

Development Management
East Herts Council
Wallfields
Pegs Lane
Hertford
Hertfordshire

27th October 2025

Dear Sir/Madam

Reference : 3/25/1573/FUL

Address : Manorview, 21 High Street, Walkern, Hertfordshire, SG2 7PA

Proposal : Construction of one (1) 3 bedroom self-build dwelling with associated works including creation of 2no. parking spaces and access from High Street

Walkern Parish Council formally objects to the proposed construction of a three-bedroom self-build dwelling on the site in question.

Planning History and Precedents

In 2021, an application for two dwellings on this site was withdrawn. The Parish Council raised concerns at the time, many of which remain relevant—particularly regarding the impact on heritage assets, the conservation area, and road safety.

Earlier this year, a subsequent application was refused on similar grounds, including:

- a. Harm to the setting of the Grade II Listed Walkern United Reformed Church
- b. Incompatibility with the character of the Walkern Conservation Area
- c. Detrimental effect on the village's rural setting
- d. The proposed access fails to provide adequate visibility splays for the existing speed limit along High Street (B1037). This deficiency would result in unsafe and unsuitable access arrangements, contrary to Policy TRA2 of the East Herts District Plan (2018).
- e. Insufficient information has been submitted to assess the impact on protected species. As such, the proposal conflicts with Policy NE3 of the East Herts District Plan (2018) and risks the loss of habitats suitable for protected species and biodiversity-supporting environments.
- f. The application lacks sufficient evidence to demonstrate that the proposed dwelling qualifies as a self-build. Consequently, it would not be eligible for exemption from mandatory Biodiversity Net Gain (BNG) requirements. No habitat plan or biodiversity metric has been submitted to support the application.

It is the view of the Parish Council that this revised application does not adequately address the majority of those grounds for refusal.

Housing Allocation and Compliance with Planning Policies

Walkern is classified as a Group 1 Village under Policy DPS3 of the East Herts District Plan, which permits a 10% increase in housing—around 55 homes—between 2017 and 2033. However, roughly 94 new homes have already been built, far exceeding this target.

Being a Group 1 Village does not automatically justify further infill development. Continued proposals risk changing Walkern's rural character and putting further pressure on local infrastructure. Although East Herts currently lacks a five-year housing land supply, this does not override other planning policies. Paragraph 11(d) of the National Planning Policy Framework (NPPF) calls for balanced decision-making, and harm to heritage assets can outweigh the benefits of new housing.

Policy WLK12 of the Neighbourhood Plan supports small-scale infill within the village boundary but gives priority to brownfield sites and sets clear conditions:

- Suitable access, parking, and turning space
- Protection of key views and open spaces that define village character and the conservation area
- Alignment with existing building lines, scale, and massing

The proposed development does not meet these requirements.

Impact on Heritage and Conservation

The design and form of the proposed dwelling would negatively affect the setting of the Grade II Listed Walkern United Reformed Church, causing less than substantial harm to its significance.

Even with the proposed reduction to one dwelling, any new development on this sensitive site risks diminishing the visual prominence and historic setting of the Grade II Listed Walkern United Reformed Church. The open character of the area contributes significantly to its heritage value, and introducing a new structure—even modest—may still erode this context. While the revised scheme reduces bulk, it still introduces domestic architecture into a historically open and rural streetscape. This can set a precedent for further infill, gradually suburbanising the Conservation Area and undermining its distinct character.

Furthermore, the development would appear out of character within the Walkern Conservation Area and detract from the village's rural setting. Policy WLK14 of the Walkern Neighbourhood Plan sets out the criteria all new development must adhere to including that the scale and design of all new development will reflect the character of Walkern and its historic Conservation Area as detailed in the Walkern Conservation Area Appraisal and Management Plan 2016. The Parish Council consider the scale and design of the proposed development would disrupt the distinctiveness of the village, detract from the conservation area and the setting of listed buildings and would therefore be in contravention of the Neighbourhood Plan.

Detailed Reasons for Objecting

1. Detrimental impact on the character, setting, and integrity of the Walkern Conservation Area.

The Conservation Area Appraisal clearly outlines the unique qualities that define Walkern's historic and rural identity. The proposal is incompatible with the principles outlined in the Walkern Conservation Area Appraisal. It fails to respect the area's historic development pattern, natural character, and the setting of key heritage assets. These include:

- a. Walkern is a linear village with a varied street plan, particularly evident in the north end of the High Street. The built form alternates between street-facing structures and those set back in their own distinct settings, such as Manor Farm and the United Reformed Church. This organic pattern reflects centuries of ad hoc development and contributes to the village's charm and authenticity.
- b. The open quality of the site – locally known as the Orchard - contributes directly to the rural setting and historic interest of Walkern and the presence of a large apple tree serves as a living reminder of its heritage. It is not merely a backdrop—it is a living part of the village's character, shaped by centuries of agricultural use and informal development. Once built upon, this openness cannot be restored. Landscaping and planting may soften the appearance, but they do not replace the intrinsic value of undeveloped land.
- c. Although the land at 21 High Street is not specifically listed as an important open space, its current undeveloped state contributes significantly to the Conservation Area's setting. It offers visual relief, maintains the low-density grain of the northern High Street, and supports the ecological and spatial continuity of the area.
- d. The claim that “thoughtful landscaping” will mitigate the impact is misleading. Landscaping is a cosmetic intervention—it cannot recreate the spatial freedom, ecological value, or visual permeability of an open field.
- e. Introducing built form, however compact or well-designed, fundamentally alters the site's character. The presence of structures, driveways, and domestic boundaries fragments the space and erodes its rural informality.
- f. The argument that views to and from No. 21 and nearby heritage assets will be preserved misses the broader point. The loss of openness is not just about sightlines—it's about the spatial experience of the village.
- g. Manor Farm and St Mary's Church are key heritage assets whose significance is amplified by their surroundings. Any development risks undermining their heritage value.

The proposed development threatens to erode these qualities in several ways:

- a. It introduces built form into a currently open and green plot, disrupting the visual rhythm and spatial grain of the Conservation Area.
- b. It risks obscuring or diminishing views of trees and fields that are central to the area's character.
- c. It may set a precedent for further infill development, accelerating the loss of rural openness and historic integrity.

2. Impact on the setting of the Grade II Listed Walkern United Reformed Church

The proposed development, despite its design intentions, introduces a built form that is inappropriate in scale, siting, and character. It risks eroding the openness and tranquility that are essential to the Church's significance. Heritage impact is not just about visibility—it's about preserving the integrity of place. The Parish Council's concerns are not simply about height or visibility—they are about preserving the integrity, setting, and tranquility of a historic landmark that holds cultural and architectural value. The Parish Council are still concerned about the impact the proposed development will have in regard to setting of the Grade II Listed Walkern United Free Church. In particular:

- a. Saying there's limited visibility between the Church and the proposed site misses the bigger picture. Heritage impact is not solely determined by direct lines of sight – it also includes the space around the building, its history, and the overall experience it offers.
- b. The Church's tranquil and open surroundings are integral to its character. Introducing a new dwelling—regardless of its height—into this space alters the rhythm and openness that define the Church's setting.
- c. While the proposed dwelling may be technically lower than the Church's ridge height, its bulk and siting within an open area near a heritage asset make it stand out in a way that doesn't fit. It therefore feels out of place and disrupts the balance of the site.
- d. The compact massing and linear layout do not mitigate the impact. Instead, they introduce a built form that competes with the Church's simplicity and prominence, undermining its visual and symbolic presence.
- e. The presence of shrubbery or boundary planting does not negate the impact on heritage. Screening may obscure direct views, but it does not erase the intrusion into the Church's setting. The tranquillity and openness of the area are still compromised by the introduction of built form. Moreover, seasonal changes and future alterations to landscaping could reduce this screening effect, making the development more visually intrusive over time.
- f. The claim that the new dwellings reflect the Church's proportions and roof form is superficial. Mimicking elements of historic architecture does not automatically render a development appropriate. Context, scale, and spatial relationship are equally critical.

3. Highway and Visibility Issues

One of the reasons the previous planning application was refused was because the proposed access fails to provide adequate visibility splays for the existing speed limit along High Street (B1037). It was considered that this deficiency would result in unsafe and unsuitable access arrangements. The Parish Council are still concerned about the impact the proposed development will have in regard to highway safety. In particular:

- a. *Reduced vehicle movements do not eliminate safety concerns:* While a single dwelling may generate fewer trips than a two-dwelling scheme, even minimal traffic can pose risks if visibility splays are substandard or compromised by environmental factors (e.g., vegetation growth, parked vehicles, or weather conditions).
- b. *Visibility splays may not be sufficient:* Although the applicant claims visibility splays are policy-compliant and within their control, the actual effectiveness of these splays in practice—especially on a potentially busy High Street—remains questionable. Without independent verification or traffic modelling, safety concerns persist.
- c. *Increased traffic risk:* Even a single dwelling introduces new vehicular movements, which could exacerbate existing traffic or pedestrian safety issues.
- d. *Land ownership does not guarantee long-term visibility:* Even if splays fall within the applicant's land and the adopted highway, future changes (e.g., fencing, planting, or neighbouring development) could obstruct sightlines unless visibility is legally secured through conditions or covenants.
- e. *Turning provision may be theoretical:* The claim that vehicles can turn and exit in forward gear assumes optimal use of space. In practice, obstructions like bins, visitor vehicles, or landscaping features can restrict manoeuvrability, especially for larger vehicles like delivery vans or emergency services.

- f. *Frontage parking can degrade streetscape and safety:* Frontage parking often leads to increased reversing movements across footways and can reduce pedestrian safety.
- g. *EV charging and cycle storage are commendable but not compensatory:* While these features align with sustainability goals, they do not mitigate core concerns about access safety or the adequacy of parking layout and manoeuvring space.

4. Ecology , Biodiversity and Self Build Issues

Further reasons the previous planning application was refused were because there was insufficient information submitted to assess the impact on protected species and the application lacked sufficient evidence to demonstrate that the proposed dwelling qualified as a self-build. The Parish Council have concerns about the current application in regard to these matters. In particular: .

- a. While the applicant asserts that the dwelling will exceed Building Regulations in terms of energy efficiency, these claims remain largely aspirational and lack enforceable guarantees. The mention of “potential” solar photovoltaic panels and a “pathway” to net-zero operational carbon is vague and non-committal. Without firm commitments, timelines, or mechanisms for accountability, these measures cannot be relied upon to deliver meaningful carbon reductions.
- b. Furthermore, the Preliminary Ecological Appraisal conducted in May 2025 is insufficient to justify the conclusion that the site holds low ecological value. Semi-improved grassland with locally abundant species may not qualify as notable protected habitat, but it still plays a vital role in supporting local biodiversity. The absence of recorded protected species during a single survey does not conclusively prove their absence year-round. Many species are transient or have seasonal activity patterns, and the timing and scope of the survey may have missed key ecological indicators.
- c. The reduction from two dwellings to one is presented as a mitigation strategy, yet this does not negate the ecological disruption caused by the development itself. The retention of boundary vegetation is minimal compensation for the loss of open green space and habitat connectivity.
- d. The proposed ecological enhancements—hedgerow planting, bird and bat boxes, hedgehog gaps, and wildflower meadow—while commendable in theory, are tokenistic in practice. These measures are standard and do not adequately offset the ecological degradation caused by construction. Biodiversity net gain should be demonstrated through robust, quantifiable metrics, not generic landscaping features.
- e. The reliance on self-build status to bypass biodiversity net gain requirements could be seen as exploiting a loophole. This undermines broader environmental goals and may not reflect the spirit of national planning policy.

In summary, the application’s sustainability and ecology claims are insufficiently substantiated and fail to convincingly demonstrate that the development will result in a genuine environmental benefit.

5, Self build and Affordable housing Consideration

A proforma for Self-Build or Custom Build Schemes has been submitted with the application. However, the application presents a development with its layout and design already finalised. This raises a genuine concern that the proposal may not qualify as a true self-build scheme, given the

requirement that initial homeowners should play a significant role in determining the style and layout of their properties.

While the Self-Build and Custom Housebuilding Act 2015 places a duty on local authorities to grant sufficient permissions for self-build projects, this does not imply automatic approval for every proposal. The duty must be balanced against other material considerations, including heritage protection, landscape impact, and local character. In this case, the site's proximity to a Listed Church and its location within a Conservation Area require careful consideration/.

Moreover, the proposed development is relatively substantial in scale and appears unlikely to be affordable to local residents. Policy HOU3 of the East Herts District Plan clearly states that developments are expected to provide affordable housing. This proposal seems to circumvent that requirement, offering no meaningful contribution to the district's affordable housing stock particularly in a village like Walkern, where housing affordability is already strained. The proposal does not appear to address any identified local housing need and instead risks introducing high-cost homes that could exacerbate affordability challenges and alter the village's character.

In conclusion, while self-build housing is a valuable component of the broader housing strategy, it must not be pursued at the expense of heritage, landscape, or community character. Despite referencing relevant policies and precedents, this proposal fails to demonstrate that its benefits outweigh the potential harm. A more suitable site should be identified—one that aligns with both the self-build agenda and the wider planning framework.

In conclusion

This proposal, though reduced in scale, remains inappropriate for its location. It risks harming the character of Walkern's northern edge, undermining the Conservation Area, and setting a precedent for further development. The modest housing benefit and self-build provision do not outweigh these concerns. In summary the Parish Council consider the application should be refused on the following basis:

- a. While the application claims to be heritage-led, the introduction of any new dwelling—regardless of scale—at this sensitive location risks undermining the rural character and visual integrity of the northern edge of the Walkern Conservation Area. The area's open setting and proximity to the Grade II Listed Church contribute significantly to its historic and aesthetic value. Even a modest dwelling could erode this setting, especially given the prominence of the site within the street scene.
- b. Approval of this application may set a precedent for future infill or edge-of-village development, incrementally altering the village's boundaries and rural identity. The reduction from two dwellings to one does not eliminate the risk of suburbanisation—it merely delays it. The site's location outside the defined village boundary should be respected to prevent gradual encroachment into the countryside.
- c. Although the proposal suggests reduced traffic movements over the previous proposal, any new dwelling inevitably increases vehicular activity. The access arrangements, visibility splays, and turning provisions may meet technical standards, but they do not address broader concerns about cumulative traffic impact on narrow village roads.
- d. The Preliminary Ecological Appraisal may not identify significant constraints, but it is unclear whether a full biodiversity net gain assessment has been undertaken. The site lies on the rural fringe, and development here could disrupt local wildlife corridors and habitats.

Hedgerow reinforcement and bird/bat boxes are welcome but insufficient to offset the loss of open green space.

- e. The Council's shortfall in housing land supply should not override the need to protect designated heritage assets and sensitive landscapes. The National Planning Policy Framework (NPPF) does not grant automatic approval in such cases—it requires a balanced judgment. A single dwelling offers only a negligible contribution to housing targets and does not justify compromising the village's historic character.
- f. While self-build opportunities are encouraged, they should be located in appropriate areas. The appeal decisions cited (Malmesbury and Steventon) are context-specific and not directly comparable to Walkern's conservation setting. The benefit of a self-build plot does not outweigh the potential harm to heritage and landscape.

However, if the planning authority takes a different view and the application is approved then the Parish Council expect:

- a. that a condition is put in place, and enforced, concerning providing satisfactory drainage and mitigating harmful additional sewage overflows, reducing flood risk and groundwater matters.
- b. a condition is put in place, and enforced, to minimise the amount of mud, soil and other materials originating from the site being deposited on the highway. This should include that all vehicles leaving the development site during construction are in a condition such as not to emit dust or deposit mud, slurry or other debris on the highway. Measures should include cleaning the wheels of all construction vehicles leaving the site.
- c. a condition is put in place, and enforced, that mitigates noise and disruption to adjoining or nearby neighbours including:
 - i. that workers are prevented from using adjoining roads as overflow parking away from the site during the construction phase.
 - ii. that a Construction Traffic Management Plan is in place to ensure the impact of construction vehicles on the local road network is minimised
- d. a condition is put in place, and enforced, concerning site preparation, demolition, construction and ancillary activities that working hours shall be restricted to 08:00 - 18:00 hours on Monday to Friday, 08:00 - 13:00 hours on Saturdays, and not at all on Sundays or Bank / Public Holidays. Vehicles arriving at and leaving the site must do so within these working hours
- e. that the boundary is respected and that any trees or plants that are removed, die or are damaged be replaced as soon as is reasonably practicable with others of species, size and number as originally approved

Yours faithfully

on behalf of Walkern Parish Council

Abi Brown

Clerk to Walkern Parish Council