

West End Action Group (WEAG)

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OBJECTION **to planning application 19/0154:** **Rosedene Farm and land south of Fenns Lane, West End**

West End Action Group, representing a significant number of residents of West End, objects to planning application 19/0154 by Fairfax Acquisitions, at Rosedene Farm and land south of Fenns Lane, West End. We object on the following grounds.

1. Green Belt

The applicant's site is in the Green Belt, as shown on the Local Plan 2012 Policies Map (East Sheet). Paragraph 145 of the National Planning Policy Framework (NPPF – revised 2018 edition) states "A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt." The Borough's Local Plan (Core Strategy) endorses this.

Thus both the NPPF and Local Plan documents rule out housing development on the applicant's land.

2. 'Very special circumstances' do not exist

The NPPF does allow development of land within the Green Belt in exceptional circumstances. The applicant claims that 'very special circumstances' apply in this case under NPPF paragraph 145g - but that is incorrect.

NPPF 145g states that an exception permitting building on Green Belt is:

"limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:

– not have a greater impact on the openness of the Green Belt than the existing development; or

– not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.”

This imposes three conditions:

- That it be previously developed land (PDL)
- That it does not cause substantial harm to the openness of the Green Belt
- That there is a substantial proportion of affordable housing

The Fairfax application does not meet any of these conditions, as shown below.

3. ‘Very special circumstances’ do not exist: (a) Previously Developed Land

The site has been divided into four areas. Area 1 (Fenns Livery & Training Centre) and Area 3 (Rosdene Farm) are where it is proposed the houses be sited. Areas 2 and 4 are the proposed SANG.

Only a minority of Area 1 and Area 3 is previously developed land (PDL), namely where there are existing buildings, exercise/training yards, hard surfaces, storage of building materials and caravans, and so on. The majority of both areas is open paddocks used for grazing horses. These paddocks do not constitute PDL.

We agree with the statement on page 3 of the Surrey Heath Borough Council (SHBC) pre-application advice that “in this case, only the existing buildings and hardstanding areas for the equestrian land could be considered to be previously developed land, which is a relatively small proportion of the land proposed to be developed for housing”.

This point is powerfully supported by a very recent decision by The Planning Inspectorate, on 22 November 2018 (Appeal ref APP/V0728/W/18/3207383). It concerned the Saltburn Riding School at Saltburn by the Sea, North Yorkshire. The situation was very similar to the Fenns Lane situation. The Saltburn Riding School had applied for outline permission to build 75 homes on the riding school’s paddocks as well as the land on which the equestrian buildings stood. The site is outside but adjoining the existing settlement area.

The Inspector dismissed the applicants’ appeal against refusal by the local authority on two main grounds: the paddocks do not constitute previously developed land (PDL), and the housing would cause unacceptable harm to the rural landscape. This is precisely the case with the Fenns Lane application. The Inspector’s report states:

“The definition of PDL in the NPPF refers to land which is occupied by a permanent structure, including the curtilage of the developed land... The northern area of the site containing the riding school buildings has the characteristics of PDL. The southern area of the site contains two grassed paddocks. The appellants contend that the paddocks form part of the riding school curtilage as they are considered to be an integral part of the operation... I am mindful that the paddocks are used in association with the riding school, and the whole site may be within the same ownership. However... they do not outweigh the distinctly separate nature of the paddocks... Rather than being within the curtilage of the buildings of the riding school, in my view the paddocks are adjacent to it. As a matter

of fact and degree, I conclude that the two paddocks are not within the curtilage of the buildings and are therefore not PDL.”

Fairfax’s agents Bell Cornwell cite in their Planning Statement a number of case histories of previous court or appeal cases (paragraphs 4.7 to 4.9). However the Wychavon case (para 4.7) is only about the definition of ‘very special’, and it concludes that the decision maker (in this case the Borough Council) must make its own qualitative assessment. The Basildon case (para 4.8) is likewise about the definition of ‘very special’ and again concludes that it “is a matter of planning judgement for the decision maker”. The Herba Foods case (para 4.9) merely confirmed that “the decision maker is obliged to give adequate consideration to circumstances... and in doing so has to exercise a judgement”.

All that these three cases say is that the decision maker must give adequate consideration to all the circumstances in judging whether or not ‘very special circumstances’ apply. We already knew that! These court cases may be dismissed as adding nothing of consequence, and we interpret them as an attempt to add some legal gloss to a very weak cause.

The tentative nature of Bell Cornwell’s language – “in case the Council does not agree with us regarding the extent of the previously developed land on the site” (paragraph 4.5 of their Planning Statement) and “If the Council does not agree that the site as a whole constitutes previously developed land...” (paragraph 4.19 and 6.6) – suggests to us that even Bell Cornwell do not really believe in their argument on this point.

Wider implications. If the paddocks in Area 1 and Area 3 were accepted as PDL it would open up much wider implications. If open fields used for grazing horses can be classified as previously developed land, it would not only be contrary to common sense but would also mean that every field throughout the eastern part of the Borough which is used for horses (and also those many fields on which landowners would then put horses in order to meet such a planning criterion) would become liable to development, by the simple expedient of erecting a permanent building there, such as a wooden shelter. That would amount to a very large proportion of the Chobham, West End, Bisley, Lightwater, Windlesham and Bagshot area! In the end, it could lead to coalescence into a single large town on the east of Chobham Ridges.

4. ‘Very special circumstances’ do not exist: (b) Openness of the Green Belt

The NPPF states (paragraph 145g) that in approving new development of previously developed land it needs to be demonstrated that it would not have a greater impact on the openness of the Green Belt than the existing development. Considering that most of Area 1 and Area 3 is open fields, it is self-evident that building 74 houses there would harm the openness of the site.

The Landscape Visual Impact document produced by Hyland Edgar Driver seems to us to be heavily biased, being commissioned by Fairfax to portray the landscape in as urbanised a manner as possible. One of many examples of lack of balance is the ridiculous assertion in

paragraph 11.7 that “the proposals... *enhance* [our italics] the key relevant characteristics of the local character area and the openness of the Green Belt”.

Similarly the consultants Bell Cornwell, in paragraph 4.19, rubbish the appearance of the existing structures in order to make the risible statement that by contrast the housing estate would actually “have *beneficial* [our italics] impacts on the openness of the Green Belt”! It is obvious that a housing estate of 74 houses would have an immensely harmful impact on the openness of the land compared with the existing grassy meadows.

The proposed layout of the estate, although only indicative, reveals a very urban character which is out of keeping with the rural surrounding area. The proposal therefore conflicts with policy DM9(ii) of SHBC’s Core Strategy which states that development should “respect and enhance the local, natural or historic character of the environment”.

We strongly dispute the assessment in paragraph 4.33 of the Landscape Visual Impact document that the landscape quality of the site is ‘Poor,’ and in paragraph 4.30 that the landscape value of the site is ‘Low to Medium’. Exhibits A, B and C in the Appendix show that the views from the public road across the open fields of both Area 1 and Area 3 are of High landscape quality and value: attractive open green fields, with clusters of mature trees beyond. The soil quality means that these and neighbouring fields can produce lush grass. Horses are grazing on the grass (see for example Exhibit B), showing the agricultural use of the fields. Building houses there would utterly destroy the openness of this part of the Green Belt.

The Planning Inspector’s report on the Saltburn appeal, cited earlier, turned to the harm that would be caused to the rural character of the area. What he said about the Saltburn site applies equally to the Fenns Lane site. The Inspector wrote:

“The paddocks within the southern part of the site are of an open rural character and are clearly associated with the countryside around Saltburn rather than the built form of the settlement. Although views of the paddocks are shielded to a degree by the existing buildings within the site, I saw the development on the paddocks would be prominent in views from Marske Road as well as from the wider area. As a result of development for housing, the rural appearance and character of the paddocks in views from the road and the wider area would be unacceptably changed to a more suburban character. Even when viewed against the backdrop of the residential development on a neighbouring site, I consider that the intrusive nature of this encroachment would be still be apparent. The proposal would therefore be viewed as built development projecting into the countryside, with subsequent harm to the rural landscape.

“I am mindful that future proposals for the site would include landscaping. However due to the extent and visibility of the site I am not persuaded that such landscaping could mitigate the harm arising from the projection of development into the landscape.

“I acknowledge that the proposal would result in the redevelopment of the extant buildings on the site which are unsightly and currently detract from the character and appearance of this area of countryside. However there is no evidence before me that the development of the buildings cannot be brought forward independently of the rest of the site. This matter does not therefore weigh significantly in favour of the proposal as a whole.”

All these points apply to the Fenns Lane proposal.

The Inspector ended by writing “For the reasons given above, I conclude that the proposal would not be in accordance with the [local authority’s] development plan and would lead to significant harm to the character and appearance of the landscape. The proposal would also conflict with the NPPF in respect of... conserving and enhancing the natural environment, including recognising the intrinsic character and beauty of the countryside. Taking account of all material planning considerations, I conclude that the appeal should be dismissed.”

For the same reasons, among others, we the West End Action Group contend that the very similar application 19/0154 should also be dismissed.

5. ‘Very special circumstances’ do not exist: (c) Affordable housing

Fairfax refers to the provision of affordable housing as a benefit of their scheme. However only a minority of the housing would be classified as affordable, whereas a much higher proportion would be required for this to be relevant. Indeed, in the Borough’s Core Strategy the policy concerning Rural Exception Sites, policy DM5, requires 100% of the houses to be affordable. Although Fairfax is not treating this land as a Rural Exception Site, for the affordable housing to be a significant consideration under NPPF paragraph 145g, at the very least a majority of the housing should be affordable.

6. ‘Very special circumstances’ do not exist: (d) SANG

Bell Cornwell argue in paragraph 6.7 that the provision of a SANG is a ‘very special circumstance’. But the SANG would only be necessary as a means of partially offsetting the danger posed to the Special Protection Area (SPA) by having another 74 houses built close by. It is a circular argument: if we have the houses we need the SANG, but if we don’t have the houses we don’t need the SANG. The SANG does not amount to a reason for building the houses.

A similar argument was put forward by the appellants in the Saltburn case referred to above. The appellants stated that a contribution would be made to a Special Protection Area. The Planning Inspector retorted that a Special Protection Area “would primarily address issues generated by the development itself and is therefore neutral in the overall planning balance”.

In any case the Fenns Lane SANG in itself would not be large enough to satisfy the dog-walking requirements. What would happen is that dog-walkers would walk through the SANG, along a footpath, and quickly be onto the SPA itself - which is only a few minutes’ walk away, the SANG being within the 400m buffer zone. Thus the 74 houses would materially increase the dog-walking taking place *within the SPA*.

The SANG is not a ‘very special circumstance’ that justifies over-riding the Green Belt regulations; it is merely a very partial mitigation of one of several aspects of the real harm that the 74 houses would create.

7. Supply of land for housing

We acknowledge that Surrey Heath Borough Council (SHBC) cannot show a supply of land sufficient to meet housing targets for the next five years. However we do not believe that this should over-ride other, stronger, policies which prevent development on Green Belt land. In support of this, we note the statement in SHBC's pre-application advice to Fairfax's agent Bell Cornwell that "the Government in its policy statements and appeal decisions have made it clear that a lack of adequate housing supply, even in locations with a significantly lower available supply than this Borough, would not be a significant justification to provide housing on Green Belt sites."

Bell Cornwell cite the St Albans case in the Court of Appeal (paragraph 4.10 & 4.11), and the statement that "In principle, a shortage of housing land when compared to the needs of an area is capable of amounting to very special circumstances". Agreed, but "is capable of" is very far from "must". The shortage of housing land is merely one of many considerations to be taken into account when deciding whether or not the arguments in favour of the development outweigh the strong negatives on building on Green Belt land. WEAG's opinion is very firmly in support of SHBC's pre-application advice cited in the paragraph above. Shortage of housing is not sufficient justification in this particular case.

8. Fenns Lane: the road itself

Fenns Lane is unsuitable as an access road for an estate of 74 houses. It is a narrow winding country lane. At points it is only 3.9 metres wide. We have taken measurements at 15 places spaced evenly along the lane, and almost half of the places are only 4.2 metres wide or less.

The width of a Land Rover Discovery, a common 4x4, is 2.22 metres. This means that, with a small gap between them, two of these vehicles require a minimum road width of 4.5 metres for them to pass each other. Yet two-thirds of Fenns Lane is less than this width! Lorries and vans that would be required to service the proposed new estate would need even greater width for passing. In effect, Fenns Lane is a single track road with passing places.

Moreover most of the lane has no paved footway, and the short stretches where it exists are only on one side, and not the side where residents in the 74 houses would live. Sometimes cars are parked on the pavement, which forces pedestrians onto the road anyway. Already the lane is a dangerous one for pedestrians, people with dogs, and for horse riders riding to and from the Fenns Lane Livery & Training Centre. In addition there are blind bends. The road is certainly not a 'safe cycling route' as the Fairfax documents allege.

Exhibits D and E in the Appendix demonstrate through photographs that Fenns Lane does not meet the required standards to serve as an access road for a large new housing estate.

9. Traffic generated by 74 new houses

We have studied the Transport Assessment (TA) conducted by RGP for Fairfax Acquisitions. It contains a number of errors of fact, highly questionable assumptions, and omissions. We focus here on six of them, all of which lead to serious underestimates of the impact of the development on Fenns Lane and local roads generally. The six are:

A322 traffic levels have risen, not fallen. The TA states in paragraph 7.1.1.ii that “the traffic flows recorded at the A322 Guildford Road roundabout show that traffic flows on A322 have reduced from the levels recorded in 2013/14”. This is utterly implausible, and can only have arisen from the two traffic surveys being conducted in non-comparable ways and/or at non-comparable times, and by different developers, not independently by SCC. This erroneous claim is made in an attempt to minimise the effect of generating extra traffic from the proposed new estate. On the contrary, West End residents know very well that traffic volumes on the A322 have gone up, not down, in the last five years to a significant and readily observable degree.

The TA seriously underestimates peak time traffic from Fenns Lane. We think the estimate of 334 two way trips per day generated by the new estate may be a reasonable estimate (Figure 5.4 of RGP report), but the estimated distribution of those trips through the day is not. If the 334 trips were spread evenly through say the 16 hour period 6.00am to 10.00pm, at 21 per hour, it would not be a serious problem, even though it would mean one extra car every 2.9 minutes. Unfortunately the extra traffic will be heavily weighted towards the peak periods for commuter rush hour and school run traffic – more so than RGP’s use of TRICS data suggests. We estimate that the true trips generated by the estate at peak times would be twice the figure shown in the TA.

The TA seriously underestimates congestion at the Fellow Green roundabout, where Kerria Way meets the A322. The figures do not take account of the traffic from the Thakeham or Martin Grant Homes estates (130 dwellings), which means the TA’s estimate of total traffic volumes at the roundabout is an underestimate. Even so, the TA concedes that their traffic estimates exceed the junction’s capacity – that is, it will jam up. The TA goes on to assert that SCC’s proposed very modest alterations to the junction will eliminate all delays. We believe this is completely unrealistic at peak hours, since the proposed modification is very limited, with a slip road for the small minority of traffic from the north that wishes to turn left into Fellow Green; and making the roundabout smaller. Traffic jams causing very slow moving traffic will continue and the congestion will be exacerbated by the Fenns Lane estate.

The TA seriously underestimates the criss-crossing of cars on Fenns Lane itself, especially during peak hours. The TA assumes that 100% of the traffic from the eastern development, Area 3 (Rosdene Farm), will arrive and depart via Kerria Way and the Fellow Green roundabout. This is extremely unlikely. In practice residents wishing to travel north on the A322 towards the Gordon’s roundabout will drive up Fenns Lane to Brentmoor Road and onto the A322 at that junction; similarly those arriving from the north will take that route. This will enable them to avoid the heavy slow-moving traffic and the two sets of pedestrian traffic lights on the stretch of A322 between the Fellow Green roundabout and the

Brentmoor Road junction. This will account for about half of the traffic coming from the Area 3 houses. Similarly, about half of the traffic from the western development, Area 1 (Fenns Livery) will want to travel south on the A322 towards Bisley or east along Fellow Green and down Beldam Bridge Road towards Woking; it will go south down Fenns Lane to Kerria Way. Throughout the day, but especially during peak hours, these vehicles will have to pass each other in the part of Fenns Lane between the entrances to the Area 1 and Area 3 houses. This is more than half of the lane and includes the narrowest and most serpentine single-track section. In peak times there would be bound to be significant congestion in Fenns Lane itself, with vehicles having to frequently dodge into someone's driveway or to reverse to the nearest one, for another vehicle to pass in the other direction. It is a recipe for road rage and accidents as well as delays.

The TA fails to assess the impact of the extra traffic on the Brentmoor Road/A322 junction – which will be considerable as a result of the point above. This is an important omission.

The TA is unrealistic about other modes of travel. The TA is highly unrealistic in suggesting that large numbers of residents of the proposed 74 houses will travel by bus (the buses through the village are usually nearly empty), or become involved in car sharing, or use a car club vehicle. Very few will cycle during peak hours because of the heightened risk at that time on dangerous Fenns Lane and the congested A322, and local roads generally. Everyone knows that residents will simply drive everywhere.

Overall, the traffic problems that would be generated by the proposed housing mean that the project conflicts with policy DM11 of the SHBC Core Strategy. The project would definitely have a demonstrable harmful impact on the local roads.

10. The nature of the proposed houses

Although the house designs shown in the application are merely indicative, they are two-storey houses. Yet much of the housing on the opposite side of Fenns Lane facing Area 3 is single-storey. We contend that the proposed housing on Area 3 that borders the lane ought to be single-storey in order to fit in with the existing character of the lane. Since none of the proposed houses are single-storey, this is another ground for rejecting the application.

Moreover the density of housing on Areas 1 and 3, at 28 per hectare, is far greater than that of Character Area 9 of the West End Village Design Statement, in which Fenns Lane sits. In Character Area 9 the densities range from 1/ha to 15/ha. This illustrates in another way that the proposed development would not be in harmony with its surroundings.

Fenns Lane forms a clear geographical boundary to the settlement area of the village. A new estate on the south side of Fenns Lane would destroy the clarity of the settlement area's bounds.

11. Flooding

Although the flood risk assessment by Temple does not predict substantial flooding problems for the prospective houses on Areas 1 and 3, which are in Flood Zone 1, it does not take account of local knowledge about the likely effect of the estate's houses and roadways on flooding outside the application site.

Figure 2.1 of Temple's report shows the local topography, and shows how surface water from Brentmoor Heath and especially the Sandpit Hill area flows downhill (gathering further surface water from roads and other hard surfaces) to the 'nursery/flowers estate'. From there it drains through the estate's ditches and culverts and the catchment pond at Erica Close/Fuchia Way, and reaches Fenns Lane close to Glentramman. At that point, during heavy rain it frequently floods a length of the lane until the water drains down through the absorbent fields on the south side of Fenns Lane. The impact of building houses and roadways on the application site, particularly Area 3, will be to hold up the water and prolong and deepen flooding.

Residents of Fenns Lane and the houses east/north of it have plenty of experience of flooding in Fenns Lane, and after heavy rain the public footpath that runs across the Rosedene section of the site is regularly soggy and sometimes impassable.

In short, the flooding problems arising from the Fairfax estate would not solely be problems on the estate itself but principally for the surrounding area.

12. Education

West End's primary and secondary schools are at full capacity, even before the 370+ new houses currently under construction at Beldam Bridge Road, Kings Road, and Benner Lane are taken into account. When the 370+ houses are fully occupied the catchment area for the schools will have to be drawn in tighter to the east of the village, leaving the Fairfax estate in the west well outside. Consequently children in the 74 Fairfax houses would have to be driven to schools outside the village every school day. That is very undesirable for children and would add significantly to the existing school run congestion.

Fairfax's agent Bell Cornwell claim in paragraph 6.8 that children will be able to walk to school. That is patently not correct, because the catchment area of the schools will not include the Fairfax site.

13. Medical facilities

We acknowledge that GP and other medical services are not the responsibility of either the Borough or County Councils, but nonetheless it should be a consideration that the medical practice is very full, and has at times had to close its books to new patients. When the 370+ new houses currently under construction at Beldam Bridge Road, Kings Road, and Benner Lane are fully occupied, the problem will be much worse, and by the time the Fairfax houses

could be occupied the practice is highly likely to have no scope to accommodate the residents.

14. Public consultation: residents' opinion

The Fairfax submission refers to the public consultation conducted by means of an exhibition in West End's Sports Pavilion on 29 January 2019. Their comments about residents' responses do not convey the immense degree of opposition to the proposed development. To measure this, WEAG had conducted an exit poll.

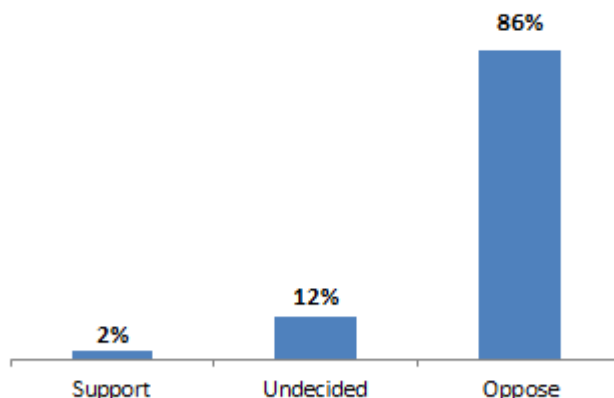
The survey was conducted in accordance with the Market Research Society's Code of Conduct, and was designed and managed by a Full Member of the Market Research Society. The universe for the survey was visitors to the exhibition. A team of interviewers was stationed outside the Sports Pavilion entrance. On leaving, visitors to the exhibition were asked the following question:

"Having seen the Fairfax exhibition, do you support or oppose the plan to build up to 74 dwellings on land to the south of Fenns Lane?"

142 residents of West End were interviewed, approximately 90% of all visitors to the exhibition. (Fairfax estimated 250 visitors but this is evidently an exaggeration; however they may have included residents who sent in questionnaires online without attending the exhibition.)

As the chart below shows, no less than 86% of visitors to the exhibition opposed the Fairfax proposal, and only 2% were in favour.

**"Having seen the Fairfax exhibition,
do you support or oppose the plan to build up to
74 dwellings on land to the south of Fenns Lane?"**



Base: 142 residents who visited exhibition

Anecdotal evidence in the following weeks, including large numbers of posts on the village community Facebook page, has shown that opposition to Fairfax's housing estate spoiling the Green Belt around the village remains extremely strong.

15. Imposing Conditions

Without prejudice to our strong belief that this application should be refused, if it was granted we believe that certain Conditions should be imposed, in addition to the usual ones about a Construction Method Statement (CMS) and so on:

- The approval should be conditional on the SANG being implemented. There are cases – and the current Taylor Wimpey development at Beldam Bridge Road, West End, is a notorious case in point – where a SANG is initially proposed, but later withdrawn, so that the village gets the houses but not the benefit of the SANG.
- An exploratory archaeological excavation should be conducted, as a Condition of approval, to check for evidence of significant archaeological remains. This is particularly important in West End since the discovery in 2017 in fields around Malthouse Farm, Benner Lane, of an Iron Age settlement including roundhouses, a storage building and iron smelting; and Bronze Age pottery which, taken with the Bronze Age barrows on Brentmoor Heath in the SPA, suggests a Bronze Age settlement somewhere in the area. (Cotswold Archaeology's report on the excavations is CA Report 18166, dated May 2018.) The Fairfax site's location beside a stream, the Trulley Brook, adds to the potential of the site for a prehistoric settlement.
- It is possible some of the buildings to be demolished contain asbestos. The CMS should state a requirement for a full pre-demolition survey of asbestos. Lesser forms of survey which amount to little more than a quick visual inspection would not be adequate.

For the reasons above, we urge you to refuse planning permission to this application.

Appendix

The following pages contain photographs illustrating some of the points we have made.

Appendix

Exhibit A

Open fields forming part of Area 1, seen from the public road. There are no permanent buildings. The landscape value is High.

Fairfax claim that building houses in these fields will not harm the openness of the Green Belt!



“As a result of development for housing, the rural appearance and character of the paddocks in views from the road and the wider area would be unacceptably changed to a more suburban character.”

These words of the Saltburn Planning Inspector apply equally to the Fenns Lane site.

Exhibit B

Another spot from which open fields forming part of Area 1 can be seen from the public road. There are no permanent buildings. The landscape value is High.

The two horses are grazing on the grass, showing the field is being used for agricultural purposes – as occurs throughout the paddocks in Area 1 and Area 3.



Exhibit C

Part of Area 3, seen from the public road. There are no permanent buildings. The landscape value is High. Houses built here would be highly visible by everyone using Fenns Lane, and the openness of the view would be destroyed.



The open view across fields continues further along Fenns Lane, including on land which is not part of the application site. The whole character of the road is of a narrow winding country lane with fields on one side. 74 new houses on that side of the lane would immensely harm the character and atmosphere of the whole lane, in breach of NPPF policy.

Exhibit D

An example of the narrowness and serpentine nature of Fenns Lane. Note the lack of pavement for pedestrians, who are forced to walk in the road. It is already dangerous for pedestrians and horse riders, even without a large increase in traffic from 74 houses.



Exhibit E

Another shot of bends in narrow Fenns Lane. This road is unsuitable for large volumes of traffic. Again, note the lack of pavement for pedestrians, who are forced to walk in the road. There is also horse-rider traffic, travelling to and from the livery stables.

