

SUPPLEMENTARY REPRESENTATION

Material omissions and contradictions in the applicant's submission

Document-by-document audit of the 70 original submission documents

Application	UTT/26/1635/OP - Land north and south of The Broadway, Great Dunmow
Submitted by	Carl Rolph, Save Church End
Address	withheld from website copy for privacy
Date	21 August 2026
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Purpose

This representation should be read alongside my main objection and earlier supplementary representations. It does not reproduce their detailed evidence. Where a subject overlaps, this paper identifies a separate defect in the applicant's own submission or records an unresolved position subsequently taken by a consultee. It records material omissions, contradictions and unsupported assumptions identified by checking the applicant's 70 original submission documents against each other and against the consultation responses now on the public file.

These are not minor drafting points. They affect whether the environmental effects, infrastructure requirements and deliverability of 850 homes can lawfully and reliably be understood at outline stage.

Central request

The Council should not determine this application while the applicant's evidence remains incomplete and internally inconsistent. The missing assessments and unresolved holding objections concern the principle and scale of development, highway access and capacity, protected species, drainage, water and wastewater capacity, education land and essential infrastructure, including the protection of an acknowledged private spring water supply. They cannot safely be repaired by general conditions after outline permission.

The Council should require the necessary further environmental information from the applicant, publish it and allow consultees and the public a proper opportunity to comment before reaching a reasoned conclusion on the proposal's significant environmental effects.

1. The Environmental Statement is unfinished

The applicant's Air Quality chapter says that only a baseline has been completed and that the full impact assessment will follow when traffic modelling becomes available. The air-quality technical appendix says the missing work must assess construction dust, development traffic, existing and future receptors, PM2.5, significance and mitigation. ES Chapter 12 twice records “Air quality — Assessment to be completed”.

This is inconsistent with the covering letter, which presents the air-quality requirement as having been met. It is also inconsistent with the scoping opinion, which expressly required air quality to be included because of the development's scale, traffic and cumulative effects. Environmental Health's response confirms that the full assessment is still awaited.

The same missing traffic modelling prevents the transport and air-quality cases from being completed together. ECC's corporate response maintains a holding objection because the Road Safety Audit, agreed modelling methodology and detailed junction modelling have not been provided.

Documents: covering letter 4765283; ES Chapter 4, 4764424; Appendix C, 4764444; ES Chapter 10, 4764436; Appendices H1/H2, 4764455–4764456; ES Chapter 12, 4764440; Environmental Health response 4795096; ECC response 4794622.

2. A significant adverse climate effect disappears from the ES summary

The Climate Change chapter calculates that this proposal and 14 committed developments would amount to 10.32% of Uttlesford's emissions baseline to 2050. It calls that cumulative effect material, adverse and significant in EIA terms.

ES Chapter 12 nevertheless records “Climate change — None” in its table of significant residual effects. Its monitoring table then refers to increased greenhouse-gas emissions. The ES glossary confirms that “residual effects” means significant effects remaining after mitigation, so this is not a difference of terminology. The decision-maker must be given the actual significant adverse finding and a corrected summary.

Documents: ES Chapter 5, 4764425; Appendix D, 4764446; ES Chapter 12, 4764440; ES Glossary, 4764441.

3. The all-electric estate does not have demonstrated electrical capacity

The Utility Feasibility Report calculates demand of 3,650 kVA: 2,850 kVA for homes, 200 kVA for the school and 600 kVA for the local centre. The UK Power Networks application was made for only 3,500 kVA. The local-centre figure is itself a broad assumption and is not supported by a load schedule for the grocery store's refrigeration, healthcare use, ventilation and cooling, hot water, nursery, business units, sports facilities, floodlighting and EV charging.

Only 1,000 kVA was described as immediately available, approximately enough for 350 homes. The larger quotation was provisional and interactive, depended on reinforcement and further studies, and

warned that another customer was seeking capacity on the same constrained network. The submitted acceptance form is blank and its December 2025 acceptance deadline has passed.

Both proposed points of connection depend on the same Dunmow Primary substation and reinforcement scheme. No independent second source, firm-capacity test or outage-resilience case is supplied for an estate with electric heating and hot water as well as EV charging and community facilities.

No current UK Power Networks consultation response or accepted live capacity offer appears on the public file. The application therefore remains supported only by the applicant's expired, provisional quotation rather than confirmation from the network operator that the full scheme can be connected and supplied.

No occupation should occur without current written network confirmation, completed and commissioned reinforcement, sufficient capacity for the whole relevant phase and an enforceable electricity delivery sequence.

Documents: Utility Feasibility Report parts 1–5, 4764401, 4764402, 4765618, 4765642 and 4765656; ES Chapter 2, 4764421; Climate Change and Sustainability Statement, 4764409.

4. Potable-water capacity and non-residential demand remain unproven

The Utility Feasibility Report says that an Affinity Water pre-development capacity enquiry “is to be submitted”. It merely assumes a connection to a nearby four-inch asbestos-cement main and provides no confirmed flow, pressure, resource headroom, reinforcement, programme, fire-flow or effect on existing customers.

Affinity Water's consultation response says it would be the supplier if the development is built and tells the developer to contact its services team because of increased demand. It is not a capacity confirmation.

The applicant's scoping response also says that “No non-domestic uses ... are proposed” when the scheme expressly includes a primary school, healthcare facility, nursery, shop, business units, community uses and sports facilities. Their demand cannot be omitted. The Environment Agency has now requested written confirmation from Affinity Water covering residential and non-residential demand, reinforcement and phasing, and says the Local Plan's 90 litres per person per day should be secured as a minimum rather than left as an aspiration.

Documents: Utility Feasibility Report part 1, 4764401; Scoping Appendix, 4765438, PDF pp.39–41; Affinity Water response 4778506; Environment Agency response 4786541.

5. The applicant's wastewater conclusion does not answer the Environment Agency's warning

The scoping material records the Environment Agency's warning that Great Dunmow Water Recycling Centre was exceeding its permitted dry-weather flow, had exceeded the Q90 enforcement trigger in

each of the preceding five years, and discharged to a Chelmer water body of only moderate ecological status for which sewage discharge was a reason for failure.

The Agency also said that Anglian Water appeared to have significantly underestimated planned growth in the catchment and required cumulative flow, volume and phasing evidence. The applicant relies instead on an AMP8 investment period and a future connection strategy. An investment period is not an operational completion date and does not prove that treatment or network capacity will be available before occupation.

No Anglian Water consultation response appears on the public file. There is therefore no current undertaker confirmation that the foul network, pumping arrangements and Great Dunmow Water Recycling Centre can accept the development, phase by phase, before the required improvements are completed and operational.

Documents: Scoping Appendix, 4765438, PDF pp.42–44; ES Chapter 11, 4764438; Appendix I1, 4764457; Flood Risk Assessment/Drainage Strategy, 4764458.

6. The transport strategy is not fixed or demonstrated

The ES states that all construction HGVs are anticipated to use St Edmunds Lane. That requires a specific assessment of width, parking, pedestrians, school movements, residents and heritage, not a generic future construction plan. The access drawings themselves say they remain subject to highway agreement, ownership, topography, statutory services, detailed design, Road Safety Audit and traffic modelling.

The ES also says the bus strategy remains under discussion. Active Travel England identifies only one lit walking route to the town centre, no convenient fully accessible lit cycle route meeting LTN 1/20, and no regular public-transport node within recommended distances. Its conditional position does not validate the applicant's assumed mode shift.

National Highways records 558 two-way vehicle trips in the morning peak and 447 in the evening peak, with approximately 99% of development traffic expected to travel south towards Church End and the A120. It maintains a holding objection until at least 2 October 2026 because the Transport Assessment Addendum, future baseline, detailed junction modelling, A120 assessment, cumulative-growth assessment and any necessary mitigation have not been supplied. The highway effects of 850 homes therefore cannot presently be verified.

Documents: ES Chapter 2, 4764421; Transport Assessment 4764436 and 4764455–4764456; Travel Plan 4764386; access drawings 4764337, 4764346, 4764348 and 4764351; ATE response 4787957; ECC response 4794622; National Highways response 4787951.

7. Education provision is not established

ECC calculates demand for 102 early-years places, 255 primary places, 170 secondary places, 34 post-16 places and 16.15 SEND places. It records no unfilled early-years places in the ward. It maintains a holding objection because the required Land Compliance Studies for the school and standalone early-years sites are missing. It also says the combined primary/early-years site must be 2.18 ha, while the application provides 2.1 ha.

Against that evidence, the ES labels increased primary-school provision a very substantial benefit with “absolute” certainty. That certainty is not justified while the land has not been demonstrated compliant, delivery depends on ECC and the receiving provision for other age groups is unresolved.

Documents: ES Chapter 6, 4764428; Planning Statement 4764353; ECC responses 4786612 and 4794622.

8. Protected-species and watercourse ecology evidence is still insufficient

Both the Environment Agency and ECC ecology maintain holding objections. The unresolved matters include bats, great crested newts, ancient-woodland and veteran-tree buffers, ditch and culvert impacts, the River Chelmer corridor and long-term habitat delivery.

The native Biodiversity Metric produces +24.37% habitat units and +41.80% hedgerow units, but the workbook leaves the planning-reference field and both baseline and post-development map-reference fields blank. Its claimed gain depends on approximately 821 new small trees, about 5.94 km of new native hedgerow and extensive created habitats achieving assumed conditions for 30 years. The metric records zero watercourse units despite the site ditch network; both the Agency and the applicant's own metric therefore require a clear reconciliation of how those ditches are treated.

Documents: EclA 4765477; BNG report 4765267; native metric 4764468; Arboricultural Impact Assessment 4764370; Lighting Assessment 4764395; EA response 4786541; ECC ecology response 4793778.

9. The sports proposal does not demonstrate compliance with the adopted site template

The adopted Site Development Template requires adult football, youth football, cricket, a pavilion with parking and a floodlit MUGA of at least four courts. The Sports Statement proposes two grass pitches and an undefined MUGA, omits cricket and then claims compliance largely because the overall area exceeds a minimum land figure.

Its Sport England calculation also uses a population of 2,040, while the ES uses 2,142 for the same 850 homes. The lower sports population understates demand. The calculator identifies demand for 3.12 pitches and 0.55 cricket pitches, together with substantial capital, changing and lifecycle costs, but the application provides no complete funded specification, management body, replacement fund or occupation triggers.

Documents: Sports Statement 4764397; ES Chapters 2 and 6, 4764421 and 4764428; adopted Site Development Template for Core Policy 10.

10. Assumed floorspace is being counted as delivered services

The ES says the exact local-centre uses are unconfirmed and assumes a shop, business units, nursery, health facility and mobility hub for assessment purposes. It then treats a 1,400 m² health facility as a significant beneficial increase in GP services, although the evidence says the space only “could” accommodate providers.

Floorspace does not provide GPs, nurses, dentists, appointments, NHS funding or an operator. Likewise, a possible local centre does not establish that shops and community services will be occupied and operational before residents arrive. Benefits should not be credited unless the use, operator, funding, delivery, opening and occupation triggers are secured.

ECC Public Health also finds the submitted Health Impact Assessment unbalanced and deficient: it lacks clear aims and objectives, adequate baseline evidence, meaningful health-enhancement recommendations and delivery mechanisms. No NHS or Integrated Care Board consultation response appears on the public file. The applicant's claimed significant healthcare benefit is therefore neither demonstrated by its own assessment nor independently endorsed by the health service.

Documents: ES Chapters 2 and 6, 4764421 and 4764428; Planning Statement 4764353; Health Impact Assessment 4764390; ECC combined response 4794622.

11. The controlling submission contains unresolved basic inconsistencies

The application uses at least four different site areas: 69.40 ha in the application form, 68.35 ha in the Planning Statement, 69.39 ha in the BNG baseline and 68.49 ha in the scoping material. The Location Plan identifies the boundary graphically but prints no area and therefore does not reconcile them.

The signed application form also retains placeholders such as “Framework Plan XXXX”, “Access Plan XXXX”, “section XXX of FRA” and “drawing No XXXX”. These errors concern the controlling site, access and drainage evidence and should be corrected formally.

Documents: application form 4764413; Location Plan 4764331; Planning Statement 4764353; Scoping Appendix 4765438; BNG report 4765267 and metric 4764468.

12. The cumulative baseline is not demonstrably current

The ES uses an August 2024 housing-land-supply statement for remaining dwelling numbers at major schemes and allows individual topic chapters to exclude projects considered irrelevant. That is not a demonstrably current and consistent June/July 2026 baseline for transport, drainage, utilities, schools, healthcare and emissions. The ES itself predicts a cumulative population increase of about 90% in Great Dunmow North ward, yet repeatedly assumes that future facilities and contributions will remove capacity effects without proving that those facilities have been built, staffed, funded or create net spare capacity.

Documents: ES Chapter 3, 4764423; ES Chapter 6, 4764428; cumulative-development schedule and topic appendices.

13. Heritage mitigation does not remove the admitted significant landscape harm

The applicant accepts that Church End's historic separation remains legible and important to its character, that the site forms part of its agricultural and wider landscape setting, and that the proposal causes less-than-substantial harm to Great Dunmow Conservation Area. Historic England now says the proposal in its present form does not align with heritage policy and asks for changes to reduce harm to

the historic settlement, conservation area, scheduled monuments and grade I listed St Mary's Church. It also identifies the dramatic change caused by rerouting The Broadway through the development.

Historic England's requested changes are substantial, not cosmetic. It asks the applicant to reconsider the distribution of development between the northern and southern parcels, reduce the three-storey cluster opposite St Mary's Church and significantly increase the green buffer north of The Broadway. These matters go to the amount and location of development and must be resolved at outline stage.

The landscape assessment does not say planting removes the harm. It classifies the site as medium-to-high landscape sensitivity and finds that effects on the arable fields and site landscape character remain significant after planting matures. The effect on the view from Broadway Cottage remains substantial-to-moderate and significant after 15 years.

The heritage conclusion depends on a view corridor, green corridors, building-height controls, road treatment and structural planting, yet the Framework Masterplan still marks the Broadway rerouting "To be confirmed", a green-corridor access is indicative and detailed landscape, lighting and layout controls remain partly deferred. The Quality Review Panel also retained concerns about upper-slope massing, a visually dominant road through the heritage corridor, further setbacks and the tension between restrained design and commercial deliverability.

Those admitted residual effects cannot be discounted simply because the applicant labels the heritage harm as being at the low end of the less-than-substantial range. The Council must assess the full harm and give only the weight justified by mitigation that is fixed, enforceable and deliverable at outline stage.

Documents: Framework Masterplan 4764333; Parameter Plan 4764334; Design and Access Statement parts 1 and 2, 4764357 and 4765371; Site-wide Design Code 4764400; ES Chapter 7, 4764429; ES Chapter 8, 4764433; Heritage DBA 4764448; Heritage Impact Assessment 4764450; LVIA parts 1 and 2, 4764451–4764452; Historic England response 4791794; UDC Urban Design response 4791120.

14. The policy-required Development Framework is missing

UDC Urban Design says Core Policy 52a requires a Development Framework to be prepared before a planning application, but none has been submitted. That omission is especially serious because the proposal increases the allocation from 715 to 850 homes and seeks approval of access while leaving many design and infrastructure matters unresolved.

The Site-wide Design Code is not an adequate substitute. UDC describes it as broad and aspirational, with only about 20 mandatory requirements, limited detail for the local centre and unclear separation between requirements and guidance. It also identifies differences between the Parameter Plan and Framework Masterplan and recommends removing the Farmstead cluster near St Edmunds Lane to reduce the built extent. The Council should require the Development Framework and reconcile the controlling plans before determining the application.

Documents: Framework Masterplan 4764333; Parameter Plan 4764334; Site-wide Design Code 4764400; UDC Urban Design response 4791120.

15. The submitted surface-water design has not satisfied the LLFA

ECC's Lead Local Flood Authority maintains an express holding objection. It identifies proposed SuDS features within areas shown to flood and requires the applicant to demonstrate that its storage calculations and drainage features can also accommodate those flood flows. Until that work is supplied, the LLFA cannot confirm that the drainage design is safe or effective.

There is also an unresolved design conflict with Stansted Airport safeguarding. The landscape, ecology and drainage case relies on ponds, wetland and reed-bed features, while the airport maintains a holding objection because such features may increase bird-strike risk and seeks features that remain dry except during storms, drain within 48 hours, or are governed by an acceptable Bird Hazard Management Plan. These competing requirements must be reconciled in a workable drainage design before permission, not left to incompatible later conditions.

This point should be read with my earlier cumulative surface-water representation. It does not repeat that evidence; it records that the statutory drainage and airport-safeguarding consultees have not accepted the applicant's submitted design.

Documents: Flood Risk Assessment/Drainage Strategy 4764458; ES Chapter 11, 4764438; ECC combined response 4794622; Stansted Airport safeguarding response 4780295.

16. The acknowledged private spring has been screened out without a site-specific assessment

The applicant's Water Environment appendix records a domestic private water supply from a spring about 200 metres north-west of the site at grid reference TL 62896 23912. It says the spring coincides with the Kesgrave Catchment Subgroup deposits and a mapped ditch issue, but then excludes the supply from further assessment because no built development is proposed in the north-west of the application site and because the applicant considers an effect unlikely on topographic and geological grounds.

That brief screening does not assess whether site-wide earthworks, compaction, changed infiltration, dewatering, drainage excavation or unlined SuDS could affect the spring's recharge, yield or water quality. The applicant's own ground investigation records shallow groundwater, recognises potential movement of contaminants through groundwater and recommends further groundwater sampling. It also records a separate potential groundwater linkage near the northern boundary that was not assessed in that report.

A newly published representation from the Lower Hall Farm landowner explains that this spring is the only water supply for residents, farming and livestock at the property. That first-hand evidence makes the consequence of any effect potentially serious. It does not establish that harm will occur, but it shows why the applicant's desktop exclusion is not an adequate substitute for a site-specific hydrogeological assessment.

Before determination, the applicant should establish the spring's catchment and recharge source, record baseline flow and water quality, assess construction and operational risks, and provide enforceable protection, monitoring and contingency measures. The Council should consult the relevant environmental-health and water-resources authorities on that assessment.

Documents: ES Appendix I1 — Water Environment 4764457, PDF pp.12 and 16–17; Phase 2 Geo-environmental and Geotechnical Site Investigation part 1, 4765533, PDF pp.6, 12, 22 and 37; Lower Hall Farm representation 4798271.

Requested action

I ask the Council to:

1. treat the missing air-quality and transport assessments, the contradictory climate summary and the unresolved highway, drainage, ecology and airport-safeguarding holding objections as material deficiencies in the environmental information;
2. require corrected and complete information from the applicant before determination, including the policy-required Development Framework, reconciled controlling plans, current provider confirmations, a site-specific private-water-supply assessment and controlling infrastructure/phasing schedules;
3. publish and consult on that further information before reaching its reasoned EIA conclusion;
4. retain all relevant holding objections until the responsible consultees confirm that their requirements have been met; and
5. refuse the application if the applicant cannot demonstrate that the additional 135 homes and the scheme as a whole can be delivered without unacceptable effects and with all necessary infrastructure completed at the right time.

The adopted allocation does not remove the need to assess the application actually made. The Council must decide the evidence for 850 homes, not assume that evidence prepared for 715 homes automatically supports the larger scheme.

Carl Rolph

Save Church End