

Good evening,

I refer to your current consultation upon the latest Local Plan, and as it proposes knocking down more of our homes upon Limes Farm than the last version we objected to, I would like to register the strongest objection I have ever had against a council proposal please. My wife bought a house on Limes Farm, invested a lot of time and savings into this property with the intention of living out our days here. It is a strong community with all facilities at hand but the one thing that uplifts residents and contributes to your Health Policies is the ability of our children and grandchildren to get outside and use the Public Open Spaces we have, as well as a large number of dog walkers and worshippers walking to the synagogue which leads to fitter adults. Intensification upon Limes Farm and the resultant loss of green spaces flies in the face of your policies on health and wellbeing and the NPPF, and is sure to lead to a 'toy town' development like next door in Hughes Road and a less fit community.

When I search the internet for a Masterplan for Limes Farm I find my 1st attachment. My first complaint would be that local residents do not feel adequately consulted, some of us found out about the current consultation very late, after the Christmas holidays, and were not invited to local exhibitions. As well as consultation and a duty to cooperate being a need for **legal compliance**, I do not believe that the latest document is lawful as it is dated "December 2017" but many of the plans use Ordnance Survey data and "EFDC Licence No:100018534 2016" Copyright is a year out of date. If this makes the document unlawful then surely it should be withdrawn and reissued starting the consultation period again?

As significantly more dwellings are proposed from one point of highway access due to Lord Stradbroke's covenants banning access onto Manor Road, I refer to the relevant standards within the '[Essex Design Guide](#)'. Pages 119-120 of this guidance demand that up to 700 dwellings are served from a single point of vehicular access, so **1271 + Amanda Close + over 100** dwellings proposed is likely to have a severe impact and therefore be **unsound** according to current standards and the NPPF. I have looked for the proposed intensification to be proved sound within Essex Highway's most recent Highway Assessment (my 2nd attachment), but alas it does not consider 'Limes Farm' and the traffic impacts far enough south upon the A123 Fencepiece Road and the surrounding network, but they acknowledge in Paragraphs 1.3.1 & 1.3.2 that "further consideration should also be given to 'cross boundary' impacts with the neighbouring Harlow District to the north", and "the 'cross boundary' impacts with neighbouring Broxbourne District... will also need to be considered as part of any future work to support the final Local Plan submission". If this further work has not been completed then it does not sound like EFDC is ready to submit a sound Plan.

['Manual for Streets'](#) is a recognised National Highway Standard and says: -
"6.7.3 The Association of Chief Fire Officers has... clarified... as follows: **the length of cul-de-sacs or the number of dwellings have been used by local authorities as criteria for limiting the size of a development served by a single access route. Authorities have often argued that the larger the site, the more likely it is that a single access could be blocked for whatever reason.** Since the introduction of the

Fire and Rescue Services Act 2004, all regions have had to produce an Integrated Management Plan setting out response time targets... These targets depend on the time required to get fire appliances to a particular area, together with the ease of movement within it... **parked cars can have a significant influence on response times. Developments should have adequate provision for parking to reduce its impact on response times.**” More dwellings is bound to mean more vehicles parking, we do not have enough land dedicated for parking now, and with an aging population, the risk of an emergency response vehicle getting held up accessing the development will increase, as residents recently experienced when the water main was being replaced near the only road in and out. At least when this happens at the moment there is a back-up of an Air Ambulance being able to use our beloved green space, but if EFDC takes this away response times could increase, especially for the police from Brentwood, and the local GPs and schools will not be able to cope with the additional residents. We already get referred to Loughton as there is not enough capacity this side of the M11.

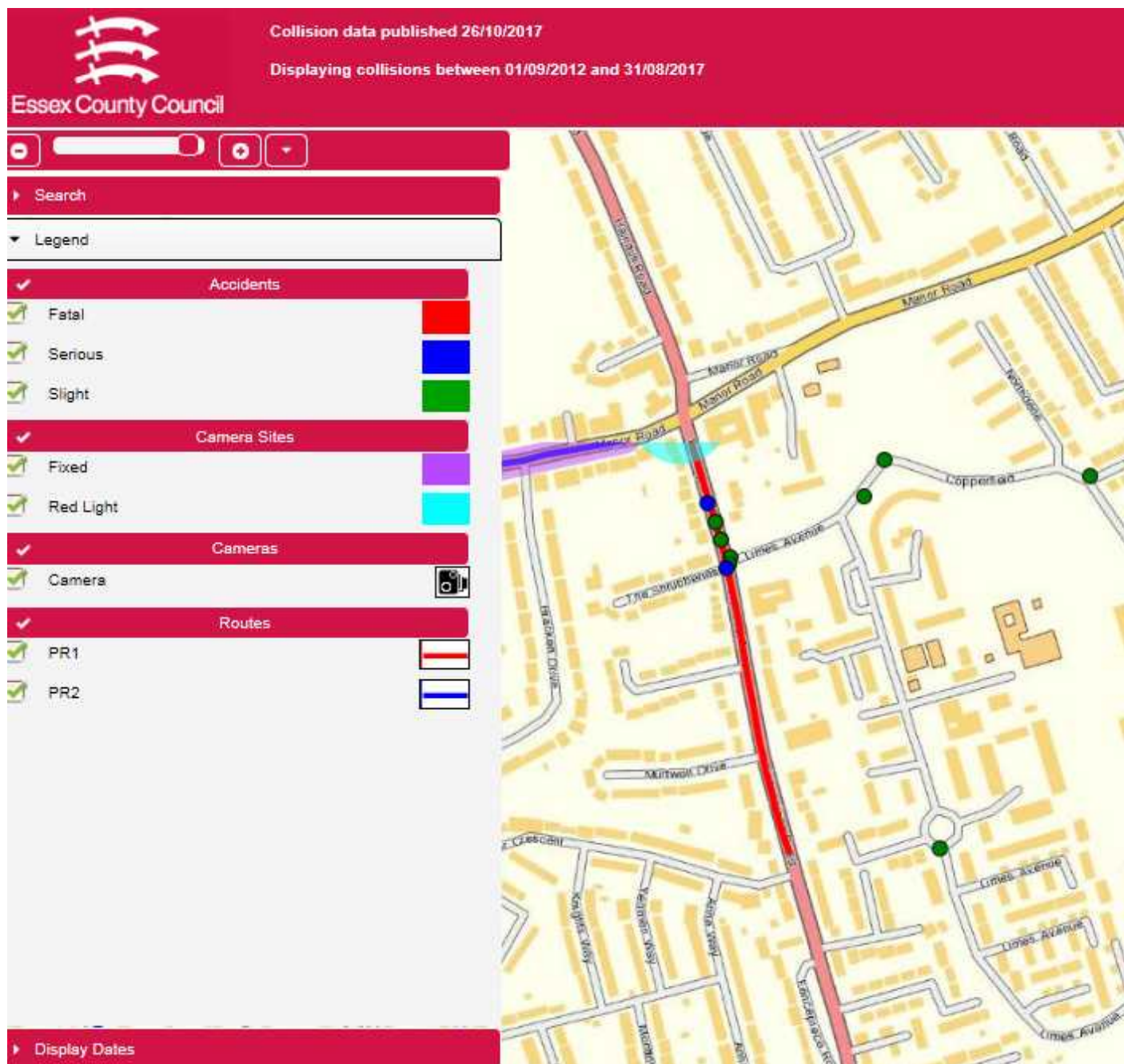
According to the following website, the A123 Fencepiece Road had a Daily Traffic Flow of 15,645 during June 2013, of which 6,693 vehicles (43%) were speeding. This is obviously not acceptable and not advisable to ask more traffic to Give Way onto this road or wait to right-turn from it.

<http://data.redbridge.gov.uk/View/vehicles-and-roads/automatic-traffic-counter-permanent-statistics>

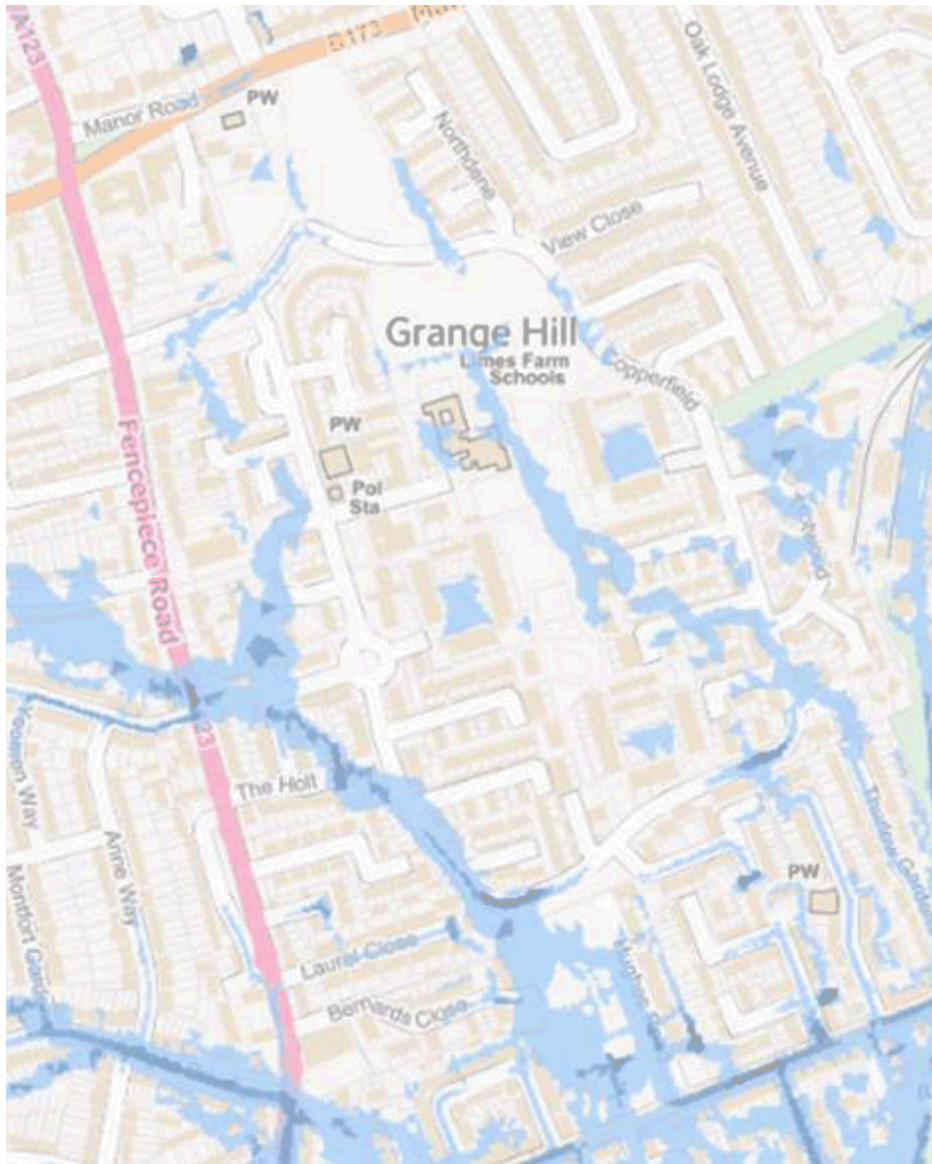
Further north the A123 carried 20,038 vehicles per day in 2014 according to this Government website: -

<https://www.dft.gov.uk/traffic-counts/cp.php?la=Essex#73493>

As well as being a very congested junction in the peak hours, you can see the Limes Avenue T-junction with Fencepiece Road is already a ‘blackspot’ with 2 Serious Injury Accidents and 4 slight Injury Accidents within 5 years. To stress this junction and the junction with Manor Road with more traffic would be madness: -

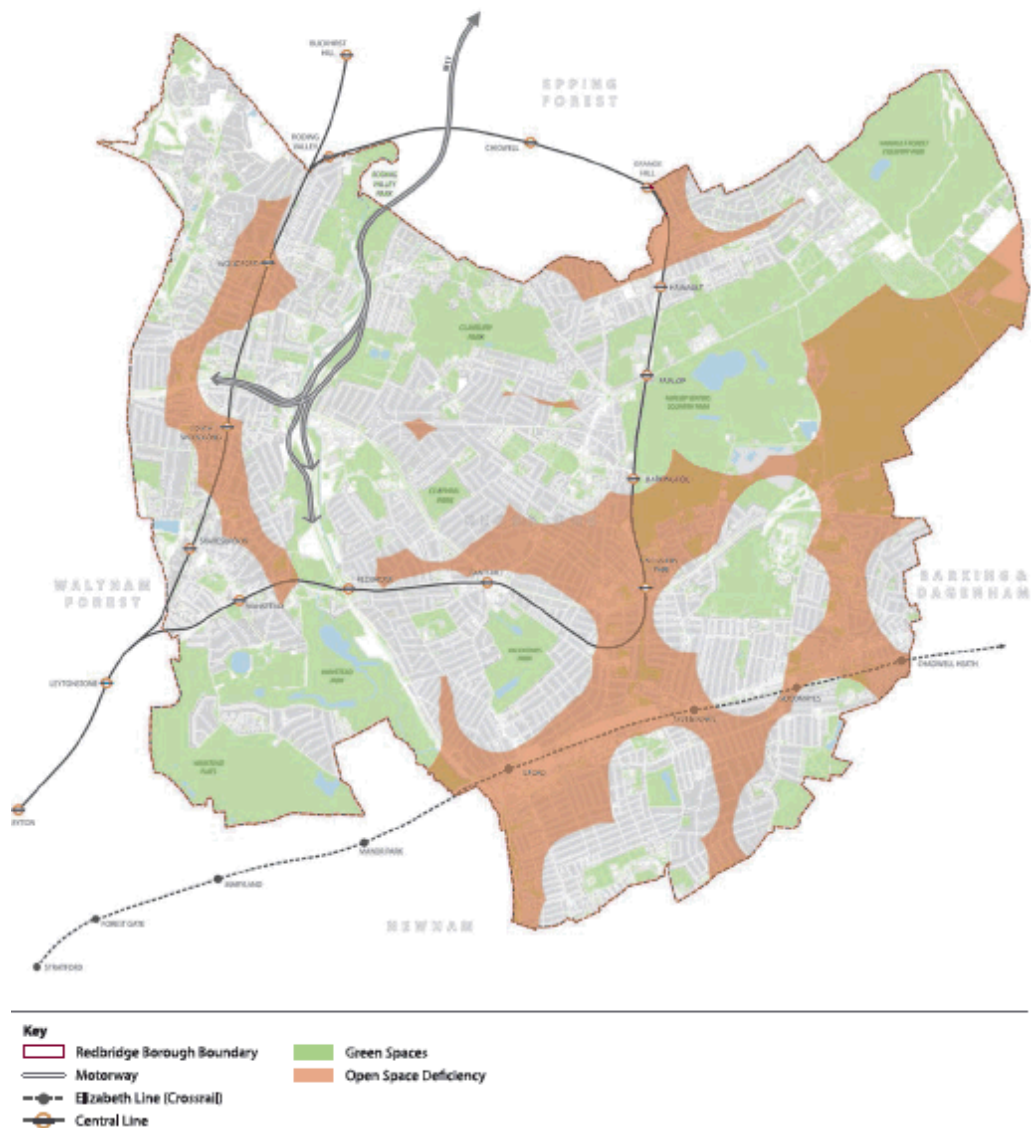


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- According to the Environment Agency, Limes Farm is within Nitrate Vulnerable Zone ref.S441, and has risks from surface water flooding as shown below, which makes it inappropriate for further development with higher densities of housing and impermeable surfaces: -
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If we consider just over the border to the south, Redbridge realise in their Local Plan that it has an Open Space Deficiency, which will be made worse by EFDC if you choose to operate in isolation. See below: -

FIGURE 24: Areas of Open Space Deficiency



If the Local Plan gets submitted in this fashion please can I register early to make representation in front of the Planning Inspector at the Local Plan Examination in the autumn? I look forward to your considered response.

Kind regards,

Mark Youngman