

Development Management
East Herts Council
Wallfields
Pegs Lane
Hertford
Hertfordshire

3rd September 2026

Dear Sir/Madam

Reference : 3/26/1230/SCREEN

Address : Land West Of High Street Walkern Hertfordshire

Applicant: Taylor Wimpey South Midlands

Proposed development: Up to 125 dwellings on approximately 7.31 hectares

1 FORMAL OBJECTION

Walkern Parish Council objects to the conclusion in the submitted EIA Screening Request that the proposed development does not constitute EIA development.

Having considered the information contained within the Screening Request, the Parish Council considers that the proposal has the potential to give rise to **significant environmental effects**, particularly when the nature, scale and location of the development are considered together.

The Council therefore respectfully requests that East Hertfordshire District Council determines that the proposal **is EIA development and that an Environmental Statement should be required.**

The Parish Council's objection is not based simply upon the principle of development. It is based upon the environmental sensitivities of this particular site and, importantly, upon matters which are **expressly acknowledged within the applicant's own Screening Request.**

2 THE SCREENING REQUEST UNDERESTIMATES THE ENVIRONMENTAL SENSITIVITY OF THE SITE

The proposed development is not taking place on previously developed land or within an established urban area.

It would introduce **up to 125 dwellings onto approximately 7.31 hectares of undeveloped agricultural/grassland land** to the west of Walkern.

The site currently forms part of the rural landscape surrounding the village and contributes to the setting and visual experience of Walkern.

The applicant's own assessment describes the receiving landscape as part of the **Middle Beane Valley Landscape Character Area (LCA 039)**, characterised by open arable farmland, small

woodlands linked by hedgerows and a medium-to-large field pattern over strongly undulating slopes.

The applicant also acknowledges that the site contributes to the visual experience of Walkern, including **cross-valley views and views from elevated Public Rights of Way**.

Most significantly, the applicant accepts that the development **may result in adverse impacts upon the receiving landscape and visual resource**.

The Parish Council considers that these admissions are difficult to reconcile with the conclusion that significant environmental effects are unlikely.

A development of up to 125 houses, with associated roads, lighting, parking, infrastructure, gardens and domestic activity, would result in a **permanent transformation of the existing rural landscape**.

This is not merely a change of detail or a limited extension to an existing built-up area. It is a substantial change in land use and character.

The fact that detailed landscaping and an LVIA may subsequently be submitted does not establish that significant effects are unlikely. On the contrary, the acknowledged sensitivity of the landscape and the site's contribution to views demonstrate why the effects require proper assessment.

3 THE RELATIONSHIP WITH THE WALKERN CONSERVATION AREA IS A FUNDAMENTAL CONCERN

The Screening Request confirms that the **Walkern Conservation Area abuts the eastern boundary of the site** and, critically, that the proposed access would **cross into the Conservation Area**.

This places the proposal in a particularly sensitive historic environment.

The Screening Request identifies a number of designated heritage assets in the vicinity, including:

- the Grade II* listed Manor Farmhouse;
- the Grade II* listed Dovecote;
- the Grade II listed forecourt and walls at Manor Farm;
- No. 56 High Street and other nearby listed buildings; and
- the Grade I listed St Mary's Church.

The Parish Council is particularly concerned that the applicant itself acknowledges that the development would cause **harm to the setting of Manor Farmhouse**, including effects upon views of its roofline and chimney stacks.

The applicant describes this as “less than substantial harm” at the lower end of the scale.

However, the fact that harm is described as “less than substantial” does **not** mean that there is no significant environmental effect.

The issue for EIA screening is whether the proposal is likely to have significant effects on the environment, having regard to the characteristics and location of the development.

Here, the proposed access, traffic and residential development would interact directly with the historic settlement and its designated heritage assets.

The Parish Council therefore considers that the combined effects on:

- the Conservation Area;
- the setting of listed buildings;
- views towards and from heritage assets;
- the character of the historic approach to Walkern;
- traffic and movement through the historic environment; and
- the introduction of modern residential development into the surrounding rural setting

cannot properly be dismissed at screening stage.

A full Environmental Statement would provide the necessary opportunity to assess these effects comprehensively and cumulatively.

4 ARCHAEOLOGICAL POTENTIAL HAS NOT BEEN ADEQUATELY RESOLVED

The proposed access lies within an **Area of High Archaeological Potential associated with the historic core of Walkern**.

The Screening Request identifies:

- a high potential for remains associated with a 19th-century cottage; and
- a medium potential for earlier post-medieval roadside occupation.

The applicant proposes archaeological evaluation trenching and, should remains be identified, excavation and recording.

The Parish Council considers that this demonstrates **uncertainty rather than an absence of environmental impact**.

The archaeological resource has not yet been fully evaluated.

The applicant is effectively asking the Council to conclude that significant effects are unlikely while proposing that the extent and significance of potential archaeological remains be established through work undertaken later.

Where development is proposed within an area already identified as having high archaeological potential, the Parish Council considers that this uncertainty should weigh in favour of requiring a fuller environmental assessment.

5 THE ECOLOGICAL VALUE OF THE SITE SHOULD NOT BE UNDERESTIMATED

The ecological surveys reported within the Screening Request identify a range of wildlife and habitat interests.

These include:

- slow worms;
- seven species of bats;
- breeding birds;
- potential skylark habitat;
- hares;
- hedgerows;
- scrub; and
- tree lines.

The bat surveys identified activity from **seven species**, including common and soprano pipistrelles, noctule, brown long-eared, serotine, myotis and low numbers of barbastelle calls.

Importantly, bats were recorded using the majority of the site's field boundary features.

The applicant also recognises that the hedgerows, tree lines and scrub are among the site's most ecologically significant features because they provide **landscape linkages and green corridors**.

The proposal is also likely to require some tree removal.

The Parish Council therefore considers that the ecological effects cannot reasonably be reduced to the provision of replacement planting, bird boxes, bat boxes or future lighting controls.

Potential impacts include:

- loss and alteration of habitat;
- disturbance during a prolonged construction period;
- disruption of ecological corridors;
- impacts upon boundary habitats;
- lighting effects on bats;
- tree and hedgerow removal; and
- changes to the ecological function of the site.

The presence of multiple species and the acknowledged ecological importance of the site's boundary features provide further evidence that the environmental consequences require careful and comprehensive assessment.

6 THE SCALE OF THE DEVELOPMENT IS SIGNIFICANT IN THIS LOCATION

The Screening Request appears to place considerable reliance on the fact that the proposal is below the 1,000-dwelling threshold referred to in the relevant guidance.

The Parish Council considers this approach to be too simplistic.

The proposal is for **up to 125 dwellings across approximately 7.31 hectares of undeveloped rural land.**

The relevant question is not whether 125 dwellings automatically require an EIA. It is whether **125 dwellings in this particular location**, taking account of the site's environmental sensitivities, are likely to result in significant environmental effects.

The environmental effects cannot sensibly be considered in isolation.

The development would simultaneously affect:

- an undeveloped rural landscape;
- the setting of Walkern;
- views across the valley;
- the Conservation Area;
- the settings of designated heritage assets;
- an area of high archaeological potential;
- ecological corridors and protected/notable species;
- local highways and traffic conditions; and
- neighbouring residential amenity during a prolonged construction period.

It is this **combination of effects** which is of particular concern.

7 HIGHWAY AND TRAFFIC IMPACTS REQUIRE PROPER ASSESSMENT

The Screening Request estimates approximately **one additional two-way vehicle movement per minute during peak periods.**

The report also acknowledges that **on-street parking on High Street can impede two-way traffic flow at busy times.**

This is highly relevant given that the proposed access connects directly with this sensitive part of the village.

Yet the detailed Transport Assessment is deferred to a subsequent planning application.

The Parish Council does not consider it appropriate for the screening conclusion to assume that future highway assessment will demonstrate that the effects are acceptable.

The environmental consequences of additional traffic should include consideration of:

- congestion and traffic flow;
- highway safety;

- pedestrian movements;
- impacts upon Public Rights of Way;
- noise;
- vehicle emissions;
- effects upon the historic environment; and
- interaction with existing on-street parking and the physical constraints of High Street.

Until these matters have been properly assessed, the conclusion that highway and transport effects are unlikely to be significant is premature.

8 THE CONSTRUCTION PERIOD IS SUBSTANTIAL

The proposed construction period is estimated at approximately **3 to 3.5 years**, commencing in October 2027.

The applicant itself recognises the potential for:

- construction noise;
- dust;
- construction traffic; and
- disturbance to neighbouring properties.

The Parish Council considers that a construction period of this length is material, particularly given the sensitive surroundings.

Construction would take place adjacent to existing homes and close to:

- the Conservation Area;
- listed buildings;
- ecological habitats;
- public routes; and
- the existing village environment.

It is not sufficient to state that these effects will subsequently be managed through a Construction Environmental Management Plan or Construction Traffic Management Plan.

Those documents may help mitigate effects, but they do not demonstrate that significant effects are unlikely.

9 CUMULATIVE EFFECTS REQUIRE GREATER CONSIDERATION

The Screening Request concludes that there are no relevant cumulative effects.

The Parish Council considers that conclusion insufficiently demonstrated.

The site has previously been promoted for substantial development, including an outline proposal for **up to 105 dwellings** and a subsequent proposal for a retirement care village. Both applications were withdrawn.

The Parish Council acknowledges that withdrawn applications do not constitute approved development and should not be treated as such.

Nevertheless, they demonstrate that this is a location which has repeatedly been promoted for significant development and that the environmental and infrastructure implications of development at this site warrant careful consideration.

The Council should ensure that the screening exercise properly considers **all relevant existing, committed and reasonably foreseeable development in the surrounding area**, rather than relying principally upon the applicant's assertion that cumulative effects are not anticipated.

10 TOO MUCH RELIANCE IS PLACED ON FUTURE MITIGATION

A central concern with the Screening Request is the extent to which its conclusion depends upon assessments and mitigation which have **not yet been completed, designed or secured**.

The applicant refers to future:

- Landscape and Visual Impact Assessment;
- Transport Assessment;
- Ecological Impact Assessment;
- archaeological evaluation;
- landscape proposals;
- drainage proposals;
- Construction Environmental Management Plan;
- Construction Traffic Management Plan;
- biodiversity measures;
- sensitive lighting;
- tree protection measures; and
- heritage mitigation.

The Parish Council does not consider it appropriate to assume that all future assessments will necessarily conclude that effects can be satisfactorily mitigated.

The purpose of screening is to establish whether the development is likely to have significant environmental effects.

Where material uncertainty remains regarding landscape, heritage, archaeology, ecology, transport and construction impacts, that uncertainty should not automatically be resolved in favour of the applicant.

11 THE APPLICANT'S OWN EVIDENCE SUPPORTS A MORE PRECAUTIONARY APPROACH

The Parish Council considers that the strongest reason for rejecting the applicant's "not EIA development" conclusion is that the Screening Request itself identifies numerous environmental constraints and potential effects.

The applicant accepts that:

- the development will alter the site's existing land use and character;
- the site contributes to the receiving landscape;
- there may be adverse landscape and visual effects;
- there will be harm to the setting of Manor Farmhouse;
- the proposed access lies within an area of high archaeological potential;
- protected and notable species are present;
- ecologically important boundary features are present;
- some tree removal is likely;
- additional traffic will be generated;
- High Street already experiences obstruction from on-street parking; and
- construction will generate noise, dust, traffic and disturbance over approximately three years.

Taken together, these matters provide a compelling basis for concluding that the environmental effects of the development have **not been demonstrated to be insignificant**.

The Parish Council therefore considers that the applicant's conclusion is not sufficiently robust.

12 THE COUNCIL SHOULD REQUIRE AN ENVIRONMENTAL STATEMENT

The Parish Council respectfully submits that the appropriate response is not to rely upon a series of future technical reports and mitigation measures, but to require the environmental implications of the proposal to be brought together within a properly prepared Environmental Statement.

An Environmental Statement would enable the effects of the development to be assessed in a coordinated manner, including the interaction between:

Landscape + Heritage + Archaeology + Ecology + Transport + Construction + Village Character

This is particularly important because the principal concern is not necessarily any one isolated impact.

It is the **combined effect of introducing a substantial residential development into a sensitive rural and historic setting.**

13 CONCLUSION AND REQUEST TO EAST HERTS COUNCIL

Walkern Parish Council respectfully but firmly objects to the conclusion reached in the EIA Screening Request.

The Council considers that the proposal has the potential to result in significant environmental effects by reason of its:

1. **scale**, involving up to 125 dwellings;
2. **location**, on approximately 7.31 hectares of undeveloped rural land;
3. **landscape sensitivity**, including the Middle Beane Valley landscape and important cross-valley and Public Right of Way views;
4. **direct relationship with the Walkern Conservation Area**;
5. **impact upon the settings of designated heritage assets**, including Manor Farmhouse and Dovecote;
6. **acknowledged harm to the setting of Manor Farmhouse**;
7. **archaeological potential**, particularly around the proposed access;
8. **ecological interests**, including bats, slow worms, breeding birds and hares;
9. **important hedgerows, scrub and tree-line corridors**;
10. **potential tree loss**;
11. **additional traffic and highway pressure** on High Street;
12. **prolonged construction period of approximately 3–3.5 years**;
13. **permanent transformation of the existing rural landscape and land use**; and
14. **material uncertainty arising from reliance upon future technical assessments and mitigation.**

The Parish Council considers that these matters, taken individually and particularly **in combination**, are sufficient to demonstrate that the proposal cannot confidently be regarded as unlikely to give rise to significant environmental effects.

Accordingly, Walkern Parish Council requests that East Hertfordshire District Council:

- 1. Rejects the applicant's proposed conclusion that the development is “not EIA development”;**
- 2. Determines that the proposed development is likely to have significant environmental effects;**
- 3. Requires the applicant to prepare and submit an Environmental Statement in accordance with the EIA Regulations; and**

4. Ensures that the relevant statutory and technical consultees, including heritage, archaeology, ecology, landscape and highway authorities, are fully consulted before the screening opinion is finalised.

The Parish Council considers that requiring an Environmental Statement is the **proper and precautionary course** given the combination of environmental sensitivities identified by the applicant itself.

The Council therefore urges East Hertfordshire District Council **not to issue a negative screening opinion on the basis of future mitigation or assessments which have yet to be undertaken**, and instead to require a full EIA so that the environmental consequences of this substantial development can be properly understood before the proposal proceeds further.

Yours faithfully
on behalf of Walkern Parish Council

Abi Brown
Clerk to Walkern Parish Council