

17 February 2021

Phil Perkin  
Planning and Coastal Management  
Waveney District Council  
Riverside  
4 Canning Road  
Lowestoft NR33 0EQ

Dear Mr Perkin,

**DC/21/0007/FUL Change of use to sports facilities comprising new grass football pitch adjacent to Harrisons Lane and construction of a new artificial football pitch with associated parking, access, lighting and drainage adjacent to the Apollo Youth Centre and adjacent field to the south North Suffolk Skills Academy Harrisons Lane Halesworth Suffolk IP19 8PY**

I am writing regarding the above application which is for part of a 22 hectare site allocated in the Waveney Local Plan at policy WLP4.1 for the Halesworth/ Holton Healthy Neighbourhood. We note that a parallel application (DC/21/0027) for the north west portion of the site currently seeks consent for the care home and extra care element of the scheme. This application is for grass and artificial pitches, lighting and car parking and forms phase one of proposals for sports facilities on the site. We understand from the design and access statement that a future phase will deliver an indoor sports hall and swimming pool which is indicated on the masterplan to the north of the artificial pitch. SPS is concerned that, although no indicative sizes or elevations are provided for the phase 2 element, this will no doubt be a substantial building which has the potential to seriously impact the setting of grade II listed Town Farmhouse immediately to the east.

Town Farmhouse was formerly used as an isolation hospital and is characterised by its outlying location in an agricultural setting. SPS is concerned that the heritage impact assessment only considers the impact of the phase 1 development on this designated heritage asset, namely the artificial pitch and its associated lighting and fencing. Submitting the application in this piecemeal fashion will restrict the siting of the phase 2 element to that indicated on the masterplan. and therefore a full assessment of the impacts of both phase 1 and phase 2 on the heritage asset should be carried out at this point.

We note that a degree of buffer planting is proposed to the west of Town Farmhouse to screen the heritage asset. We would urge that the buffer width is materially increased in order to meaningfully mitigate the impact of the scheme and that efforts should also be taken at this stage to site the phase 2 building away from the eastern edge of the site. Moreover, in order to minimise the impact of the scheme on Town Farmhouse and the residential amenity for those living close by, external lighting should be minimised and strictly controlled.

## Conclusion

Whilst the proposals are in accordance with the allocated use of the site, we would remind the lpa that heritage assets are afforded statutory protection under Section 66(1) of the Planning (LBCA) Act 1990. This statutory duty requires the decision maker to afford *special attention to the desirability of preserving or enhancing the character or appearance of the listed building*. This includes the contribution to its significance made by its setting. The NPPF gives clear advice on when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the heritage asset's conservation, including sustaining significance (paragraph 132). We therefore urge that a full assessment of the impacts of both phase 1 and phase 2 on Town Farmhouse is carried out in order that appropriate mitigation through careful siting of the phase 2 elements and adequate screening can be delivered.

We hope that this is helpful in the consideration of this application and request that SPS is consulted on any forthcoming amendments.

Yours sincerely,



**Bethany Philbidge BSc (Hons) MSc (Town Planning) MRTPI  
Planning Officer**

Ccs: Jessica de Grazia - SPS Waveney District  
Halesworth Town Council  
Ward Councillors