

TOWN AND COUNTRY PLANNING ACT 1990
LAND AT CHICHELE ROAD, OXTED
APPEAL BY CALA HOMES (SOUTH HOME COUNTIES) LTD
PINS REF. APP/M3645/W/24/3345915

PROOF OF EVIDENCE

LANDSCAPE AND ECOLOGY

OXTED & LIMPSFIELD RESIDENTS GROUP AND OXTED PARISH COUNCIL

EVIDENCE OF: JACKIE WREN

1. I am Jackie Wren and I live in Gordons Way which is a 5 minute walk from the appeal site. I am a former Tandridge District Councillor.

2. My evidence will explain the adverse impact of the proposal on the landscape character and ecology of the site, and on the wider landscape of which it is a part, based on my personal experience of walking in and around the appeal site and beyond over the last 25 years.

Landscape

3. Prior to 2013, I walked through the site regularly, enjoying its very rural and peaceful character. The variety of rural elements, including open grassland, woodland, hedgerows and varying topography, made these walks particularly special.

4. Natural England has confirmed how special this site is, recommending its inclusion in the extended AONB. It has high landscape sensitivity and value and as NE's expert assessment of February 2023 (attached at Appendix 1), states, the land forms part of a sweep of open countryside, contiguous with the AONB, and with views to the North Downs.

5. The whole community was devastated when, in March 2013, ancient oak trees were ring-barked. The deliberate killing of these majestic trees was heartbreaking to everyone who had enjoyed their beauty and shade. Shortly after this vile act of environmental vandalism, public access was denied by the erection of huge, wooden boarded barricades, locked gates and barbed wire.
6. An estate of 116 houses and 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.
7. The damage would extend beyond the site because it is physically and visually a part of the wider landscape which I believe qualifies as a valued landscape under the NPPF due to having qualities above and beyond ordinary countryside. The wider landscape also includes the existing AONB, and so the proposed development would significantly degrade the quiet and natural beauty of the AONB, its setting and this valued landscape.
8. Paragraph 182 of the NPPF 2023 says that development within the setting of AONBs 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 AONBs 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.
9. The appeal site has been assessed by the Council as strongly fulfilling the Green Belt purposes. It checks unrestricted sprawl, prevents Oxted and Limpsfield merging because it is part of the open wedge of countryside between them, safeguards the countryside from encroachment and encourages the recycling of urban land. The loss of countryside and openness caused by this proposed development would result in substantial harm.

Ecology

10. There would also be substantial harm to the irreplaceable Ancient Woodland which is part of the current AONB. It will be impossible to prevent access to the Ancient Woodland, as fences can be either broken or climbed. Planning conditions would be unenforceable. These Ancient Woodlands are an irreplaceable habitat as set out in paragraph 186 (c) of the NPPF 2023. It is inevitable that the pressures from 116 new dwellings in such close proximity to this Ancient Woodland would lead to its deterioration, harming biodiversity.

11. The appellant's Invertebrate Site survey of June 2024 confirms that there is a priority species (section 41 butterfly, the small heath) on the site. This butterfly has been in serious decline across much of southern England, negatively impacted by construction, human development, and general habitat loss in recent years.

12. Any grassland habitats on the site that support this butterfly must be managed correctly in perpetuity. I believe that any planning conditions imposed on either the management or extent of these grassland habitats would be unenforceable as it is wholly impractical for the Council to monitor whether herbicides or fertilisers have been used, whether the grassland has been mown at the right time or whether the size of the area has been altered. I am sorry to say that it is inevitable that these fragile habitats will be destroyed.

13. These harms to biodiversity are all reasons for refusal in their own right as paragraph 186 (a) of the NPPF 2023 makes clear, and add substantially to the harm arising from this proposal. There is no biodiversity net gain proposed for the site and so the proposal is also contrary to Paragraph 180 (d).

Value of this site and its surrounds

14. I would now like to expand on my personal experience of the site and its surrounds and the benefits to my own health.

15. 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.

16. We started the walks at the entrance in Silkham Road and walked through the appeal site and beyond through acres of 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.

17. Luckily, this regime soon 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.

18. As my daughter grew older, I involved the family in my daily walks. We would sometimes have a picnic and always took a book to identify the many wildflowers, insects, birds and wildlife we saw. We then got a dog and the walks became more frequent as she loved them and we would meet others walking their dogs which was a delight for her and me. There were beautiful shady areas with large ditches that held the rainwater, the dogs loved to drink from here on a warm day and the children loved jumping over the ditch, laughing with pleasure when one fell in. The area is more than just fields, it's a place of education, entertainment, joy and exercise.

19. My daughter attended St Mary's School and still to this day speaks of the walks across the field with her class and teacher, identifying flowers, rare grasses and wildlife.

20. When she left St Mary's for Oxted School, she and her friends would often meet to walk the whole 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.

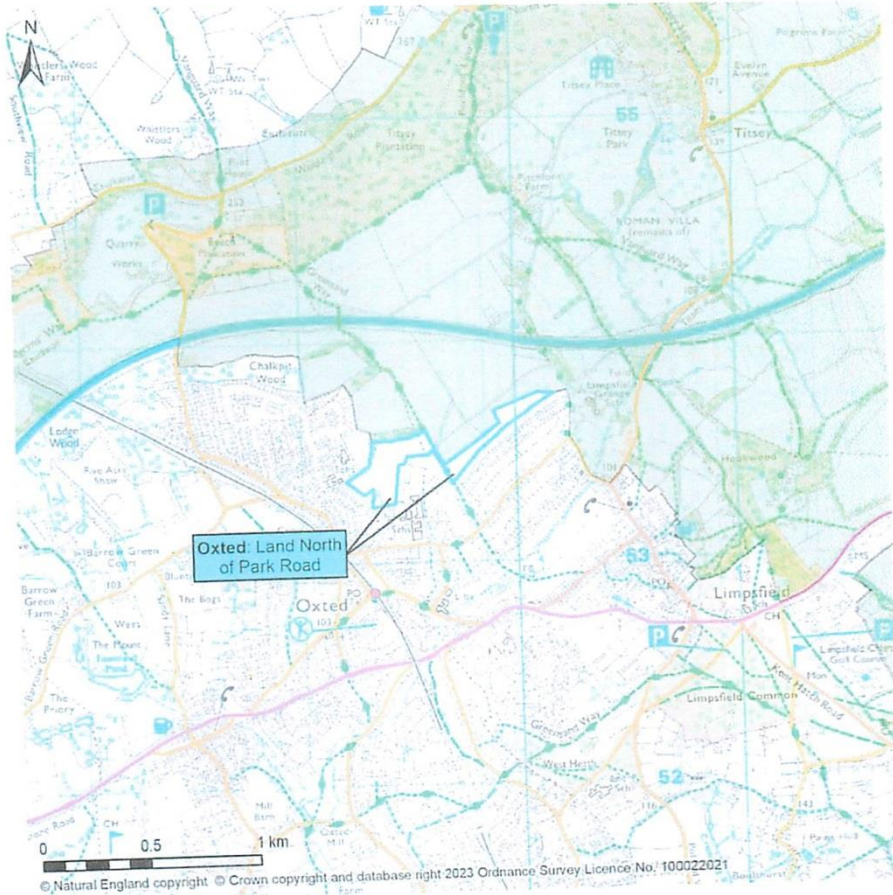
21. After access to the field was blocked off, we followed other walking routes in the AONB and I often stand looking down at the sweeping open fields, ancient woodland and breathtaking beauty of the colours and sounds of nature below. I gain immense pleasure and a sense of tranquillity from the uninterrupted views. To corrupt that natural landscape by building houses in this outstanding area of beauty would be detrimental on so many levels, including to views from the Vanguard Way, particularly in winter, and from the North Downs Way. This is an exceptional valued landscape of natural beauty and should be protected for both current and future generations to enjoy.

22. I note the appellant's proposal to formalise a footpath link through the site to link with PRoW (FP75) and that this is claimed as a "benefit". I disagree. The main beneficiaries of this link will be the new residents of the housing estate. They will add to the recreational pressure with more people using FP75 and potentially straying off into the SNCI Chalkpit Wood. For others, the recreational attraction of the site is that it is an undeveloped field set amongst woodland and hedges. It is tranquil and unspoilt. Walking through a housing estate is just not comparable.

Conclusion

23. The harm to the Green Belt, to the AONB and to the Ancient Woodland would be substantial and permanent. The Rule 6 parties accordingly support the Council's position on these matters. There are also other substantial harms. Overall, the harms are not clearly outweighed by the benefits and so in accordance with paragraph 153 of the NPPF 2023, I respectfully request that the appeal is dismissed.

5.5 Oxted



Land North of Park Road

This area forms three pastoral fields on the edge of Oxted abutting the urban edge. These fields form part of a sweep of open countryside, are contiguous with the existing AONB, and have views to the North Downs. The existing AONB boundary does not follow a clear feature on the ground, instead cutting across the three fields. To the west, there is a further irregular field which is contained by mature hedges and woodland shaws. Although close to the urban area, this latter area retains a strongly rural character. An alternative boundary can be defined along the vegetated edge at the rear of properties on Park Road and hedgerows/woodland to the southwest.

Proposed Boundary (Figure 23)

The proposed boundary leaves the existing AONB at Grid Reference TQ 40182 53753 and follows the vegetated property boundaries on the edge of Oxted. On reaching the bridleway, it crosses the track at right angles and turns northwest along the hedgerow boundary and then southwest, continuing along a hedge and fence line which marks the edge of the playing field associated with Oxted School. It continues to follow hedgerows and then the outer edge of a small wood, and then property boundaries on Chichele Road, before adopting the edge of woodland and property boundary to St Mary's School. It follows the western side of woodland to re-join the existing AONB boundary at Grid Reference TQ 39326 53549.