

TECHNICAL PLANNING OBJECTION

Planning Application UTT/26/1635/OP

Land north and south of The Broadway, Church End, Great Dunmow

Version 3.36 — Final Submission Consolidation

Controlled reconstruction from the surviving public objection, evidence registers and recovered technical findings

Control	Position
Document status	Final submission document
Purpose	Technical evidence and planning-control report supporting the public objection
Application	UTT/26/1635/OP
Maximum development	Up to 850 homes
Adopted site-framework figure	Approximately 715 homes
Current controlled master	Public Master Objection v4.8
Current executive summary	Executive Summary v4.38
Controlled tracker	Dependency and Delivery Control Tracker v1.87
Reconstruction limitation	This report is a new evidence-led reconstruction. It does not claim to reproduce the lost 150-page technical document verbatim.

1. Purpose, Method and Evidential Status

This document reconstructs the technical planning objection for application UTT/26/1635/OP. It consolidates the strongest controlled findings presently available, identifies unresolved dependencies, and specifies the evidence and legal controls required before the application can safely be determined.

The factual and terminology baseline used here is aligned with Public Master v4.8 and Executive Summary v4.38: 850 homes, approximately 715 homes in the site framework, a 135-home / approximately 18.9% uplift, approximately 2,142 additional residents and 26,671 registered patients across the two Great Dunmow practices.

The report follows a deliberately cautious evidence protocol. Verified facts are distinguished from applicant assertions, local evidence leads, provisional findings and unresolved questions. No missing source is treated as though it had been reviewed.

- Verified evidence: controlled source or official document reviewed and capable of citation.
- Applicant position: statement or conclusion made in submitted material, not automatically accepted.
- Evidence lead: relevant local or specialist information requiring verification.
- Open dependency: evidence, consultee response or legal control not yet available or not yet audited.
- Technical finding: present conclusion based on the controlled record, expressed at the level justified by that record.

2. Executive Technical Conclusions

- The application seeks 850 homes against an adopted site-framework figure of approximately 715 homes: an uplift of 135 homes, approximately 18.9%.
- The applicant estimates approximately 2,142 additional residents, and the controlled technical evidence records an estimated 42% increase in Great Dunmow North ward population.
- The full 850-home scale has not yet been demonstrated consistently across transport, education, healthcare, wastewater, drainage, housing, parking, open-space and legal-control calculations.
- The Council's own heritage evidence identifies Church End's separation, rural approach, important views and the Chelmer Valley setting as matters requiring protection.
- The applicant's Environmental Statement records significant adverse effects remaining after fifteen years on site landscape character and at Broadway Cottage.
- The complete 2018 Bigods Lane appeal site lies within the present application boundary. The 2019 Inspector's site-specific findings on the Chelmer Valley, The Broadway approach and the urbanising effect of housing are relevant evidence requiring an express current-policy response.
- Ecological survey coverage, publication of the full Essex Field Club search, data currency, the great crested newt survey/licensing route and the final Biodiversity Net Gain delivery package remain incomplete or unresolved.

- Great Dunmow Water Recycling Centre has a controlled capacity constraint position requiring further investment before cumulative planned growth can be accommodated.
- The proposed healthcare floorspace is not yet an operational service: provider, commissioning, funding, fit-out, staffing, trigger and fallback remain unresolved.
- The secondary-care position is also unresolved: the hospital trust serving Broomfield states that demand exceeds capacity, Broomfield four-hour A&E performance was 65.1% in March 2026, and local cancer and elective-treatment performance remained well below NHS standards.
- Reserved school land is not equivalent to a funded and operational school; pupil yield, delivery, provider and occupation triggers remain open.
- Final highway modelling, cumulative assumptions, local-route effects, sustainable-transport commitments, parking and emergency-access resilience remain unresolved.
- The final affordable-housing, housing-mix, phasing, Section 106 and conditions packages have not yet been fully audited.
- The application should be refused, or determination deferred, until the outstanding technical and legal-control dependencies are resolved.
- Church End Bridge remains a critical delivery dependency: its recorded assessed rating is 7.5 tonnes, while Essex County Council requires 40 tonnes and may require strengthening or replacement, including for construction-vehicle loading.
- The Stage 2 Water Cycle Study warns that Anglian Water may have underestimated growth in the Great Dunmow WRC catchment and calls for action on poorly performing storm overflows before new development adds wastewater demand.
- The Infrastructure Delivery Plan identifies electricity reinforcement through additional circuits for Great Dunmow, but completion, headroom, funding and occupation controls have not yet been verified.

3. Development Scale and 715-to-850 Uplift

Issue	Whether the technical evidence and mitigation package address the maximum 850-home permission rather than the approximately 715-home framework figure.
Controlled evidence	Applicant acknowledgement of a higher quantum than originally envisaged; approximately 2,142 additional residents; controlled estimate of about 42% ward population growth; controlled 12-row uplift audit.
Technical finding	The scale difference is material and capable of increasing demand across every principal infrastructure and environmental topic.
Evidence gap / dependency	A document-by-document audit remains incomplete. Several assessments or controls are deferred, unfinished or not yet available.
Required control or decision response	Require a single 850-home assumptions schedule and updated/sensitivity-tested calculations for every technical assessment, contribution and occupation trigger.

The uplift is not a purely numerical difference. It changes the expected population, vehicle trips, pupils, healthcare demand, foul flows, surface-water runoff, affordable-housing yield and the scale and timing of community infrastructure.

- The permission and all controls must be drafted for the maximum 850 dwellings.
- Assessments using 715 dwellings require updating or a transparent sensitivity test.
- The same cumulative-development assumptions must be used across all topics.
- Contributions and thresholds must operate cumulatively across phases and land parcels.

4. Development Plan and Policy Compliance

Issue	Whether the proposal accords with the adopted Uttlesford Local Plan, Great Dunmow site framework, current NPPF and Great Dunmow Neighbourhood Plan.
Controlled evidence	Uttlesford Local Plan 2021-2041 adopted 25 March 2026; framework identifies approximately 715 homes; verified NPPF tests; GDNP Policies LSC1-LSC3.
Technical finding	Allocation does not confer automatic approval for 850 homes or for any form of development. Detailed conformity and policy conflict require assessment.
Evidence gap / dependency	The adopted Local Plan identifies Great Dunmow 009 RES within Core Policy 10 (South Uttlesford Area Strategy). The site template and Core Policy 5 require the allocation to be tested against infrastructure delivery, landscape, heritage, flood risk, transport, education, affordable housing and other applicable policies. The allocation does not grant automatic consent for 850 homes; the decision-maker must assess the current proposal, its quantum and its mitigation package against the adopted plan.

Issue	Whether the proposal accords with the adopted Uttlesford Local Plan, Great Dunmow site framework, current NPPF and Great Dunmow Neighbourhood Plan.
Required control or decision response	Complete the controlled Policy Compliance Matrix and identify each conflict, conformity point, mitigation dependency and residual harm.

The policy analysis must avoid treating allocation as automatic consent. The decision-maker must consider the specific quantum, design parameters, environmental effects and infrastructure package now proposed.

5. Heritage, Church End and Settlement Separation

Principal applicant source references: Environmental Statement Chapter 7, PDF p.25 / printed p.7-24 paragraphs 7.110-7.114 and PDF p.34 / printed p.7-33 paragraphs 7.152-7.157; Heritage Impact Assessment Appendix E2, PDF pp.24-25 paragraphs 2.105-2.115; Design and Access Statement Part 1, pages 25 and 30; Heritage Desk-Based Assessment, printed page 119 / PDF page 122 paragraph 6.367.

Issue	Whether the development preserves the significance, setting, approach and separate historic identity of Church End.
Controlled evidence	Council heritage evidence plus the current Historic England extract identifying 18 listed-building records and two scheduled monuments in the Church End / Parsonage Farm group.
Technical finding	The open countryside gap and rural approach perform a documented heritage and settlement-form function. Urbanisation risks irreversible harm and coalescence.
Evidence gap / dependency	Final conservation-officer response and the enforceability of separation land, heights, views, lighting, access and planting remain open.
Required control or decision response	Give great weight to conservation; fix development limits and heritage safeguards at outline stage; do not credit unsecured mitigation.

The heritage interest is the legibility of Church End as a historic place within an open valley setting, not merely the physical condition of listed buildings. The countryside gap, views and approach form part of that significance.

5A. Current Historic England designation evidence

The Historic England National Heritage List extract acquired on 28 July 2026 identifies a concentrated Church End heritage group: 18 listed-building records, including the Grade I Parish Church of St Mary the Virgin, the Grade II* Porters Yard and 16 Grade II entries, together with two scheduled monuments at Parsonage Farm.

The official Parsonage Farm moat entry describes a broad spur north of Church End overlooking the River Chelmer valley to the north and east, and several listed-building records identify group value. These designations and descriptions establish sensitivity and the need for an asset-by-asset setting assessment; designation and proximity do not, by themselves, prove the degree of Broadway-specific harm.

Required evidence: a mapped heritage figure using the official geometry, a significance and setting table for each relevant asset, verified viewpoints and a clear explanation of how the proposed urban edge, lighting, traffic and landscape change would affect the group and valley setting.

5B. Uttlesford's site-specific evidence for the eastern approach

The Great Dunmow Historic Settlement Character Assessment (August 2007), PDF page 13, separately assesses Sector 7: land on the Stebbing Road approach. It describes open rising arable land descending to Church End, a firm and heavily treed edge to Church End and The Broadway, and the tower of St Mary's visible above the tree canopy. It says the fields make a clear distinction between built form and countryside.

The same Sector 7 assessment says development would extend the urban area onto highly visible open farmland, diminish the separate identity of the small Church End community, exacerbate the effects of St Edmunds Fields, add traffic to narrow historic roads, potentially affect the landmark church tower and diminish the settlement's sense of place and local distinctiveness.

The approved Great Dunmow Conservation Area Appraisal (November 2007), PDF page 38 paragraph 1.159, states that the open agricultural land separating the distinct areas performs an extremely important anti-coalescence function and that its open qualities must be maintained. PDF page 39 identifies an important gap of farmland separating Church End from the rest of the town.

The Great Dunmow Town Design Statement was adopted as Council Approved Guidance on 22 July 2009. At PDF page 24 it warns that development north of St Edmunds Lane could widen the town boundary, harm significant Chelmer Valley views and reduce the valley to a strip of land within housing. At PDF page 31 it recommends protection of agricultural landscapes north and south of the B1057 and enhancement of the St Edmunds Lane junction and approach to Church End.

No searchable citation to the Town Design Statement or Historic Settlement Character Assessment was found in the submitted Cultural Heritage chapter, Landscape and Visual Effects chapter, Heritage Desk-Based Assessment, Heritage Impact Assessment, Landscape and Visual Impact Assessment Part 1 or Landscape Design Document. This is a

text-search result rather than proof that no differently worded or image-only reference exists, but it requires the applicant and decision-maker to address these site-specific Council documents directly.

The applicant acknowledges the narrow Beaumont Hill-Church End gap but then distinguishes the application site from the 'most important agricultural land'. That distinction does not answer the broader Sector 7 assessment or the Town Design Statement's protection of both sides of The Broadway. A definitive mapped overlay should establish the precise boundary relationship; the wider setting and eastern-approach conflict is already evidenced.

5C. Bigods Lane appeal: directly overlapping site evidence

Principal controlled sources: Planning Inspectorate appeal decision APP/C1570/W/19/3235257 dated 2 December 2019; official UTT/18/3157/OP location plan and indicative masterplan; current UTT/26/1635/OP location plan 4764331; Heritage Desk-Based Assessment 4764448, PDF page 14.

Direct comparison of the official location plans establishes that the complete former appeal site - the field east of Bigods Lane and north of The Broadway - lies within the much larger current application boundary. The earlier site adjoined the River Chelmer and occupied the north-eastern approach to Church End.

At paragraphs 6-13 the Inspector described the land as part of the river valley and as an inherently rural arable field between The Broadway and Bigods Lane. The Inspector found that housing would have a strong urbanising influence at an important approach to Church End and Great Dunmow, would be visible from a considerable distance along The Broadway and from public rights of way, and would form a prominent incursion into open countryside. The Inspector disagreed with the appellant's landscape assessment and found that planting and open-space mitigation would not satisfactorily integrate the development. The appeal was dismissed at paragraph 29.

The current Heritage Desk-Based Assessment lists UTT/18/3157/OP in a planning-history bullet and records that the appeal was dismissed. A text check of the current Planning Statement, both Design and Access Statement files, ES Chapter 8, Heritage Desk-Based Assessment, Heritage Impact Assessment and both LVIA files found no identification of APP/C1570/W/19/3235257 or express engagement with paragraphs 6-13. The controlled point is therefore not that the planning history was omitted, but that the directly relevant decision reasoning is not shown to have been addressed.

5D. UTT/19/0921/SCO and UTT/19/1802/OP: overlapping southern-land evidence

UTT/19/1802/OP sought outline permission for up to 115 homes on overlapping southern Broadway land and was refused by Uttlesford on 20 February 2020. Refusal reason 2 found that urbanisation of a rural area making a significant contribution to Church End Conservation Area's setting would harm the Conservation Area, Grade I St Mary's Church and Grade II Crouches, and that the public benefits did not outweigh that harm. (Refusal Notice 3338302, PDF p. 2.)

The Council's conservation adviser found that Church End's relative isolation and legible break from Great Dunmow survived, that the agricultural setting explained its farming origins, and that the proposal would change the experience of St Mary's from a church in an agricultural setting to one adjoining a housing estate. The landscape adviser described the land as open rolling arable land appreciated from The Broadway and public paths, integral to the broad bucolic sweep on the approach to Church End, and concluded that development would cause significant detrimental landscape impact. The officer report further recorded that the LVIA failed to acknowledge the backdrop to the church tower from the Causeway, omitted more visible viewpoints 23 and 24 and produced a moderate adverse impact. (Conservation Advice 3294037, pp. 1-2; Landscape Comments 3299326, p. 1; Delegated Officer Report 3334175, pp. 14-15.)

ECC's archaeological adviser identified cropmark linear features south of Crouches and potential prehistoric, Roman, medieval and post-medieval evidence. It recommended trial trenching followed, where necessary, by open-area excavation under a written scheme of investigation before reserved matters or groundworks. The earlier screening process initially identified a potentially significant cumulative effect on Hatfield Forest; the later no-EIA opinion followed additional information about wider rights-of-way and recreation links and required careful treatment. (ECC Specialist Archaeological Advice 3317371, pp. 1-2; Screening Opinions 2818920, pp. 2-3 and 2844356, p. 1.)

The adopted 2026 Local Plan changes the policy context that applied to the earlier decisions, but it does not erase their exact-site evidence. The 2019 material records the rural and heritage value of the land, the broad approach to Church End and the need for transport mitigation. Gladman's present Planning Statement accepts that the development would harm Crouches Farm, St Mary's Church and the Great Dunmow Conservation Area. That permanent heritage harm 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. A focused review found no express engagement with UTT/19/1802/OP or UTT/19/0921/SCO in the current main Planning Statement, Cultural Heritage chapter or Landscape chapter. The applicant and Council must publish a direct current-policy reconciliation. (Planning Statement 4764353, p. 31; ECC Highways Comments 3305999, pp. 1-3; controlled source review dated 10 August 2026.)

The decision concerned up to 50 homes and applied the policy and housing-land-supply position current in 2019. It is not an automatic precedent and does not determine this 850-home application. Its physical observations are nevertheless site-specific independent evidence. The Council should require an express current-policy response explaining whether, and on what evidence, the Inspector's findings are now said to be overcome.

6. Landscape and Visual Impact

Principal applicant source references: Environmental Statement Chapter 8, printed page 8-23 / PDF page 24 paragraphs 8.116-8.119, printed page 8-26 / PDF page 27 paragraph 8.135, and Table 8.2 at printed page 8-28 / PDF page 29.

Issue	Whether the scheme's permanent landscape and visual effects are acceptable and whether mitigation assumptions are reliable.
Controlled evidence	Applicant LVIA findings plus the adopted June 2026 Uttlesford Design Code requirements for landscape identity, valleys, views, historic lanes, hedgerows, buffers and ecological connections.
Technical finding	The scheme would permanently replace agricultural countryside with an urban neighbourhood. Planting softens but does not reverse that change.
Evidence gap / dependency	Full receptor, viewpoint, photomontage, building-height and mitigation audit remains open.
Required control or decision response	Verify every year-one/year-fifteen finding and secure all relied-upon landscape parameters and long-term management.

Residual effects after fifteen years demonstrate that mitigation does not eliminate the harm. Any parameter relied upon to reduce those effects must be fixed and enforceable.

6A. Adopted Uttlesford Design Code SPD, June 2026

The current documents are the Uttlesford Design Code SPD, Version 08, June 2026, and Appendix A Uttlesford Places, Version 04, June 2026. Uttlesford Planning Committee minutes of 8 July 2026 expressly describe the Code as adopted in June 2026. It therefore supersedes the 2024 SPD for the present decision. The 2026 wording is not the first Council recognition of these matters. The adopted 2024 Code already required open views to historic buildings and local landmarks to be conserved (ID1.3C, main SPD PDF page 24). It already protected historic lanes, hedgerows, panoramic views and open and enclosed views across hills and valleys (ID2.2C-ID2.5C, main SPD PDF page 26). Appendix A already recorded Great Dunmow's two separate parts, Church End's rural/village character and the retention of key views towards St Mary's Church (2024 Appendix A, PDF pages 25 and 28). The 2026 version retains that established position and strengthens or clarifies it, notably through the new heritage-setting rule ID1.6C, the new topographical-evidence rule ID2.6C, and the links between key views or panoramas and the relevant character appraisal or latest Landscape Character Assessment.

The mandatory provisions are directly relevant. ID1.3C requires key views to historic buildings and local landmarks identified in local character appraisals to be conserved and enhanced; ID1.6C requires development near heritage assets to preserve or enhance their significance. ID2.1C-ID2.6C require a positive response to landscape sensitivities, conservation of historic and protected lanes, verges, woodland, copses and hedgerows, protection of key panoramic views, maintenance of open and enclosed views across hills and valleys, and topographical evidence including eye-level perspectives (main SPD, PDF pages 13-14).

Appendix A is unusually site-specific. It says that Great Dunmow has two quite separate parts - the market town and Church End - and that Church End's rural/village character results from that separateness (Appendix A, PDF page 13). Its Great Dunmow design cues identify the retention of key views towards St Mary's Church (PDF page 15). It also describes river valleys as rolling landscapes of hedgerows, tree belts, wetland habitats and views from higher ground, with church spires above wooded skylines (PDF page 24).

Nature provisions N3.6C-N3.10C require field boundaries, woodland, copses, hedges, riverside habitat and the green natural character of river valleys to be conserved and managed (main SPD, PDF page 27). These provisions do not by themselves prove refusal is required, but they materially strengthen the need for a provision-by-provision compliance assessment covering the Chelmer Valley, Church End's separation, St Mary's Church views, historic lanes, hedgerows, lighting, topography, biodiversity buffers and connected habitats. Any claimed compliance must be demonstrated against the final June 2026 wording and the verified site evidence.

6B. Applicant's admitted long-term effects and mitigation dependency

Environmental Statement Chapter 8 Table 8.2 records long-term significant adverse effects at year 15 on the arable farmland, the landscape character of the site, views from the B1057 through the site, views from public footpaths FP/21/18 and FP/82/18, and views from Broadway Cottage. The last remains substantial to moderate adverse.

By contrast, Environmental Statement Chapter 7 paragraph 7.157 predicts no significant residual heritage effects. Landscape and heritage assessments can apply different professional tests, so the difference is not by itself proof of error. It nevertheless requires explicit reconciliation because the affected farmland, Broadway views, footpaths and Church End setting overlap with the historic character identified in the Council's evidence.

The proposed view corridor, riverside park, green corridors, tree-lined streets and planting may filter buildings. They cannot retain agricultural land, the present open rural approach or the existing distinction between built form and countryside. Visual filtering must not be treated as complete replacement of those qualities.

Buildings up to 12 metres high would be highly prominent in this open countryside and valley setting. Their height, number and combined mass would fundamentally change views from Church End, Beaumont Hill, St Mary's Church and surrounding public viewpoints. The proposal would not be an unobtrusive extension of the town; it would create a major new

built presence in the landscape. The applicant must demonstrate that this scale of development is acceptable. Proposed landscaping cannot be treated as an answer to the underlying harm.

The year-15 conclusions rely on planting reaching the assumed maturity, while the chapter states that no future monitoring is required. Building heights, lighting, planting establishment, replacement, long-term management and the heritage view corridor therefore need measurable and enforceable controls. Final conservation and landscape officer responses should address the 2007 and 2009 Council evidence and this cross-discipline inconsistency.

6C. Agricultural land quality and soil resource

The Planning Statement says that an Agricultural Land Quality Report was submitted, but no identifiable report is published in the application corpus. The approximately 69-hectare site is mainly arable farmland. General mapping cannot establish the proportions of Grades 2, 3a and 3b or quantify the loss of best and most versatile agricultural land. The promised report, or a detailed field survey of equivalent quality, must be published and assessed before determination, together with a soil handling, protection and reuse strategy.

7. Ecology and Biodiversity Net Gain

Principal controlled source references: Essex Wildlife Trust consultation response 4771985 and supporting pages; applicant natural-heritage and Biodiversity Net Gain submissions; controlled Ecology Evidence Register.

Issue	Whether protected species, habitats, connectivity and long-term BNG delivery have been adequately assessed and secured.
Controlled evidence	Applicant survey gaps and species records; EFC6965 and current publication terms; Natural England's 29 July 2026 DLL procedure response; official Essex GCN risk-zone GeoJSON and bounded MAGIC context.
Technical finding	The applicant has not demonstrated great crested newt absence or resolved the inaccessible ponds and licensing route. The EFC report relied upon for the desk study is not present in full on the public application record reviewed, and its 2025 data currency has not been demonstrated. Bat, [REDACTED] bird and corridor effects require species-specific controls. Headline BNG percentages are insufficient.
Evidence gap / dependency	Publication and refresh of EFC6965; reasoned record-schedule comparison; declared GCN licensing route; treatment of inaccessible ponds; any DLL enquiry reference or countersigned certificate; final metric, HMMP, responsible body, funding, monitoring and enforcement remain open.
Required control or decision response	Publish and update the source records, resolve survey and licensing evidence needed for determination, and secure measurable BNG outcomes and remedies for the full management period.

The ecological decision must be based on adequate baseline information. Where survey limitations affect the ability to understand protected-species presence or habitat function, later conditions are not a substitute for evidence needed now.

The Environment Agency's formal response dated 4 August 2026 maintains an ecological holding objection. It says the great crested newt evidence is inconclusive because ponds were inaccessible and the eDNA results were indeterminate. It requires further survey or precautionary mitigation, full accounting for the ditch network and culverting, protection of Markshill Wood, and a habitat management and monitoring plan lasting at least 30 years.

Essex Wildlife Trust also maintains a formal holding objection. It requires an updated botanical survey, proper assessment of ditches and hedgerows, compliance with the Hedgerow Regulations, and a complete ecological evidence base capable of supporting the proposed mitigation and Biodiversity Net Gain. These two formal objections show that the ecology case is not complete.

7A. Dark Skies, Artificial Light and Nocturnal Ecology

The application would introduce a substantial new source of artificial light into the Chelmer Valley and the rural setting of Church End. The likely sources include adopted street lighting, junction lighting, residential windows and gardens, vehicle headlights, school and local-centre lighting, sports and recreation lighting, security lighting, illuminated signs and temporary construction lighting.

Planning relevance

National planning policy requires decisions to limit the impact of artificial light on local amenity, intrinsically dark landscapes and nature conservation. Planning Practice Guidance states that lighting can harm wildlife and undermine enjoyment of the countryside and night sky, particularly where a development would conspicuously alter existing nocturnal light levels.

The relevant questions are not confined to whether lighting meets highway or safety requirements. The assessment must address where light shines, when it operates, how much light is emitted, its colour and spectral content, and its effects on ecological receptors and landscape character.

Relationship with the submitted bat evidence

The controlled ecology evidence records a peak of 133 bat contacts at survey location SSL4 in September 2025, with timings suggesting that a roost may be nearby, as well as important hedgerows and flight lines, mature trees and the River Chelmer corridor. Natural England's standing advice requires consideration of lighting where development is close to trees, shrubs, water, roosting habitat, feeding habitat or commuting routes.

Natural England identifies the creation and retention of dark commuting corridors between roosting and foraging areas as an appropriate avoidance and mitigation measure. The Institution of Lighting Professionals and Bat Conservation Trust Guidance Note GN08/23 applies a mitigation hierarchy in which avoidance of lighting on important bat habitat is preferred to later technical correction.

Required baseline and assessment

- A measured pre-development night-time baseline at representative locations, including Beaumont Hill viewpoints, the River Chelmer, Church End, retained hedgerows, mature trees and likely bat routes.
- A complete lighting impact assessment covering operational, residential, highway, school, local-centre, sports, security, signage, construction and vehicle-headlight effects.
- Horizontal and vertical illuminance modelling, including light spill at habitat edges, water, tree canopies, potential roosts, gardens and sensitive viewpoints.
- Assessment of cumulative night-time effects with existing and committed development around Great Dunmow.
- A clear explanation of which areas will remain unlit, rather than merely receiving reduced light.

Required design controls

- The layout should be designed around protected dark corridors before roads, plots and lit facilities are fixed.
- No lighting should be installed where it is not demonstrably necessary.
- Luminaires should be fully shielded, directed downwards and selected to minimise blue-rich and ultraviolet output.
- Lighting should be dimmed or switched off during ecologically sensitive hours wherever safety allows.
- The River Chelmer, retained hedgerows, mature trees, roost entrances and identified bat routes should remain genuinely dark.
- Sports, school, commercial and security lighting should have enforceable hours, maximum light levels and automatic shut-off controls.
- Construction lighting should be separately controlled by phase and should not illuminate retained habitats.
- The approved lighting scheme should be tested after installation, with corrective action required where measured levels exceed approved limits.
- Any later change to lighting should require ecological review and approval rather than being treated as routine maintenance.

Landscape and residential effects

The impact is not solely ecological. A large lit development would change the nocturnal character of the open valley and views from Beaumont Hill and Church End. The assessment should therefore consider sky glow, glare, visibility of lighting and illuminated buildings, and the loss of the existing contrast between the built-up town and darker countryside.

Controlled conclusion

The applicant has not provided a complete lighting strategy, measured dark-sky baseline or enforceable dark-corridor plan. Given the recorded bat activity, possible roost, river corridor, mature trees and sensitive valley setting, lighting cannot safely be left as a minor reserved-matters detail.

The Council should require the lighting assessment and controlling principles before determination, with the detailed scheme, post-installation testing, monitoring and long-term controls secured by condition and, where necessary, the Section 106 agreement.

Primary official and professional sources

Planning Practice Guidance, Light pollution: <https://www.gov.uk/guidance/light-pollution>

Natural England, Bats: advice for making planning decisions:
<https://www.gov.uk/guidance/bats-advice-for-making-planning-decisions>

Institution of Lighting Professionals and Bat Conservation Trust, GN08/23 Bats and Artificial Lighting at Night:
<https://theilp.org.uk/static/d9ebd734-85c3-4a9f-9c518b7e40325d5b/GN08-Bats-and-Artificial-Lighting.pdf>

7B. MAGIC and Natural England mapping context

A bounded official-data check centred on the verified MAGIC location found 13 Priority Habitats Inventory polygons within the 1 km square, all mapped as deciduous woodland. The 4 km square returned deciduous woodland, traditional orchard and additional-habitat records. The 20 km context returned four SSSIs and Hatfield Forest National Nature Reserve; the recorded bounded SAC and SPA queries returned no intersecting features.

These are context-square results, not an application-boundary intersection or distance analysis. The Priority Habitats Inventory is not a complete ecological survey, and a zero result from the bounded query must not be treated as evidence of absence. The applicant has not demonstrated the full site position through the red-line boundary, local biological records, surveys, hedgerows, trees, connectivity and field verification.

7C. Essex Field Club datasearch: publication, currency and interpretation

Principal controlled source references: Essex Recorders partnership Datasearch Report EFC6965, PDF pages 1, 3-4 and the species schedules; current Essex Field Club Datasearch Terms of Service; applicant Ecological Impact Assessment and its public Appendix 3.

EFC6965 is the 209-page, 2 km-buffer search commissioned by CSA Environmental for the Broadway project. The applicant states that its EFC desk study was undertaken in February 2025. The public ecological appendix reviewed contains applicant-produced desk-study maps rather than the full EFC report.

The report states that, when its information is used for a desk study, Environmental Statement or planning application, the report must be placed in the public domain in full, in the supplied searchable-PDF format, and must not be changed or redacted. It also states that the Recorders partnership should be contacted if the data are used after six months. The application was finalised and submitted in 2026, but the published material reviewed does not demonstrate that the January/February 2025 search was refreshed.

The source schedules include recent local records for lapwing and hobby that are not mentioned in the applicant's short narrative list of birds considered potentially relevant. Many records are supplied at 1 km resolution, so residents cannot determine site use from those records alone. The applicant has not demonstrated whether the species currently use, breed, nest, roost or forage on the application land, whether the records remain current, or why the records do not require further survey or assessment. The full source report, currency confirmation and a reasoned source-to-assessment explanation are required.

Required before determination: publish the full searchable EFC report; provide written confirmation from the Recorders partnership or applicant on whether the dataset was refreshed; and explain how the complete record schedules, including lapwing and hobby, were considered in the assessment and mitigation.

7D. Great crested newt risk zone and licensing route

Principal controlled source references: Natural England Wildlife Licensing Officer response dated 29 July 2026; Natural England Great Crested Newt Risk Zones (Essex) GeoJSON; applicant Natural Heritage Appendix G; controlled point-in-polygon verification at OSGB36 561833,222851.

Natural England confirms that Essex is covered by district level licensing and that it found no formal DLL enquiry using the supplied site name. The applicant has not supplied any alternative enquiry identifier or countersigned certificate. Natural England also confirms that DLL can be pursued with or without prior survey data; inaccessible ponds are included as 'Not Surveyed'; absence is accepted for DLL purposes only where a licensed ecologist surveyed the pond and found no great crested newts; and a countersigned certificate must be given to the local planning authority if DLL is chosen.

A verified Broadway reference point intersects an official Amber Zone polygon, while nearby official polygons include Green Zone land. The applicant has not provided an exact whole-boundary intersection or demonstrated the presence-or-absence position across the site. The verified Amber intersection and inaccessible ponds require the risk and licensing route to be resolved before determination.

The applicant mapped one pond on site, ten more within 250 metres and a further six within 500 metres. The on-site pond was dry throughout the breeding period. Only ponds P5 and P6 were sampled for environmental DNA, and both results were indeterminate. Access was not granted to eight of the closer ponds (P2-P4 and P7-P11). These limitations must be reconciled with the intended licensing route and the ecological conclusions. The Council should require the applicant to state whether it will use DLL or conventional mitigation licensing and to publish any relevant enquiry reference, countersigned certificate, licensed-surveyor evidence and explanation of how inaccessible ponds were treated before the ecology position is finalised.

7E. Otters and the connected River Chelmer corridor

A resident video records two otters entering the River Chelmer beside Great Dunmow churchyard at 21:16 on 25 April 2023. The original video is preserved in the controlled evidence set. The Essex Field Club two-kilometre search also contains three otter records, including TL634219 with a latest date of 2016. This evidence demonstrates otter use of the nearby River Chelmer corridor.

The application site is connected to that corridor by the river, banks, ditches, culverts, riparian vegetation and crossing points. Residents are not required to record an otter inside the red line before the applicant completes the necessary

assessment. The applicant must provide competent, current surveys covering the site and the connected corridor and assess construction disturbance, lighting, habitat loss and fragmentation, drainage and SuDS, road access, safe movement, mitigation and long-term monitoring.

Principal controlled sources: resident video dated 25 April 2023, attributed to Mary Jensen and preserved with source metadata; Essex Field Club report EFC6965, otter schedule at PDF page 59.

8. Potable Water and Wastewater Infrastructure

Principal controlled source references: Anglian Water Environmental Information Regulations response received 10 June 2026; Environmental Statement Chapter 11, PDF page 16 paragraph 11.78; BBC News, 'Woman buys back-up bottles due to water trickle', 11 August 2026.

Issue	Whether sufficient water-supply and wastewater capacity will exist before occupation.
Controlled evidence	Current WRC capacity evidence, EA Chelmer Moderate ecological / Poor phosphate and dissolved-oxygen context, and controlled PEIR 54 operational flow data that still require permit and growth comparison.
Technical finding	Occupation must not precede completed network and treatment capacity. Potable water and wastewater must be assessed separately.
Evidence gap / dependency	Exact upgrade scope, programme, completion evidence, network works and fixed occupation threshold remain open.
Required control or decision response	Use an enforceable pre-occupation restriction tied to verified operational capacity; do not rely on tankering as an accepted solution.

8A. Current Great Dunmow drinking-water pressure failure

BBC News reports that residents at Great Dunmow Grange, a development approved for 790 homes, have experienced severely reduced water pressure for months, including a trickle or no water at some times of day. Residents described disruption to showers, washing machines, cooking and the hygiene needs of families with children.

Affinity Water said the extensive development, ongoing construction and hot weather had strained demand. Great Dunmow Town Council called for urgent investigation and assurance that the wider network is resilient enough for continuing development and further large-scale schemes in the planning pipeline.

This is current local evidence of serious pressure failure when household, construction and hot-weather demand combine. Before UTT/26/1635/OP is determined, Affinity Water and the applicant must publish a development-specific hydraulic capacity and pressure assessment for all 850 homes, including peak demand, hot-weather conditions, construction use, cumulative committed and allocated growth, required reinforcement, funded delivery dates and enforceable occupation limits protecting existing customers.

The Council should require written confirmation that both network conveyance and treatment capacity will be operational before occupation beyond an agreed threshold. Investment programmes alone do not demonstrate site-specific headroom.

8B. Great Dunmow WRC growth assumptions and historic design constraints

The Uttlesford Stage 2 Water Cycle Study (July 2024) states that population estimates in Anglian Water's Drainage and Wastewater Management Plan may have underestimated growth in the Great Dunmow WRC catchment. It further records that Local Plan growth could cause significant water-quality deterioration at Great Dunmow unless treatment is improved.

The Water Cycle Study also identifies poorly performing storm-tank overflows at treatment works in Uttlesford and states that action should be taken before additional wastewater demand is generated by new development. This is a direct cumulative-growth and timing issue; it cannot be resolved by considering the Broadway site in isolation.

The 2018 technical account of the Great Dunmow Nereda plant provides relevant historical context. The earlier works had ongoing capacity and hydraulic limitations, including pumping part of the influent to another local works. The replacement plant was designed with a future growth horizon of at least 2031. The site was described as space constrained and prone to occasional flooding.

The historic material is not a current spare-capacity statement. The applicant and Anglian Water have not demonstrated the present scheme-specific and cumulative capacity position. Because the current treatment solution was designed against a finite growth horizon and physical constraints, a current capacity statement and occupation control are required.

8C. Required wastewater evidence and controls

- The population, dwelling and employment assumptions included in the current Great Dunmow WRC forecast.
- A development schedule identifying completed, committed, allocated and neighbouring-authority growth included in that forecast.
- Current dry-weather flow, permitted flow, treatment headroom and network conveyance constraints, expressed in terms capable of independent scrutiny.

- The scope, funded programme, capacity gain and completion date of any AMP8 or later works relied upon.
- The relationship between treatment capacity, storm-overflow performance, environmental permits and the receiving River Chelmer.
- A Grampian-style or equivalent occupation restriction preventing occupation beyond a defined threshold until the necessary network and treatment capacity is operational and verified.

Primary sources: Uttlesford District Council, Stage 2 Water Cycle Study, July 2024; Great Dunmow Water Recycling Centre project account, UK Water Projects 2018-2019; Anglian Water's current Great Dunmow response and drainage planning material.

8D. Environment Agency Chelmer water-body evidence

The Environment Agency identifies water body GB105037033950, Chelmer (Great Easton to River Can), as heavily modified. It reports Moderate ecological status and Poor phosphate status in both the 2019 Cycle 3 records and the latest displayed 2022 classification; the 2022 classification also reports Poor dissolved oxygen.

The Cycle 3 reasons-for-not-achieving-good-status records identify intermittent and continuous water-industry sewage discharges as point-source reasons linked to phosphate, and continuous sewage discharge as a reason linked to dissolved oxygen. This is material catchment context for cumulative wastewater and no-deterioration assessment, but it is not a Broadway-specific causal finding and the latest-data page is not real-time monitoring.

8E. Anglian Water PEIR 54 operational flow disclosure

Anglian Water's PEIR 54 disclosure provides a Dunmow worksheet containing 35,137 timestamped 15-minute values and 367 daily values from 1 January 2024 to 1 January 2025. It is official operational source data for a controlled later comparison with the applicable dry-weather-flow permit, flow-to-full-treatment value and committed growth.

The workbook labels the fields only as Time and Value, does not state units, and supplies no permit, capacity or headroom calculation. It must not be used to assert capacity or compliance without those missing definitions and comparators. The covering response restricts publication of the raw data; the workbook should remain controlled and should not be reproduced in the public objection.

9. Flood Risk, Drainage and the River Chelmer

Principal applicant source references: Flood Risk Assessment Executive Summary, PDF page 4; Environmental Statement Chapter 11, PDF page 7 paragraph 11.29 and PDF page 12 paragraph 11.57.

Issue	Whether the full development can manage surface water safely for its lifetime without increasing risk or harming the Chelmer catchment.
Controlled evidence	Submitted FRA and drainage material; current EA guidance and TL50 data; and a completed controlled comparison with the Council's WAT5.2 strategic assessment. The comparison verifies different boundaries and model bases, material strategic risk findings, mapped flow paths, safe-access and culvert questions. It is documentary and visual, not a survey-grade GIS overlay.
Technical finding	The system must be tested for climate change, blockage, exceedance, failure, downstream effects, pollution and long-term maintenance.
Evidence gap / dependency	The changed red line, 2010 versus 2020 Chelmer model basis, Sequential and Exception Test positions, culvert blockage, safe access and egress, mapped flow paths, ditch alterations, outfalls, storage, infiltration, discharge, exceedance, adoption and final EA/LLFA responses remain unresolved.
Required control or decision response	Require a georeferenced boundary and model reconciliation, application-specific safe-access and blockage assessment, complete independent drainage audit and secured adoption, funding, maintenance, monitoring and failure remedies before determination.

A drainage system must remain safe when components fail or events exceed the design standard. The layout must include safe exceedance routing and a durable, funded management regime.

9A. ECC SuDS standards: status and assessment basis

Essex County Council is the Lead Local Flood Authority and is expected to provide the principal statutory-consultee assessment of the proposed surface-water drainage arrangements. The applicable technical framework must therefore be identifiable and current.

ECC published updated SuDS standards on 19 June 2025. A subsequent acknowledgement issued in July 2026 reportedly stated that those standards were still under review. On the presently controlled evidence, that wording is ambiguous: it may reflect an obsolete acknowledgement template, or it may indicate that a continuing review had not been concluded.

The distinction cannot safely be resolved by inference. ECC should identify the current operative standards, their effective date, the status and scope of any continuing review, any transitional arrangements, the standards applied to the submitted Flood Risk Assessment and drainage strategy, and whether further information will be required.

This inconsistency prevents the public and the Council from confirming the technical benchmark being applied. The applicant has not demonstrated compliance with one clear operative framework. Determination should await a substantive LLFA response that states that framework and addresses storage, discharge, climate change, exceedance, blockage, maintenance, adoption, water quality and cumulative downstream effects.

9B. Current Environment Agency guidance and 2026 surface-water datasets

Environment Agency guidance updated 28 May 2026 requires assessment of all current and future flood sources. Where existing modelling is used, the applicant remains responsible for showing that it represents current risk, uses the latest datasets and climate-change allowances, is at a suitable scale and captures site-specific detail.

The current TL50 Flood Map for Planning File Geodatabases acquired under Defra support reference DSP3-10922 contain present-day and climate-change surface-water extents and separate climate-change depth layers for 3.3%, 1% and 0.1% annual-exceedance-probability scenarios. The depth data distinguish seven bands from under 150 mm to over 2,300 mm. The climate-change product uses UKCP18 RCP 8.5 upper-end 95th-percentile allowances for the 2070s epoch.

These are modelled area-risk datasets, not surveyed property-level depths, and do not cover river, groundwater, sewer or infrastructure-failure flooding. The combined 1% and 0.1% extent layer must be filtered using its AEP attribute. No site conclusion should be drawn until the layers are clipped and compared with the application boundary, levels, access and egress, exceedance routes, drainage design and submitted FRA.

9C. Level 2 SFRA and controlled WAT5.2 application comparison

The June 2024 WAT5.2 interactive GeoPDF has been acquired, its relevant layers have been rendered under controlled conditions, and the strategic assessment has been compared with the application location plan and Flood Risk Assessment. PDF page 3 is the Great Dunmow map. It contains the Level 2 site boundary, watercourses, flood zones, historic flooding, present-day and climate-change river extents, depth, velocity, hazard, groundwater and emergency-planning layers.

The two red lines are not the same. The SFRA assesses a 70.32-hectare strategic site and an allocation assumption of 884 homes. The application FRA defines a 68.35-hectare red line and proposes up to 850 homes. This documentary and visual comparison is not a survey-grade GIS overlap calculation. The SFRA cannot simply be treated as the application assessment, but the applicant must reconcile the risks identified by the Council with the changed application boundary.

The Council's Level 2 evidence identifies Land off The Broadway as one of the Uttlesford sites most affected by river flooding, surface-water flooding, access and egress problems and climate-change sensitivity. For the strategic boundary, 9.6% lies in Flood Zone 3 and 10.9% in Flood Zone 2. The 0.1% annual-probability higher-central climate scenario affects 12.9%. Surface-water mapping affects 3.7% of the site in the 3.3% annual-probability event, 6.2% in the 1% event and 16.2% in the 0.1% event. The site summary also records flooding in 1947 when the River Chelmer exceeded channel capacity. Sources: Level 2 SFRA main report, PDF pages 13-14 and 33; Appendix A site summary, PDF pages 23-34.

The SFRA uses the River Chelmer 2020 1D-2D hydraulic model. The applicant's FRA principally uses the Chelmer 2010 model, which it expressly describes as partially superseded, because that model produces higher levels than the Upper Chelmer 2019 results. The application documents do not reconcile that choice with the Council's use of the later 2020 model. The applicant should therefore demonstrate, using the exact red line, why the older model remains adequate and whether the 2020 model changes any boundary, layout, level, access or mitigation conclusion. Sources: applicant FRA, PDF pages 15-31; Level 2 SFRA main report and Appendix A.

The SFRA says Bigods Lane may be inundated by up to 0.6 metres of water moving at more than 2 metres per second in the 3.3% annual-probability surface-water event and should be avoided where possible. It identifies potential access and egress problems, requires safe access for residents and emergency vehicles to be demonstrated, and recommends blockage modelling of relevant culverts using the River Chelmer model. The application FRA does not provide an equivalent application-specific safe-access assessment for the actual access routes.

The applicant's preliminary Flood Risk Constraints Plan and Drainage Strategy show several surface-water routes crossing the red line, including a route from the southern parcel across The Broadway and through the northern parcel towards Bigods Lane. They also show ditches to be filled, realigned or diverted and an indicative culvert route where no evidence was found during the survey. Reprofiling, culvert design, calculations, exceedance assessment and other important matters are left to reserved matters or detailed design. Sources: applicant FRA, PDF pages 126-127.

The applicant concludes that no Sequential Test is required. The SFRA says the local planning authority must confirm the Sequential Test and that the Exception Test was required for the strategic site it assessed. Because the boundary and evidence base differ, the Council should issue a clear written position on both tests for this application rather than assume that either document settles the point.

Before determination, the applicant and Council should publish a georeferenced boundary comparison; reconcile the 2010 and 2020 model bases using current climate allowances; test culvert blockage; demonstrate safe resident and emergency access; and show how every mapped flow path, ditch, culvert, basin and outfall will be retained or safely managed without increasing risk to Church End, St Edmunds Lane, Bigods Lane, neighbouring land or downstream receptors.

9D. Flood-warning-area context

The Environment Agency's operational warning area covers the River Chelmer from Churchend through Great Dunmow and onward to Chelmsford, and the upper Chelmer alert area runs from Great Dunmow to Chelmsford. These communication zones confirm that the official warning network recognises this reach. A no-warning snapshot on 28 July 2026 must not be treated as evidence that historic or future flood risk is absent.

9E. Environment Agency formal response of 4 August 2026

The Environment Agency's application response records that surface-water, reservoir, sewer, groundwater and emergency-access flood risks have not been considered in detail. It also requires clarification of the ditch network, justification for any culverting, protection of open-watercourse habitat and ecological connectivity, and long-term management. These are decision-stage gaps because the drainage system, access and habitat network are integral to the outline parameters.

The same response says that an intended connection to Affinity Water's network does not demonstrate that sufficient potable-water capacity exists. The applicant must obtain and publish the relevant network enquiry, identify reinforcement and phasing, and secure occupation controls that protect existing customers.

9F. Cumulative drainage discharge, flood duration and recovery

Major Great Dunmow developments within the wider Chelmer catchment—including development around Tesco, Woodlands Park, Great Dunmow Grange and Broadway—introduce substantial impermeable area. Their SuDS and attenuation systems do not remove runoff from the catchment; they route, store, treat and release it through sewers, culverts, drains, ditches and watercourses that ultimately contribute to the River Chelmer system.

A discharge-rate test for each site in isolation does not demonstrate cumulative safety. Attenuation extends the hydrograph by releasing stored water after the rainfall peak. Multiple delayed releases may overlap, prolong elevated ditch and river levels, reduce recovery time before a second storm and increase the consequence of saturated, blocked, unmaintained or overtopped systems. The LLFA and Council should publish a site-by-site schedule of outfalls, receiving watercourses, consented and actual rates, storage volumes, exceedance routes and maintenance bodies, then model combined duration, consecutive storms and system recovery.

10. Healthcare and GP Capacity

Principal controlled source references: NHS England Patients Registered at a GP Practice, May 2026; NHS England General Practice Workforce, 31 May 2026; NHS Essex ICB official commissioner and West Essex pages; Hertfordshire and West Essex ICB Estates Infrastructure Strategy 2024-2034; Environmental Statement Chapter 6, PDF pages 9-10 paragraphs 6.30-6.31 and PDF page 15; Planning Statement, PDF pages 21-22.

NHS Essex Integrated Care Board became the statutory commissioner for Essex on 1 April 2026, and Uttlesford sits within its West Essex area. The public sources establish the current commissioner, local practices and planning-capacity context; they do not provide a scheme-specific commissioning decision, named operator, approved business case, construction and fit-out funding, recurring revenue, workforce plan, opening trigger, interim mitigation or fallback.

Issue	Whether the development will be supported by operational healthcare capacity.
Controlled evidence	26,671 registered patients and 12.087 qualified-GP FTE; NHS Essex ICB is the current commissioner; no scheme-specific provider, funded business case or opening programme is verified.
Technical finding	Floorspace is not an operational service. The two patient measures must remain distinct.
Evidence gap / dependency	No verified formal commissioning decision, named provider, complete funding, fit-out, staffing, trigger, interim arrangement or fallback.
Required control or decision response	Credit only secured operational provision. Link occupation to commissioned capacity and specify fallback if the proposed facility does not proceed.

The planning balance should distinguish a building shell from commissioned clinical capacity. The responsible NHS body must confirm the service model, provider, funding, staffing and opening programme.

The correspondence contains planning opinions concerning CIL and the proposal's status outside the allocation quantum. Those points require separate verification against the adopted charging regime, Local Plan wording and formal officer advice before they are used as factual grounds.

Accordingly, the required control should be structured around deliverable milestones: serviced land; agreed specification; construction and fit-out funding; commissioner approval; operator-engagement evidence; an early occupation cap; review points; and an NHS-approved fallback that creates measurable additional clinical capacity. A shell building or an uncertain condition should not receive the same planning weight as commissioned and operational capacity.

The correspondence also identifies a genuine delivery-control issue. Healthcare provision depends on NHS commissioning, a provider and operational funding, none of which is wholly controlled by the developer. Planning Practice Guidance allows a negatively worded Grampian condition where development or occupation is prohibited until specified supporting

infrastructure is provided, but states that such a condition should not be used where there are no prospects at all of the action occurring within the permission period.

The underlying calculation remains an open dependency. The determining authority should obtain the baseline deficit, population assumptions, floorspace standard, cumulative-growth allowance and dwelling quantum used. It should then demonstrate whether the figure has been recalculated from the approximately 715-home allocation to the maximum 850-home application.

The Local Plan consultation response records that NHS advice identified around 1,400 m² of new primary-care floorspace to address both existing capacity pressures and demand from new housing. This strengthens the evidence that the figure was intended to perform two functions, rather than being a simple Broadway-only demand calculation. No healthcare parking schedule or number of spaces has been identified. The applicant must show how parking for staff, patients, disabled users, carers, visitors and deliveries will be provided and how overspill parking will be prevented on surrounding streets, because the facility is not solely for residents who can walk from the estate. Existing parking near the practices is already inadequate and parking is routinely difficult. Residents have had to use the Methodist church site when nearby spaces are unavailable, but that site is up for sale and cannot be treated as a secured overflow facility. Staff also cannot be assumed to live on the new estate or to be able to walk to work.

10A. Origin, sufficiency and legal delivery of the 1,400 m² health provision

An existing practice occupying or relocating to the proposed 1,400 m² facility would not itself add clinical capacity. The scheme should receive no healthcare benefit unless the commissioner secures additional funded GP and nurse whole-time-equivalent posts, increased appointment capacity, defined opening hours and services, a delivery date and occupation trigger, while preventing the loss or simple transfer of existing Great Dunmow provision.

10B. Hospital, emergency, cancer and specialist-care capacity

The submitted healthcare case has concentrated principally on primary-care floorspace. That is incomplete. Residents generated by 850 homes will also require urgent and emergency care, inpatient beds, planned surgery, diagnostics, cancer services, maternity care, critical care, outpatient treatment, rehabilitation and palliative or end-of-life care.

Relevant provider and catchment evidence

Mid and South Essex NHS Foundation Trust provides acute services from Broomfield, Basildon and Southend hospitals and states that it primarily serves a population of about 1.2 million. Its 2025/26 Annual Report identifies operational pressure, constrained capital funding, estates risk and planned-care and cancer capacity as material strategic risks.

The Trust expressly states that demand continued to exceed capacity during 2025/26, affecting patient flow, length of stay, elective activity and performance against the four-hour A&E standard. This is direct provider evidence of existing pressure; it should not be reduced to anecdotal concern.

Urgent and emergency care

The longstanding NHS constitutional and operational standard is that at least 95% of A&E patients should be admitted, transferred or discharged within four hours. For 2025/26 NHS England also used a lower interim recovery target of 78% by March 2026. The lower recovery target does not replace the underlying 95% standard.

Mid and South Essex achieved 68.1% in March 2026. The site-level figures were Basildon 71.6%, Southend 66.5% and Broomfield 65.1%. Broomfield was therefore 12.9 percentage points below the interim 78% target and 29.9 percentage points below the longstanding 95% standard.

The Trust remained within NHS England Tier 2 oversight for urgent and emergency care. It also reported that ambulance handover performance remained below the 90% target and worsened during winter pressures.

Cancer standards and performance

From 1 October 2023, NHS England replaced the former two-week-wait performance measure with three headline cancer standards: 75% of urgently referred patients should receive a cancer diagnosis or have cancer ruled out within 28 days; 85% should begin first definitive treatment within 62 days of an urgent referral; and 96% should begin treatment within 31 days of the decision to treat. The two-week-wait data continue to be collected, but the percentage seen within 14 days is no longer a headline operating-framework measure.

Mid and South Essex remained in NHS England Tier One, the highest level of intervention support, for cancer recovery. In March 2026 it achieved 62.7% against the 75% 28-day diagnosis standard and 54.0% against the 85% 62-day treatment standard. The Trust also reported 442 patients in the backlog after waiting more than 62 days.

Planned treatment and diagnostics

The NHS Constitution gives patients a right to start non-emergency consultant-led treatment within 18 weeks, subject to limited exceptions. The operational standard is that at least 92% of incomplete pathways should be within 18 weeks.

Mid and South Essex achieved only 50.6% within 18 weeks in March 2026 and remained in NHS England Tier One recovery oversight. The Trust also recorded 1,885 patients waiting at least 65 weeks. Orthopaedics was identified as the most pressured specialty.

These figures are relevant to the full range of hospital services that new residents may require. They demonstrate that existing hospital pressure is not confined to A&E and cannot be addressed by providing GP consulting space alone.

Missing Broadway assessment

No controlled evidence has yet been identified showing that the applicant or relevant NHS bodies have quantified the secondary-care demand generated by the full 850-home proposal. The assessment should identify likely A&E attendances, emergency admissions, inpatient bed-days, outpatient activity, planned procedures, diagnostics, cancer referrals, maternity demand and palliative-care requirements.

That demand must be added to completed, consented and allocated growth using the same hospital services. It must then be compared with staffed capacity, current performance, funded recovery plans and realistic opening dates for any additional facilities.

It would not be proportionate to require this development alone to build a new general hospital. It is, however, necessary for the Council to understand whether the hospital system can absorb the additional demand, what improvements are planned, whether they are funded and when they will be available.

Required evidence and determination control

- A formal secondary-care response from the relevant ICB and acute hospital trusts, including Mid and South Essex NHS Foundation Trust.
- A clear statement of the hospitals and specialist services expected to serve Broadway residents.
- A quantified 850-home and cumulative-growth demand assessment for urgent, inpatient, elective, cancer, diagnostic, maternity and palliative care.
- Historic and current staffed-bed capacity, occupancy, A&E, ambulance-handover, cancer, RTT and diagnostic performance, with organisational-boundary changes explained.
- A funded capacity and workforce plan showing how additional demand will be met and when improvements will become operational.
- An explanation of why any healthcare contribution is necessary, what deliverable project it would fund and how the resulting extra capacity would be measured.

Until this evidence is supplied, the proposed primary-care floorspace cannot be treated as a complete answer to the development's healthcare effects. The absence of a secondary-care assessment is a material gap in the cumulative infrastructure case.

Primary official sources

Mid and South Essex NHS Foundation Trust, Annual Report and Accounts 2025/26:
<https://www.mse.nhs.uk/download/docm93ijm4n13254.pdf?ver=54998>

NHS England, A&E Attendances and Emergency Admissions, June 2026 statistical commentary:
<https://www.england.nhs.uk/statistics/wp-content/uploads/sites/2/2026/07/Statistical-commentary-June-2026-sDI1e.pdf>

NHS England, changes to cancer waiting-times standards from 1 October 2023: <https://www.england.nhs.uk/wp-content/uploads/2023/08/PRN00654ii-changes-to-cancer-waiting-times-standards-from-1-october-2023-letter.pdf>

NHS England, Referral to Treatment: <https://www.england.nhs.uk/rtt/>

NHS England, March 2026 RTT statistical press notice: <https://www.england.nhs.uk/statistics/wp-content/uploads/sites/2/2026/05/Mar26-RTT-statistical-press-notice-PDF-545K-Dc1i9U.pdf>

Department of Health and Social Care, New Hospital Programme plan for implementation: <https://www.gov.uk/government/publications/new-hospital-programme-review-outcome/new-hospital-programme-plan-for-implementation>

11. Education and School Capacity

Principal controlled source references: applicant education and Health Impact Assessment material; Uttlesford Infrastructure Delivery Plan, July 2024, paragraphs 3.75-3.78, 3.94-3.95 and 3.101.

The determination package should identify pupil yield at 850 homes and cumulatively; the education authority's current need case; land-transfer specification and timing; construction and fit-out funding; academy or other provider route; opening programme; temporary provision; and a binding occupation trigger. A reserved site must not be credited in the planning balance as though it were an operational school.

The later Great Dunmow examination material specifies approximately 2.1 hectares for a primary school and early-years provision, near the local centre and bus route. This resolves the earlier policy question of whether land should be safeguarded, but it does not resolve delivery.

Issue	Whether sufficient early-years, primary and secondary places will be operational when required.
Controlled evidence	Approximately 2.1 ha primary-school site and 56-place early-years provision identified; ECC response and delivery evidence remain open.
Technical finding	Reserved land does not provide school places. Land, building, provider, staffing, revenue and opening date are separate dependencies.
Evidence gap / dependency	Pupil yield for 850 homes, Helena Romanes position, funding, provider, servicing, opening trigger and interim provision remain unresolved.
Required control or decision response	Secure occupation-linked school delivery and fallback; do not count replacement capacity as net additional capacity without evidence.

Education demand arises progressively as homes are occupied. The legal package must prevent a situation in which families arrive before permanent or suitable interim places exist.

11A. ECC Education's missing Land Compliance Study

Essex County Council Education's consultation response says the required Land Compliance Study for the proposed school site has not been supplied. It requires the full report and assessment before the school land can be accepted. The absence of this study means the outline application has not demonstrated that the promised site is suitable, deliverable or capable of supporting the school relied upon as mitigation.

11B. Helena Romanes travel assumption and weather sensitivity

The Helena Romanes Transport Assessment and School Travel Plan state that most pupils use dedicated school buses and only 4% rely on car drop-off. The documents do not publish the source date, sample size, seasonal conditions or weather basis for that 4% assertion. The School Travel Plan instead provides for later staff and pupil surveys and records that its implementation budget had not yet been specified.

The 4% figure must not be treated as a fixed all-weather future outcome after relocation. Broadway's cumulative assessment should test ordinary, wet-weather, winter and school-bus disruption scenarios, and should use the monitored travel pattern at the relocated school when available. It should also distinguish this school-specific assertion from Broadway's separate 4% internalisation assumption for education and shopping trips.

Primary sources: Helena Romanes Transport Assessment, PDF page 19 paragraph 4.19; Helena Romanes School Travel Plan, PDF pages 5-6, 15 and 18; Broadway Transport Assessment, PDF pages 80-82 paragraphs 6.16-6.23.

12. Highways, Transport and Construction Traffic

Helena Romanes School is not advanced as a standalone parking or drop-off objection. The revised school scheme includes an internal kiss-and-drop area, coach provision and substantial parking. The remaining technical control is limited to confirming that its approved traffic generation and access arrangements are included accurately in the cumulative Broadway transport assessment.

Principal applicant source references: Environmental Statement Chapter 10, PDF page 11 paragraphs 10.45-10.46 and PDF page 14; Environmental Statement Chapter 12, PDF page 14; Design and Access Statement Part 2, PDF page 85; Framework Masterplan drawing 300; Planning Statement, PDF page 22.

Issue	Whether the road network, local routes and sustainable modes can accommodate the full and cumulative development safely.
Controlled evidence	Final modelling and ECC response remain outstanding. Signed bridge SoCG confirms the historic 7.5-tonne rating and ECC's 40-tonne plus construction-loading requirement. Applicant ES identifies St Edmunds Lane as the main construction HGV route with up to 200 delivery movements daily.
Technical finding	Strategic capacity modelling does not replace local safety, severance and operational analysis. Construction traffic is a multi-year impact.
Evidence gap / dependency	Final traffic model, cumulative list, trip rates, junction results, construction strategy and mitigation package remain open.
Required control or decision response	Require full 850-home modelling, verified cumulative assumptions, enforceable construction routing, funded mitigation and monitoring.

The transport evidence must be transparent about survey dates, model inputs, committed schemes, trip distribution and the treatment of the 135-home uplift. Local operational problems should be investigated rather than dismissed because they are not reproduced in a strategic model.

12A. National Highways holding objection and missing strategic modelling

National Highways recommends non-approval and asks the Council not to approve the application before 2 October 2026. It records approximately 558 two-way vehicle trips in the morning peak and 447 in the evening peak, with about 99% of development traffic expected to travel south towards Church End and the A120. The Transport Assessment Addendum and strategic modelling are missing, so National Highways cannot verify the applicant's conclusions or confirm that the safe and efficient operation of the strategic road network would not be adversely affected. (National Highways response 4787951, pp. 3-4.)

12B. Church End Bridge: load rating, construction traffic and delivery control

The adopted Uttlesford Local Plan sets general requirements for safe access and infrastructure delivery, but it does not name Church End Bridge or record its 7.5-tonne constraint. That bridge-specific evidence is in the June 2025 Statement of Common Ground between Essex County Council and Arup. The bridge issue therefore remains a current determination matter and must be resolved before construction traffic is accepted.

The June 2025 Statement of Common Ground between Essex County Council and Arup records that Church End Bridge carries the B1057 over the River Chelmer and was assessed in 1994 at 7.5 tonnes maximum gross vehicle weight.

Essex County Council requires the structure to achieve a 40-tonne maximum gross vehicle-weight rating. The Statement records that, if necessary following assessment, the bridge must be strengthened or replaced and must also satisfy any special-vehicle loading associated with construction traffic for the development.

This is a formally acknowledged infrastructure dependency. The recorded absence of disagreement between ECC and Arup concerns the assessment process. The applicant has not supplied the completed current rating or demonstrated that any necessary strengthening or replacement is funded and programmed.

Required bridge evidence before determination

- The completed structural assessment and ECC technical acceptance.
- The resulting load rating and any restrictions applying before strengthening or replacement.
- The design, approvals, land requirements, heritage and environmental implications of any works.
- A funded delivery programme identifying the responsible party and completion trigger.
- A construction logistics plan demonstrating lawful and safe routes for heavy and special vehicles before the required bridge works are operational.
- An occupation and/or commencement restriction preventing development from relying on bridge capacity that has not yet been delivered.

Primary source: Statement of Common Ground between Essex County Council and Ove Arup & Partners Ltd concerning Church End Bridge, signed 2 June 2025.

12C. St Edmunds Lane construction route, parking and road safety

The applicant's Environmental Statement Chapter 10, paragraph 10.57, states a maximum of 100 construction delivery vehicles per day, equivalent to 200 two-way movements, and says approximately 80% would be HGVs. It states that HGVs would mainly access the site from the B1057 through St Edmunds Lane.

Paragraph 10.41 describes St Edmunds Lane as a residential 30 mph two-way bus route and acknowledges that on-street parking can obstruct two-way traffic. Paragraph 10.71 identifies five off-carriageway spaces on the northern section and parking bays partly within the carriageway on the southern section. Paragraph 10.76 leaves detailed construction traffic management to a later Construction Traffic Management Plan.

The applicant's Appendix H parking strategy states that a 5.5 m carriageway would be retained in the southern section, while acknowledging that Essex County Council design guidance indicates 6.75 m for a bus route and that this width is not achievable (Appendix H, paras 4.31-4.38). That is a material gap for the proposed construction route. The assessment does not demonstrate that the actual tipper and articulated vehicles can pass safely with mirrors, trailer movement, pavement edges, parked vehicles, buses and pedestrians present. A route-wide swept-path and opposing-vehicle conflict assessment is required, together with pedestrian-clearance and independent road-safety analysis.

That evidence makes the route a determination-stage issue, not merely a later management detail. A maximum of about 160 HGV movements within the stated daily total must be tested against the actual available carriageway, parked vehicles, bus operation, junctions, crossings, pedestrians, cyclists, children and other vulnerable users.

Required evidence and controls

Before route approval there should be representative weekday, evening and overnight parking-occupancy surveys for St Edmunds Lane and the few adjoining streets; a quantified assessment of spaces displaced and realistic replacement; construction-HGV swept paths and opposing-vehicle conflict analysis; an independent road-safety audit; route and junction assessment; delivery booking and marshalling; hours; monitoring; enforcement; complaints and corrective-action procedures.

Residents report that adjoining streets are limited and already experience parking pressure. That is a relevant evidence lead, not a verified survey result. The assessment should test it rather than assume either that displaced parking can be absorbed or that all parking immediately outside a dwelling is legally guaranteed.

12D. Air-quality assessment remains incomplete

Principal applicant sources: Environmental Statement Chapter 4: Air Quality, PDF page 2 paragraph 4.1 and PDF page 5 paragraph 4.20; Environmental Statement Technical Appendix C: Air Quality, PDF page 14 paragraphs 6.1-6.3.

The submitted material is expressly a baseline assessment, not the completed assessment of the proposal's effects. ES Chapter 4 states that the full assessment will be produced when traffic modelling data are available. Technical Appendix C states that the later work will assess development-generated road-traffic emissions on existing local air quality and will include a construction-dust risk assessment.

The baseline evidence should be acknowledged accurately. UDC monitoring and Defra background estimates reported by the applicant are below the current objectives, and the appendix considers the site suitable for new residential receptors. However, ES Chapter 4 paragraph 4.15 expressly says the 2020 and 2021 monitoring results are not representative of typical values because COVID affected road traffic and other activity. Later 2022-2024 readings are also reported, so the complete baseline cannot be dismissed as COVID data, but the reported monitoring locations do not include St Edmunds Lane or Church End and no PM10 or PM2.5 monitoring is undertaken close to the site.

The air-quality gap is particularly acute for St Edmunds Lane. The applicant's transport evidence indicates up to about 160 HGV movements on a busiest construction day along this residential route. The street's parked vehicles can obstruct two-way flow, creating a foreseeable need to test stop-start operation and exposure at nearby homes and for pedestrians, cyclists and children. Exhaust nitrogen oxides and particles, brake and tyre wear, resuspended road dust and construction trackout all require quantified receptor assessment. The applicant has not demonstrated the resulting concentrations, compliance or acceptability. The promised assessment is required before the route and outline permission are accepted.

NPPF paragraph 199 requires decisions to contribute towards compliance with pollutant objectives, consider cumulative impacts and identify opportunities for traffic and travel management and green infrastructure. Planning Practice Guidance on air quality requires a proportionate, location-specific assessment of baseline conditions, construction and operational changes, vehicle volumes, speeds and composition, cumulative effects, sensitive receptors and mitigation. The applicant also identifies adopted Uttlesford Local Plan Core Policy 43 as preventing significant adverse air-pollution effects on health, the environment, protected sites or amenity.

Required evidence before determination

- A completed air-quality assessment using the final 850-home traffic model, with transparent trip, routing, speed, congestion, fleet and committed-development assumptions.
- Receptor modelling for nitrogen dioxide, PM10 and PM2.5 along affected routes and at sensitive homes and other locations, including realistic construction-HGV effects on St Edmunds Lane.
- A construction-dust risk assessment covering demolition, earthworks, construction, trackout, phasing, controls, monitoring, complaints and corrective action.
- Cumulative assessment across relevant Great Dunmow development, together with sensitivity testing for public-transport under-delivery and higher car use.
- Publication, Environmental Health review and public consultation on the completed work before determination, followed by enforceable mitigation, monitoring and review controls.

The applicant has not completed the assessment needed to demonstrate that development-generated pollution will be acceptable. The Council should not transfer that evidential burden to residents or approve the proposal on the assumption that the missing work will later produce an acceptable result.

12E. Construction noise and vibration

ES Chapter 10 paragraph 10.55 anticipates a seven-year construction period with standard working hours of 07:30-18:00 Monday-Friday and 07:30-13:00 Saturday. The submitted Noise Assessment evaluates the acoustic suitability of the site and operational sources affecting future residents, but does not provide a detailed construction-noise and vibration assessment for existing receptors along St Edmunds Lane, Church End and The Broadway.

Before determination the applicant should identify sensitive receptors; predict phase-specific construction noise and vibration; specify limits, monitoring locations and trigger levels; demonstrate quieter methods and routing; and secure hours, communications, complaints, corrective action and enforcement through a Construction Environmental Management Plan.

Primary sources: Environmental Statement Chapter 10, PDF page 12 paragraph 10.55; Noise Assessment, PDF pages 38-39 paragraphs 6.1.1-6.1.17.

13. Walking, Cycling, Buses, Parking and Emergency Access

Issue	Whether realistic non-car travel, residential parking and emergency access will operate safely across all phases.
Controlled evidence	Travel Plan, route, bus, parking and garage-usability evidence; Essex County Fire and Rescue Service response dated 15 July 2026, which considers access to existing nearby premises but defers observations on access within the proposed development.
Technical finding	Targets are not mitigation without funding, monitoring and remedies. Garages count only if practically usable. The applicant has not demonstrated that an 850-home internal layout can remain accessible to the Fire Service under realistic parking and obstruction.
Evidence gap / dependency	Final mode-share assumptions, route gradients/crossings, bus commitment, parking stress test, appliance swept paths, clear widths, access distances, turning facilities, route resilience, firefighting water supplies and outline-stage Fire Service assessment remain unresolved.
Required control or decision response	Before outline determination, demonstrate an operable internal layout using realistic occupied parking and obstruction scenarios, and obtain Fire and Rescue Service confirmation on access and water-supply requirements.

Sustainable travel must be practical from first occupation. Routes, crossings and bus services that arrive late cannot mitigate early car dependency. Parking and emergency access must be tested under realistic occupied conditions.

13A. Current weekday public-transport test

Representative weekday timetable tests were completed on 29-30 July 2026 using published operator timetables and a door-to-door journey planner. They test present services and do not assume that an uncommitted future service will be delivered.

For an arrival by 09:00, the earlier 1 hour 48 minute route-planner example is withdrawn because it is not reproducible against the current route tables. The current lower-bound calculations are about 102–109 minutes via Stansted or 126–135 minutes via Bishop's Stortford before ordinary waiting and connection margins. A realistic peak journey can be around two to two-and-a-half hours each way, and the checked worst-case walk from Marks Farm Cottage to Great Dunmow High Street is about 30 minutes and 1.4 miles before waiting and connections. These examples demonstrate that station-to-station time alone materially understates the resident's journey.

The return journey is also fragile. One checked connection allowed five minutes at Bishop's Stortford and another three minutes at Stansted Airport; missing either could materially delay arrival. The 324 presently links St Edmunds Lane and Bishop's Stortford only about every two hours, while the 333 links St Edmunds Lane and Stansted Airport. Current services do not constitute a frequent service through the proposed estate.

Cost is also missing from the application. On 30 July 2026 Greater Anglia advertised Bishop's Stortford-Liverpool Street returns from £23.50, but this is not a guaranteed peak commuter fare and excludes the feeder bus, station access and onward London travel. Before transport benefits are credited, the applicant should publish operator consultation, demand, destinations, service frequency, operating hours, peak and season-ticket costs, funding period, first-occupation trigger, monitoring and a funded fallback. Door-to-door tests must cover Great Dunmow town centre, Bishop's Stortford, Stansted Airport, Chelmsford and London in both directions, including bad weather and missed connections.

Primary and current sources checked 29-30 July 2026: applicant Framework Travel Plan, PDF page 21 paragraph 2.40; Environmental Statement Chapter 10, PDF pages 11-12 paragraphs 10.48-10.51 and PDF page 15 paragraph 10.75; published Greater Anglia, Central Connect and First Essex timetable and fare information; and the dated door-to-door journey checks recorded in the controlled evidence file.

Essex County Fire and Rescue Service's consultation response dated 15 July 2026 does not demonstrate that safe and reliable emergency access can be achieved within the proposed development. Its Section 13 conclusion is expressly limited to whether access to existing premises in the vicinity appears to be affected. It says that further observations on Fire Service access to the proposed development will be made should the application proceed.

That leaves the proposed estate itself unassessed at the present outline stage. The application seeks up to 850 dwellings and reserves all matters except access. The Site-Wide Design Code says that streets must accommodate emergency access, but leaves detailed street sections to later approval. The Design and Access Statement also leaves detailed parking provision to the reserved-matters stage. These statements are design intentions, not evidence that an operable 850-home layout is deliverable under realistic occupied conditions.

Before outline permission is granted, the determining authority should obtain an outline-stage emergency-access assessment agreed with the Fire and Rescue Service. It should test realistic resident and visitor parking, on-street obstruction and parking overspill; appliance swept paths; remaining clear carriageway widths; bends, junctions and turning heads; access distance to every dwelling; resilience if a principal route is blocked; and firefighting water supplies. The assessment must show that a compliant layout can fit within the application parameters without relying on the later removal

of necessary parking or on an assumption that fundamental capacity conflicts can be cured after the principle and means of access have been approved.

Primary sources: Essex County Fire and Rescue Service consultation response, reference 298803, 15 July 2026, application document 4772280; Application Form, PDF page 3; Planning Statement, PDF page 3; Site-Wide Design Code, PDF pages 19 and 52; Design and Access Statement Part 1, PDF pages 100-101 and 105.

13B. Active Travel England's accessibility findings

Active Travel England gives conditional approval rather than a holding objection, but its formal response confirms material weaknesses in the submitted transport case. The two regular-service bus stops are more than one kilometre from the centre of the site; only one walking route is lit; there is no convenient, fully accessible and lit cycle route; parts of the network are remote or unlit; and the delivery and timing of the proposed mobility hub remain unclear. These findings support the conclusion that existing services do not provide a practical alternative to car use for the whole development. Any relied-upon hub, bus service and active-travel routes must be specified, funded and delivered from first occupation. (Active Travel England response 4787957, pp. 2-3.)

14. Housing Mix, Accessibility and Affordable Housing

Issue	Whether the development provides the correct mix, accessible homes and affordable-housing package for local need.
Controlled evidence	Framework calls for variety; public master contains delivery tests; final schedules, adopted percentage, tenure and viability evidence remain unverified.
Technical finding	The additional 135 homes should produce corresponding additional affordable housing and infrastructure, not simply additional market housing.
Evidence gap / dependency	Final dwelling schedule, M4 standards, specialist housing, tenure split, distribution, viability and registered-provider arrangements remain open.
Required control or decision response	Secure quantum, tenure, distribution, phasing, accessibility and viability-review mechanisms in the legal agreement.

Housing benefits should be assessed by type, tenure, affordability, accessibility and delivery certainty, not only by gross unit count.

The application form records 552 market houses and 298 social, affordable or intermediate-rent houses, but places every dwelling in the 'Unknown Bedroom' column. It records zero specified one-, two-, three- and four-plus-bedroom dwellings. The outline application therefore provides no enforceable bedroom-size schedule for any of the 850 homes.

The applicant has not provided a complete dwelling-size or bedroom mix, tenure schedule, or phasing plan for the proposed 850 homes. Without this information, the projected population and the resulting demands on schools, healthcare, transport, parking and other infrastructure cannot be reliably calculated. The applicant must provide this information before permission is granted.

Before housing need is given substantial weight, the legal package should set minimum and maximum numbers by bedroom size, dwelling type, market and affordable tenure, M4(2) and M4(3) standard, specialist or older-person provision and phase. The schedule should be tied to the latest Local Housing Needs Assessment and protected from later tenure or mix dilution.

Primary sources: Application Form, PDF pages 8-9; Design and Access Statement Part 1, PDF page 110; Design and Access Statement Part 2, PDF page 20; Planning Statement, PDF pages 24-25.

14A. Local Viability and Obligation-Variation Case Study: Woodlands Park Sector IV

This case study is included as evidence of local delivery risk. It is not presented as proof that Broadway's obligations will be reduced, nor as a legal precedent binding the present application.

Controlled chronology

- UTT/2507/11/OP approved up to 125 dwellings with 50 affordable homes, representing 40% provision.
- UTT/21/1249/DOV sought removal of the affordable-housing requirement; the developer's BNP Paribas viability appraisal concluded that no affordable housing could be provided.
- Essex County Council District Valuer Services concluded that 40% affordable housing remained viable.
- Uttlesford commissioned Altair because of the substantial divergence. Altair concluded that 24% on-site provision plus a £46,000 off-site contribution was viable.
- The revised 118-home scheme reduced affordable provision from 50 homes to 28 homes, equivalent to 23.7%.
- The committee report described the reduction as regrettable but treated the remaining provision as a significant public benefit.

- The Housing Enabling Officer objected to total segregation of the affordable homes in one cluster.

Technical relevance to Broadway

The case demonstrates that an affordable-housing obligation secured at the original permission stage may later be reopened on viability grounds, even where an independent valuation initially supports the original policy-compliant level.

Where affordable housing or other obligations carry material weight in granting Broadway permission, the legal package should protect that planning balance throughout the development period.

Required Broadway safeguards

- Full disclosure of the applicant's viability model, benchmark land value, build costs, finance assumptions, sales values, grant assumptions and developer return.
- Independent review funded by the applicant and available for public scrutiny, subject only to genuinely confidential material.
- An early-stage review if development does not commence or progress within specified periods.
- A late-stage review and clawback mechanism based on actual sales values, costs and returns.
- Phase-by-phase affordable-housing delivery with occupation restrictions preventing market housing from running materially ahead.
- Anti-avoidance clauses covering land sales, subdivision, altered phasing, tenure switching and related-party transactions.
- Integration and distribution controls preventing unnecessary segregation.
- A requirement that any later variation explains how the revised package remains consistent with the original planning balance.

Sources: UTT/22/2052/FUL Planning Committee report, paragraphs 14.6.2-14.6.9; UTT/22/2052/FUL Planning Statement, paragraphs 4.1-4.5; UTT/22/1508/DOV.

Wider Woodlands Park obligation and condition changes

The controlled local review identified further post-permission changes across the wider Woodlands Park development:

- UTT/13/3368/FUL removed Code for Sustainable Homes Level 4 and the requirement for 10% annual energy demand to be met by on-site renewable or low-carbon technology.
- UTT/13/3393/FUL removed the occupation-linked trigger for a youth shelter; UTT/13/3439/FUL removed the youth-shelter requirement.
- UTT/15/3625/FUL removed an M4(2) accessible and adaptable housing condition for six replacement dwellings.
- UTT/21/1249/DOV sought variation of the original public-transport contribution; the executed deed is still required before quantifying the reduction.
- UTT/14/2989/NMA and UTT/20/0878/NMA altered areas described as public open space or drainage-related land, including transfer into private curtilages. Their precise net planning effect remains subject to full document audit.

Technical conclusion

The Woodlands Park evidence supports a wider delivery-risk finding: planning benefits can be eroded cumulatively through separate variation, condition-removal and amendment applications. Each application may appear limited when considered alone, while the combined effect is a materially different public-benefit package.

Required control framework

- A schedule identifying every benefit, standard, facility, contribution, parcel and trigger relied upon in the original planning balance.
- A cumulative register of all later discharge, variation, removal and amendment applications affecting those commitments.
- A replacement-benefit test requiring equal or demonstrably superior provision where a secured commitment is removed or reduced.
- A requirement to reassess the original planning balance where any material benefit is diluted.
- Independent technical or viability review where cost, viability or deliverability is relied upon.
- Public reporting of the combined effect of all approved variations rather than consideration in isolation.
- Occupation restrictions, clawback, monitoring and remedies surviving land transfers, subdivision and changes of developer.

14B. Great Dunmow Grange S106 variation case study

This case study is confined to UTT/13/2107/OP and compares the executed Section 106 agreement dated 22 October 2015 with deeds dated 15 November 2021, 29 April 2022 and 11 February 2026. It is a legal-text comparison, not a compliance audit.

Material dilution 1 — specialist affordable housing. The 2015 agreement required fifteen affordable units to comprise fourteen one-bedroom self-contained flats and one communal unit. The 29 April 2022 deed deleted that requirement in full. The overall 40% affordable-housing requirement outside the first 160-home phase remained. The defensible conclusion is loss of the specified specialist form and mix, not reduction of the overall percentage.

Material dilution 2 — mortgagee protection. For the northern land defined in the 11 February 2026 deed, the original mortgagee process and residual-unit protection were replaced. Following an unsuccessful three-month sale process, relevant units may be disposed of free from the affordable-housing provisions and those provisions determine absolutely. The number of potentially affected units cannot be quantified from the deed alone.

Equivalent substitution — sports pavilion. The 2022 deed retained 5.21 hectares, two pitch locations, two pavilions and the aggregate £410,000 pavilion ceiling, but permitted the south-east pavilion to be incorporated into the community-centre building. Headline quantum was retained, but functional equivalence and prevention of double counting require separate specification.

Beneficial administrative change. The 2021 deed allowed UDC to invoke the expert-dispute procedure. This should be recorded as an improvement, not criticised as dilution.

The deed series does not show a general reduction of the original infrastructure package. The school land, £5 million education contribution, community centre, open space, allotments, principal highway and public-transport obligations, ecology and drainage conditions, healthcare contribution, indexation and principal occupation triggers were not amended by the supplied deeds.

Required Broadway safeguards: quantify specialist provision separately; use phase-specific occupation controls; preserve residual-unit protection; require independent valuation and evidenced marketing; secure replacement affordable benefit before further occupation; define separate community and sports functions, floor areas and costs; prevent double counting; and give all enforcing authorities access to dispute mechanisms.

Source control: 2015 S106 Schedule 3 Part 1 paragraphs 6 and 11.8; 2022 deed Schedule 1 paragraphs 1.1–1.2; 2026 deed Appendix 2 replacement paragraph 11.8; controlled Great Dunmow Grange comparison and findings v0.1.

15. Employment, Jobs and Commuting

The application form provides no proposed full-time, part-time or full-time-equivalent employee numbers. The Socio-economic Benefits Statement instead estimates 108 post-construction jobs: 38 at the primary school, 9 at the early-years centre, 11 in a convenience store, 4 in a retail unit, 4 in a café, 5 in a co-working unit and 37 in the healthcare facility. Many depend on facilities, occupiers and staffing that are not yet secured.

The applicant estimates approximately 2,142 residents but does not quantify the economically active population, likely occupations, local-job match, workplace destinations or net outward commuting. The claimed 473-549 annual construction jobs are temporary and the statement itself notes that not all construction GVA would be retained locally. A completed-site estimate of 108 posts cannot demonstrate that the working population of 850 homes will work locally.

A resident employment and commuting assessment is required. It should quantify economically active residents; compare on-site and wider Great Dunmow job capacity; test home working and shift patterns; identify likely destinations; and model door-to-door time, frequency, reliability and cost by public transport to Bishop's Stortford, Stansted Airport, Chelmsford and London. The transport and air-quality scenarios should include a sensitivity case in which promised jobs, facilities or bus services are delayed or under-delivered.

Primary sources: Application Form, PDF pages 11-12; Socio-economic Benefits Statement, PDF pages 2 and 9-10 paragraphs 3.15-3.16 and Table 3.2; applicant population estimate.

16. Local Centre, Community Facilities and Off-site Effects

Issue	Whether the proposed local centre and community uses will become operational and reduce off-site travel.
Controlled evidence	Indicative local-centre, healthcare, early-years and community floorspace; grocery and town-centre parking effects identified.
Technical finding	A masterplan label or shell floorspace is not an operational facility. Off-site shopping and service trips remain material.
Evidence gap / dependency	Use mix, operator interest, construction, fit-out, opening trigger, accessible routes and fallback remain unresolved.

Issue	Whether the proposed local centre and community uses will become operational and reduce off-site travel.
Required control or decision response	Secure minimum use mix, delivery responsibilities, occupation trigger, monitoring and fallback; include off-site trips in transport evidence.

The local centre should receive planning weight only to the extent that its floorspace, uses, funding, fit-out, operator, opening and fallback are secured.

16A. Town-centre social trips and parking displacement

The outline local centre does not secure a pub, restaurant or comparable evening and social venue. Residents seeking meals, drinks, entertainment and social activity would continue to travel into Great Dunmow. Given the distance, weak public transport and unlit routes, a material proportion of these journeys would be by car. The Co-op car park is customer parking for that store and must not be modelled as general spare town-centre capacity. A current weekday, evening and weekend parking-occupancy survey is required, together with cumulative demand from other committed developments and assessment of displacement into surrounding streets.

17. Electricity-Network Capacity and Electrification Demand

The July 2024 Infrastructure Delivery Plan identifies network reinforcement through additional circuits as key infrastructure for Great Dunmow's strategic allocations. The applicant has not demonstrated that those circuits have been completed, that sufficient headroom is available or that the full Broadway demand has been included.

The relevant demand is wider than conventional domestic consumption. The assessment should include electric heating, electric-vehicle charging, the primary school and early-years provision, the local centre, sports and community facilities, street and junction lighting, wastewater and drainage pumping, and cumulative committed growth.

Required electricity evidence and controls

- Written UK Power Networks confirmation of existing firm capacity and available headroom.
- Identification of the additional circuits or other reinforcement required, including current status, funding and delivery date.
- Confirmation that the maximum 850-home proposal and all non-residential and electrification demand have been assessed.
- Any connection, phasing or occupation constraints required until reinforcement is energised.
- A fallback and review mechanism if the programmed reinforcement is delayed or altered.

Primary source: Uttlesford Infrastructure Delivery Plan, July 2024, utilities section. The issue should remain framed as an unresolved evidence and delivery dependency unless and until the network operator confirms a present shortfall.

17A. Current UK Power Networks planning context

UK Power Networks identifies Dunmow Primary 33/11 kV as a two-transformer primary and its published datasets place it within the Thaxted Grid 33 / Pelham and Wymondley hierarchy. The authenticated connection-interest data record material aggregated demand interest, while the four DFES scenarios forecast Dunmow demand headroom of approximately 5.6-6.0 MW in 2026 and 1.5-2.2 MW in 2030. An upstream Pelham operational restriction is also recorded.

These figures are planning context, not firm Broadway capacity. Transformer ratings minus maximum demand are not connection headroom; queue position, diversity, topology, security standards, outage conditions, accepted offers and reinforcement can materially change the result. The Council should obtain a scheme-specific UKPN statement identifying the point of connection, demand assumptions, existing and queued headroom, reinforcement, offer status, land and easements, programme, energisation date and resilience.

18. Policing Capacity, Community Safety and Local Delivery

Principal controlled sources: Essex Police consultation response dated 23 July 2026, application document 4778415; Essex Police Designing Out Crime response dated 16 July 2026; Essex Police station-closure disclosure; Essex Police Dunmow and Felsted neighbourhood-team page; Police.uk statistics and the official Police API; Uttlesford Infrastructure Delivery Plan, October 2023; and national Planning Practice Guidance on planning obligations.

Essex Police assesses the maximum scheme as adding approximately 2,074 residents and identifies increased demand for calls for service, safeguarding, neighbourhood policing, traffic and road safety, crime prevention and operational support. Its requested £589,664 package includes setup for one additional local or neighbourhood policing officer, construction-phase PCSO tasking, a vehicle and charging provision, ANPR capability and accommodation or police-estate capacity. The response also says that the applicant's draft Section 106 material did not contain a specific reference to policing or emergency-service infrastructure. The general development estimate of approximately 2,142 residents is the applicant-wide planning estimate; 2,074 is the police-specific estimate used for policing demand.

The Council's infrastructure evidence records populations of 9,636 for Great Dunmow and 3,112 for Felsted, a combined 12,748. The police population estimate would therefore add approximately 16.3% to that combined population. Essex

Police's public neighbourhood page identifies PC Wayne Davies as one of the officers responsible for neighbourhood policing in Dunmow and Felsted, while the named inspector and sergeant cover the wider Braintree and Uttlesford area. This public page does not establish that the area has only one officer. It also does not publish the local full-time-equivalent establishment, shift pattern, night and rest-day cover, abstractions, deployment availability or response performance.

Essex Police's published station record confirms that the Great Dunmow public front counter closed in 2015. The Chelmsford Road building should not therefore be described as wholly unmanned, but Great Dunmow does not have a routinely staffed public police counter at which residents can obtain face-to-face assistance.

For the same Dunmow and Felsted neighbourhood boundary, the official Police API records 37 violence and sexual offences in May 2025 and 47 in May 2026, an increase of 10 or 27.0%. Total recorded crime rose from 90 to 102, an increase of 13.3%, so the combined violence-and-sexual-offences category rose at about twice the total-crime rate in this point-in-time comparison and represented 46.1% of the May 2026 total. The category combines violence and sexual offences and must not be represented as sexual offences alone. These verified figures are material current context requiring a transparent assessment of police capacity and local delivery.

Required evidence and determination controls

- The current locally deployable police establishment, actual coverage area and population, operating hours and shift resilience, including nights, rest days and abstractions.
- Current response performance and demand data at an appropriate local resolution, together with an assessment of the additional demand generated by 850 homes and the construction period.
- The number, role, location, availability and delivery date of every additional officer, PCSO, vehicle, ANPR asset and estate measure relied upon as mitigation.
- A Section 106 obligation that is geographically and functionally tied to this development and Great Dunmow, with values, indexation, triggers, duration, monitoring, enforcement, repayment and anti-substitution provisions. A contribution capable of being absorbed into wider Braintree, Uttlesford or Essex provision would not by itself demonstrate local capacity.
- No occupation beyond a defined threshold until the agreed local policing resources are operational and independently confirmed.

The applicant has not yet demonstrated that locally available police capacity will keep pace with the permanent population increase or the construction phase. Permission should not be granted on the strength of an indicative monetary request alone. The operational service, local allocation and enforceable delivery mechanism must be specified before the contribution receives weight in the planning balance.

19. Cumulative Development and Shared Infrastructure

Issue	Whether all technical topics use one reconciled schedule of completed, committed, consented and allocated growth.
Controlled evidence	Controlled requirement for application reference, status, quantum, delivery period and shared receptor; quantified schedule not yet complete.
Technical finding	Shared capacity must not be double-counted or promised to several developments. Timing matters as much as ultimate totals.
Evidence gap / dependency	Complete reconciled development register and cross-topic consistency check remain open.
Required control or decision response	Use one controlled cumulative schedule across transport, health, education, wastewater, drainage, ecology and town-centre effects.

Residents experience combined demand on the same services. A reconciled schedule is therefore a core decision-control, not an optional appendix.

20. Construction and Infrastructure Phasing

Issue	Whether essential infrastructure will be delivered in the correct sequence across all phases and land parcels.
Controlled evidence	Public master contains substantive phasing framework; detailed applicant phasing and occupation controls remain unresolved.
Technical finding	Submission or commencement of a later scheme does not ensure operational infrastructure. Long build-out creates cumulative disruption and delivery risk.
Evidence gap / dependency	Final phasing plan, provider commitments, temporary arrangements, occupation thresholds and third-party dependencies remain open.
Required control or decision response	Use cumulative occupation triggers, anti-avoidance clauses, infrastructure lead-in periods, monitoring, remedies and fallback.

Phasing controls must prevent occupation from overtaking infrastructure and must survive land sales, subdivision and multiple reserved-matters applications.

21. Section 106, Conditions and Delivery Certainty

Issue	Whether every claimed benefit and mitigation measure is legally secured, deliverable and enforceable.
Controlled evidence	Applicant's June 2026 suggested Heads of Terms are acquired but remain indicative. National guidance, the draft Developer Contributions SPD and local variation evidence support exact delivery, monitoring, enforcement and fallback controls.
Technical finding	Indicative or third-party-dependent facilities should receive limited weight. Contributions require identifiable deliverable projects.
Evidence gap / dependency	Complete latest heads of terms, draft agreement and consolidated conditions schedule have not yet been reviewed.
Required control or decision response	Defer determination until the final legal package is available and audited; use occupation-linked controls and anti-avoidance provisions.

Each commitment should be classified as secured, partly secured, proposed or absent. The planning balance should reflect that classification.

21A. Applicant's June 2026 Heads of Terms

Appendix 1 to the applicant's Planning Statement, PDF pages 35-36, proposes 35% affordable housing with tenure and cascade to be agreed; on-site open space, play and sports provision with phasing and management to be agreed; unspecified necessary highway and sustainable/public-transport improvements; an offer to transfer 2.1 hectares for a primary school for a period to be agreed; an offer to transfer a healthcare facility to a relevant provider for a period to be agreed; and possible later consideration of other contributions.

This is the applicant's suggested opening position, not an executed or council-agreed agreement. A check of the refreshed 390-document application corpus on 11 August 2026 found no separately described negotiated agreement or Heads of Terms document. The wording does not secure a funded operational school or healthcare service, identify the highway works, or fix contribution values, triggers, long-stop dates, delivery bodies, monitoring, enforcement, remedies and fallback.

21B. Applicable obligation-control principles

National Planning Practice Guidance confirms that planning obligations run with the land and must be legally binding and enforceable. They may be relied upon only where necessary, directly related to the development and fairly and reasonably related in scale and kind. The February 2026 Uttlesford Developer Contributions SPD is only a consultation draft, but it records the Council's intended emphasis on Heads of Terms, evidence for payment and delivery timing, development-related triggers, monitoring and enforcement.

The same consultation draft records a district-wide infrastructure funding gap of £211.6 million from its February 2026 figures and says strategic allocations are intended to be CIL zero-rated and addressed through Section 106. The applicant has not provided the evidence needed to identify Broadway's exact liability and funded share. Each claimed benefit must therefore be costed, funded, triggered, monitored and enforceable before it receives weight.

22. Planning Balance and Requested Decision

Issue	Whether the benefits outweigh verified harm, unresolved uncertainty and delivery risk.
Controlled evidence	Material scale uplift; heritage and landscape harm; ecological, infrastructure, transport and legal-control dependencies; proposed benefits not all secured.
Technical finding	At present, the public-benefit package lacks the certainty needed to outweigh the identified harm and unresolved fundamental matters.
Evidence gap / dependency	Final consultee responses, technical audits and legal controls remain outstanding.
Required control or decision response	Refuse permission. Alternatively defer determination until all material evidence and enforceable delivery controls are complete.

The present technical position supports refusal or deferral. Granting outline permission before these matters are resolved would transfer substantial delivery risk to existing residents, future residents and public bodies.

Appendix A. Controlled Evidence and Dependency Schedule

The latest controlled dependency tracker is the single checklist for evidence, owners, actions, deadlines, readiness impacts and status. The following dependency groups remain material:

- Critical consultee responses: National Highways, Active Travel England, Environment Agency, Essex Wildlife Trust, Lead Local Flood Authority, ECC Highways, ECC Education, ecology and conservation positions.

- Applicant documents: final transport modelling, drainage details, ecology/BNG package, housing schedule, affordable-housing and viability evidence, phasing plan, final S106 and conditions.
- Infrastructure-provider evidence: wastewater upgrade scope and completion; healthcare commissioning, provider and staffing; school funding and provider.
- Control schedules: 715-to-850 uplift audit, Policy Compliance Matrix, cumulative development schedule and commitment-by-commitment legal audit.

HC-005 — Hospital and specialist-care capacity

Status: Open, high priority. Evidence now establishes severe current performance pressure, but the Broadway-specific secondary-care demand calculation and provider response remain outstanding.

Required next action: obtain formal responses and historic capacity data from the ICB, Mid and South Essex NHS Foundation Trust and, where relevant, the East of England Ambulance Service and palliative-care providers.

EC-006 — Dark skies and lighting

Status: Open, high priority. A complete measured baseline, operational lighting assessment and enforceable dark-corridor plan have not yet been verified.

Required before determination: a lighting strategy demonstrating avoidance of light on the River Chelmer corridor, important hedgerows, mature trees, bat routes and sensitive valley viewpoints, with quantified limits, hours, testing and corrective controls.

AQ-001 - Air-quality assessment completion

Status: Open, critical. The applicant has provided a baseline study but states that the traffic-emissions assessment and construction-dust risk assessment will be completed later.

Required before determination: the completed 850-home, cumulative and construction-phase assessment, publication and consultation, Environmental Health review, and enforceable mitigation and monitoring.

PS-001 — Local policing capacity and delivery

Status: Open, critical. The police consultation response and current public crime context are verified, but the local staffing establishment, response performance and binding local-delivery mechanism remain outstanding.

Required before determination: publish the local operational baseline and scheme demand assessment, identify the extra resources and delivery dates, and secure them through a geographically and functionally specific obligation with occupation triggers, monitoring and enforcement.

Appendix B. Required Determination Gate

Before determination, the Council should be able to answer yes to each of the following:

- Has every material assessment been prepared or sensitivity-tested for 850 homes?
- Has the applicant completed and published the traffic-emissions and construction-dust assessments promised in its own air-quality documents?
- Is one reconciled cumulative-development schedule used across all technical topics?
- Are final statutory-consultee responses available and addressed?
- Are wastewater, drainage, healthcare, education and transport controls linked to occupation?
- Are heritage, landscape and ecology mitigation parameters fixed and enforceable?
- Are housing mix, bedroom sizes, accessibility, specialist provision and affordable-housing obligations fully specified and phase-controlled?
- Has the applicant quantified the economically active population, likely workplace destinations, local job capacity and realistic commuting time and cost?
- Has construction noise and vibration at existing homes been assessed and made subject to enforceable limits, monitoring and corrective action?
- Is the local centre and other community infrastructure operationally deliverable?
- Has current local police capacity been published, and are the additional officers and resources operationally specified, locally tied and secured before the relevant occupation threshold?
- Has the complete Section 106 agreement and conditions schedule been published and audited?
- Are monitoring, remedies, fallback and anti-avoidance provisions adequate?
- Can the Council demonstrate that the benefits relied upon in the planning balance are secured and deliverable?

- Has ECC accepted the final Church End Bridge assessment, and are any 40-tonne strengthening or replacement works funded and secured before construction dependence?
- Has Anglian Water disclosed the full Great Dunmow growth assumptions and confirmed funded treatment and network capacity before the relevant occupation threshold?
- Has UK Power Networks confirmed capacity, reinforcement and energisation timing for the full 850-home and non-residential demand?
- Has the applicant reconciled the exact application boundary and its principally 2010 Chelmer model with the Council's 2020-model WAT5.2 evidence, resolved the Sequential and Exception Test positions, modelled culvert blockage, demonstrated safe resident and emergency access, and provided surveyed control of every mapped flow path and drainage feature?
- Has the St Edmunds Lane construction route been supported by parking surveys, displacement analysis, HGV swept paths, an independent road-safety audit and enforceable controls protecting children and other vulnerable users?
- Does the final agreement replace the applicant's indicative Heads of Terms with exact works, values, parties, triggers, long-stop dates, monitoring, enforcement, remedies and fallback?

Archaeology and deliverability of open space and sports provision

The submitted Cultural Heritage chapter (ES Chapter 7, June 2026) and Heritage Desk-Based Assessment (Technical Appendix E1) identify geophysical anomalies of probable or possible archaeological origin, including potential later-prehistoric to Romano-British activity. The assessment also records a possible Roman cemetery approximately 340 m south-west of the site near St Mary's Church, together with other Roman finds in the locality. The Heritage Impact Assessment relies on a staged programme of archaeological investigation secured by condition. The Council should not accept that as a reason to defer the evidence: the evaluation strategy, fieldwork, reporting, significance assessment and any preservation-in-situ requirements should be agreed before ground disturbance, with results published and reflected in the reserved-matters framework.

The Sports Statement and Planning Statement identify formal pitches, a MUGA, changing facilities, a clubhouse and extensive public open space. The Planning Statement nevertheless defers phasing, long-term maintenance and management, and any commuted sums, to a later agreement. The outline submission does not identify the future owner or management body, the maintenance budget or indexation, the transfer or adoption route, public-access standards, replacement obligations, or remedies if the facilities are not delivered. The Council should require a costed, funded and enforceable management and maintenance plan, named responsible parties, phase-specific occupation triggers, transfer/adoption terms and public-access requirements before permission is granted or homes are occupied.

7E. Stansted Airport wildlife-hazard safeguarding

The applicant checklist states that a Wildlife Hazard Risk Assessment and, if needed, a Wildlife Hazard Management Plan are not applicable because the site is not within 13 km of Cambridge aerodrome. That is not a sufficient assessment of the relevant aviation receptors. The official Stansted Airport aerodrome-safeguarding response (27 July 2026, ref. STN 2026-171; portal document 4780295) issues a holding objection. It identifies the proposed permanently and seasonally wet ponds, reed beds, swales, attenuation basins, pocket wetlands and micro-pools as features capable of attracting hazardous waterbirds and roosting birds, and requests design changes or a Bird Hazard Management Plan. It also requests controls on upward light spill and draws attention to crane and tall-equipment notification procedures.

The Council should not determine the application while this holding objection remains unresolved. It should require a written Stansted response to the final drainage, planting and lighting design; a bird-hazard assessment proportionate to the 850-home scheme; and, if open water or reed habitat remains, a funded and enforceable Bird Hazard Management Plan with a named operator, monitoring, corrective action and long-term management. The applicant's Cambridge-only "not applicable" entry should be corrected. Andrewsfield Aerodrome should also be contacted to confirm whether it is officially safeguarded or has an agreed local consultation procedure; no mandatory 13-km claim should be made for Andrewsfield until that status is verified.

8F. Land contamination, former refuse tip and historic waste use

The Phase 2 Geo-environmental and Geotechnical Site Investigation (4765533, part 1 of 3, July 2026) identifies a historic refuse tip approximately 18 m south-east of the site boundary. It expressly assesses potential contaminant and ground-gas linkages from that tip, including lateral migration through groundwater, vapour inhalation, gas ingress and accumulation in buildings. It also identifies made ground and potentially infilled wells, tracks, burning areas and other infilled pits, quarries and workings within 250 m.

The applicant reports that tested samples were below generic assessment criteria, but the same report says that the investigation is limited, contamination may be variable and remain undetected, construction-worker health and safety was not assessed, no low or falling atmospheric-pressure gas monitoring was completed, and the preliminary waste classification may be insufficient without a further sampling plan. Future water-pipe routes were also not established. These qualifications prevent the report being treated as a complete site-suitability demonstration.

Residents report that the area may also have been used for council dumping and animal-slaughter waste. That history is not treated as verified here. The Council should obtain and publish its historic waste-disposal, environmental-health, landfill and mapping records and require the applicant to update the conceptual site model and investigation if those records support the report. Before determination, require targeted soil, groundwater and gas investigation; a construction-worker risk assessment; a remediation and waste-management strategy; controls for excavation and imported or reused soils; and independent validation before occupation. Any gas, groundwater, contamination or waste controls must be secured by condition and phase-specific occupation triggers.

Public records, including Council and archaeological sources, identify former landfill and historic slaughterhouse-related features in the wider Church End and Great Dunmow area. The applicant must demonstrate that the application site itself has been fully checked for former landfill, waste disposal, slaughterhouse activity, made ground and associated contaminants. A generic Phase 2 report should not be accepted without clear site-specific evidence, sampling locations and test results.

8G. Nearby Great Dunmow Roman settlement record

The Archaeology Data Service resource links to the Historic England Research Record for the Great Dunmow Roman Settlement (UID 376484; grid reference TL6299322957). It records a Roman linear settlement or vicus along Stane Street, occupied from the first to fourth centuries AD, with a Roman cremation cemetery, possible shrine, timber buildings and later sub-Roman or Anglo-Saxon evidence. Comparison with the Phase 2 investigation grid reference places this recorded

The record materially strengthens the need to investigate the applicant's own geophysical anomalies that may be prehistoric or Romano-British, and to assess cumulative archaeological and historic-environment effects along the Chelmer/Stane Street corridor. The Council should require the applicant's evaluation strategy to use the Historic England and Essex HER records, test the anomalies and possible cropmarks, and publish the results before reserved matters or ground disturbance.

8H. Roman road network and pre-determination archaeology

Historic England Research Record UID 376484 describes Great Dunmow as a Roman settlement at the crossing of Roman roads RR30, RR32 and RR300. The record identifies a Roman vicus along Stane Street, a cremation cemetery, a possible shrine and later sub-Roman/Saxon evidence. A separate Roman settlement at Church End, including a small villa and burial ground, is recorded in the local archaeological evidence. The Twittr LiDAR and route-map material illustrates the reconstructed Stane Street approach, its dog-leg into the settlement and a further route towards London; it is contextual reconstruction rather than a substitute for HER mapping.

The NPPF requires the applicant to describe the significance of affected heritage assets and requires an appropriate desk-based assessment and, where necessary, field evaluation where archaeological interest is known or potential. The Council must identify and assess significance and impact when determining the application. For this outline proposal, the archaeological work should be completed to a decision-grade standard before permission is granted; any later condition should deal only with residual, clearly defined recording or mitigation, not unresolved significance.

8I. Wildlife hazard and Stansted aerodrome safeguarding

The applicant's checklist marks a Wildlife Hazard Risk Assessment as not applicable because the site is not within 13 kilometres of Cambridge aerodrome. That statement does not address Stansted Airport and is contradicted by the formal aerodrome-safeguarding response now on the planning file.

On 27 July 2026, London Stansted Airport's aerodrome safeguarding authority issued a holding objection. It identifies the proposed Riverside Park ponds and reed beds, and the SuDS swales, attenuation basins, pocket wetlands and micro-pools, as features capable of attracting hazardous waterbirds and therefore increasing bird-strike risk. Stansted requests that new ponds and reed beds be avoided where possible. Where surface-water features cannot be avoided, it requires rapid drain-down arrangements or a Bird Hazard Management Plan addressing bird breeding and roosting. It also requires controls on upward light spill and notification of cranes and tall equipment.

The Council should not treat the applicant's Cambridge-based checklist entry as an adequate aerodrome assessment. This application has an active Stansted holding objection. The objection should be resolved by a revised drainage and landscape design or an adequate Bird Hazard Management Plan, with enforceable safeguards attached to any permission before the application is determined.

8J. Housing mix and population consequences

The applicant has not stated the full housing mix for the proposed 850 dwellings. The Affordable Housing Statement refers to up to 298 affordable homes, but leaves the tenure and size mix to be agreed later. It does not provide a schedule showing the number of one-, two-, three-, four- or five-bedroom homes, either across the whole scheme or within each tenure.

The applicant has not provided a complete dwelling-size or bedroom mix, tenure schedule, or phasing plan for the proposed 850 homes. Without this information, the projected population and the resulting demands on schools, healthcare, transport, parking and other infrastructure cannot be reliably calculated. The applicant must provide this information before permission

is granted. This is not a minor reserved-matters detail: any permission must bind the approved mix through enforceable controls.

Appendix C. Evidence Status and Supplementary Submission Schedule

Topic	Current controlled position	Outstanding evidence	Use of later evidence
Heritage	Council evidence, current Historic England records and the overlapping Bigods Lane appeal support a sensitive Church End heritage group, valley-setting and historic-approach case.	Applicant and officer response to the Inspector's paragraphs 6-13, final conservation/landscape conclusions and enforceable plan controls.	Refine policy weight and mitigation analysis.
Landscape	Significant adverse effects, the adopted June 2026 Design Code requirements and the Inspector's site-specific findings for the overlapping Bigods Lane field are verified.	Express current-policy response to APP/C1570/W/19/3235257, full LVIA receptor/viewpoint audit and officer response.	Test mitigation assumptions and residual harm.
Ecology	The Environment Agency and Essex Wildlife Trust maintain formal holding objections. Great crested newt evidence is inconclusive; botanical, ditch, hedgerow, culverting, habitat-management and monitoring matters remain unresolved. The applicant's commissioned Essex records report and otter evidence confirm the need for a complete current assessment.	Applicant's further surveys and mitigation; full current records evidence; revised ditch and culverting assessment; final BNG metric and 30-year habitat management and monitoring plan; written responses resolving both holding objections.	Do not determine the application while the formal ecological holding objections remain unresolved.
Wastewater	WRC constraint, Chelmer water-body status and controlled PEIR 54 source data are verified; capacity interpretation remains open.	Final AMP8 scope, dates, network works and occupation control.	Update delivery and phasing ground.
Drainage	The controlled WAT5.2 comparison identifies different strategic/application boundaries, older applicant modelling, material river and surface-water findings, flow paths, ditch changes and an unconfirmed culvert route. The Environment Agency's formal response of 4 August 2026 says surface-water, reservoir, sewer, groundwater and emergency-access risks have not been considered in detail and requires further ditch and culverting evidence.	Combined LLFA response; georeferenced boundary and model reconciliation; Sequential/Exception Test decision; blockage modelling; safe-access assessment; and final surveyed drainage design.	Require the applicant to resolve the formal response and demonstrate safety before determination.
Highways	National Highways maintains a holding objection because the Transport Assessment Addendum and strategic modelling are missing. Church End Bridge and St Edmunds Lane route evidence identifies further unresolved capacity, loading, parking and safety matters.	Transport Assessment Addendum; completed strategic and local modelling; National Highways' further response; ECC Highways response; bridge assessment; route-safety and parking-displacement work; and outline-stage Fire Service assessment of the proposed estate.	Do not approve while the National Highways holding objection remains or before the local route and emergency-access evidence is complete.
Healthcare	Current commissioner, patient and workforce context are verified; scheme-specific commissioning and delivery remain open.	Commissioning, provider and legal controls.	Assess claimed benefit and occupation control.

Topic	Current controlled position	Outstanding evidence	Use of later evidence
Education	ECC Education says the required Land Compliance Study for the proposed school site is missing. The suitability and deliverability of the school land are therefore not demonstrated.	Full Land Compliance Study; ECC Education's completed assessment; school-delivery programme; and enforceable S106 terms.	Do not credit the school as mitigation until the land, funding, delivery and occupation triggers are secured.
Section 106	Applicant's suggested Heads of Terms are acquired; a negotiated, complete and enforceable agreement is not published.	Draft agreement / operative Heads of Terms.	Test enforceability and benefit certainty.
Policing	Essex Police's 23 July 2026 response, the public neighbourhood-team and station records, official Police API figures and local population evidence are verified. The request identifies additional operational demand and a £589,664 mitigation package.	Local FTE establishment, shift and response data; a scheme demand assessment; identified additional resources and delivery dates; and final locally tied Section 106 wording.	Do not treat an indicative contribution as local operational capacity. Test staffing, delivery, geographic allocation and enforceability before attributing benefit.

Appendix D. Reconstruction Note

This report is a controlled reconstruction prepared because the earlier long technical document is not recoverable as a complete editable file. It preserves the present evidence-led position and provides a structured base for further source integration. It should not be represented as a verbatim recovery of the earlier approximately 150-page document.

Appendix E. Formal citation verification schedule

This schedule records the formal consistency and citation review completed on 29-30 July 2026, the Bigods Lane comparator update, the air-quality evidence-gap review, the batched housing-mix, employment, public-transport, electricity, school-travel and construction-disturbance review, the controlled WAT5.2 application comparison completed on 30 July 2026, and the policing-capacity review completed on 31 July 2026. "PDF page" means the page number in the controlled electronic file. Point-in-time datasets, crime counts, fares and timetables remain subject to later change.

Claim or issue	Controlled source	Exact location	Audit result and caveat
Maximum scheme and site-framework figure	Applicant Planning Statement	PDF pp. 7, 23 and 30	Verified: up to 850 homes; applicant acknowledges a higher quantum than originally envisaged and discusses the approximately 715-home framework figure.
2,142 additional residents and approximately 42% ward increase	Applicant ES Chapter 6: Community, Social and Economic Effects	PDF p. 13, para. 6.44	Verified as the applicant's worst-case estimate, based on 2.52 people per dwelling.
Council evidence on the Church End countryside gap	Great Dunmow Historic Settlement Character Assessment	PDF pp. 4, 6-7 and 13	Verified: separation, open Chelmer Valley character, Church End identity, visible farmland, traffic and St Mary's landmark effects.
Council-approved local design guidance	Great Dunmow Town Design Statement and UDC adoption minutes	Statement PDF pp. 23-24 and 31; minutes PDF p. 2	Verified: existing parking/traffic issues, Chelmer Valley development pressure, protection of Broadway agricultural land and Council Approved Guidance status.
Anti-coalescence function and views	Great Dunmow Conservation Area Appraisal	PDF pp. 8 and 38-39	Verified: the open farmland gap prevents coalescence; Beaumont Hill/Causeway views and St Mary's tower are particularly important.
Continuity from the adopted 2024 Design Code	Uttlesford Design Code 2024 and Appendix A	Main PDF pp. 24 and 26; Appendix A pp. 25 and 28	Verified: landmark views, historic lanes, hedgerows, panoramic/hill-and-valley views, two separate parts and Church End's rural character.

Claim or issue	Controlled source	Exact location	Audit result and caveat
Current adopted Design Code	Uttlesford Design Code SPD Version 08 and Appendix A Version 04, June 2026	Main PDF pp. 13-14 and 27; Appendix A pp. 13, 15 and 24	Verified: the 2026 code retains and strengthens relevant landscape, heritage-setting, lane, hedgerow and view requirements.
Landscape effects	Applicant ES Chapter 8: Landscape and Visual Effects	PDF pp. 24, 27 and 29; paras. 8.116-8.119 and 8.135; Table 8.2	Verified: significant adverse residual effects remain for site landscape character and Broadway Cottage after 15 years.
Skylark, bats and [REDACTED]	Applicant ES Chapter 9: Natural Heritage	PDF pp. 13-16 and 27; paras. 9.53, 9.58, 9.69 and 9.129	Verified: seven skylark territories; 133-contact peak at SSL4; roost may be nearby; main sett with at least 11 active entrances.
Great crested newt survey limitations	Applicant ES Technical Appendix G: Natural Heritage 1 of 2	PDF pp. 36-37	Corrected: one on-site pond, ten more within 250m and six further ponds within 500m; eDNA only at P5/P6, both indeterminate; no access to eight closer ponds.
Essex records report	Essex Field Club / Essex Recorders partnership report EFC6965 and Terms of Service	Report: 209 PDF pages; terms webpage copy	Verified: the full supplied report has 209 pages. Publication and data-refresh requirements remain open matters for the applicant/authority.
Wastewater constraint	Uttlesford Stage 2 Water Cycle Study, July 2024	PDF pp. 103, 106 and 109	Verified: insufficient headroom, current permit-limit position, early-AMP8 treatment capacity/new DWF permit proposal, and 4,097-dwelling catchment forecast.
Church End Bridge	ECC-Arup Statement of Common Ground, signed 2 June 2025	PDF pp. 1-2	Verified: 1994 assessment at 7.5 tonnes; ECC requires 40 tonnes plus relevant special-vehicle construction loading; strengthening/replacement may be needed.
Construction traffic through St Edmunds Lane	Applicant ES Chapter 10: Traffic and Transport	PDF pp. 10, 13 and 15; paras. 10.41, 10.57, 10.71 and 10.76	Verified: maximum 100 delivery vehicles/200 movements; about 80% HGV; HGVs mainly via St Edmunds Lane; parking can obstruct two-way traffic; detailed CTMP deferred.
Current public-transport test	Greater Anglia/Stansted Express, Intalink Central Connect 324 and First Essex X30/X20 timetables	Timetables checked 29 July 2026	Corrected to revised 324: 18:50 from Bishop's Stortford Interchange, about 19:34 at The Broadway; five-minute train connection. Timetable evidence is point-in-time.
Fire-service access response	Essex County Fire and Rescue Service response, ref. 298803	PDF pp. 1-2, dated 15 July 2026	Verified: current response addresses access to existing nearby premises and defers further observations on access to the proposed development.
GP registrations and workforce	NHS England registered-patient and general-practice workforce data, May 2026	Controlled CSV extracts and acquisition note	Verified: 26,671 registered patients and 12.087 qualified-GP FTE across the two Great Dunmow practices. Figures do not alone prove operational capacity.
Electricity planning context	UK Power Networks DFES NSHR and LTDS datasets	Controlled CSV/XLSX extracts	Verified: Dunmow Primary demand headroom is 5.6-6.0 MW in 2026 and 1.5-2.2 MW in 2030 across four scenarios. This is not scheme-specific capacity confirmation.

Claim or issue	Controlled source	Exact location	Audit result and caveat
Applicant's draft planning obligations	Applicant Planning Statement, Appendix 1	PDF pp. 35-36	Verified: suggested 35% affordable housing, school-site and healthcare-facility transfer offers, and transport/open-space heads remain subject to matters being agreed.
Current application-document corpus	GDPIIS controlled evidence index for UTT/26/1635/OP	evidence-index.csv/json; verified 11 August 2026	Verified: 390 files are present and indexed. No separately described negotiated S106 agreement or Heads of Terms file was identified.
Environment Agency formal response	Environment Agency consultation response 4786541, 4 August 2026	PDF pp. 1-4	Verified: formal ecological holding objection; inconclusive great crested newt evidence; further ditch, culverting, Markshill Wood and 30-year habitat-management requirements; potable-water capacity not demonstrated; and multiple flood sources not considered in detail.
Bigods Lane appeal comparator	Planning Inspectorate APP/C1570/W/19/3235257; Uttlesford UTT/18/3157/OP official plans; current location plan 4764331; Heritage DBA 4764448	Appeal decision PDF pp.2-3 paras 6-13 and p.5 para 29; former location plan 2749469; indicative masterplan 2748189; current location plan; Heritage DBA PDF p.14	Verified: the complete former appeal site lies within the current red line and the Inspector made directly relevant landscape and approach findings. The Heritage DBA lists the old application and dismissal but does not engage with the decision reasoning. Caveat: the 2019 policy balance and 50-home scheme are not determinative of the current application.
Incomplete air-quality effects assessment	Applicant ES Chapter 4: Air Quality and ES Technical Appendix C: Air Quality	Chapter 4 PDF p.2 para. 4.1, p.4 para. 4.15 and p.5 paras. 4.17 and 4.20; Appendix C PDF p.14 paras. 6.1-6.3	Verified: the submitted work is a baseline. The applicant states that the full development-generated traffic-emissions assessment and construction-dust risk assessment will follow. It says 2020-2021 monitoring was not representative because COVID affected traffic; later data are also reported. No close PM10/PM2.5 monitoring or St Edmunds Lane receptor result is provided, so the applicant has not demonstrated compliance or acceptability for the development-generated effects.
WAT5.2 application-specific flood comparison	UDC Level 2 SFRA main report and Appendices A/B; applicant FRA 4764458; application location plan 4764331; controlled comparison report	SFRA main report PDF pp.13-14 and 33; Appendix A PDF pp.23-34; GeoPDF Appendix B p.3; applicant FRA PDF pp.15-31 and 126-127; location plan PDF p.1	Verified: strategic and application boundaries differ; the Council uses the 2020 Chelmer model while the applicant principally uses a partially superseded 2010 model; the SFRA identifies material river, surface-water, access and climate sensitivity; application plans show flow routes, ditch changes and an unconfirmed culvert. Caveat: documentary/visual comparison, not a survey-grade GIS overlap or proof that flooding will occur.

Claim or issue	Controlled source	Exact location	Audit result and caveat
Police mitigation request	Essex Police response, 23 July 2026, document 4778415; Uttlesford IDP, October 2023	Controlled PDF mitigation schedule; Great Dunmow and Felsted population table	Verified: combined population 12,748; police estimate adds about 2,074 residents (16.3%) and requests £589,664 for specified resources. Caveat: this is a consultee request, not an executed or locally tied delivery agreement. The general development estimate of approximately 2,142 residents is the applicant-wide planning estimate; 2,074 is the police-specific estimate used for policing demand.
Local police visibility and public access	Essex Police team page and station record	Current official page; station record 2010-present	Verified: one named PC is identified as one of the neighbourhood officers; senior roles cover Braintree and Uttlesford; Great Dunmow's public counter closed in 2015. The records do not reveal the total establishment or prove the building is unmanned.
Current crime comparison	Police.uk and official Police API, neighbourhood NA201	May 2025 and May 2026 boundary totals	Verified: violence and sexual offences 37 to 47 (+27.0%); all crime 90 to 102 (+13.3%). Official combined category; not sexual offences alone.

Appendix F. Local Plan versus Nigel Brown's six email themes

This controlled schedule records what the adopted Uttlesford Local Plan 2021–2041 answers, partly answers and does not answer in relation to the six substantive representations. The adopted Great Dunmow allocation is relevant evidence, but it is not permission for a materially larger scheme. The unresolved items below remain application-specific evidence and delivery requirements.

1. Development scale and allocation

ANSWERED AT STRATEGIC LEVEL — The Great Dunmow 009 RES site template identifies approximately 715 homes. The application seeks up to 850 homes: 135 additional homes, approximately 19% above the allocation framework. The allocation does not remove the need to test the larger quantum against the adopted plan and the NPPF.

2. Flooding, drainage and the River Chelmer

PARTLY ANSWERED — The site template requires a site-specific flood-risk assessment, safe access and egress in the surface-water-plus-climate-change event, and authority engagement. UNRESOLVED — The plan does not answer the current scheme's cumulative surface-water, downstream River Chelmer, wastewater-network or exceedance-routing effects. The complete current FRA, drainage strategy, climate allowances, SuDS maintenance and any required exception-test evidence remain necessary.

3. Education, healthcare and police

PARTLY ANSWERED — The template requires education contributions and healthcare/leisure provision, and the NPPF expects proactive delivery of schools and public-service infrastructure. UNRESOLVED — There is no scheme-specific provider capacity, land, staffing, opening date, funding trigger or enforceable police/blue-light delivery commitment identified in the adopted plan.

4. Local centre, grocery demand and town-centre parking

PARTLY ANSWERED — The template requires a mixed-use local centre with everyday shops, health and childcare. UNRESOLVED — It does not specify floorspace, operator, viability, opening trigger, supermarket capacity, parking occupancy, or the effect on Great Dunmow town-centre parking and vitality.

5. Employment, commuting and A120–M11 effects

PARTLY ANSWERED — The plan provides strategic employment and transport context. UNRESOLVED — It does not provide the application's worker destinations, mode share, long-distance commuting profile, A120–M11 trip distribution or cumulative highway model. Those must be demonstrated by current application evidence.

6. Residential parking and emergency access

PARTLY ANSWERED — Core Policy 31 provides parking standards and the plan supports safe movement. UNRESOLVED — The plan does not establish actual garage usability, visitor demand, overspill, refuse/fire swept paths, obstruction resilience or emergency access through occupied streets.

7. Section 106, viability and delivery controls

PARTLY ANSWERED — Core Policy 5 and the infrastructure framework identify the types of contribution expected. UNRESOLVED — The current material does not establish final Heads of Terms, indexed amounts, phasing triggers, monitoring, enforcement or remedies if viability changes. Draft obligations and occupation-linked controls are needed before determination.

NPPF decision-stage tests to apply

The relevant current tests include NPPF paragraphs 20 and 35–36 (strategic infrastructure, contributions and plan effectiveness), 109–118 (vision-led transport, safe access and transport assessment), 161–182 (climate change, cumulative flood risk, sequential/exception tests and SuDS), and 96–101 (healthy communities, education, health and blue-light services). For an allocated site, paragraph 180 does not prevent a further exception-test assessment where newer information or a materially different proposal requires it.

Control action: retain this schedule in the tracker and require the missing application-specific evidence before treating the relevant dependency as complete. The current synced review documents are Public Master v4.8 and Executive Summary v4.38.

Transport evidence update - 2 August 2026

The current evidence confirms that the X20 runs through Great Dunmow to Stansted Airport, and that the X30 serves Great Dunmow and Chelmsford. Central Connect 322/323/324 serves Great Dunmow and Bishop's Stortford. The existence of these routes does not establish that they provide a practical commute from Church End.

The proposed estate is not beside the existing town-centre bus stops. The applicant's published material refers to walks of approximately 19–21 minutes from Church End to existing stops, but a street-level worst-case check from Marks Farm Cottage gives about 30 minutes and 1.4 miles to Great Dunmow High Street. The complete journey must then include

waiting time, the bus journey and the walk from the destination stop to work. The latest publicly available First Bus X20 and X30 timetable PDFs found are dated to 24 July 2026. First's 26 July service-change notice does not provide replacement X20/X30 timetable PDFs. The applicant must provide current dated weekday and Saturday timetables, first and last services, exact stops, fares and passenger-capacity information before relying on these routes.

A Bishop's Stortford rail commute also has a significant cost. A current fare comparison lists approximately £21.90 for an Anytime single and £34.20 for an Anytime return to Liverpool Street. Greater Anglia's own page shows only a lower 'from £13.90 each way' figure and confirms that fares vary by peak/off-peak time and ticket type. The lower figure is not a reliable peak-commuter cost. The applicant must provide a dated peak fare and door-to-door test.

The assessment must also test realistic drive-to-station behaviour: driving to Bishop's Stortford and parking at the station, driving to Epping and using the Central line, or driving towards Redbridge and using the Tube. These journeys still create additional local traffic and cannot be ignored when forecasting car dependence.

The applicant must not rely on route names or station-to-station calculations. It must show a reproducible door-to-door test for an 08:30 and 09:00 start, a normal evening return, peak fares and the car trips generated when the public-transport option is impractical.

Aerodrome safeguarding and wildlife hazard - additional check

The applicant's 'not applicable' entry considers Cambridge aerodrome only. It does not demonstrate that the site has been checked against Stansted Airport or Andrewsfield Aerodrome. Government and CAA guidance identify a 13 kilometre wildlife consultation circle around relevant officially safeguarded aerodromes and require the relevant operator to be consulted where development may attract hazardous birds.

Andrewsfield is an operational, licensed general-aviation aerodrome at Saling Airfield, Stebbing, Great Dunmow, CM6 3TH. The applicant must provide the current safeguarding-map check and distance to both Stansted and Andrewsfield, confirm consultation with both operators, and explain the effect of ponds, reed beds, swales, attenuation basins, landscaping, refuse areas and standing water. A Cambridge-only checklist entry is not a site-specific assessment.

Before determination, the Council should require a site-specific Wildlife Hazard Risk Assessment and, if the assessment identifies a risk, a binding Wildlife Hazard Management Plan covering construction and operation. The plan must include drainage, planting, refuse, water management, monitoring and enforcement requirements agreed with the relevant aerodrome operators.

Sources checked: First Bus X20 and X30 timetables and July 2026 service-change notice; Greater Anglia Bishop's Stortford–Liverpool Street journey information; National Rail Bishop's Stortford station information; GOV.UK aerodrome wildlife guidance; CAA safeguarding guidance; Andrewsfield Aviation operator information.

Site history, contamination and archaeology - evidence update

Environment Agency mapping records a historic landfill at Merks Hill near St Edmunds Lane. The applicant must confirm whether any proposed access, drainage, utility or construction works interact with this land and assess any resulting contamination risk.

The applicant has not provided the evidence needed to demonstrate that the application site and all proposed access, drainage and construction areas have been fully checked for former landfill, waste disposal, slaughterhouse-related activity, made ground and associated contaminants. A generic Phase 2 report is not enough: the Council should require the historical sources, sampling plan, sampling locations, laboratory results, gas and leachate assessment, remediation design and verification arrangements to be identified clearly and tied to the actual red-line area and works.

The public Archaeology Data Service record for Great Dunmow reports excavations in 1968-1972 that uncovered a minor Roman linear settlement along Stane Street, extending over about 2-3 acres, with occupation from the 1st to 4th centuries AD. It also records a Roman cremation cemetery, a possible shrine associated with timber buildings, and an Anglo-Saxon Grubenhaus. This is direct evidence of substantial archaeological activity in the local landscape. The Council must ensure that the archaeological desk-based assessment, field evaluation, trial trenching and any mitigation are complete and site-specific before permission is granted; outline approval must not defer the essential investigation of archaeological potential.

The applicant must provide the full Historic Environment Record search, the archaeological adviser's consultation response, the proposed evaluation coverage and the management strategy for any remains found. The evidence should explain how the proposed access, drainage, utilities, earthworks and building platforms will avoid or record archaeological deposits. The ADS Great Dunmow record is a local context source, not a claim that the Roman settlement lies within the application boundary.