

## **Walberswick Parish Council response to AP/26/0025/REFUSE**

### **6007229 Herons, Church Field**

As Walberswick Parish Council (WPC), we have reviewed the appellant's Planning Appeal Statement (points referenced in brackets) in detail and write to provide additional response to be considered alongside our original comment on the application.

We remain firmly of the view that the proposal represents an unacceptable intensification of development in one of the most environmentally sensitive parts of the village. The appellant's case does not overcome the harms identified by East Suffolk Council's Planning Committee or by WPC.

#### **Mischaracterisation of the Site and Its Sensitivity**

The appellant repeatedly asserts that the site "*is experienced as part of a settled landscape rather than as open countryside*" (2.14). This is a fundamental misreading of the location. The northern boundary of Herons directly adjoins Walberswick Common, an exceptionally tranquil, unlit and ecologically sensitive landscape forming part of the setting of the SAC, SPA and Ramsar designations. The existing bungalow is a low-lying form which is particularly suited to this sensitive site. The surrounding dwellings nearest the Common are modest, predominantly single-storey, and set within large, green plots that maintain an open, rural edge.

The appellant relies heavily on the orientation of this proposal being broadly online with the existing bungalow however continues to ignore the impact an additional storey and first floor living quarters in a sensitive landscape.

The appellant's attempt to normalise a two-storey, 380m<sup>2</sup> dwelling in this context is not supported by the physical reality of the site nor by the pattern of development closest to the Common.

#### **Scale, Massing and Intensification of Built Form**

The appellant claims the proposal has been "*materially reduced in scale*" and "*does not appear overly dominant*" (1.6–1.7). This is true only in relation to their earlier, even two larger schemes which they state themselves as being a "single dominant structure". It does not make the current proposal acceptable. The proposal remains a substantial intensification of built form on the edge of protected Common land, where any intensification will cause harm.

The appellant's own drawings confirm a significant increase in massing: a full additional storey, a dominant articulated roofscape, a large parking area and extensive glazing. The amount of habitable space more than doubles. The appellant's reliance on examples of

two-storey dwellings elsewhere on Church Field is selective; those properties are located further north and east, away from the Common's edge.

The proposal therefore conflicts with SCLP10.4, which requires development to protect and enhance the special qualities of the landscape, including openness, tranquillity and rural character.

### **Residential Amenity and Overlooking**

The appellant argues that generous separation distances mitigate amenity impacts (2.8–2.11). This misunderstands the nature of the harm. The issue is not distance alone; it is height, bulk, activity and visibility.

The existing bungalow creates no overlooking. The proposed dwelling introduces first-floor living areas with increased light spill, significant glazing, a seating area overlooking neighbouring gardens and a ground-floor entertainment area facing west. The appellant's suggestion that these impacts are negligible is contradicted by the site's topography, the exposed northern elevation and the unprecedented number of resident objections.

The proposal therefore conflicts with SCLP11.2 (Residential Amenity).

### **Light Pollution, Dark Skies and the Appellant's Mitigation Strategy**

The appellant states that the area is "*not devoid of residential lighting*" (2.15). While Church Field does contain domestic lighting, the Common itself is entirely unlit and forms part of a protected dark-sky landscape. The proposal would introduce, for the first time along this edge, first-floor living spaces, a second storey with no natural screening and extensive glazing facing the sensitive Common area.

The appellant relies heavily on mitigation measures, including "*low visible light transmission glazing*" and "*automated blackout blinds triggered at dusk*" (1.13; 3.19), together with a "*detailed lighting strategy*" to be secured by condition (1.13; 3.20). These measures are neither credible nor enforceable.

Blackout blinds cannot be conditioned in any meaningful way. Occupant behaviour cannot be regulated, and the dwelling is clearly designed to maximise views over the landscape that we aim to protect. Low-transmission glazing increases bird collision risk, a concern not addressed in the appellant's ecological assessment. A lighting strategy cannot control internal light spill, and the appellant's own wording confirms that the strategy relates to external lighting only (3.20).

The need for blackout blinds, specialist glazing and a lighting strategy is itself an admission of impact and therefore implicit harm. The appellant's claim that the baseline lighting environment is already "domestic" (2.16) ignores the ecological sensitivity of the Common and the statutory duty to protect dark skies.

## **Ecological Impacts**

The appellant asserts that ecological impacts are minimal. This is not supported by evidence. The site lies adjacent to internationally designated habitats. The proposal introduces increased light, increased noise, increased human activity and a substantial intensification of built form. The appellant's ecological analysis does not meaningfully address these factors and will therefore cause harm.

## **Policy Conflicts**

The proposal conflicts with multiple Local Plan policies, including SCLP10.4 (landscape character), SCLP10.1 (settlement character), SCLP11.1 (design quality) and SCLP11.2 (residential amenity). The appellant's policy analysis is selective and incomplete. The appeal statement does not overcome these conflicts.

## **Conclusion**

WPC fully accepts the principle of residential development at this site. However the appellant sets out the central question as the basis of their appeal that is whether the proposed replacement dwelling would result in unacceptable harm to the character of the area or to the amenities of neighbouring properties, when assessed against the development plan and the NPPF. Having reviewed the appellant's Appeal Statement in detail, WPC remains firmly of the view that such harm would occur.

The appellant places considerable weight on the professional judgement of the case officer, noting that the application was recommended for approval (1.11). However, they have repeatedly failed to reflect on the expert, long-standing knowledge of the residents and landowners who live within and actively steward this character area and landscape. These individuals hold a depth of understanding of the Common's tranquillity, dark-sky qualities, ecological sensitivities and settlement pattern that cannot be replicated through desk-based assessment alone. Their concerns are not speculative; they arise from lived experience of how this landscape functions and how sensitive it is to incremental change.

The proposal introduces a scale, height and intensity of built form that is fundamentally at odds with the sensitive landscape setting at the edge of Walberswick Common. Its two-storey format, extensive glazing and elevated massing would erode the rural character of this part of the village and diminish the tranquillity and dark-sky qualities that define the adjoining National Landscape. The appellant's reliance on glazing treatments, blackout blinds and a future lighting strategy does not mitigate these effects in any meaningful or enforceable way.

The proposal would also materially harm the amenities of neighbouring properties through increased overlooking, elevated activity at first-floor level and significant light

spill into an area that is currently unlit. These impacts arise directly from the design and cannot be resolved through conditions.

In policy terms, the development conflicts with SCLP10.4, SCLP10.1, SCLP11.1 and SCLP11.2, and the appellant's submissions do not demonstrate compliance with the NPPF's requirement to conserve and enhance valued landscapes or to ensure high standards of amenity for existing and future users.

For these reasons, WPC concludes that the proposal would result in unacceptable harm to both the character of the area and the amenities of neighbouring properties. The development plan and the NPPF therefore point clearly toward dismissal of the appeal.

DRAFT