

Land at the Broadway, Great Dunmow – Planning Consultant Advice

An independent planning consultant was appointed to support the Town Council's response to the Gladman Developments planning application UTT/26/1635/OP.

Yesterday they circulated their advice to the Town Council.

The consultant raises a number of planning concerns relating to the proposed increase from 715 dwellings identified in the adopted Local Plan allocation to up to 850 dwellings within the application.

The advice identifies four principal areas where, in the consultant's opinion, further scrutiny is required:

- Development quantum and policy conflict: The additional 135 dwellings represent a material increase above the recently adopted Local Plan allocation, without sufficient evidence to demonstrate that the infrastructure, environmental and spatial assumptions underpinning that allocation remain robust.
- Heritage and archaeology: There are significant deficiencies in the heritage assessment, including the deferral of intrusive archaeological evaluation and insufficient assessment of whether the uplift from 715 to 850 dwellings causes or exacerbates harm to important heritage assets, including the Grade I listed Parish Church and surrounding Conservation Areas.
- Infrastructure: The applicant's own evidence identifies demand for 102 early years places, against the 56-place facility proposed, leaving a potential shortfall of 46 places which has not yet been satisfactorily accounted for. There also remains uncertainty regarding the delivery, staffing and operation of the proposed healthcare facility.
- Transport and highways: The transport strategy relies heavily upon assumptions concerning modal shift and reduced private car use, while significant elements of the highway evidence remain outstanding. In particular, the majority of the capacity analysis and detailed junction modelling has been deferred to a future Transport Assessment Addendum, meaning the full highway consequences of 850 dwellings cannot presently be properly assessed.

Taken together, the advice considers that the application has not demonstrated that the additional development can be accommodated without unacceptable additional impacts, or that the infrastructure and mitigation proposed are sufficient to support the increased housing quantum.

Once the Town Council have voted on their response to the consultation the full planning consultant's report will be made available on the Town Council website and socials.

Town Clerk, 11/08/26.

THE BROADWAY – PROPOSED 850 HOME DEVELOPMENT

Great Dunmow Town Council has OBJECTED — but the final decision has not been made.

Planning application UTT/26/1635/OP proposes up to 850 homes on land north and south of The Broadway — around 135 more homes than the 715 identified for the site in the adopted Local Plan.

The Town Council has considered the application and independent professional planning advice and has submitted an objection.

But residents must not be complacent.

WANT TO HAVE YOUR SAY? ACT NOW — SEE CONSULTATION DEADLINES BELOW

Great Dunmow Town Council does not decide this application. Uttlesford District Council does.

If you have concerns about the development, make your own views known to UDC. The Town Council's objection does not replace individual representations from residents.

- **TAKE ACTION**
- **HAVE YOUR SAY ON THE PLANNING APPLICATION**
- **READ WHY THE TOWN COUNCIL OBJECTED**
- **READ THE INDEPENDENT PLANNING REPORT**
- **CONTACT YOUR DISTRICT COUNCILLORS**

Your voice still matters

Please do not assume that because the Town Council has objected, residents no longer need to take action.

The Town Council is a consultee. The final planning decision rests with Uttlesford District Council.

If you support or object to the application, submit your own comments and explain your reasons in your own words, focusing on the planning issues that matter to you.

You can also contact your Uttlesford District Councillors, who represent Great Dunmow at the authority responsible for determining the application. The Council's resident information sheet provides the relevant contacts.

What is being proposed?

Planning application UTT/26/1635/OP seeks outline planning permission for a major development on land north and south of The Broadway, Great Dunmow.

The application proposes up to 850 new homes, together with land for a two-form-entry primary school, mixed-use local centre, sports pitches, public open space, landscaping, sustainable drainage and new vehicular access.

The site is already allocated for development in the recently adopted Uttlesford Local Plan. However, the Local Plan identifies approximately 715 homes for the site, while the current application seeks up to 850 homes — an additional 135 homes, or around 19% more.

Town Council's Response

Great Dunmow Town Council has considered the application and resolved to OBJECT to the development as currently proposed.

The Town Council is a statutory consultee and does not make the final decision on the application. The application will ultimately be determined by Uttlesford District Council, as the Local Planning Authority.

Given the scale and complexity of the application, and following significant concerns raised by residents, the Town Council commissioned independent professional planning advice to assist councillors in considering the application.

Councillors considered that advice alongside the application and other information available before determining the Town Council's response.

Read the Independent Planning Report

The Town Council commissioned an independent planning consultant to undertake a detailed assessment of the application.

The report considers four principal areas:

- **The proposed increase from 715 to 850 homes**
- **Heritage and archaeology**
- **Schools, healthcare and other infrastructure**
- **Highways, traffic and sustainable transport**

You can read the full independent report below.

Why the Town Council Objected

The central issue is not whether this site should have housing. The site is already allocated for development. The key question is whether the applicant has demonstrated that increasing the development from approximately 715 homes to up to 850 homes can be accommodated without unacceptable additional impacts.

The independent assessment raised concerns about whether the infrastructure, environmental and transport assumptions underpinning the Local Plan allocation remain appropriate for a development approximately 19% larger.

The Town Council's objection therefore focuses on material planning considerations, particularly the scale of development, highways and transport, infrastructure, and heritage and archaeology.

Highways & Traffic Concerns

Highways and transport are a significant part of the Town Council's concerns.

Great Dunmow has **no railway station**, and the report notes that many journeys from the development are likely to continue to rely on private vehicles. The development would remain heavily dependent upon existing routes including **The Broadway, Church End and St Edmunds Lane**, without a substantial new highway connection.

The report also raises concerns that:

- significant junction and highway modelling was still outstanding;
- the transport strategy assumes approximately a **10% reduction in car trips**, but the report says there was no sensitivity testing showing what happens if that reduction is not achieved; and
- elements of the proposed bus services and mobility hub remained uncertain or subject to future arrangements.

The consultant concluded that it would be premature to reach a conclusion on the transport impacts until the outstanding Transport Assessment Addendum and associated modelling had been submitted and considered.

Schools, Healthcare & Infrastructure

The Town Council welcomes the principle of providing infrastructure alongside new housing. However, concerns have been raised about whether the infrastructure originally planned for approximately 715 homes is sufficient for up to 850.

Early Years

The applicant's own assessment calculates that the development could generate demand for **102 early-years places**.

The dedicated Early Years Centre proposed provides **56 places**, potentially leaving **46 additional places** to be accommodated elsewhere. The report states that additional provision within the primary school has been suggested but had not been quantified.

Healthcare

The development includes provision for a **1,400m² healthcare facility**.

However, the report distinguishes between providing enough floorspace and demonstrating that healthcare services will actually be delivered and staffed. It notes existing pressure on local GP provision and calls for greater certainty over the delivery, occupation and operation of the proposed facility.

Heritage & Archaeology Concerns

The site is close to important historic assets, including the Grade I listed Parish Church of St Mary the Virgin, Conservation Areas and listed historic farmsteads.

The independent report raises concerns about the effect that development at the proposed scale could have upon their historic settings.

Importantly, the report says the applicant's heritage assessment considers the effects of **850 homes**, but does not provide a comparative assessment showing how those effects differ from development closer to the **715 homes identified in the Local Plan**.

There are also archaeological concerns. Potential prehistoric and Romano-British features have been identified, but intrusive archaeological trial trenching had not taken place before the application was submitted.

Have Your Say on the Application

Residents can still make their own views known.

Great Dunmow Town Council's objection is **not a substitute for individual representations from residents.**

Uttlesford District Council is the Local Planning Authority and will make the final decision.

When commenting, residents should explain **their own views** and concentrate on material planning considerations relevant to the application.

Planning Application: UTT/26/1635/OP
Land North and South of The Broadway, Great Dunmow

COMMENT ON THE PLANNING APPLICATION

- **Who Can I Contact?** If you would like to raise concerns or questions about the application, you can contact your elected representatives or the planning officers dealing with the application.
- Your uploaded contacts sheet identifies the relevant **Great Dunmow North and South District Councillors**, temporary contacts covering the County Councillor's responsibilities, the UDC case officer and senior planning officers.

Consultation Deadlines – When Do I Need to Respond?

If you want to comment on this application, we strongly encourage you to do so as soon as possible.

UDC's planning information currently shows two dates:

12 August 2026 – Latest Consultation Expiry Date

This is the deadline the Town Council has worked to for its statutory consultation response.

24 August 2026 – Neighbour Consultation Expiry Date

This relates to the neighbour notification process.

Residents: don't wait

If you wish to make a representation and **did not receive a neighbour consultation letter**, we recommend submitting your comments **by 12 August 2026.**

Comments may still be accepted by UDC after the published consultation period, but residents should **not rely on a late representation being considered.**

SUBMIT YOUR COMMENTS TO UDC NOW

Useful Contacts

Who are my district councillors at Uttlesford and how can I contact them to represent me with regard to a planning application?

Great Dunmow North Ward has two district councillors:

- Cllr Will Church (recently elected) – cllrchurch@uttlesford.gov.uk
- Cllr John Davey – cllrdavey@uttlesford.gov.uk

Great Dunmow South Ward and Barnston have three district councillors:

- Cllr Thomas Loveday – cllrloveday@uttlesford.gov.uk
- Cllr Chris Martin – cllrmartin@uttlesford.gov.uk
- Cllr Brian Regan – cllrregan@uttlesford.gov.uk

Who is my Essex County Councillor and how can I contact them?

Cllr Kevin Mordrick is Great Dunmow Division's County Councillor. He has recently stepped away from his duties due to family illness, and in his absence has advised that the following County Councillors shall be taking on his responsibilities for the time being:

- Cllr Geoff Bagnall – cllr.geoff.bagnall@essex.gov.uk
- Cllr Bo Davis – cllr.bo.davis@essex.gov.uk

Who is the case officer handling this application UTT/26/1635/OP and how can I contact them?

Uttlesford District Council's website states that the Case Officer is Rachel Beale:

rbeale@uttlesford.gov.uk

Are there any other useful contacts in the Planning Department and how do I contact them?

Uttlesford's Strategic Director of Planning is Dean Hermitage – dhermitage@uttlesford.gov.uk

Uttlesford's Head of Development Management and Enforcement is Nigel Brown – nbrown@uttlesford.gov.uk



Objection to Outline Planning Application UTT/26/I635/OP

Land North and South of The Broadway, Great Dunmow



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1.0 Introduction

- 1.1 [REDACTED] have been instructed on behalf of the Town Council to object to the outline application cited below.

Outline application for up to 850 residential dwellings, land for a 2FE primary school, a mixed-use local centre, sports pitches, public open space, structural planting, landscaping, sustainable drainage and vehicular access (all matters reserved except access) – Reference UTT/26/1635/OP.

- 1.2 This representation focuses on four related matters:

1. The principle of the proposal as it relates to the housing quantum allocated in the adopted Development Plan, and the limits of the Tilted Balance;
2. Procedural evaluation gaps and severe, unmitigated heritage impacts driven directly by the excessive housing quantum;
3. Insufficient infrastructure provision to meet the additional demands arising from the increased development capacity; and
4. Significant methodological flaws, modelling assumptions, inconsistencies and Insufficient transport mitigation to address identified highway constraints.

2.0 The Principle of the Proposal as it Relates to the Quantum Allocated in the Adopted Development Plan

- 2.1 The application site forms part of the Great Dunmow strategic allocation. Core Policy 10 of the Uttlesford Local Plan 2021–2041 ("the ULP"), adopted on 25 March 2026, allocates land northeast of Great Dunmow for 715 dwellings, supported by a Site Development Template ("SDT") at Appendix 3 to the ULP which sets out the site's infrastructure requirements and an illustrative masterplan.
- 2.2 The proposal, however, seeks outline permission for "up to 850 residential dwellings"; an increase of some 135 units, or c.19%, above the target set in Core Policy 10. We do not consider this to be a minor or immaterial variation from the allocation. Consequently, it represents a fundamental change to the scale of development which the site was found, through independent examination of the ULP, to be suitable to accommodate.
- 2.3 The applicant's own Planning Statement acknowledges this directly, stating that "the number of homes proposed goes above that specified within the allocation policy" but that "715 dwellings is not a maximum figure" (paragraph 7.6.2). The applicant's case for the additional 135 dwellings therefore does not rest on accordance with the development plan, but on other material considerations, principally national policy statements on housing delivery, the Council's housing land supply position, and the forecast economic benefits of national housebuilding targets.
- 2.4 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires applications to be determined in accordance with the development plan unless material considerations indicate otherwise, and paragraph 11(c) of the National Planning Policy Framework (NPPF) applies a presumption in favour of proposals that accord with an up-to-date development plan. As this proposal does not, on its own terms, accord with the housing quantum identified in Core Policy 10, the paragraph 11(c) presumption is not engaged in the way the Planning Statement implies. The proposal therefore falls to be assessed against the development plan, with any conflict with Core Policy 10 carrying appropriate weight in the planning balance, and permission should only be granted where material considerations indicate a decision otherwise than in accordance with the development plan.
- 2.5 The 715-dwelling figure for the site reflects the development quantum which informed the preparation, assessment and examination of the ULP, including the associated infrastructure, environmental and design requirements contained within the Site Development Template. Whilst it is acknowledged that Core Policy 10 does not expressly identify 715 dwellings as an absolute maximum, an increase of approximately 19% is materially different from the quantum upon which the allocation was planned and examined.
- 2.6 Whatever view the Inspectors expressed during the examination sessions regarding alternative capacities (Issue 3, Report on the Examination of the Uttlesford Local Plan 2021–2041), the statutory development plan ultimately adopted identifies 715 dwellings for this allocation. The relevant question is therefore whether the applicant has demonstrated, through robust evidence, that increasing the development to 850 dwellings remains consistent with the infrastructure, environmental and spatial assumptions which underpin the allocation. As demonstrated in the sections below, there are substantive reasons to conclude that this has not been established.

2.7 The Tilted Balance and the Impending Five-Year Housing Land Supply (5YHLS) Position

- 2.7.1 Following the formal adoption of the ULP on 25 March 2026, the Council's housing land supply position must be considered in the context of a newly adopted development plan containing allocations intended to meet the district's identified housing requirements. Core Policy 2a also establishes a specific mechanism for responding to any continuing inability to demonstrate an appropriate five-year housing land supply following adoption. Accordingly, any current shortfall should be considered in its proper context and does not, of itself, provide justification for materially increasing the capacity of an individual strategic allocation

- without demonstrating that the infrastructure and environmental assumptions underpinning that allocation remain robust.
- 2.7.2 More importantly, established planning case law confirms that the engagement of the tilted balance does not require relevant development plan policies to be disregarded. In *Gladman Developments Ltd v Secretary of State for Housing, Communities and Local Government* [2021] EWCA Civ 104 (3 February 2021), the Court of Appeal confirmed that development plan policies may properly be taken into account within the paragraph 11(d)(ii) assessment, with the weight to be afforded to those policies remaining a matter of planning judgment. The Court also emphasised the continuing importance of the plan-led system and recognised that development contrary to the plan may, depending on the circumstances, undermine the credibility of that system and constitute a relevant adverse impact within the tilted balance.
- 2.7.3 A housing land supply shortfall is not, therefore, a licence to increase the capacity of an allocated site by 19% irrespective of the consequences. This is particularly important where the additional development gives rise to material impacts on the historic environment, infrastructure and the local highway network, as identified in the sections below.
- 2.7.4 Increasing the allocation by a further 135 dwellings would result in adverse impacts which, for the reasons set out below, are considered to significantly and demonstrably outweigh the benefits associated with the additional housing, thereby rebutting any paragraph 11(d)(ii) presumption. Furthermore, Core Policy 2a establishes an expressly adopted mechanism for responding to any continuing deficiency in the district's five-year housing land supply through the plan-making process. Whilst this does not prevent an application from proposing development above the identified allocation figure, it reinforces the need for any material increase in capacity to be supported by clear evidence demonstrating that the infrastructure, environmental and spatial assumptions underpinning the recently adopted allocation remain valid.

3.0 Procedural Evaluation Gaps and Severe, Unmitigated Heritage Impacts Driven Directly by The Excessive Housing Quantum

- 3.1 The insistence on forcing 850 dwellings onto a site allocated for 715 is the direct driver of acute, unmitigated environmental harm. Beyond the overarching conflict with the housing quantum identified in Section 1, the evidence submitted within Environmental Statement (ES) Chapter 7 (Cultural Heritage) and its supporting standalone Heritage Impact Assessment (HIA) contains severe procedural gaps and unsubstantiated conclusions that fail to satisfy paragraph 203 of the NPPF and Core Policy 64 of the adopted ULP.

3.2 The Pre-Determination Evaluation Gap (Failure to Conduct Trial Trenching)

- 3.2.1 The applicant's archaeological baseline within ES Chapter 7 relies entirely on non-intrusive geophysical survey data and historical map regression. The ES Chapter explicitly identifies high-probability archaeological features, including a notable 13m penannular anomaly (indicative of a prehistoric roundhouse or funerary monument) and multiple rectilinear anomalies suggesting prehistoric or Romano-British enclosures. The assessment consequently rates the archaeological potential of the site as "moderate" (paragraphs 7.20 – 7.26).
- 3.2.2 Despite identifying these definitive, non-designated heritage assets of archaeological interest on-site, the applicant seeks within the ES text to defer all intrusive evaluation (i.e., trial trenching) to a post-determination planning condition. This is a severe procedural flaw. Under paragraph 203 of the NPPF, where a site includes or has the potential to include heritage assets with archaeological interest, local planning authorities must require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation. A geophysical survey cannot ascertain the depth, preservation, or exact date of a 13-metre roundhouse anomaly.
- 3.2.3 Deferring physical evaluation until after outline consent is granted deprives the Council of its statutory ability to understand the significance of the asset pre-determination. Because the applicant has inflated the scheme to 850 units, the masterplan is packed to its physical limits; if significant, non-preservable remains are discovered during post-consent trenching, the entire layout would be rendered unviable, invalidating the outline access boundaries currently sought for approval.
- 3.2.4 This deferral directly violates the Council's own statutory evidence base. The Heritage Assessment on the Regulation 19 Local Plan Allocations, prepared by Oxford Archaeology for Uttlesford District Council, explicitly addresses this strategic allocation. Within Section 6.1 (Archaeological Evaluation/Mitigation), the report mandates that archaeological field evaluation must be required to investigate the presence/absence and significance of remains, and that this information would be used to design a mitigation strategy intended to reduce or offset the archaeological impacts.
- 3.2.5 Furthermore, Section 6.2 (Impacts and Possible Mitigation) states that the results of this field evaluation should be used to inform a suitable archaeological mitigation strategy and should also be used to guide the design of any development proposals. By pushing to delay this work until after outline permission is granted, the applicant is attempting to bypass the explicit instructions of the Oxford Archaeology assessment, which requires physical testing to dictate the site layout, rather than vice versa.
- 3.2.6 The June 2026 HIA does not resolve this evidential deficiency. Rather, it confirms that the likelihood of prehistoric to Romano-British activity is moderate and that some potential archaeological remains would be permanently removed by the development, resulting in a direct, permanent and adverse impact of Medium Magnitude. Nevertheless, the HIA proposes that a staged programme of archaeological investigation be secured by condition. This approach leaves the nature, extent and significance of the archaeological resource unresolved at the point at which outline permission is sought. Of particular concern, the

HIA has therefore assessed the acceptability of the proposed development parameters before the intrusive investigation necessary to establish whether those parameters are compatible with preservation or appropriate mitigation of the archaeological resource has taken place.

3.3 Unjustified Suppression of Heritage Harm via Custom Methodology

- 3.3.1 To fit the additional 135 units within the site boundaries, development has been pushed aggressively against the margins of sensitive historic assets, resulting in a severe escalation of setting harm. The ES frequently misapplies "professional judgement" to artificially downgrade these identified impacts, creating an internal contradiction with their own assessment framework.
- 3.3.2 For instance, the assessment admits that the 850-unit build-out will exert a "medium impact" on the Grade II listed farmhouse at Crouches due to the permanent loss and development of its historically associated agricultural land. According to the applicant's own 'Degree of Effect Matrix' (reproduced in ES Figure 7.3), a 'Medium' impact on a 'Medium' sensitivity receptor yields a "Moderate Adverse Effect".
- 3.3.3 Crucially, ES Figure 7.3 explicitly states that if the degree of effect is moderate or above, then the effect is considered to be significant. Yet, via a customised qualification in the text, the applicant applies an arbitrary, bespoke "in-house methodology" to declare this moderate harm as "not significant" in EIA terms. This methodological manipulation is used to downplay what is undeniably "less than substantial harm" under paragraph 208 of the NPPF. The complete encirclement of Crouches and Marks Farms by a high-density, 850-unit urban expansion fundamentally severs their remaining functional and visual relationship with their historic agricultural hinterlands. This harm is a direct product of the over-inflated housing quantum and cannot be dismissed through standard professional hedging.
- 3.3.4 The HIA also identifies a Moderate Adverse, direct and long-term effect upon Grade II listed Crouches, arising from a Medium Magnitude of Change to its setting. It expressly acknowledges the introduction of new dwellings into views, co-visibility with development and the change in character of historically associated agricultural land. Notwithstanding that assessment, the HIA concludes that the effect is not significant "on the basis of professional judgement". The Council should therefore require a clear explanation of how that professional judgement has been applied and how a Moderate Adverse long-term effect has been reconciled with the conclusion that no significant effect arises.

3.4 Failure to Appraise the Regional Rarity of Non-Designated Agricultural Assets

- 3.4.1 The applicant summarily dismisses the identified areas of ploughed-down ridge and furrow earthworks and former field boundaries, claiming they are typically of insufficient archaeological or historical interest to be considered even as non-designated heritage assets. Whilst this ubiquity argument may hold true in the extensive open-field landscapes of the Midlands, it is historically and archaeologically incorrect in an Essex context. Due to early enclosure and intensive post-medieval arable farming, surviving remnants of medieval ridge and furrow systems are exceptionally rare within the county and Uttlesford District specifically. By evaluating these features through a generic national framework rather than a localised regional context, the applicant has failed to properly calibrate the asset's significance, in direct breach of Core Policy 65.

3.5 Irremediable Conflict with the Setting of the Grade I Listed Parish Church

- 3.5.1 Crucially, this concern is reinforced by the applicant's own account of pre-application engagement. The Planning Statement records that Historic England, a statutory heritage consultee, expressed a concern over the quantum of development in the northern parcel and recommended that development be relocated to the southern parcel (paragraph 5.3.2 of the ES). A statutory heritage body has already raised concern about quantum, on a site with the heritage sensitivities identified above, indicates that the uplift from 715 to 850

dwelling goes beyond a neutral, immaterial adjustment and has a real, demonstrable potential to increase harm to the heritage assets whose settings the adopted 715-dwelling quantum was itself calibrated to protect.

- 3.5.2 The high-density layout required to achieve 850 units introduces acute setting harm to the Grade I listed Parish Church of St Mary the Virgin, an asset of the highest national importance. The ES text acknowledges that the application site forms part of the immediate backdrop in key landscape views looking east toward the church from established public footpaths to the west. The applicant attempts to mitigate this by providing an internal "heritage view corridor" looking out from the development toward the church.
- 3.5.3 This completely misinterprets the concept of landscape setting protection. The critical visual relationship is the historic, rural approach to Church End from the west, where the church tower is appreciated against an open, rising agricultural valley backdrop.
- 3.5.4 The HIA's own assessment confirms the sensitivity of precisely the landscape relationship that would be altered by the development. It identifies the open land surrounding the Grade I listed Church of St Mary the Virgin as contributing to its significance by providing a green setting in which its tower has historically been appreciated as a landmark. It further identifies co-visibility between the application site and the Church from the public footpath to the west and acknowledges that this footpath passes through important open space within the Great Dunmow Conservation Area which facilitates views towards the Church.
- 3.5.5 Replacing this rural skyline with the high-density roofs, domestic clutter, and street lighting of an 850-dwelling estate fundamentally degrades the landmark scale of the church. This directly contradicts the Uttlesford District Council Great Dunmow Conservation Area Appraisal (2007), which explicitly mandates that "any detracting proposals [to views of the church tower] will be refused" (paragraph 1.159).

3.6 Reliance of Embedded Mitigation at Outline Stage

- 3.6.1 The Heritage Impact Assessment acknowledges that the proposed development would alter the wider agricultural surroundings of the Great Dunmow Conservation Area and identifies a Slight to Moderate Adverse, direct and long-term effect. In reaching its conclusion that this effect would not be significant, the HIA relies heavily upon embedded design mitigation, including the proposed heritage view corridor, riverside park and green corridor, tree-lined streets, the positioning of the school and the retention of open land within important views.
- 3.6.2 Similar reliance on embedded mitigation occurs throughout the assessment of individual listed buildings. For example, development setbacks, open space and planting are relied upon to maintain separation and a green outlook around Marks Cottage, while setbacks and planting are similarly relied upon to mitigate the change from agricultural to residential character within the setting of Diamond Cottage.
- 3.6.3 This reliance on design mitigation is particularly important given the outline nature of the application. Where conclusions of acceptable heritage impact depend upon the precise extent and location of open space, development setbacks, planting, building disposition and the preservation of particular views, the Council must be satisfied that these measures are secured with sufficient certainty through the approved parameter plans and any necessary conditions. If these measures remain illustrative or capable of material alteration at reserved matters stage, there is insufficient certainty that the mitigation relied upon by the HIA will actually be delivered in the form necessary to achieve its stated heritage conclusions.
- 3.6.4 Accordingly, the conclusion that no significant heritage effects would arise should only be afforded weight where the spatial and design measures upon which that conclusion depends are demonstrably secured as part of the permission.

3.7 Failure to Assess the Heritage Consequences of the Uplift from 715 to 850 Dwellings

- 3.7.1 A further significant deficiency is the absence of any clear assessment within the HIA of the heritage consequences specifically arising from the increase in development above the quantum identified in Core Policy 10. The HIA assesses the application proposal of up to 850 dwellings, but does not provide a comparative assessment demonstrating how the heritage effects of this quantum differ from those associated with the 715 dwellings identified through the recently adopted Local Plan allocation.
- 3.7.2 This omission is material because the HIA's own conclusions demonstrate that the ability to accommodate development without greater heritage harm is dependent upon retaining space around sensitive assets. Throughout the assessment, reliance is placed upon development setbacks, open space, landscaping, green corridors and the maintenance of separation and important views as measures to reduce harm. At the same time, the HIA acknowledges that the 850-dwelling proposal would result in permanent adverse changes to the historic environment, including a Moderate Adverse, direct and long-term effect upon Grade II listed Crouches arising from changes to its setting. It also identifies a Slight to Moderate Adverse, direct and long-term effect upon the Great Dunmow Conservation Area.
- 3.7.3 The HIA therefore establishes that adverse heritage effects will occur, but does not demonstrate whether the additional 135 dwellings have increased those effects, required development to extend further into sensitive areas, reduced the extent of buffers or open space, or otherwise compromised the effectiveness of the mitigation upon which the assessment relies. Nor does it demonstrate whether a development closer to the 715-dwelling allocation could avoid or materially reduce some of the identified harm.
- 3.7.4 This is particularly relevant where the applicant seeks to justify a development approximately 19% greater than the housing quantum identified in Core Policy 10. It should not simply be assumed that the heritage effects identified by the HIA are an inevitable consequence of developing the allocated site. In the absence of a comparative assessment, the applicant has not demonstrated that those effects are unavoidable at the allocated quantum, rather than being caused or materially exacerbated by the additional development now proposed.
- 3.7.5 Accordingly, the HIA does not provide a sufficient evidential basis to conclude that the proposed uplift from 715 to 850 dwellings represents an appropriate response to the site's identified heritage constraints. Where a materially greater quantum is proposed, and adverse heritage effects are already acknowledged, the applicant should demonstrate that the additional development can be accommodated without avoidable additional harm and that reasonable alternatives capable of reducing that harm have been properly considered.

3.8 Summary

- 3.8.1 In summary, the heritage evidence submitted by the applicant fails to provide the rigorous, objective assessment required by planning law. By artificially compressing significance thresholds via custom "in-house" methodologies and deferring essential field investigations, the applicant has sought to mask the true environmental cost of their 19% capacity over-allocation.
- 3.8.2 The resulting less than substantial harm to the Grade I Listed Parish Church, the Great Dunmow and Church End Conservation Areas, and the Grade II listed farmsteads at Crouches and Marks Farms is not outweighed by public benefits, because housing delivery targets for this site have already been balanced and optimised at the 715-unit figure in Core Policy 10. The proposal therefore stands in direct and irreconcilable conflict with Core Policies 64, 65, and 67 of the adopted Uttlesford Local Plan, Section 16 of the NPPF, and the statutory duties set out under Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

4.0 Insufficient Infrastructure Provision to Meet the Additional Demands Arising from the Increased Development Capacity

- 4.1 Core Policy 10 establishes a number of specific infrastructure requirements for the allocated site, including a new healthcare facility of approximately 1,400 sq.m NIA, a new 56-place Early Years Centre and a local centre within the northern part of the site, north-west of The Broadway, with access from the proposed bus loop and strong connections to walking, cycling and public transport routes.
- 4.2 It is acknowledged that the application makes provision for these facilities. However, these infrastructure requirements were established in the context of a materially smaller development of approximately 715 dwellings, whereas the current application seeks permission for up to 850 dwellings. This represents an increase of 135 dwellings, or approximately 19%. It is therefore necessary to consider whether simply replicating the infrastructure requirements identified by Core Policy 10 is sufficient to meet the additional demand arising from the increased development capacity.
- 4.3 This issue is particularly apparent when considering the applicant's own evidence within the Environmental Statement Chapter 6: Community, Social and Economic Effects (June 2026) and the Socio-economic Benefits Statement (June 2026).

4.4 Early Years Provision

- 4.4.1 The applicant's own assessment provides clear evidence that the 56-place Early Years Centre identified through Core Policy 10 is not, in itself, sufficient to meet the demand generated by 850 dwellings.
- 4.4.2 The ES Chapter 6: Community, Social and Economic Effects (June 2026) applies Essex County Council's current pupil yield factor of 0.12 early years places per dwelling and calculates that the proposed development would generate demand for 102 early years places. Notwithstanding this, the development continues to propose a 56-place Early Years Centre.
- 4.4.3 The same position is expressly confirmed within the Socio-economic Benefits Statement (June 2026), which states that 850 dwellings would generate demand for 102 early years places. There is therefore a potential shortfall of 46 places between the quantified demand generated by the development and the capacity of the dedicated Early Years Centre
- 4.4.4 The applicant seeks to address this shortfall through an assumption that additional early years provision may be incorporated within the proposed primary school. However, the Environmental Statement acknowledges that it is not presently possible to quantify this additional provision and merely concludes that it is "likely" to accommodate some or all of the remaining demand.
- 4.4.5 This uncertainty is repeated within the Socio-economic Benefits Statement (June 2026), which similarly states that the primary school is "likely" to have some early years provision but expressly acknowledges that "it is not possible to quantify this at this stage". This is particularly important given the existing pressure on early years provision. The Socio-economic Benefits Statement identifies an early years vacancy rate of only 3.9% within Great Dunmow North, indicating relatively high existing demand for places.
- 4.4.6 Accordingly, the conclusion that sufficient early years capacity will be available appears dependent upon additional provision which has neither been quantified nor demonstrated. Given that the applicant has itself calculated a requirement for 102 places, further evidence should be provided to demonstrate precisely how and where the remaining 46-place requirement will be accommodated and how this additional provision will be secured.

4.5 Healthcare Provision

- 4.5.1 There are similar concerns regarding healthcare infrastructure, although these relate principally to the delivery and operation of the proposed facility rather than its theoretical floorspace capacity.
- 4.5.2 The ES Chapter 6: Community, Social and Economic Effects (June 2026) calculates a worst-case population increase of 2,142 people and identifies that this would generate demand for approximately 1.2 additional FTE GPs. The Socio-economic Benefits Statement (June 2026) similarly calculates that the development would generate demand for approximately 1.2 additional FTE GPs and 1.1 dentists.
- 4.5.3 The applicant concludes that the proposed 1,400 sq.m healthcare facility would be sufficient to accommodate this demand by applying the NHS London Healthy Urban Development Unit benchmark of approximately 165 sq.m per primary care provider. On this basis, the applicant considers that the facility could accommodate approximately six additional GPs and/or dentists.
- 4.5.4 Whilst this demonstrates theoretical floorspace capacity, the wider healthcare context identified by the applicant is important. The Socio-economic Benefits Statement (June 2026) records existing patient-to-GP ratios of 2,929 patients per FTE GP at Angel Lane Surgery, 1,833 at John Tasker House Surgery/The Felsted Surgery and 2,790 at Thaxted Surgery, compared with the HUDU benchmark of 1,800 patients per FTE GP.
- 4.5.5 More significantly, the same document expressly acknowledges that GP capacity within Uttlesford South is "significantly constrained and not able to meet the current population". It also confirms that planned improvements are not designed to accommodate additional growth and that existing GP practices within Great Dunmow are themselves constrained.
- 4.5.6 In this context, identifying sufficient floorspace to theoretically accommodate additional practitioners is not necessarily the same as demonstrating that sufficient healthcare services will actually be delivered. Greater certainty should therefore be provided regarding the delivery, occupation and operation of the healthcare facility, including evidence of engagement with the relevant NHS body and confirmation that appropriate staffing and services can be secured to meet the additional demand generated by 850 dwellings.
- 4.5.7 This is particularly relevant because the Socio-economic Benefits Statement (June 2026) itself states that the exact uses within the local centre have not yet been confirmed. For assessment purposes it has simply been "assumed" that these could include the 56-place Early Years Centre and 1,400 sq.m healthcare facility.

4.6 Overall Infrastructure Capacity

- 4.6.1 The issue is therefore not simply whether the infrastructure quantities specified within Core Policy 10 have been reproduced within the application. The question is whether those facilities remain sufficient and will actually be delivered at an appropriate scale to serve a development which has increased from approximately 715 to 850 dwellings.
- 4.6.2 Indeed, Core Policy 5 is identified within both the ES Chapter 6: Community, Social and Economic Effects (June 2026) and Socio-economic Benefits Statement (June 2026) as requiring development to provide the necessary on-site and, where appropriate, off-site infrastructure requirements arising from the proposal.
- 4.6.3 The applicant's own assessments demonstrate that the increased development capacity creates additional infrastructure demands. Most notably, the identified requirement for 102 early years places materially exceeds the 56 places expressly proposed, with the remaining requirement dependent upon presently unquantified provision. Existing healthcare provision is also acknowledged to be significantly constrained and unable to meet the existing population, while the proposed development would generate further demand.

4.7 Summary

- 4.7.1 The proposals are therefore considered to conflict with Core Policy 5, which requires all development to provide the necessary on-site and, where appropriate, off-site infrastructure requirements arising from the proposal.
- 4.7.2 Accordingly, further evidence is required to demonstrate that the social and community infrastructure package has been appropriately recalibrated to reflect the increase to 850 dwellings. In particular, the application should demonstrate how the identified early years shortfall will be accommodated and secured and provide greater certainty regarding the delivery and operation of the healthcare facility. Without this information, it has not been sufficiently demonstrated that the infrastructure package originally identified for the allocated site remains capable of satisfactorily accommodating the additional demands generated by the increased development capacity.

5.0 Significant methodological flaws, modelling assumptions, inconsistencies and Insufficient transport mitigation to address identified highway constraints

- 5.1 Overall, it is considered that the transport strategy is insufficient to demonstrate that a development of this scale can be satisfactorily accommodated by the existing highway network. This is particularly concerning given that the proposal seeks approximately 850 dwellings, significantly exceeding the policy allocation of 715 dwellings.
- 5.2 The transport case therefore relies heavily upon sustainable travel measures and assumptions regarding future travel patterns rather than providing substantial additional highway capacity.
- 5.3 There are five principal concerns with the transport evidence submitted:
 - 1. An overreliance on achieving significant changes in travel behaviour and reductions in private car use through a modal shift.
 - 2. A number of assumptions within the transport assessment remain uncertain or speculative, including future public transport use, trip internalisation and the effectiveness of sustainable transport measures.
 - 3. Insufficient information has been provided at this stage to allow the full transport and highway impacts of approximately 850 dwellings to be definitively assessed.
 - 4. Other concerns.
 - 5. Consultee comments.
- 5.4 These matters are considered in further detail below.

5.5 Modal Shift

- 5.5.1 A fundamental concern with the transport strategy is that it places significant reliance upon reducing the need to travel and achieving a substantial change in the travel behaviour of future residents. This approach is questionable given the scale of the development and the characteristics of Great Dunmow.
- 5.5.2 The strategy seeks to reduce private car use by encouraging residents to walk, cycle, use buses, utilise shared mobility and access facilities within the development itself. Whilst these objectives are supported in principle and align with national planning policy, the range of services and facilities proposed within the development is limited. Residents will inevitably need to travel outside of the development for employment, shopping, leisure, education and other day to day purposes.
- 5.5.3 This is particularly important in the context of Great Dunmow. The town has no railway station and provides more limited employment, retail and leisure opportunities than larger surrounding settlements. Many journeys will therefore continue to be made to destinations such as Stansted Airport, Bishop's Stortford, Chelmsford and Cambridge, as well as nearby

railway stations. For many of these journeys, the private car is likely to remain the most practical means of transport.

- 5.5.4 Despite this, the development has very limited vehicular connectivity. The Broadway, itself a B road, would provide the principal vehicular route serving the development and connecting it with Great Dunmow and the wider highway network. Alternative connections are limited, with Bigods Lane being a narrow road and St Edmunds Lane providing another constrained route towards the strategic highway network. There is no substantial new highway connection proposed to accommodate the scale of growth.
- 5.5.5 Whilst changes are proposed to The Broadway to divert traffic into the site and facilitate bus movements, there are no substantive improvements proposed to Bigods Lane. Traffic seeking to access the strategic highway network would therefore be heavily directed towards Church End and St Edmunds Lane. As a result, these existing routes are likely to accommodate a significant proportion of journeys to the A120 and onwards to the surrounding settlements and employment destinations upon which future residents will inevitably rely.
- 5.5.6 This is particularly concerning in relation to access to the A120. Given the absence of a railway station, the A120 is an essential strategic connection for journeys towards surrounding towns, employment areas and the wider transport network. However, the proposals do not provide a significant new connection between the development and the A120 nor significant improvements to existing roads to facilitate a suitable access. The development would instead remain predominantly dependent upon The Broadway and the existing highway network.
- 5.5.7 The applicant proposes a range of measures including new access junctions onto The Broadway, off site highway works, pedestrian and cycle improvements, bus contributions, improved connectivity through Church End, potential 20mph measures and mobility hub infrastructure. These measures may encourage more sustainable travel but they do not fundamentally increase the capacity or connectivity of the highway network serving the development. There are also strong doubts over the deliverability and effectiveness of some of these measures explained in the sections below.
- 5.5.8 The Broadway would remain broadly the same road, particularly in terms of its connectivity into Great Dunmow and no new principal highway route is proposed despite the introduction of approximately 850 dwellings.
- 5.5.9 The transport strategy therefore appears to seek to manage the highway consequences of the development primarily by reducing the number of vehicles entering the network rather than providing highway infrastructure proportionate to the scale of development proposed.
- 5.5.10 There is consequently a significant risk associated with the applicant's approach. If the anticipated modal shift towards walking, cycling, buses and shared mobility does not occur to the extent predicted, the development could generate substantially greater levels of private vehicle traffic than anticipated. That additional traffic would then be concentrated onto a limited number of existing routes, principally The Broadway, Church End and St Edmunds Lane.
- 5.5.11 Paragraph 6.9 of the Transport Statement (TS) suggests that the development will increase opportunities for sustainable travel. However, aside from facilities delivered within the site itself, the location and distance of existing facilities within Great Dunmow will remain unchanged. Distance and the quality and perceived safety of the complete route are key factors influencing whether residents choose to walk or cycle rather than drive. Improvements within the development alone will therefore not necessarily result in the significant increase in walking and cycling assumed, particularly where existing routes through Great Dunmow remain unchanged.

- 5.5.12 For a development of approximately 850 dwellings, it is considered inappropriate for the acceptability of the transport impacts to depend so heavily upon assumptions regarding future travel behaviour without demonstrating that the highway network itself has sufficient capacity and connectivity to accommodate a realistic level of private vehicle use.
- 5.5.13 Saffron Walden
- 5.5.14 The reliance upon the Saffron Walden Clean Air Project provides limited justification for the modal shift anticipated at the proposed development. The circumstances are materially different.
- 5.5.15 The Saffron Walden project is an established and coordinated town wide initiative, comprising 35 e-bikes across 11 locations, longer term bike loans, school programmes, community initiatives, an e-cargo bike and a car club. Importantly, the e-bike network also provides a connection to Audley End railway station.
- 5.5.16 In contrast, these facilities do not currently exist in Great Dunmow. The Transport Assessment itself acknowledges that the cycle hire scheme is not available in Great Dunmow and merely suggests that, should the scheme expand in the future, the proposed mobility hub could accommodate e-bikes. There is therefore no certainty that an equivalent scheme will actually be delivered.
- 5.5.17 There is also a fundamental difference in rail accessibility. The Saffron Walden scheme provides an e-bike connection to Audley End railway station, whereas Great Dunmow has no railway station and the applicant acknowledges that the nearest stations are not within reasonable walking or cycling distance.
- 5.5.18 Most importantly, Paragraph 6.35 of the TS confirms that the Saffron Walden project did not directly measure changes in overall travel mode share. It therefore cannot demonstrate the level of reduction in private car use actually achieved.
- 5.5.19 The Saffron Walden example may demonstrate that sustainable travel initiatives can attract participation, but it does not provide evidence that similar measures will be delivered in Great Dunmow or that they would achieve the substantial modal shift relied upon to support a development of approximately 850 dwellings.

5.6 Uncertainty

- 5.7 A further concern is the level of uncertainty surrounding a number of the measures which underpin the Transport Assessment and Environmental Statement (ES). As established above, the acceptability of the development relies heavily upon achieving a significant reduction in private car use. It is therefore important that the measures intended to achieve this modal shift are deliverable and sufficiently certain.
- 5.8 However, a number of key elements remain subject to future approval, consultation or feasibility assessments. This includes the proposed speed reductions and improvements along Church End, the future bus strategy and elements of the proposed mobility hub.
- Church End / The Broadway and Proposed Speed Reductions
- 5.9 Church End and The Broadway is identified as an important active travel connection between the development and Great Dunmow. A key component of the proposed improvements is the reduction in vehicle speeds to improve the environment for pedestrians and cyclists.
- 5.10 The technical drawings propose reducing the existing 60mph speed limit to 30mph to the east of the site frontage, with a further reduction to 20mph through the realigned section of Church End within the development.
- 5.11 The ATC results at Table 3.3 record existing 85th percentile speeds of 40.2mph northbound and 38.7mph southbound at the western end of the road, increasing to 51.3mph northbound and 48.9mph southbound at the eastern end.

- 5.12 This represents a significant reduction in vehicle speeds and is particularly notable given the relatively low existing traffic flows on The Broadway identified at paragraph 10.44 of the Environmental Statement. The introduction of approximately 850 dwellings will substantially increase the use and function of this route, creating uncertainty as to whether the proposed speed reductions are realistic and achievable alongside the significant increase in traffic that The Broadway will be required to accommodate.
- 5.13 Importantly, the proposed 20mph speed limit is expressly subject to a Traffic Regulation Order. There is therefore presently no certainty that this speed reduction will be approved or implemented.
- 5.14 Given the importance attributed to Church End as a pedestrian and cycle connection, this creates a clear uncertainty within the transport strategy. If the Traffic Regulation Order is not approved, it is unclear what alternative measures would be implemented to provide the pedestrian and cycling environment upon which the sustainable transport strategy relies.
- 5.15 There is also presently insufficient information regarding the highway safety implications of the proposed arrangements. The Transport Assessment confirms that a Stage I Road Safety Audit (RSA) is being undertaken to assess the proposed access arrangements and highway scheme throughout Church End and that the Audit and Designer's Response will be submitted separately.
- 5.16 Accordingly, these important permissions do not appear to form part of the current Transport Assessment. Until this information is available, there remains significant uncertainty as to whether the proposed arrangements are acceptable from a highway safety perspective or whether further amendments will be required. A proposal of this scale should have an RSA agreed with indicative designs.

Public Transport Strategy

- 5.17 Similar uncertainty applies to the public transport strategy.
- 5.18 The Transport Assessment places considerable emphasis upon improved public transport as a means of reducing private car use. However, relatively few firm commitments regarding the actual bus service available to future residents are provided at this stage.
- 5.19 The assessment instead refers to ongoing discussions with Essex County Council, future financial contributions and flexibility in bus routing. Indeed, the Transport Assessment acknowledges that: "As the exact route of the bus service is still being consulted on with ECC, it has not been possible to quantify the improvement this would lead to."
- 5.20 Paragraph 10.75 of the ES specifically identifies the 324 service as a "potential feasible route" which could be diverted through the development and states that its frequency would be increased through financial contributions. However, it is unclear whether the existing bus operator has agreed to this diversion, what the proposed increase in frequency would actually be, the level and duration of financial support or whether the enhanced service would remain commercially viable once developer funding ceases.
- 5.21 These are important uncertainties given that paragraph 10.75 itself acknowledges that the existing 324 service is limited to only a few journeys per day. A significant improvement would therefore be necessary for this service to provide a realistic alternative to private car travel.
- 5.22 There is consequently no certainty regarding the precise routing, frequency, timetable or longer-term operation of the improved bus service. The assessment demonstrates the potential for an improved service rather than establishing what service future residents will actually receive. It is therefore premature to conclude that the proposed bus improvements would result in a beneficial effect when their delivery and long-term operation have not yet been confirmed.

- 5.23 This is particularly important given the absence of a railway station in Great Dunmow and the proposed increase from 715 to 850 dwellings. If the anticipated bus improvements are not delivered or sustained, the alternatives available for journeys outside Great Dunmow become considerably more limited and reliance upon private vehicles is likely to be greater than assumed.
- 5.24 Without confirmation that an enhanced service is viable and can be sustained in the longer term, it is premature to conclude that the proposal would result in a beneficial effect or rely upon it to support the anticipated modal shift.

Mobility Hub

- 5.25 Further uncertainty arises from the proposed mobility hub, which is presented as an important component of the sustainable transport strategy.
- 5.26 Potential facilities include shared bicycles, e-bikes, cargo bikes, a car club, EV charging, bus interchange facilities, taxis and cycle repair facilities. However, a number of these measures appear to remain aspirational rather than committed elements of the development.
- 5.27 For example, the Transport Assessment states that car clubs are "being explored", with discussions ongoing with providers and that a car club scheme will be incorporated "if feasible". This does not provide certainty that a car club will actually be delivered.
- 5.28 More generally, terminology such as "could include", "potential", "being explored" and "if feasible" demonstrates that elements of the mobility hub remain subject to further consideration.
- 5.29 There is nothing inherently unreasonable about retaining flexibility at outline stage. However, this becomes problematic where these measures form part of the justification for expecting future residents to make fewer journeys by private car.
- 5.30 The Transport Assessment cannot reasonably rely upon the benefits of sustainable transport measures to justify reduced private vehicle movements whilst simultaneously leaving the delivery of those measures uncertain.
- 5.31 Paragraph 10.74 of the ES states that the mobility hub is "envisaged" to include cycle parking, maintenance facilities and a bike hire scheme. This wording demonstrates that these measures remain aspirational rather than committed.
- 5.32 It is unclear whether any cycle hire providers have been consulted or whether such a scheme would be commercially viable in this location. If not, it should be established whether the applicant would fund its operation and for how long.
- 5.33 Accordingly, it appears premature to attribute a beneficial effect to facilities which have not yet been demonstrated to be deliverable. The description of a "mobility hub" should not itself be afforded significant weight unless the services proposed within it are secured and shown to be viable.

Trip Internalisation Assumptions

- 5.34 A further significant uncertainty relates to the assumed reduction in car trips generated by the development.
- 5.35 The Transport Assessment applies an approximate 10% reduction in car trips, 5% increase in bus trips and 3% increase in cycling, entering the surrounding highway network. However, it is unclear how these figures have been calculated or what evidence demonstrates that a reduction of this scale will realistically be achieved.
- 5.36 These reductions are significant and ambitious when applied across a development of approximately 850 dwellings and has a direct influence on the level of traffic subsequently assessed on the surrounding highway network.

5.37 Importantly, the junction capacity assessments are based upon these reduced traffic figures. There therefore appears to be no sensitivity testing to establish how the surrounding junctions would perform if the assumed reduction in car trips is not achieved.

5.38 Given the reliance of the wider transport strategy upon changing travel behaviour, the applicant should provide clear evidence to justify the assumed 10% reduction and test a reasonable scenario where this reduction is not achieved. Without this, there remains uncertainty as to whether the junction capacity assessments provide a robust representation of the likely highway impacts of the development.

Highway Boundary and Deliverability

5.39 Paragraph 3.42 relies upon the identified extent of the Essex County Council highway boundary when considering the delivery of the proposed highway improvements. However, it should be confirmed that the relevant highway records have been formally reviewed and that all proposed works can be accommodated within adopted highway land or land otherwise under the applicant's control.

5.40 This is particularly important where roadside ditches are present. The existence of a ditch can create uncertainty regarding the precise highway boundary and whether the land required for widening, footways, cycle infrastructure or other improvements is actually available for highway works. If any required land falls outside the adopted highway or the applicant's control, third party land may be required and the proposed improvements may not be deliverable as currently shown.

5.41 Given the importance of these works to the wider transport strategy, their deliverability should be established rather than assumed at this stage.

Existing Collision Record

5.42 Paragraph 3.44 of the Transport Statement identifies 11 recorded collisions over the five-year period, comprising one fatal, five serious and five slight collisions. Despite this, the Transport Assessment concludes that there are no pre-existing hazards which could be exacerbated by the development because the collisions do not demonstrate a clear pattern and are considered largely attributable to driver error.

5.43 This conclusion appears insufficiently justified. The absence of a common collision pattern does not itself demonstrate that the existing highway network presents no safety concerns, particularly where six of the 11 recorded incidents resulted in fatal or serious injury. Given the substantial increase in vehicle, pedestrian and cycle movements associated with approximately 850 dwellings, further justification should be provided before concluding that existing highway safety conditions would not be exacerbated by the development.

5.44 Insufficient Evidence

5.45 A significant concern is that the TA and ES submitted with the application is incomplete, with critical elements of the highway assessment deferred to a future Transport Assessment Addendum (TAA). Given that the application was submitted over a month ago and the TA prepared over two months ago, this information should have formed part of the original submission and should underpin the wider transport strategy.

5.46 The Transport Assessment confirms that discussions remain ongoing between the applicant, UDC and ECC regarding the methodology for the junction capacity assessments, including whether the Strategic Model developed for the Local Plan can be utilised. This indicates that even the methodology for assessing the highway impacts of the development had not been agreed at the time the Transport Assessment was submitted.

5.47 More significantly, the Transport Assessment expressly states that:

“the majority of capacity analysis will be contained within a Transport Assessment Addendum.”

- 5.48 It further confirms that full detailed junction modelling will be provided within the separate TAA. This is a substantial omission for an application proposing approximately 850 dwellings.
- 5.49 Paragraph 10.70 of the TS states that the St Edmunds Lane / The Broadway / Church End / Bigods Lane junction will be amended to increase capacity and improve safety for all users, particularly pedestrians. However, these claimed benefits have yet to be demonstrated through the detailed junction modelling. This is particularly important given that Paragraph 3.40 describes the junction as having a narrow, rural road layout. Without the outstanding capacity modelling and associated safety assessment, it is premature to conclude that the proposed alterations will provide sufficient capacity to accommodate the substantial increase in traffic generated by the development whilst also improving safety for pedestrians and other users.
- 5.49.1 Paragraph 7.15 and 7.16 of the TS also confirms that the wider study area for the highway capacity analysis will be detailed within the TAA and that the traffic distribution methodology will be applied to forecast traffic generation and presented through traffic flow diagrams within that document.
- 5.49.2 In addition, the ES is missing assessments regarding changes in traffic flows, driver delay, severance, pedestrian fear and pedestrian amenity. The ES similarly acknowledges that detailed post-construction traffic assessment was not available at the time of submission due to traffic surveys having been delayed by roadworks and that an updated assessment would follow. These are again fundamental assessments missing from the proposals.
- 5.49.3 Given the concerns identified above regarding the reliance upon The Broadway, Church End and St Edmunds Lane and the assumptions being made regarding reductions in private car travel. Without the detailed distribution and junction modelling, it is not presently possible to properly understand the consequences of those assumptions or determine the resulting impacts upon the surrounding highway network.
- 5.49.4 The application has therefore been submitted and consulted upon without a substantial part of the evidence necessary to assess its transport impacts. For a development of approximately 850 dwellings, this is not a minor technical matter which can reasonably be separated from the wider assessment. The missing information goes directly to the question of whether the surrounding highway network has sufficient capacity to accommodate the development.
- 5.49.5 It is therefore considered premature to reach any conclusion regarding the acceptability of the transport impacts until the Transport Assessment Addendum and associated modelling have been submitted and fully considered.
- 5.49.6 Furthermore, if the TAA is submitted following the expiry of the current public consultation period, members of the public and other interested parties should be provided with a further reasonable opportunity to review and comment upon that information. Given the significance of the missing modelling to the assessment of the development, it would be inappropriate for the application to be determined on the basis of substantial new transport evidence which has not been subject to proper public scrutiny.

5.50 Other Concerns

Pedestrian Infrastructure on Church End

- 5.50.1 Paragraph 10.43 of the ES acknowledges that Church End, a key connection between the development and Great Dunmow, currently has narrow footways on both sides of the road. This raises concerns as to whether the existing pedestrian infrastructure is suitable to accommodate the substantial increase in pedestrian movements associated with approximately 850 dwellings. Given the reliance placed upon walking as part of the modal shift strategy, the applicant should demonstrate that these constrained footways provide a safe and attractive route for the level of use anticipated.

Accessibility to the Flitch Way

- 5.50.2 Paragraph 10.46 of the ES places reliance upon the Flitch Way as an existing traffic free cycle route. However, the Flitch Way is located on the opposite side of Great Dunmow from the development and the existence of the route does not itself demonstrate that it will provide a convenient or attractive cycling option for future residents.
- 5.50.3 Residents must first travel through Great Dunmow to access the route and the quality and safety of these connecting routes is therefore critical. The assessment does not adequately demonstrate that there is a continuous, direct and attractive cycle connection between the development and the Flitch Way.
- 5.50.4 Furthermore, whilst the Flitch Way provides useful connections towards Takeley and Braintree, its usefulness for journeys further west is constrained by the A120 and M11 and it does not provide a continuous traffic free cycle route to Bishop's Stortford.
- 5.50.5 The description of the Flitch Way as a "very popular" leisure route should also be distinguished from its suitability for everyday transport. A popular recreational route does not necessarily provide a practical commuting or utility cycling connection for future residents.
- 5.50.6 Accordingly, limited weight should be placed upon the existence of the Flitch Way when assessing the sustainable accessibility of the development unless the applicant can demonstrate that residents will have a safe, convenient and continuous cycle connection to it and onwards to the destinations they need to reach.

Existing Bus Provision

- 5.50.7 Paragraph 10.48 of the ES places emphasis on the proximity of existing bus stops to the site. However, the presence of a bus stop within walking distance does not itself demonstrate that public transport provides a realistic alternative to private car travel. The frequency, operating hours and destinations served are equally important.
- 5.50.8 Whilst a number of services operate through Great Dunmow, the existing provision does not provide a consistently high frequency service across all routes. For example, the 322 and 324 are relatively limited services, whilst the more useful 323 service towards Bishop's Stortford operates broadly every 30 or 90 minutes during parts of the daytime, with services becoming more limited outside these periods. Other routes provide connections towards destinations including Braintree and Stansted Airport but again do not collectively provide a high frequency, turn up and go public transport network throughout the day and evening.
- 5.50.9 This is particularly important given the substantial increase in bus use assumed within the Transport Assessment. For residents to materially change from private car to bus travel, services need to be sufficiently frequent, reliable and convenient and operate at times which correspond with employment and other everyday journeys. This is especially relevant for residents commuting to destinations outside Great Dunmow.
- 5.50.10 The assessment should therefore consider the actual frequency, first and last services, operating days and destinations of the existing bus network rather than relying principally upon the distance to the nearest bus stops.
- 5.50.11 The availability of existing bus stops should not, in itself, be treated as evidence that the site benefits from a level of public transport accessibility capable of supporting the significant modal shift assumed within the wider transport strategy.

Cycling to Stansted Airport

- 5.50.12 Paragraph 10.50 of the ES states that the nearest railway stations are not within a reasonable walking or cycling distance, with Stansted Airport approximately 10 km from the site. The ES suggests that "more confident cyclists" may nevertheless choose to cycle to Stansted

Airport station. In reality, it is considered highly unlikely that even confident cyclists would regularly undertake a 10 km cycle to an airport simply to commence an onward rail journey, particularly for commuting, journeys with luggage, during poor weather or during the hours of darkness.

- 5.50.13 Rail accessibility therefore cannot reasonably be regarded as a realistic sustainable travel option for the majority of future residents without first relying upon another mode of transport. Residents wishing to use rail will instead be heavily dependent upon the proposed bus connections or are likely to drive to surrounding stations.
- 5.50.14 For a development of approximately 850 dwellings which relies heavily upon achieving substantial modal shift, this is a significant locational constraint. The limited practical accessibility to rail further reinforces the likelihood that private car use will remain an important mode of travel for future residents.

Risks to Cyclists

- 5.50.15 Figure 4.3 of the TA proposes sections of shared footway and cycleway along The Broadway. This appears inconsistent with the stated active travel first approach, particularly for a new development of approximately 850 dwellings where high-quality cycle infrastructure should be integral to the scheme from the outset.
- 5.50.16 It also appears that cyclists would be required to use the carriageway along sections of The Broadway before reaching the proposed shared facility. This creates a potential gap in the active travel network and raises questions as to whether the proposals provide a genuinely continuous, safe and attractive cycle route between the development and Great Dunmow.
- 5.50.17 Figure 4.5 shows cyclists using the carriageway along Church End. LTN 1/20 Table 4.1 indicates that mixing cyclists with motor traffic is generally appropriate where speeds and traffic volumes are sufficiently low, including flows below 2,000 vehicles per day at 20mph.
- 5.50.18 However, the Transport Assessment does not provide sufficient traffic flow information for Church End or St Edmunds Lane to demonstrate that these conditions will be achieved following development. Given the scale of 850 dwellings and the anticipated increase in traffic on these routes, this is a significant omission.
- 5.50.19 The applicant should therefore demonstrate the forecast traffic flows on Church End and St Edmunds Lane and establish whether on carriageway cycling remains appropriate once development traffic is included

St Edmunds Lane Parking Provision

- 5.50.20 The proposals seek to formalise five parking spaces at the northern end of St Edmunds Lane using bays measuring 2m x 5.5m. The applicant acknowledges that a 6m bay would ordinarily be required but has deliberately reduced the dimensions to retain an additional space. Whilst formalising parking represents an improvement over the existing arrangement, the applicant should demonstrate that the reduced bay dimensions are appropriate and will operate satisfactorily.
- 5.50.21 More importantly, the existing situation cannot be considered in isolation from the development proposed. St Edmunds Lane will accommodate increased movements associated with approximately 850 additional dwellings and the adequacy of the parking arrangements must therefore be assessed against future rather than existing traffic conditions.

Carriageway Width and Bus Movements

- 5.50.22 The proposals retain a carriageway width of approximately 5.5m where parking bays extend partly into the carriageway. The applicant itself acknowledges that ECC guidance identifies a width of 6.75m for a bus route but states that this cannot be achieved.

- 5.50.23 The justification that this represents an improvement over the existing situation is insufficient. The relevant consideration is whether a 5.5m carriageway is appropriate for the future situation where St Edmunds Lane will accommodate increased development traffic whilst continuing to operate as a bus route.
- 5.50.24 The development proposes approximately 850 additional dwellings and simultaneously seeks to increase bus use as part of its modal shift strategy. It is therefore questionable whether knowingly providing a carriageway below the identified standard represents an appropriate long-term solution for a route expected to accommodate both increased general traffic and bus movements.

5.51 Consultee Comments

National Highways

- 5.51.1 National Highways' consultation response dated 6th August 2026 provides further significant evidence that the application has been submitted without a sufficiently complete transport evidence base to enable its impacts to be properly assessed. National Highways has issued a formal holding objection and recommends that the application is not determined before 2nd October 2026.
- 5.51.2 Of particular concern, National Highways confirms that the submitted Transport Assessment predicts approximately 558 two way vehicle trips during the AM peak and 447 during the PM peak, with approximately 99% of development traffic expected to route southwards towards Church End and the A120 corridor. Given the scale of these movements, it is particularly concerning that National Highways has been unable to complete its assessment of the impacts upon the A120, including the Dunmow South and Dunmow West Interchanges.
- 5.51.3 Importantly, National Highways specifically identifies the absence of the Transport Assessment Addendum referred to throughout the submitted transport evidence, which is intended to contain traffic flow diagrams, wider network assessments and modelling outputs. It further notes that the future baseline traffic assessment, post development traffic assessment and cumulative effects assessment remain outstanding. As a consequence, National Highways is presently unable to verify the conclusions of the Transport Assessment or determine whether the effects of the development on the Strategic Road Network have been fully assessed. This reinforces our concerns regarding the premature nature of the application and demonstrates that fundamental information necessary to understand the highway consequences of a development of this scale was not available at the point of submission.
- 5.51.4 These are not peripheral matters capable of being addressed through condition; they go directly to whether the additional traffic generated by up to 850 dwellings can be safely and satisfactorily accommodated and whether further highway mitigation is necessary. National Highways itself confirms that further assessment of the A120, cumulative growth impacts and potential mitigation is required before it can provide a substantive response.

Active Travel

- 5.51.5 Active Travel England's consultation response dated 6th August 2026 raises a number of significant concerns regarding whether the development would provide genuinely sustainable and attractive alternatives to private car travel. Although ATE has not raised an objection in principle, its assessment identifies concerns across the active travel route audit, public transport accessibility, site permeability and travel planning.
- 5.51.6 In particular, ATE questions the conclusions of the applicant's Connectivity Study, noting that routes towards the town centre rely upon unlit and remote sections which may be unsuitable for vulnerable users, including women and girls. It also identifies apparent legal restrictions on cycling along sections of the proposed routes, requiring cyclists instead to share the carriageway and junctions with high volumes of traffic. ATE concludes that there

appears to be only one lit walking route to the town centre and, importantly, no convenient, fully accessible and lit cycle route which meets LTN 1/20 guidance.

- 5.51.7 These concerns are compounded by the site's existing public transport accessibility. ATE confirms that there are currently no public transport nodes providing a regular service within the recommended distances of the site and expressly disagrees with the applicant's suggestion that the identified bus stops would be attractive to residents, noting that they are more than 1km from the centre of the development.
- 5.51.8 Whilst a future bus strategy is referenced, suitable future provision has yet to be secured and ATE expects this to be negotiated or conditioned. Furthermore, the proposed mobility hub lacks clarity regarding both its delivery mechanism and timing and ATE specifically recommends that active travel infrastructure, public transport infrastructure and the Local Centre are provided and fit for purpose during the early phases of development. Taken together, these comments reinforce concerns that the sustainable transport strategy currently relies substantially upon future infrastructure, interventions and conditions which are not yet sufficiently defined or secured. This is particularly important given the scale of the development and raises legitimate concerns as to whether early occupants would have realistic alternatives to reliance upon the private car.

5.52 Summary

- 5.52.1 Overall, it is considered that the submitted transport evidence fails to demonstrate that the proposed development of approximately 850 dwellings can be satisfactorily accommodated by the existing and proposed transport network and this view is also reinforced by National Highways and Active Travel.
- 5.52.2 This is particularly significant given that the proposal represents a substantial increase above the policy allocation of 715 dwellings. The additional 135 dwellings represent an increase of approximately 19% above the allocated housing figure and it is therefore essential that the transport infrastructure and mitigation are demonstrated to be capable of accommodating the greater level of development now proposed.
- 5.52.3 The assessment has identified a number of fundamental concerns. The development would remain heavily reliant upon The Broadway, Church End and St Edmunds Lane, with no significant new strategic highway connection provided. At the same time, considerable reliance is placed upon reducing private car journeys through modal shift, despite Great Dunmow having no railway station and having more limited employment, retail and leisure opportunities than larger surrounding settlements.
- 5.52.4 The proposed sustainable transport measures do not overcome these concerns. Key elements remain uncertain, including the proposed 20mph Traffic Regulation Order, the routing and frequency of enhanced bus services, the long-term viability of those services, elements of the mobility hub and the assumed reduction in private car trips. Existing pedestrian and cycle connections also contain clear constraints, including narrow footways along Church End, sections of on carriageway cycling and limited convenient access to the Flitch Way.
- 5.52.5 Most significantly, the detailed highway capacity evidence necessary to understand the consequences of accommodating 850 dwellings has not yet been provided. The majority of the junction capacity analysis, traffic distribution information and detailed modelling has been deferred to the Transport Assessment Addendum. It is therefore not presently possible to demonstrate that the surrounding highway network has sufficient capacity or that the proposed mitigation will satisfactorily address the additional traffic generated by the development.
- 5.52.6 This is particularly important when considering the proposal against Core Policy 10. The policy specifically requires access from Bigods Lane to St Mary's Churchyard to be improved to provide safe and convenient access into Great Dunmow for new communities.

The submitted proposals do not appear to deliver this identified improvement. Instead, significant reliance continues to be placed upon existing and constrained connections through Church End and St Edmunds Lane.

- 5.52.7 The development therefore fails to demonstrate compliance with the transport objectives of the development plan and the National Planning Policy Framework.
- 5.52.8 In particular, the proposal has not adequately demonstrated compliance with paragraph 109 of the NPPF, which requires development proposals to understand and address their potential impacts upon transport networks and to identify and pursue opportunities to promote walking, cycling and public transport. Whilst the application identifies numerous opportunities, several remain aspirational, subject to further approval or unsupported by the detailed evidence necessary to establish their effectiveness.
- 5.52.9 There is also conflict with paragraph 110. A development of this significance should be located and designed so as to limit the need to travel and provide a genuine choice of transport modes. In this instance, the absence of convenient rail accessibility, limitations of existing bus provision and need to travel outside Great Dunmow for a range of everyday purposes mean that private car travel is likely to remain significant. The proposed modal shift measures have not been demonstrated with sufficient certainty to establish otherwise.
- 5.52.10 Of particular relevance is paragraph 115, which requires safe and suitable access for all users and requires significant impacts upon the transport network, including capacity and congestion, to be cost effectively mitigated to an acceptable degree. Until the outstanding junction modelling and Transport Assessment Addendum are provided, it cannot reasonably be concluded that either requirement has been satisfied.
- 5.52.11 Similarly, paragraph 117 requires priority to be given to pedestrian and cycle movements and access to high quality public transport. The identified narrow footways, sections of on carriageway cycling, uncertain speed reductions and unconfirmed bus improvements demonstrate that a continuous, safe and attractive sustainable transport network has not yet been secured.
- 5.52.12 Finally, paragraph 118 requires significant developments to be supported by a transport assessment so that their likely impacts can be properly assessed and monitored. The present Transport Assessment expressly defers substantial elements of the highway capacity assessment to a future Addendum. The application is therefore being considered without the complete transport evidence necessary to understand its impacts.
- 5.52.13 Paragraph 116 sets a high threshold for refusal on highway grounds, requiring an unacceptable impact on highway safety or severe residual cumulative impacts on the road network following mitigation. However, critically, the outstanding evidence means that it is not presently possible to establish what those residual cumulative impacts will be once the full development traffic associated with 850 dwellings is assessed against the surrounding network.
- 5.52.14 Accordingly, the proposal cannot presently demonstrate that a development materially exceeding the allocated 715 dwellings can be accommodated without unacceptable transport consequences. The proposed highway improvements and sustainable transport measures are not sufficiently developed, secured or evidenced to demonstrate that they can accommodate the scale of growth proposed.
- 5.52.15 The application should therefore not be approved on the basis of the transport information currently available. At the very least, the outstanding Transport Assessment Addendum, full junction capacity modelling, traffic distribution evidence, Road Safety Audit and confirmation of the deliverability of the key sustainable transport measures should be provided before the application is determined. Given the significance of this information, any additional evidence should also be subject to further public consultation before a decision is made.

6.0 Conclusion

- 6.1 For the reasons set out above, the Town Council considers that the applicant has failed to demonstrate that the proposed increase from 715 to 850 dwellings can be accommodated without materially greater impacts than those anticipated through the recently adopted Local Plan. The additional 135 dwellings are not supported by sufficiently robust evidence to demonstrate that the heritage, infrastructure and transport assumptions underpinning the strategic allocation remain valid. In particular, significant uncertainties remain regarding heritage impacts and archaeological evaluation, infrastructure capacity, highway capacity, sustainable transport measures and the deliverability of the mitigation relied upon by the applicant.
- 6.2 Accordingly, the Town Council considers that the adverse impacts identified within this representation significantly and demonstrably outweigh the benefits associated with the additional housing proposed. The application has not demonstrated that the materially increased development quantum represents a sustainable or acceptable departure from the assumptions underpinning Core Policy 10 and, in its present form, planning permission should therefore be refused.