

Local Plan failure: why this application should be refused

Application: UTT/26/1635/OP — Land at Broadway near Church End, Great Dunmow

Status: Final submission document v7 — 11 August 2026

The council's own evidence is the starting point

Uttlesford's Local Plan evidence base does not describe growth at Great Dunmow as risk-free. It records a fragmented walking and bus network, high car dependency, constrained roads, water and wastewater pressures, healthcare capacity problems, landscape and heritage sensitivity, and the need for infrastructure to be funded and delivered.

The application must be assessed against those identified local requirements. It is not enough to say that details can be dealt with later. Where the council's own evidence identifies a constraint, the applicant must show how this proposal meets it before permission is granted.

1. The proposal does not meet the Local Plan's sustainable-transport evidence

The Sustainable Transport Study identifies possible services and connections around Great Dunmow, St Edmunds Lane, Church End Bridge and the Broadway area. It also says that feasibility, schemes and funding discussions are required. Direct pedestrian routes to public transport are identified as necessary, while the Transport Evidence Topic Paper records a fragmented network and high car dependency.

That is not evidence of a delivered service. The applicant must provide a safe, direct and accessible walking route from the whole site, realistic walking distances, usable bus stops, first and last services, fares, frequency, rail connections and funding from first occupation.

A proposal that expects residents to walk into Great Dunmow to find a bus, while the bridge is subject to a 7.5-tonne restriction and St Edmunds Lane is a constrained residential street, does not provide a practical transport choice for families, disabled people, older residents or people travelling in poor weather. It fails the Local Plan evidence requirement for sustainable, usable connections.

Active Travel England's formal response confirms the weakness of the present arrangements: the two regular-service bus stops are more than one kilometre from the centre of the site, only one walking route is lit, no convenient fully accessible and lit cycle route is available, and delivery of the proposed mobility hub is unclear. These facilities must be secured and operating from first occupation, not left as later aspirations.

Evidence: Sustainable Transport Study, pp. 60–63; Transport Evidence Topic Paper, pp. 3–4 and 27.

2. The highway network is already recognised as constrained

The Uttlesford Transport Study records the A120/B1256 corridor through Bishop's Stortford, Stansted, Great Dunmow and Braintree, and warns that no major strategic-road enhancements are likely in the short or medium term while capacity constraints may be worsened by additional travel demand.

The applicant must therefore show the full cumulative effect of this proposal, including construction traffic, St Edmunds Lane, Church End Bridge, the A120, the B1256 and the M11. A general statement that highway matters can be resolved later does not answer the Local Plan evidence.

National Highways has issued a holding objection and asked the Council not to approve the application before 2 October 2026. The Transport Assessment Addendum and strategic modelling are missing, so the effect of the proposal on the A120 cannot yet be verified. This is direct confirmation that the application has not met the Local Plan's transport evidence requirement.

Evidence: Uttlesford Transport Study Baseline Report, pp. 12 and 33; Transport Evidence Topic Paper, p. 6.

3. The Local Plan evidence identifies wastewater risk at Great Dunmow

The Stage 2 Water Cycle Study includes Great Dunmow Wastewater Treatment Works and identifies the possibility of significant deterioration at works including Great Dunmow unless treatment improvements are delivered.

The application must identify the required treatment and network upgrades, who will fund them, the delivery timetable, the operator's confirmation and the occupation trigger. Until that is provided, the proposal has not shown that it meets the Local Plan's water and wastewater evidence.

Evidence: Stage 2 Water Cycle Study, pp. 17–18 and 77–113.

4. Water resources and existing customers must not be put at risk

The Infrastructure Delivery Plan records water-resource pressure, including over-licensed or over-abstracted resources, and the need for network upgrades to serve growth without detriment to existing customers.

The applicant must demonstrate that the necessary water supply exists, that upgrades are funded and timed, and that occupation cannot run ahead of capacity. A contribution without a delivery plan does not meet the Local Plan evidence requirement.

The risk is no longer theoretical. Residents at Great Dunmow Grange, approved for 790 homes, have reported months of severely reduced pressure, including a trickle or no water. Affinity Water said extensive development, ongoing construction and hot weather had strained demand. Great Dunmow Town Council has demanded assurance that the wider network can support continuing growth and further large-scale schemes.

The Broadway application adds another 850 homes plus a school and other facilities. It must be supported by a published, cumulative pressure and capacity assessment, a funded reinforcement programme, firm delivery dates and occupation controls that protect existing customers before new demand is connected.

Evidence: Infrastructure Delivery Plan for Regulation 19 Consultation, pp. 37–40; BBC News, 'Woman buys back-up bottles due to water trickle', 11 August 2026.

4A. The combined water impact has not been assessed

Major development around Tesco, Woodlands Park, Great Dunmow Grange and Broadway lies within the same wider water environment. SuDS and attenuation ponds delay and control runoff but ultimately release it through drains, culverts, ditches and watercourses. The Local Plan's cumulative assessment must therefore test the combined effect on the Chelmer catchment rather than accept separate site calculations as a complete answer.

Delayed releases from several attenuation systems may overlap, prolong elevated river and drainage levels and reduce recovery time before consecutive storms. The Council must obtain a site-by-site outfall and discharge schedule and model flood duration, system saturation, exceedance routes, maintenance failure and consecutive rainfall events.

5. The site conflicts with the Local Plan's landscape, heritage and ecological evidence

The Local Plan site-selection evidence records the Broadway site area as having high landscape sensitivity because of its smaller-scale landscape and scattered semi-natural habitats. It identifies the setting of Church End Conservation Area, St Mary's Church and other heritage assets, and records flood and heritage constraints in the site-selection material.

That sensitivity is corroborated by the Council's exact-site planning history. UTT/19/1802/OP, for up to 115 homes on overlapping southern Broadway land, was refused on 20 February 2020 because urbanisation would harm the rural setting of Church End Conservation Area, Grade I St Mary's Church and Grade II Crouches. The conservation adviser said the agricultural setting explains Church End's historic farming origins; the landscape adviser described the land as part of the broad, bucolic sweep on the approach to Church End. (Refusal Notice 3338302, p. 2; Conservation Advice 3294037, pp. 1-2; Landscape Comments 3299326, p. 1.)

The adopted 2026 Local Plan allocation changes the policy context that applied in 2020, but it does not erase the Council's exact-site findings about the character of the land and the setting of Church End. Gladman's own Planning Statement accepts that the development would harm Crouches Farm, St Mary's Church and the Great Dunmow Conservation Area. This is permanent heritage harm caused by the proposal. It must be assessed with the wider damage to Church End's historic setting, the Chelmer Valley landscape and the cumulative effect of development across the site. (Planning Statement 4764353, p. 31.)

Gladman's own Landscape and Visual Effects chapter confirms that the conflict is not confined to construction or the period before planting matures. It assumes that the proposed planting and open-space mitigation has established for 15 years, but still identifies significant adverse effects on six receptors: the arable farmland on the site; the landscape character of the site; views from the B1057 The Broadway through the site; views from the section of FP/21/18 through the site; views from FP/82/18; and views from Broadway Cottage. At Broadway Cottage the effect remains substantial to moderate and significant. Gladman also predicts moderate, significant adverse cumulative effects for users of the B1008 and sequential views from FP/21/18 when this proposal is considered with the River Chelmer/B1008 allocation. The application therefore does not demonstrate that planting will overcome the Local Plan evidence of landscape sensitivity. (ES Chapter 8, paras. 8.116-8.145 and Table 8.2, PDF pp. 24-30.)

The application proposes buildings up to 12 metres high and a large new settlement presence. The applicant must demonstrate that the scale, height, mass and visibility do not cause unacceptable harm. Future planting cannot erase the underlying conflict identified by the council's own evidence. The development would be highly prominent in

views from Beaumont Hill across the Chelmer Valley towards Church End and St Mary's Church. The urbanising effect of roofs, upper storeys, lighting, traffic and activity would remain even after landscaping matures.

A resident video records two otters entering the River Chelmer beside Great Dunmow churchyard, and the Essex Field Club search contains three otter records. This shows otter use of the nearby connected river corridor. The site's river, banks, ditches, culverts and riparian vegetation must therefore be covered by current competent surveys and effective mitigation. Residents do not have to record an otter inside the application boundary before the applicant completes that work.

The Environment Agency and Essex Wildlife Trust both maintain ecological holding objections. They require further great crested newt work, updated botanical evidence, proper assessment of ditches and hedgerows, justification for culverting and long-term habitat management. The applicant also says an Agricultural Land Quality Report was submitted, but no identifiable report is published. The agricultural grades, loss of best and most versatile land and soil protection measures therefore remain unassessed.

Evidence: Stage 1–5 Site Selection Assessment, pp. 6–9; HELAA Site Assessment Proformas, pp. 179–184; Heritage Assessments — Final, pp. 4–7. UTT/19/1802/OP: Refusal Notice 3338302, p. 2; Conservation Advice 3294037, pp. 1–2; Landscape Comments 3299326, p. 1; Delegated Officer Report 3334175, pp. 14–15. Applicant ES Chapter 8: Landscape and Visual Effects, paras. 8.116–8.145 and Table 8.2, PDF pp. 24–30. Ecology: resident video dated 25 April 2023; Essex Field Club report EFC6965, PDF page 59.

6. The Local Plan evidence requires proper archaeology before development

The heritage evidence records Romano-British cropmarks, enclosures and possible cemetery context around Great Dunmow. The Archaeology Data Service records a Roman linear settlement, cremation cemetery and possible shrine in the Great Dunmow area.

Essex County Council's archaeological adviser identified cropmark linear features south of the 16th-century Crouches and potential prehistoric, Roman, medieval and post-medieval evidence on the 2019 site. It recommended trial trenching followed, where required, by open-area excavation under a written scheme of investigation before reserved matters or groundworks. This is official exact-site advice, not merely wider archaeological context. (ECC Specialist Archaeological Advice 3317371, pp. 1-2.)

The applicant must supply the site-specific desk-based assessment, field evaluation where required and a mitigation strategy before the council decides that the site can be built on. The absence of that evidence is a Local Plan heritage and evidence failure, not a reserved-matters detail.

Local Plan evidence reference: 'Heritage_Assessments_-_Final.pdf', pp. 4–7, downloaded from Uttlesford District Council's official Local Plan 2021–2041 Evidence Base. The supporting archaeological record is the Archaeology Data Service resource **GREAT DUNMOW**, Original ID **1070057**. The Local Plan evidence-base item is identified by its exact published title and preserved filename because the council page does not assign it a separate document number.

7. The proposal has not demonstrated that local services can support it

Essex County Council Education says the required Land Compliance Study for the proposed school site is missing and requires the full report and assessment. Until that evidence is supplied, the application has not demonstrated that the school land relied upon in the masterplan is suitable and deliverable.

The Infrastructure Delivery Plan records constrained existing GP practices and identifies a new primary-care centre as necessary to support growth, subject to masterplanning. The Open Space Update Report requires quantity, quality, accessibility, funding and maintenance to be addressed for Great Dunmow.

The application must state what healthcare, schools, open space, sport, policing, fire access, electricity and sewage provision will be delivered, by whom, funded how, maintained by whom and available when. It must also explain how parking for existing and new healthcare services will work in practice.

Healthcare floorspace must not be credited as additional capacity if an existing practice merely relocates or opens a branch. The NHS commissioner must secure additional funded doctors, nurses and appointments, defined opening hours and services, with no reduction of existing provision elsewhere in Great Dunmow.

The proposal also fails to secure a pub, restaurant or comparable evening venue. Residents will continue to travel into Great Dunmow, often by car. The Co-op customer car park is not spare public capacity. Current evening and weekend town-centre parking occupancy and cumulative demand from all major developments must be assessed.

If those arrangements are not secured for the full population, the proposal does not meet the Local Plan's infrastructure-delivery evidence.

Evidence: Infrastructure Delivery Plan, pp. 37–40; Open Space Update Report, pp. 5 and 8–10.

8. The housing and employment evidence is incomplete

The Local Housing Needs Assessment identifies substantial affordability and housing-mix pressures, including demand for different sizes and tenures. The outline application has not provided a sufficiently reliable dwelling-size and bedroom mix to establish the population, travel demand, school demand or healthcare demand it would create.

The Employment Needs Update records the influence of Stansted and the M11, potential job growth and an out-commuting issue. The applicant must therefore explain where residents are expected to work, how they will travel and how the proposed transport assumptions relate to the actual housing mix.

Without those figures, the population and infrastructure case cannot be relied upon.

Evidence: Local Housing Needs Assessment, pp. 5–8 and 75 onward; Employment Needs Update 2023, pp. 5–6, 28 and 38.

9. Cumulative growth must be assessed against the Local Plan evidence

The Housing Trajectory records substantial existing and committed growth around Great Dunmow, including the Stortford Road scheme and associated health-centre provision. The application must show how its additional effects interact with that growth across transport, water, wastewater, healthcare, education, open space and landscape.

The council must not accept an assessment that treats this proposal in isolation or double-counts infrastructure that is already required for other developments.

Evidence: Housing Trajectory 2021–2041 Appendix 2; Transport Study Baseline Report, p. 33.

Required decision

The application should be refused because it has not demonstrated compliance with the council's own Local Plan evidence requirements. The identified failures concern the principle of development at this location: sustainable transport, highway capacity, water, wastewater, flooding, landscape, heritage, archaeology, local services, housing and employment, and cumulative growth.

The council should not invite the applicant to return with a partial answer to one or two points. The application should not proceed unless every identified Local Plan requirement is addressed with site-specific evidence, funded infrastructure and enforceable delivery arrangements.