my daily walk along the footpaths including beautiful, wooded areas where I sat and relaxed,

or sometimes I would just stand and look at the magnitude of the North Downs, absorbing the visual beauty, the sounds, smells and colour of nature.

21. Luckily, this regime helped me back to good mental health and I started recommending my personal fitness and wellbeing clients to do the walks with me, often stopping to do Tai Chi, meditation and just standing to take in the wonderment of what we saw.

22. As my daughter grew older, I involved the family in my daily walks. When my daughter left St Mary's Primary School for Oxted School, she and her friends would often meet to walk the area during the holidays, climbing, running, painting pictures of wildflowers and landscapes. In fact, my daughter still recalls these times as most rewarding as the openness and beauty of the landscape made her and her friends happy and relaxed, which isn't easy for many teenage children.

23. Many times I have seen similar beneficial effects on other people as there were on my own health. The field's tranquillity offers a respite from the anxiety and uncertainty that often accompany serious diagnoses. Clients frequently report feeling more relaxed and optimistic after spending time walking here. The simple act of being present, watching the clouds, listening to birdsong, or feeling the breeze can ease tension and promote a sense of wellbeing. But most importantly looking at the sweeping openness of the views from the field.

24. Together with my fitness and rehabilitation clients, I often stand at the viewpoint at the top of Chalkpit Lane and look down at the open fields and beauty of the colours and sounds of nature below. I gain immense pleasure and a sense of peace from the uninterrupted views. To corrupt that natural landscape by building a large and out of place development in this area of outstanding beauty would be detrimental on so many levels. This is an exceptional and much valued landscape of natural beauty and should be protected for both current and future generations to enjoy.

25. Close to the site is a highly populated part of Oxted with many residents in social housing and housing association properties. A number of these are blocks of flats with only shared outside space which predominantly houses bins and washing drying lines/or rotary clothes lines. For these very local people the field serves as an important space to escape the confines of their housing and distance themselves from the challenges some face. Many don't have the financial resources to take their families on long journeys to visit places where they can experience nature up close. Stoney Field gives them the opportunity, close to home, to learn about the natural environment, while meeting and making friends.

26. The social consequences of losing this precious resource merit serious consideration. The field represents more than green space - it is a living classroom for children, a haven for the elderly, and a gathering place that knits together diverse threads of the neighbourhood. Its destruction would diminish the capacity of Oxted to offer inclusive, accessible opportunities for recreation and education, particularly for those who have the least.

27. The tranquillity and sense of rural openness that define this area are central not only to the experience of those who live nearby, but also to the wider community who value access to natural green spaces for recreation, relaxation, and wellbeing. This includes visitors who travel to Oxted from London and elsewhere to walk in the Surrey Hills. Stoney Field forms the start of that landscape, providing the first clear and striking views of what lies ahead.

28. The psychological and emotional value of the landscape should not be underestimated. For countless individuals, quiet walks across the field have offered moments of reflection and peace - a respite from the busyness of modern life. Such experiences, deeply personal yet widely shared, speak to the need for accessible green spaces that foster both individual wellbeing and social cohesion.

29. The irreversible loss of this open countryside would be felt not only in the immediate visual landscape, but in the disruption of established ecological networks and recreational routes, such as the bridle path that is heavily used by horse riders. Any development here threatens to fragment habitats, disturb established patterns of wildlife movement, and destroy the peace and beauty of walking, jogging, cycling and riding routes.

30. The field and its vistas form a natural gateway to the Surrey Hills, creating a sense of openness and continuity between town and countryside. The wide sweeping uninterrupted openness of the views of this field from the Surrey Hills (top of Chalkpit Lane) is the main reason I take my wellbeing clients there to meditate and engage with nature. To interrupt that sweeping landscape with a housing estate would completely change the aesthetic merits of the area.

31. The development proposal would erode the tranquillity cherished by visitors to the adjacent St. Mary's Church and to the burial ground. The serenity and restorative power of the landscape cannot be overstated; it is a resource for the whole community, supporting not just physical health but also mental and emotional wellbeing, often at times of worship, loss or remembrance. St. Mary's Church itself is a Grade I listed building and is a building of great historical interest.

### **Highway Safety**

32. Over the more than twenty years that I have lived in the area, there has been a history of accidents at the junction of Barrow Green Road and Chalkpit Lane, with many involving vehicles leaving the road and ending up in the adjacent ditch.

33. I was a Tandridge District Councillor from 2016-2024 and, during that time, I was made more aware of the persistent hazardous nature of this stretch of Barrow Green Road, especially as this part of it is frequently flooded and a skid risk.

34. My evidence will explain how non-vehicle users such as children, cyclists, dog walkers and horse riders already face heightened risks. There is no safe pedestrian access at or near the junction.

35. My evidence will explain why I believe this proposed development will seriously increase the risk to those vulnerable road users and result in more of them using this stretch of road and putting themselves and others in danger. Traffic is fast moving and the dangers are ever present for anyone travelling on foot, on a bicycle or on a horse. It is also dangerous for motorists pulling out onto this fast moving road on a blind bend, as well as for drivers travelling along Barrow Green Road.

36. Of particular concern is the bend immediately before the proposed entrance to the Stoney Field site. This drastically reduces visibility for drivers and makes it impossible for pedestrians, drivers and cyclists to safely anticipate approaching vehicles. This stretch of Barrow Green Road also presents a significant safety risk for pedestrians, especially children, due to the absence of pavements.

37. I am concerned that the proposed development does not provide safe access for pedestrians on a route which is already dangerous for them but which would be a much quicker and more direct route to St Mary's Primary School than the one being put forward in the appeal proposal. Measurements from Velocity Transport Planning demonstrate that for properties at the north end of the site, the most direct pedestrian route to St Mary's Primary would be a circa 420m walk along Barrow Green Road and Chichele Road. This compares with the safe pedestrian route which requires a walk of circa 870m, more than double the distance.

38. As a parent, I understand the realities of children's behaviour and believe it would be far too tempting for children to use the shorter route to school rather than the longer route proposed by the appellant. Children in particular, are naturally inclined to take the most convenient route available. The alternative route for pedestrians, though much safer, is considerably longer. When faced

with the prospect of being late for school or simply wanting to walk with friends, many children (and sometimes parents) will opt for the quicker shortcut, even if it means walking along a dangerous stretch of road.

39. This tendency is exacerbated by peer influence; if one child decides to take the riskier route, others are likely to follow. As a mother, I have witnessed first-hand how difficult it is to enforce safe behaviour, especially when children see their friends choosing the less safe option. Unfortunately, warnings and parental instructions are often ignored in favour of convenience and social acceptance.

40. In Chalkpit Lane there is an active quarry and, in 2020, planning permission was given for the importation of inert waste and extraction subject to a daily limit of 200 lorry movements. The passage of HGVs along Barrow Green Road has a notable impact on road safety. Due to the size and volume of these vehicles, it is common for smaller vehicles to be forced onto the edge of the road in order to make way for oncoming lorries. This manoeuvre often results in vehicles encroaching into pedestrian areas, thereby increasing the risk of accidents and near misses. There is clear physical evidence on the road surface and its verges that demonstrates where vehicles have had to go beyond the designated highway boundary to avoid conflict with lorries.

41. I also have serious concerns regarding the safety of residents of Wheeler Avenue. Wheeler Avenue is a cul de sac and a highly residential road which is home to many young families. It is not designed to accommodate a high volume of traffic and its residential nature means it is frequently used by pedestrians, cyclists and families.

42. The area is cherished for its safe and friendly environment, where children regularly play outside, ride their bikes and socialise with friends. In my view, this considerable benefit to children's health is likely to be lost if this proposal is allowed.

43. The increase in traffic in Wheeler Avenue would significantly compromise the safety and wellbeing of residents, especially children. Increased traffic in such a residential road would increase the risk of accidents potentially making it unsafe – and certainly it will be perceived as unsafe – so preventing children continuing to enjoy outdoor activities freely. Parents would inevitably worry about their children's security, and the sense of community within the neighbourhood would be diminished. The proposed increase in traffic along this road is a matter of great concern to the local community.

44. The junction of Wheeler Avenue and Church Lane is frequently subject to fast moving traffic, making it dangerous for vehicles attempting to turn either left or right out of Wheeler Avenue. When turning left, drivers can be forced directly into the path of oncoming vehicles. This danger is so pronounced that a warning sign has been erected cautioning motorists to beware of “oncoming vehicles in the middle of the road.” This signage, while helpful, underscores the inherent risks faced by anyone using this junction.

45. Turning right out of Wheeler Avenue brings its own set of hazards. This route leads directly to the junction of Church Lane with the A25 which is already a hazardous location. The dangers of this junction were frequently raised with me during my time as a Tandridge District Councillor.

46. Vehicles on the A25 travel fast down the hill and the limited visibility at the junction makes it difficult to assess oncoming traffic safely. This has contributed to a history of collisions and near misses in this location.