

SUPPLEMENTARY REPRESENTATION

August 2026 National Planning Policy Framework

Planning application: UTT/26/1635/OP

Site: Land north and south of The Broadway, Great Dunmow

Submitted by: Carl Rolph, Save Church End

Address: Withheld from website copy for privacy

Date: 22 August 2026

Status: FINAL v1.0 - approved for submission, 22 August 2026

1. Introduction

The revised National Planning Policy Framework was published on 17 August 2026. Its national decision-making policies apply immediately and must be taken into account when determining this application.

The new Framework strengthens the reasons why outline planning permission should not be granted on the evidence currently before the Council.

The application's transport, flooding, drainage, infrastructure, heritage, archaeology, ecology and landscape evidence must now be assessed against the new national decision-making policies. The applicant must demonstrate compliance with those policies before the application is determined.

The unresolved matters identified in my previous representations are not minor details. They concern whether this development is sustainable, safe and capable of being supported by the necessary infrastructure.

2. An unsustainable and car-dependent location

Policy TR3 requires development generating a significant amount of movement to be located where it will limit the need to travel, particularly by private car, and offer residents a genuine choice of transport modes.

The proposed development would generate journeys for employment, secondary education, healthcare, shopping, leisure and other everyday needs. Great Dunmow has no railway station and the application has not demonstrated a secured, comprehensive and commercially sustainable public-transport service serving the whole development.

The new Framework expressly requires the Government's Connectivity Tool to be used alongside other quantitative and qualitative evidence when assessing the connectivity of proposed development locations.

The Council should require a transparent Connectivity Tool assessment for the site, supported by local evidence about:

- actual walking and cycling routes;
- route safety and accessibility;
- bus destinations, frequencies and operating hours;
- access to schools, healthcare, employment and shopping;
- the absence of rail services; and
- the practical dependence of future residents upon private cars.

An assumed future bus arrangement cannot demonstrate that this location provides a genuine choice of transport modes.

3. Incomplete transport evidence and missing fallback arrangements

Policy TR6 requires transport assessments and travel plans to consider:

- reasonable future scenarios;

- relevant times of day;
- cumulative transport impacts;
- multimodal trip generation;
- construction traffic;
- highway safety;
- network capacity and congestion; and
- fallback measures if the initial sustainable-transport proposals fail.

This is particularly important because substantial parts of the applicant's highway modelling and junction assessment remain outstanding or deferred.

The applicant must also explain what happens if its proposed bus service, modal-shift assumptions, travel-plan targets or other measures do not deliver the predicted results.

The application should not be determined on the assumption that future residents will travel differently from existing residents without a secured, funded and deliverable transport alternative.

Policy TR6 states that development should be refused where it would have a severe adverse effect on the transport network, including cumulative effects, or an unacceptable effect on highway safety. This applies during construction and after completion.

The Council cannot undertake that assessment until the missing evidence and fallback arrangements have been provided and independently examined.

4. Schools, healthcare and essential public services

Policy HC3 requires major housing developments to be informed by a proper understanding of the improvements needed to community facilities and public-service infrastructure.

It also requires the necessary facilities and infrastructure to be delivered in time to be available when the development, or an agreed proportion of it, is first occupied.

This directly engages the unresolved questions concerning:

- the identified shortfall in early-years places;
- where the anticipated primary and secondary pupils will be educated;
- the distance and safe means of travel to Helena Romanes School;
- the availability of school transport and a safe route for it;
- existing pressure upon GP and hospital services;
- the number of additional doctors, nurses and appointments required; and
- how the proposed healthcare provision will be staffed and operated.

Healthcare floorspace is not, by itself, a healthcare service. The application must secure actual additional medical capacity. It must not merely provide space into which an existing overstretched service could be relocated.

Similarly, identifying land or financial contributions for education does not demonstrate that sufficient school places will be available when the children generated by the development require them.

These matters must be resolved through clear, funded and enforceable provision before permission is granted.

5. Flood risk, attenuation and cumulative drainage effects

Policy F7 states that development should not increase flood risk elsewhere. Where a location is known to be at risk from any form of flooding, development should be refused unless it is demonstrated that the development will remain safe and will not increase flood risk elsewhere.

Policy F8 requires sustainable drainage systems to do more than control peak discharge rates. They must also reduce the volume of runoff and have effective maintenance arrangements for the lifetime of the development.

The Council therefore requires evidence showing:

- the total impermeable area created by the development;
- the total runoff volume generated during different rainfall events;
- the storage capacity of every attenuation feature;
- the rate and duration of each controlled discharge;
- the effect of prolonged or consecutive storms;
- the condition of receiving ditches, culverts and watercourses;
- the eventual route to the River Chelmer;
- what happens when receiving watercourses are already elevated; and
- the cumulative effect of discharges from this and other approved or completed developments.

Restricting the peak discharge from an individual development does not answer what happens when numerous attenuation systems continue releasing water into the same catchment while downstream flooding is already occurring.

The applicant must demonstrate that the proposal will not increase either the severity or duration of flooding elsewhere. That assessment cannot be deferred until after outline permission.

6. Landscape character and the setting of Church End

Policy DP3 requires development to respond to the history, character and features of its site and setting and to integrate with and enhance its surroundings.

Policy N2 requires development proposals to consider:

- landscape character;
- the natural beauty and intrinsic qualities of the countryside;
- agricultural-land quality;
- established trees and hedgerows;
- ecological networks extending beyond the application boundary; and
- the successful integration of development into its surroundings.

The application site forms part of the rural landscape surrounding Church End and contributes to views towards and from St Mary's Church, the Church End Conservation Area and surrounding countryside.

Our photographic and drone evidence demonstrates the relationship between the agricultural land, Church End, St Mary's Church and the wider Chelmer Valley landscape.

The applicant's own assessment predicts that landscape effects will remain after 15 years. Planting does not remove the permanent transformation of open agricultural countryside into a substantial urban development.

The proposal must therefore be assessed as the permanent urbanisation of this landscape, not simply as buildings that may eventually be partly screened by vegetation.

7. Heritage and archaeology

Policy HE5 requires an assessment of the significance of affected heritage assets, including the contribution made by their settings.

Crucially, the new policy states that decision-makers must be satisfied that heritage assessments accurately reflect the effects caused by development.

It also requires an appropriate archaeological desk-based assessment and, where necessary, field evaluation when a proposal has the potential to affect archaeological remains.

The archaeological evaluation cannot be postponed where it is necessary to understand the significance of the site and the effect of the development before the principle of development is decided.

The Council must therefore be satisfied, before granting outline permission, that:

- the effects upon St Mary's Church, Crouches Farm, the Church End Conservation Area and other heritage assets have been properly assessed;
- the contribution of the open rural setting has not been understated;
- the assessment reflects the full 850-home development rather than a lesser allocation assumption; and
- the necessary archaeological field investigation has been completed.

Policy HE9 also specifically requires proposals affecting conservation areas to consider their special architectural and historic interest in the design of the development.

The scale and urbanising effect of the proposal must be assessed against that requirement.

8. Ecology and connected habitats

Policy N2 requires development to strengthen ecological networks extending beyond the site and to conserve and enhance existing natural features.

The ecological assessment must therefore consider the site as part of the wider Chelmer Valley network, including its relationship with:

- the River Chelmer;
- watercourses and drainage corridors;
- mature trees and hedgerows;
- the churchyard and surrounding habitats;
- recorded otter activity;
- hunting and foraging areas used by owls, bats and other wildlife; and
- habitats affected by lighting, disturbance, construction and increased recreational pressure.

The absence of a species from a limited survey does not demonstrate that the wider ecological network will be unaffected.

Policy N2 states that development should be refused where significant biodiversity harm cannot be avoided, adequately mitigated or, as a last resort, compensated for.

The outstanding ecological information must therefore be completed and assessed before determination.

9. The Council must not determine the application prematurely

Policy DM3 recognises that a decision should not proceed where:

- there is insufficient information;
- proceeding without the necessary advice could create public-safety risks; or
- further detailed consultee advice is required to determine whether the proposal can be approved.

Those circumstances apply here. Outstanding transport modelling, drainage and flood-risk evidence, water and wastewater capacity, ecology, archaeology, education, healthcare and other infrastructure matters are fundamental to whether the proposed development is acceptable.

They cannot properly be treated as ordinary reserved-matters details or left to conditions requiring the applicant to establish later whether the development can be made acceptable.

10. Infrastructure and viability

Policy DM5 states that the price paid for land cannot justify failure to comply with planning policies.

If the applicant contends that required infrastructure, affordable housing, transport, drainage, healthcare, education or other mitigation cannot be provided viably, any viability assessment must:

- be publicly available;
- identify all assumptions and inputs;
- explain any departure from the Local Plan viability evidence; and

- address the material difference between the development assessed through the Local Plan process and the 850-home proposal now submitted.

The community must not bear the consequences of a development being pursued at a scale that cannot fund or deliver the infrastructure it requires.

11. Requested decision

The August 2026 National Planning Policy Framework reinforces the objections already submitted. The applicant has not yet demonstrated that the proposed development:

- is in a genuinely sustainable and sufficiently connected location;
- can avoid unacceptable cumulative traffic and highway effects;
- has credible fallback transport arrangements;
- will provide the required schools, healthcare and public services on time;
- will not increase the severity or duration of flooding elsewhere;
- can be supported by adequate water and wastewater infrastructure;
- will avoid unacceptable landscape and heritage harm;
- has been informed by sufficient archaeological investigation; or
- will avoid significant harm to the wider ecological network.

The Council should require the applicant to demonstrate compliance with the August 2026 national decision-making policies and allow the relevant consultees and the public to examine that evidence.

Unless and until these fundamental matters have been satisfactorily resolved, outline planning permission should be refused.

12. Policy source and document control

Primary policy source: Ministry of Housing, Communities and Local Government, National Planning Policy Framework, published 17 August 2026. Relevant national decision-making policies: DM3, DM5, DP3, TR3, TR6, HC3, F7, F8, N2, HE5 and HE9.

This supplementary representation should be read alongside Carl Rolph's main objection and previously submitted supplementary representations for UTT/26/1635/OP. It updates the national-policy position without replacing or altering those preserved submissions.

Official source: <https://www.gov.uk/guidance/national-planning-policy-framework>. Controlled local policy copy: documents/EXTERNAL/UTT-26-1635-OP/HOUSING_DELIVERY_TEST_2025/National_Planning_Policy_Framework_August_2026.pdf; SHA-256 2E61CABB2BE45FCA1642980E2EA645BCAA310E467ED948F2C2233A845C3C4773.

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Save Church End

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