



# St Felix, Newmarket- Suffolk

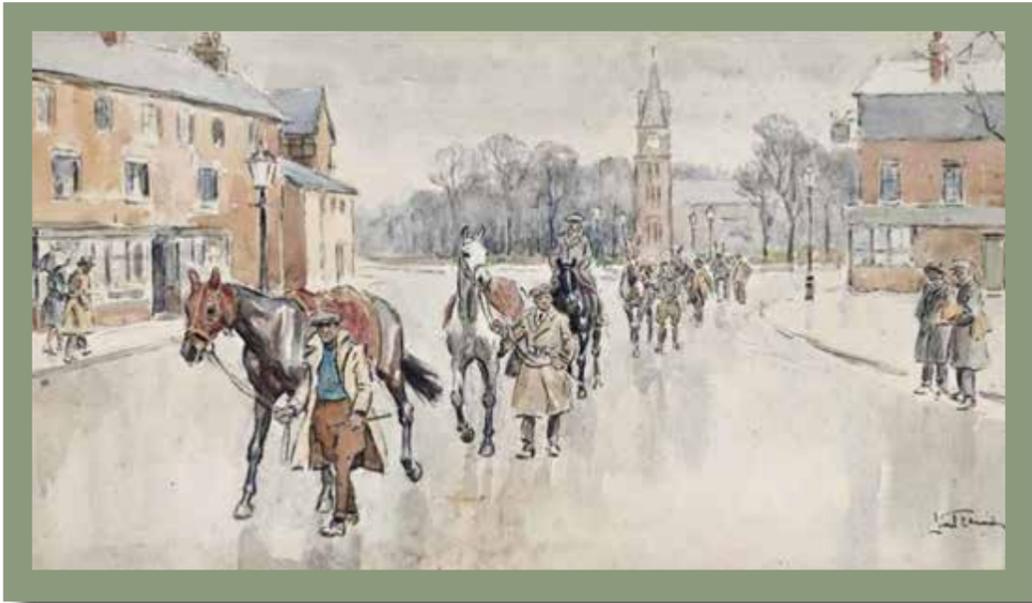
Development Brief

16.06.22



bluepencil  
DESIGNS

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Newmarket on a wet day- by Lionel Edwards

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introduction

## 1:1.1 Purpose and Status of this Document

The purpose of this Development Brief is to provide planning and design guidance for the development of the former St. Felix Middle School, which is allocated in the West Suffolk Site Allocations Local Plan (SALP) for residential development (Policy SA6d).

This Development Brief is comprised of two parts. Part 1 provides guidance relating to the proposals seeking to deliver the Local Plan policy requirements for the site, and Part 2 illustrates the opportunity for optional future opportunities for sport.

The Development Brief is a material consideration in the determination of future planning applications on this site. There is a planning policy requirement for the preparation of a Development Brief in this case, the landowner, Suffolk County Council, has prepared this document in agreement with West Suffolk Council. Once approved by the local planning authority and adopted as Informal Planning Guidance, the Development Brief will constitute a material consideration in the determination of future planning applications but should also be read in conjunction with the policies of the adopted West Suffolk Local Plan.

The reason for this Development Brief is to provide a design framework that sets out site-specific principles and objectives that are aligned with the adopted Local Plan and will guide the preparation and determination of future planning applications for this site. However, this document is not designed to be prescriptive. It is intended to guide the effective delivery of SALP Policy SA6 and has been the subject of consultation with the local community, key stakeholders and West Suffolk Council. The design frameworks set out in this document form a complimentary set of guidelines alongside other key policies of the adopted West Suffolk Local Plan.

It is intended that this document will allow those with an interest in the site to conceive informed proposals that respond to the objectives of this

Development Brief, and meet the requirements of the adopted West Suffolk Local Plan.

## 1:1.2 Introduction

This Development Brief is set out into the following sections:

### PART 1

- Introduction and Scope – this section sets out the background to the preparation of this Brief and identifies its objectives.
- Context – this section outlines the relevant planning policy context and identifies the site specific context including key characteristics.
- The Site – this section identifies the existing site conditions, has regard to the findings of site specific technical reports and presents the resultant opportunities and constraints.
- Consultation – this section identifies the extent of consultation undertaken to inform the production of this Brief and how this aligns with the final design guidance.
- Design Guidance – this section explores the design framework and illustrates site-specific principles to guide the design of future proposals.
- Delivery – this section outlines the phasing strategy, next steps and includes guidance relating to planning obligations.

### PART 2 (Indicative only and not part of the decision making process)

- Future opportunities for sport.

## 1:1.3 Scope

This Development Brief has been prepared in accordance with West Suffolk Council's (WSC) 'Protocol' for the preparation of Development Briefs, which supports the implementation of Policy DM4 (Development Briefs) of the Joint Development Management DPD. The 'Protocol' seeks engagement with WSC Officers to scope the Brief, and an agreed form of public consultation is undertaken with the local community and statutory bodies prior to submission of the Brief to West Suffolk Council for consideration. The Development Brief will then be approved by the Portfolio Holder or Cabinet and adopted as Informal Planning Guidance.

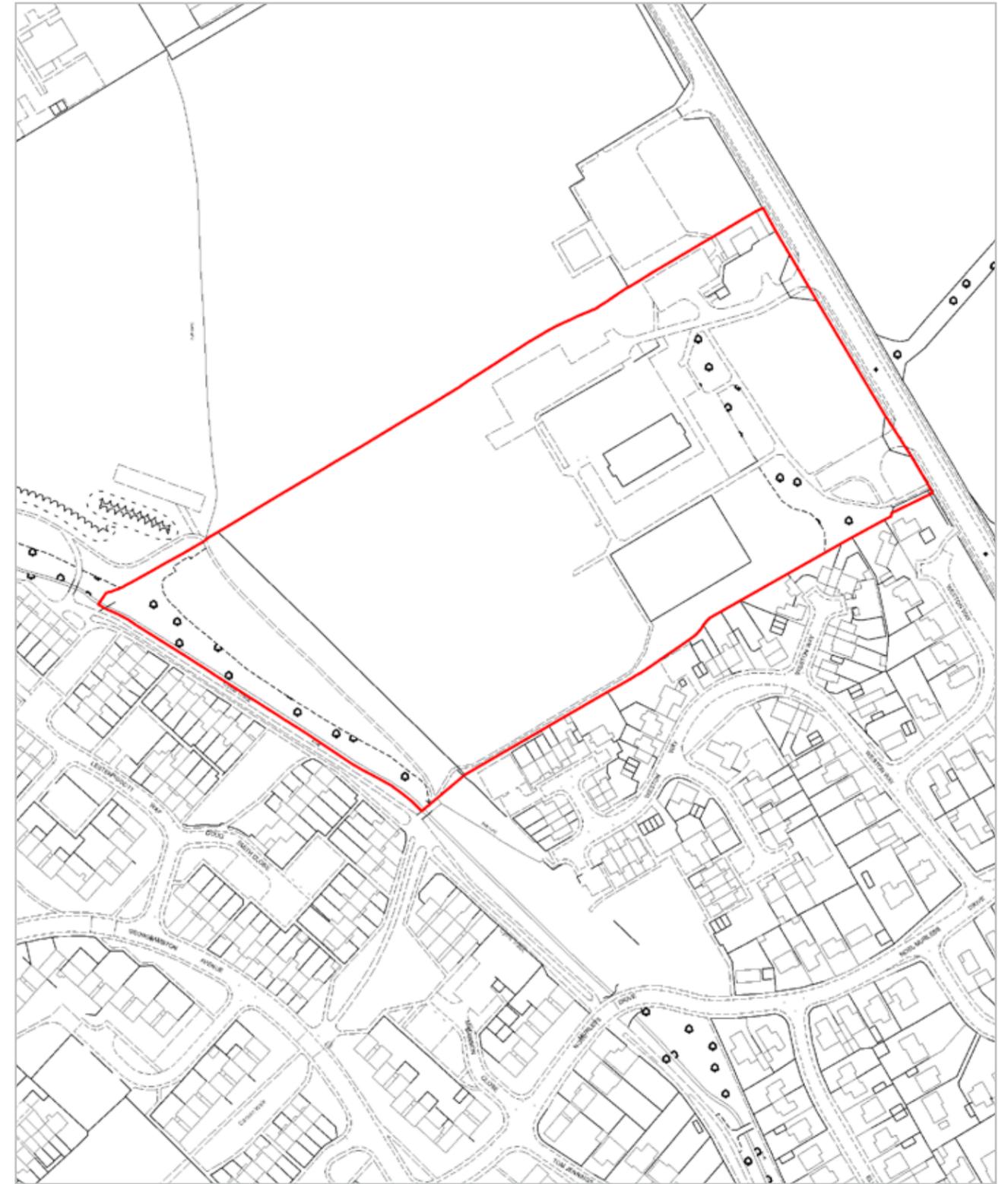


Fig. 1 Red Line Boundary Plan



Fig. 2 Site Location Plan

### 1:1.4 Involvement

This Development Brief has been commissioned and led by the landowner, Suffolk County Council, and produced by its consultant team advising on matters including town planning, architecture, highways, landscape, ecology, drainage, heritage, arboriculture, and contamination. The consultant team are consulting with WSC Planning Officers, and other relevant departments of the Council throughout the production of this Brief and have addressed key issues as they have arisen.

Consultation with the Newmarket Town Council (NTC) and its Neighbourhood Plan Group has also informed the production of this document.

A public consultation exercise with local residents and key stakeholders has also taken place as part of a six week formal virtual consultation on a previous draft of this Development Brief. Further detail surrounding the public consultation of this Brief and key influences taken from this exercise is explored further within this document.

### 1:1.5 Adoption Process and Implementation

The Development Brief has been subject of the following stages in its production:

- Stage 1 - Appointment of consultant technical team and commence of evidence base review and production.
- Stage 2 – Agree scope of the Brief with WSC
- Stage 3 – Consultation with stakeholders
- Stage 4 - Consultation with WSC regarding draft Development Brief
- Stage 5 – Consultation with Town Council and key stakeholders prior to public consultation
- Stage 6 – Six week public consultation on the draft Development Brief
- Stage 7 – Refinement of Development Brief and final engagement
- Stage 8 – formal submission of Development Brief to WSC
- Stage 9 – Determination of Development Brief, if adopted provides Informal Planning Guidance for determination of future planning application(s).

## 1:1.6 Relevant Planning Policy

Any development proposals that are brought forward for this site will be expected to comply with relevant local and national planning policy and associated guidance. This includes the following:

- West Suffolk Local Plan
- Newmarket Neighbourhood Plan
- National Planning Policy Framework

### West Suffolk Local Plan

At the local level, the West Suffolk Local Plan provides further guidance for the development of the site and should be considered fully as part of any future planning application(s). The West Suffolk Local Plan comprises the Forest Heath Core Strategy and the Site Allocations Local Plan, both adopted in 2019, and the Joint Development Management Policies DPD, adopted in 2015.

The most relevant policies from these Development Plan Documents (DPDs) are highlighted below with a more detailed review of pertinent policy matters provided within Appendix 1 of this Brief.

### Site Allocations

The Site Allocations Local Plan, adopted in 2019, allocates the site for housing development under policy 'SA6(d)', known as Former St Felix Middle School site and is a 4.5 hectare area allocated with an indicative capacity of 50 dwellings.

In particular the policy requires that proposals for this site must meet an array of particular requirements including:

- The provision of strategic landscaping and open space to address individual site requirements and location.
- A comprehensive transportation assessment of the individual and, where appropriate, cumulative impact on horse movements in the town alongside other users of the highway net

- work.
- Retaining the existing tennis courts and open space for public use, ensuring appropriate access and connectivity (including from George Lambton playing fields).
  - Protecting the amenity and biodiversity of the Yellow Brick Road blue/green corridor.

### Development Policies

The Joint Development Management Policies DPD, adopted in 2015, provides detail to guide the determination of planning applications. Policy DM4 (Development Briefs) is most relevant for production of this Development Brief.

Policy DM4 (Development Briefs) requires the production of Development Briefs to accord with the provisions contained within the planning policy before it can be adopted. Table 1, opposite, details these provisions and outlines how this Development Brief accords with these provisions.

In addition, there are a number of policies relating to matters of detail reserved for subsequent planning applications. These policies are highlighted within Appendix 1.

Provision Letter	Provision Requirement	Development Brief Compatibility
a)	The mix of housing and affordable housing provision for a site (or details of unit size and mix for employment sites) and the density of housing across the site	Addressed in the 'Land Use and Mix' section of the Design Guidance chapter.
b)	The mix of uses to be provided on a site, including the potential for areas to have multiple uses	Addressed in the 'Land Use and Mix' section of the Design Guidance chapter.
c)	The social and physical infrastructure needed to serve the development including open space and play/recreation provision	Addressed in the 'Site Location and Context' and 'Opportunities' sections of the Context chapter.
d)	Major landscaping and structural planting necessary so the development can be absorbed into the landscape and local biodiversity	Addressed in the 'Landscape and Biodiversity' section of the Design Guidance chapter.
e)	Details of the manner in which any existing and proposed wildlife, landscape or historic features will be incorporated and where possible enhanced within development proposals	Addressed in the relevant sections of the Design Guidance chapter.
f)	Provision for safe and attractive footpaths and cycle linkages to be kept, or created, to link the new development into nearby areas. (In particular, links should be created to district centres, including access to all workplaces, shops, and community facilities, and give access where achievable to the surrounding countryside)	Addressed in the 'Connectivity and Movement' section of the Design Guidance chapter.
g)	Details of vehicular movement, parking and public transport linkages	Addressed in the 'Connectivity and Movement' and 'Access Parking' sections of the Design Guidance chapter.
h)	Details of phasing, funding release stages and delivery of social and physical infrastructure	Addressed throughout the Delivery chapter.
i)	Details of materials, design features and specific design guidelines, such as height, layout, density, mix of uses, etc, for buildings and other townscape features in order to achieve local distinctiveness	Addressed in the 'Planning Policy' section of the Context chapter, and the relevant sections (e.g. 'Appearance and Materials') of the Delivery chapter.
j)	Details of sustainable design and construction measures and energy efficiency measures to be incorporated;	Addressed in the 'Sustainability' section of the Delivery chapter.
k)	Details of the manner in which buildings and infrastructure, including blue corridors (areas designated for the channelling of overland flows of water away from property and key infrastructure), will be designed to address climate change risks (such as extreme temperatures, flash flooding, ground heave etc)	Addressed in the 'Sustainability' section of the Delivery chapter.
l)	Measures to promote sustainable living patterns, including reducing the need to travel set out in a Travel Plan	Addressed in the 'Connectivity and Movement' and 'Sustainability' sections of the Delivery chapter.

## Supplementary Planning Documents

Specific focus should be attached to the following Supplementary Planning Documents (SPDs) as they will be considered as material considerations when preparing any planning application for the site:

- Suffolk Design Guide (2000)
- Suffolk Guidance for Parking: Technical Guidance (2019)
- Technical Advice Note: Space Standards for Residential Development (n.d.)
- Forest Heath Open Space, Sport and Recreation (2011)
- West Suffolk Affordable Housing (2019)
- A suite of Supplementary Planning Documents and Guidance relating to Developer Contributions

## Newmarket Neighbourhood Plan

The Newmarket Neighbourhood Plan (NNP), setting out a vision for Newmarket up until 2031, forms part of the Development Plan.

The most relevant policies to the production of this Brief are presented below:

- Policy NKT11 - Community Sports and Recreation Areas: St. Felix Playing Fields and the Tennis Court area are designated as a 'Sports and Recreation Area'. Development proposals which provide, enhance or expand (as well as reduce) amenity/sport/recreation open space or facilities in these designated areas will be determined in accordance with Policy DM42 of the adopted local plan.
- Policy NKT12 - Local Green Spaces: Yellow Brick Road Linear Park and George Lambton Playing Fields are both designated as 'Local Green Spaces'.

## National Planning Policy Framework

The National Planning Policy Framework (NPPF), updated in July 2021 will constitute a material consideration in the determination of any future planning application at the site.

It promotes the social, economic and environmental objectives required to promote the achievement of sustainable development. The changes introduced in 2021 add increased emphasis towards high quality, beautiful and sustainable buildings. This includes greater recognition of the contribution that trees make to character and quality of new development. Decisions are required to ensure that new streets are tree lined, and new trees are retained wherever possible. Relevant policy references are highlighted within Appendix 1.



Birds Eye View of the southern part of the Site

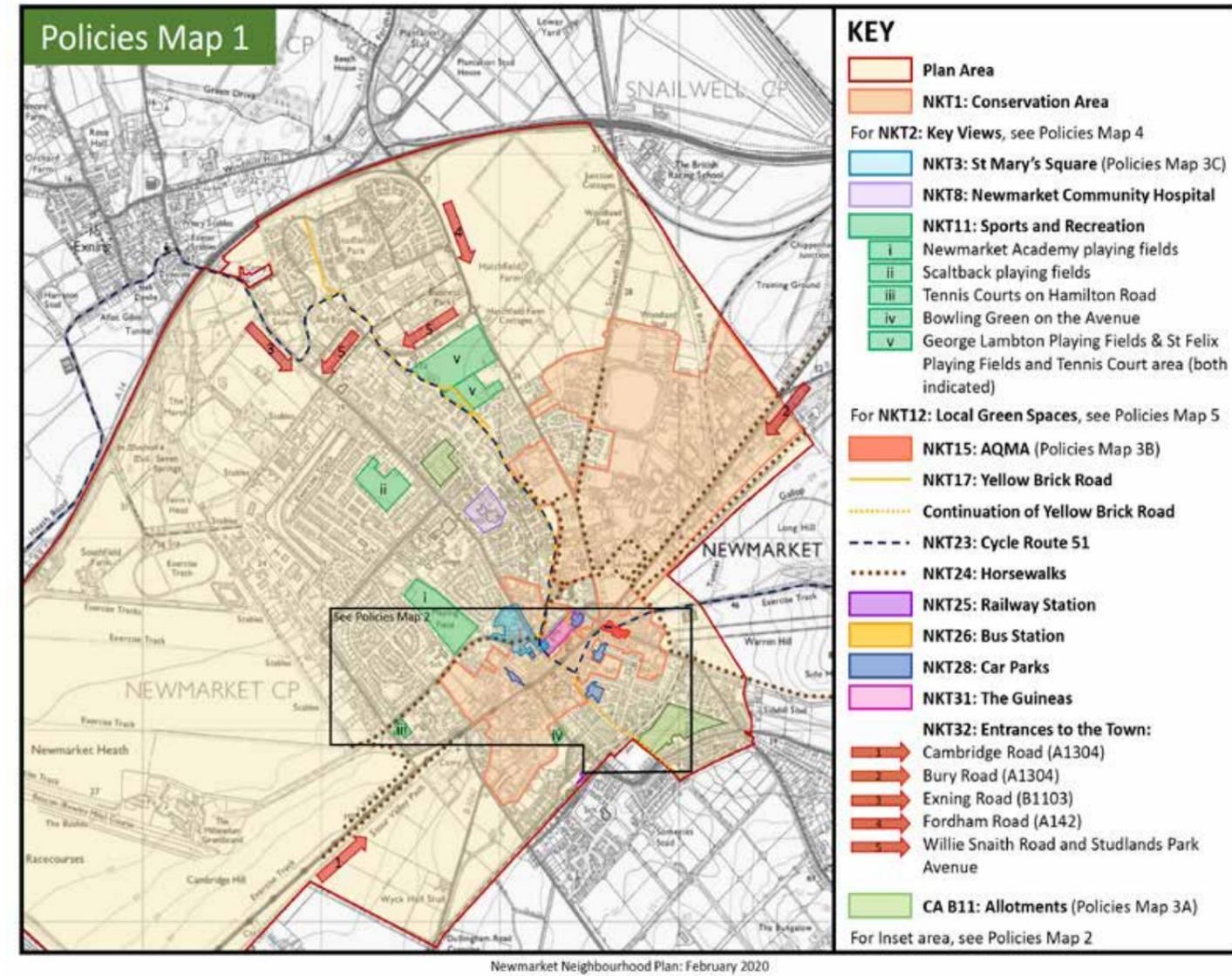


Fig.3 Newmarket Neighbourhood Plan



1:2

objectives

## 1:2.1 Objectives

In order to satisfy the requirements of SALP allocation policy, essential objectives for the outcome of the brief have been established. Separate to this, and not part of any adopted Development Brief, are the desirable objectives of the landowner.

1. Essential: Implementation of the SALP allocation and other Local Plan and Neighbourhood Plan Policy objectives; and

2. Desirable: Identifying a framework for delivery of stakeholder and landowner objectives.

Essential objectives to meet policy include, but are not limited to:

- Prioritising the delivery of new homes, including affordable homes, within the Local Plan period up to 2031;
- Ensuring the retention of tennis courts and open space, and making provision for their public use;
- Integrating on site public open space with the George Lambton playing fields;
- Protect and enhance the Yellow Brick Road (a locally named green corridor) and enhance connectivity;
- Achieving a high quality design and protecting local distinctiveness;
- Safeguarding existing horse movements within the local area and wider town, which are key to the Horse Racing Industry, by reducing the impact of additional vehicular traffic;
- Supporting sustainable transport opportunities; and
- Supporting sustainable design principles.

Desirable objectives of the landowner include, but are not limited to:

- Reserving land within the onsite open space to be made available for the provision of enhanced recreation and sporting opportunities, such as a new indoor sports facility to serve the town;
- Supporting a linked community sports hub with adjacent George Lambton Playing Fields; and
- Responding to the climate emergency through sustainable design measures that exceed local standards.



Accordingly, this Development Brief sets out to fulfil the following core objectives (CO):

CO1: To prioritise the delivery of optimum number of new homes. in accordance with policy objectives

CO2: To produce a design framework that reinforces local distinctiveness through sensitive architecture, public realm and materials

CO3: To create a new network of accessible public open space integrated with George Lambton Playing fields

CO4: To protect the horse racing industry and reduce carbon emissions by prioritising sustainable transport options that will reduce the impact of additional vehicular activity

CO5: To enable proposals that respond to climate change through sustainable design that reduces carbon emissions





1:3

context

### 1:3.1 Site Context

The 'Former St. Felix Middle School' site is located in Newmarket.

Newmarket is defined as a market town in the West Suffolk Local Plan and is the former Forest Heath area's largest settlement. It is generally considered the birthplace and global centre of thoroughbred horse racing.

The town has a population of approximately 16,615 (2011 Census) and is located south of the A14, some 11 miles west of Bury St Edmunds and 10 miles east of Cambridge.

Newmarket is considered to be one of the more sustainable locations for new development within the former Forest Heath area because of the range of services and facilities available within the town and because of its good transport links.



Fig. 4 Strategic Map showing the Site in relation to Newmarket and the surrounding area

Newmarket is the centre for the British Horse Racing Industry (HRI) which has an important economic and cultural role in the town. The town is described as the international home of horse racing with over 3,000 race horses, 89 licensed trainers, 62 stud farms, 1,133 hectares of training grounds and hundreds of stable staff within and around the town (more than anywhere else in the world).

It is the largest racehorse training centre in Britain, the largest racehorse breeding centre in the country, home to most major British horse racing institutions, and a key global centre for horse health.

Palace House, the National Heritage Centre for Horse racing and Sporting Art, the National Horse racing Museum, Tattersalls racehorse auctioneers, and two of the world's foremost equine hospitals for horse health, are in the town, which is surrounded by over sixty horse breeding studs. On account of its leading position in the multibillion-pound horse racing and breeding industry, it is also a major export centre.

Two Classic races, and an additional three British Champions Series races are held at Newmarket every year. The town has had close royal connections since the time of James I, who built a palace there, and was also a base for Charles I, Charles II, and most monarchs since. The current monarch, Queen Elizabeth II, visits the town often to see her horses in training.

Newmarket has a thriving town centre which serves the retail and leisure needs of the local catchment area. Anchored by a major supermarket and the Guineas Shopping Centre, it consists of several pubs, fast food outlets, local convenience stores, comparison shops and services, as well as other retail units.

The key local facilities situated within Newmarket include, but are not limited to, eight primary schools with secondary provision provided by

Newmarket Academy, medical facilities spanning 4 doctors' surgeries and Newmarket Community Hospital, all alongside several community facilities such as Newmarket Day Centre and The Stable. These facilities are all well-served by direct footpath links and a good provision of public transportation, including numerous bus stations strategically positioned throughout Newmarket.

These provisions are complemented by an attractive network of areas of public open space which are popular with the local population base. The general amenity needs are also served by an array of leisure and sporting facilities, for instance, the National Horse Racing Museum and Newmarket Leisure Centre.

Newmarket is a major local business cluster, with annual investment rivalling that of the Cambridge Science Park, the other major cluster in the region.



### 1:3.2 Site Location

The 'Former St. Felix Middle School' is located to the north of the town and is situated along Fordham Road, approximately 300m south from the Fordham Road roundabout. The Fordham Road is one of the main arterial roads into the town from the A14 located to the north.

Immediately north of the site is an extensive area of playing fields known locally as the George Lambton Playing Fields. Beyond that extensive commercial and retail areas extend north towards further residential development. To the east is open countryside, and the area to the south and west of the subject site is predominantly characterised by modern estate-style residential development consisting of spacious dwellings at either single or two storey in height. House typologies include detached, semi detached and terraced housing. The front and rear gardens are well defined, creating a level of clarity between public and private spaces.

Newmarket town centre is 1.5km to the south. Accordingly, the site is within close proximity to major services and facilities.

The site connects in the west to a green corridor network, known locally as the 'Yellow Brick Road' which permeates through the town providing a Byway and public rights of way for walking and cycling between the town centre and Studlands Park.

The maps adjacent shows the extent of the development, outlined in red, and its location in relation to the rest of Newmarket.

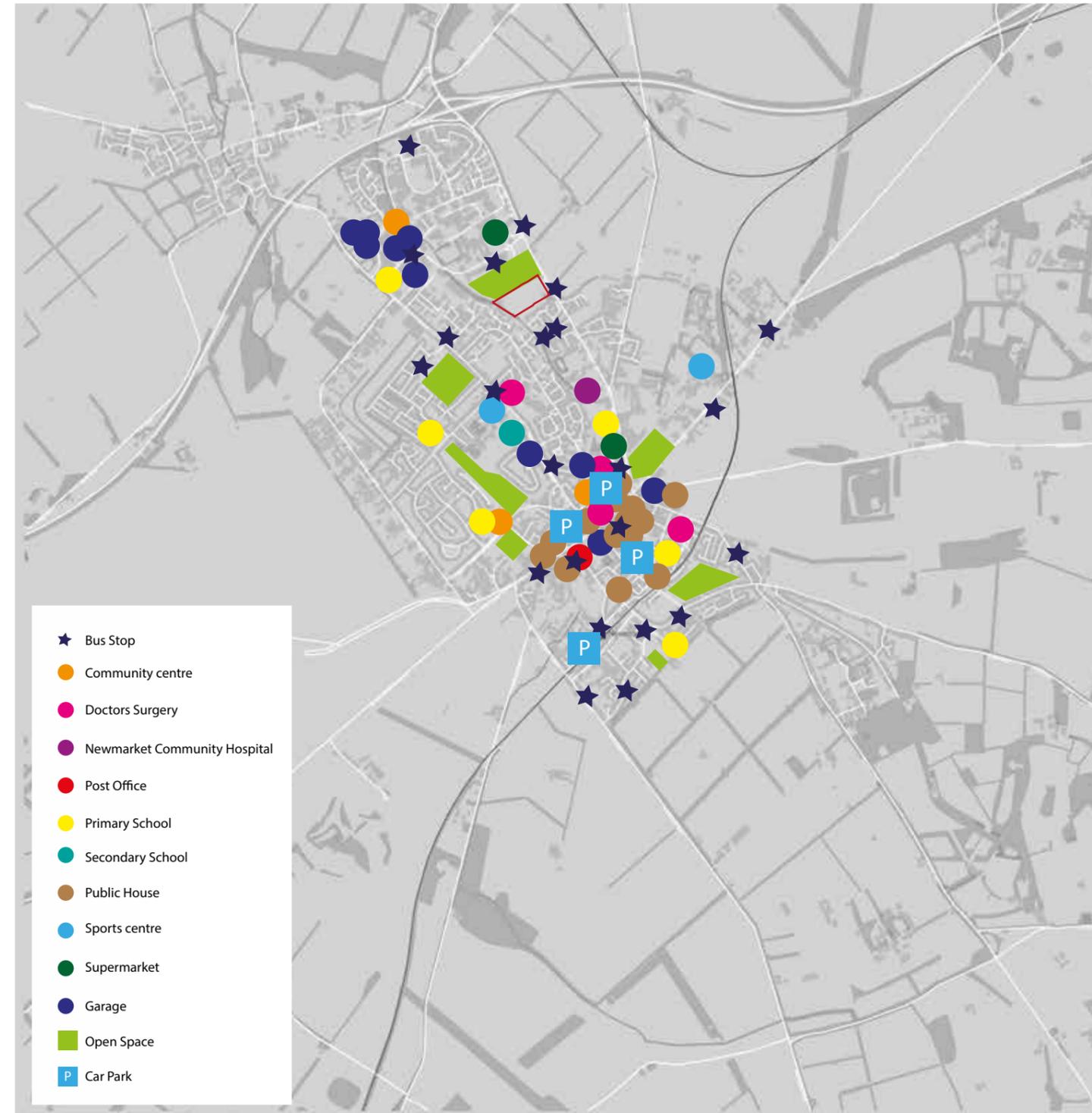
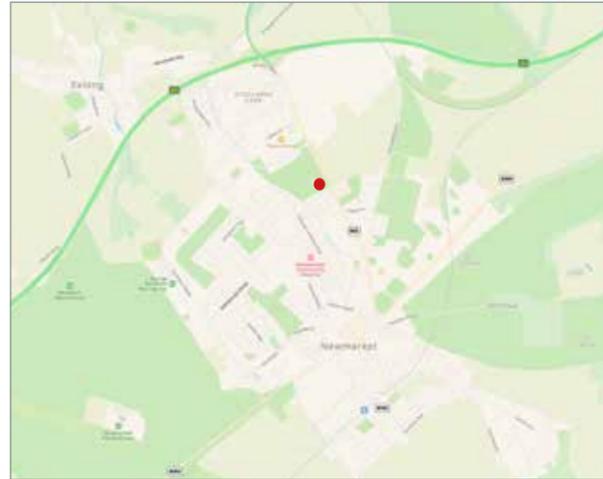


Fig.5 Strategic Map showing the location of key services

### 1:3.3 Heritage and Historic Character

#### Heritage Context

The extracts opposite show the historical evolution of the town between 1885 and 1982 highlighting the expansion of equine facilities in the area, the St Alban's House stable complex, the development of large detached properties between Fordham Road and Snailwell Road and the post-war expansion of Paget Place/ Wyndham Way

Characteristics of the Fordham Road character area include, substantial stables and paddocks with large, opulent houses, behind high; and brick or flint walls and set in significant gardens with mature trees. Houses set in well-established grounds providing a spacious, sylvan, semi-rural landscape.

Newmarket Conservation Area (see map on adjacent) is situated approximately 150 metres to its south-east. An amalgamation of five former Conservation areas, it comprises the historic town centre (including the High Street and Palace Street) as well as an extensive area of stables and owners. It has been designated due to Newmarket being a historic town with a medieval layout, and the strong association between the town of Newmarket and horse racing, training and breeding.

Whilst there are no heritage assets within the site, there are two listed buildings within a 500m radius of the site. These include the Grade II listed Newmarket General Hospital 500 metres to its south, and a Grade II listed dwelling 400 metres to its east.

Characteristics of the Fordham Road character area include, substantial stables and paddocks with large, opulent houses, behind high; and brick or flint walls and set in significant gardens with mature trees. Houses set in well-established grounds providing a spacious, sylvan, semi-rural landscape.

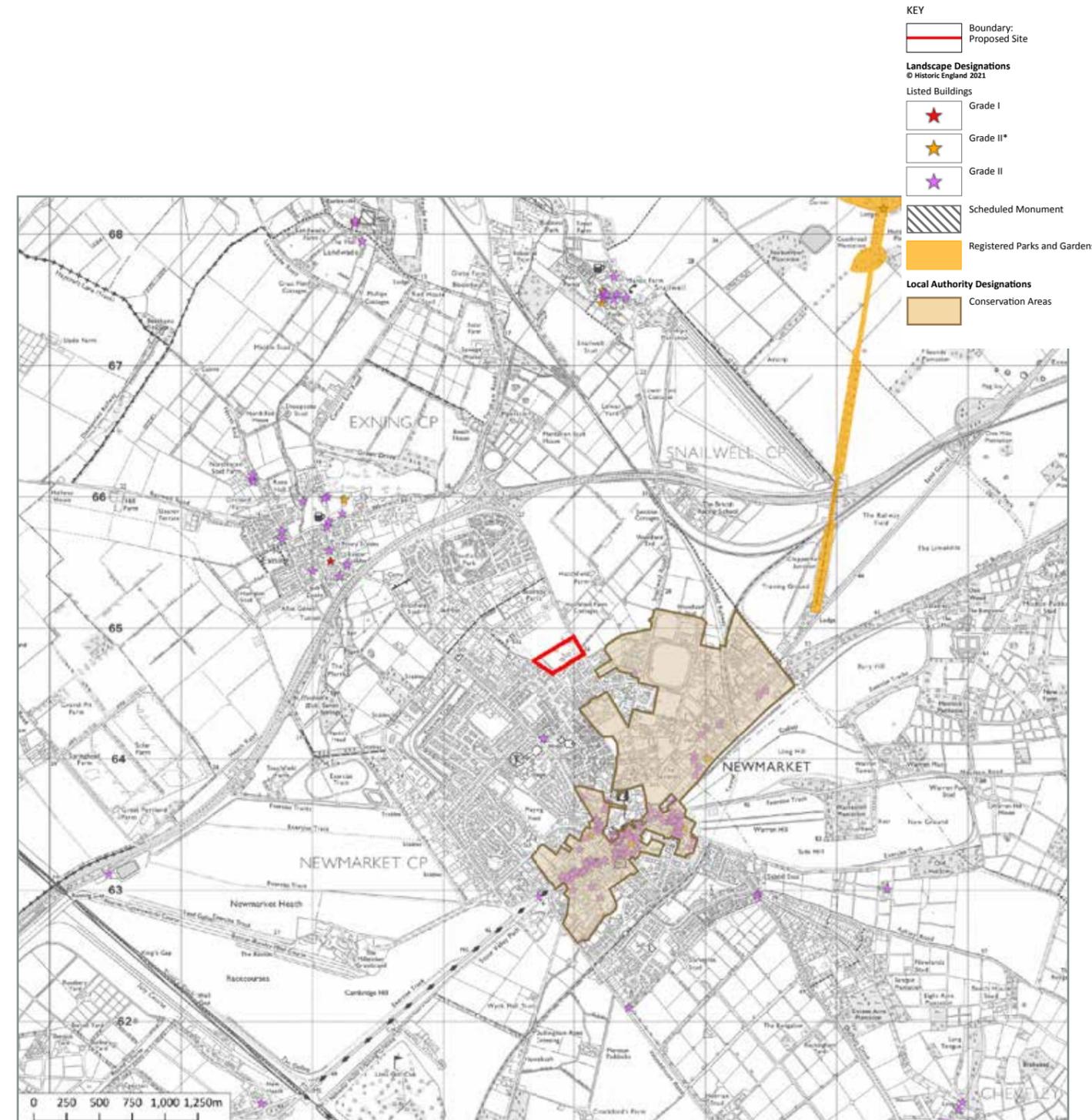
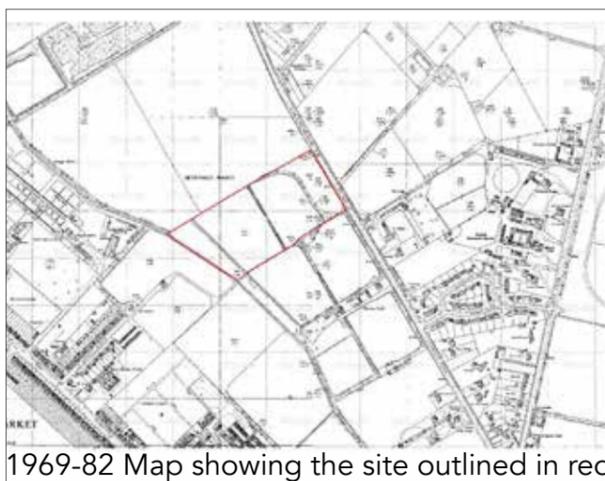
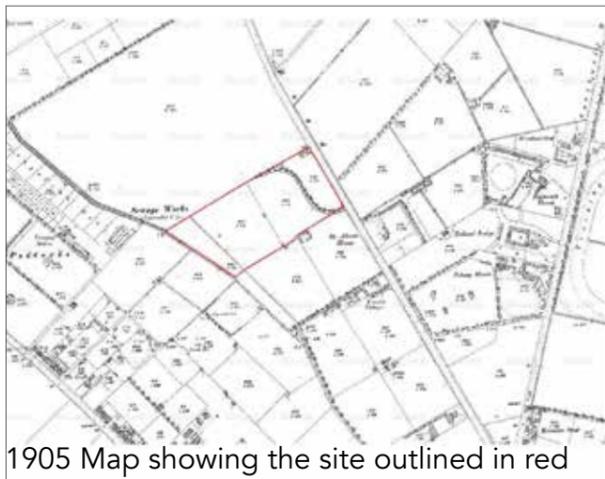


Fig. 6 Map to show Conservation Area and heritage assets in and around Newmarket

### 1:3.4 Landscape and Character

#### Landscape context

The site lies within the urban area of Newmarket as defined by the Suffolk Landscape Assessment and is not the subject of any landscape quality designations. The site adjoins a linear green open space known locally as the Yellow Brick Road which connects to the centre of Newmarket. The south western area of the site is designated as part of a Local Green Space.

#### Green infrastructure

Lines of mature trees, tree belts and small woods are present in the wider landscape, including larger areas of woodland on the higher ground to the north and east of Newmarket.

#### Green spaces and links

Newmarket has a number of Local Green Spaces, including large open spaces, green corridors and small greens that provide opportunities for leisure and dog walking, cycling, children's play, informal recreation and formal sports. The linear green space known locally as the Yellow Brick Road runs from Studlands Park to the south of the A14 to the centre of Newmarket, following the line of a small stream. There are a limited number of Public Rights of Way in the local area but the site is ideally placed to connect to the pedestrian and cycle link to the town centre.

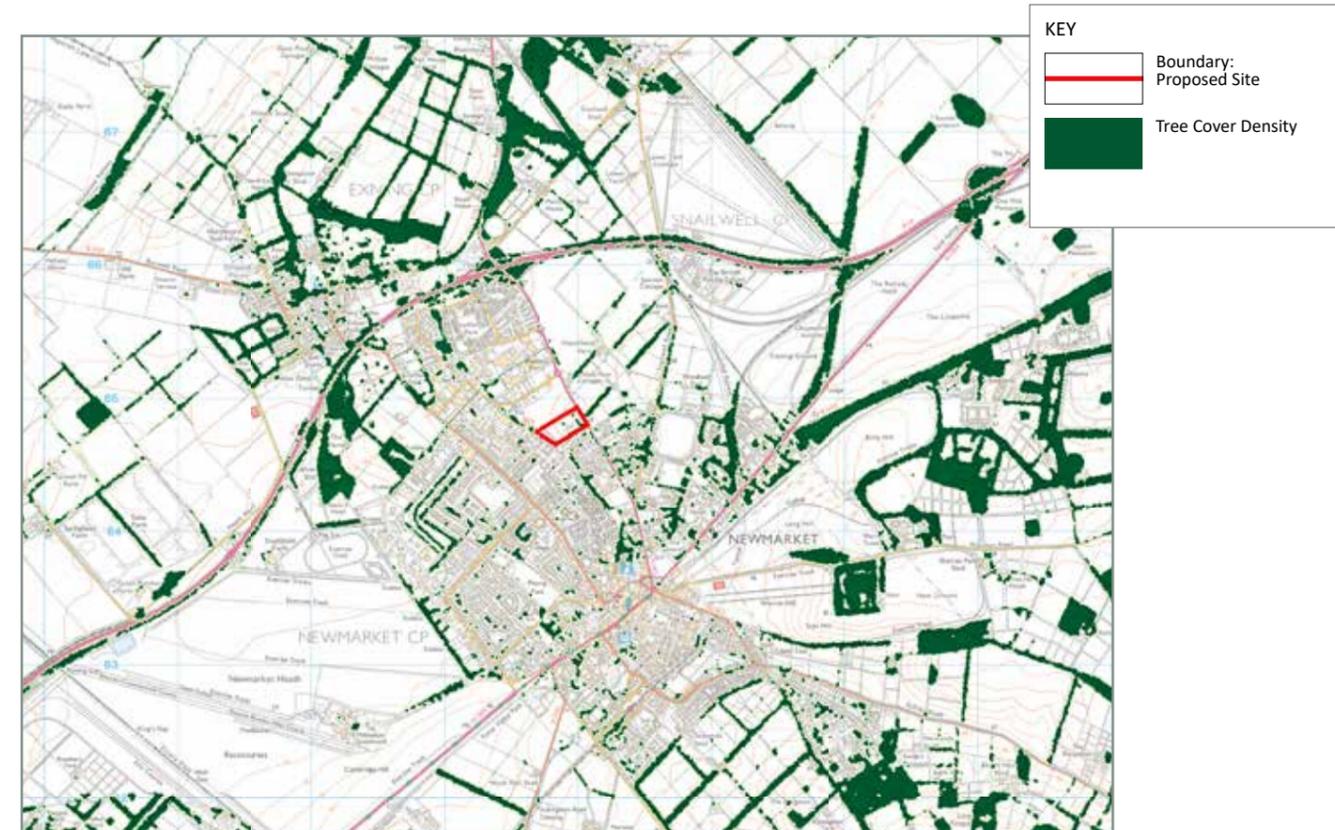


Fig. 7 Map to show density of Tree Cover in and around Newmarket

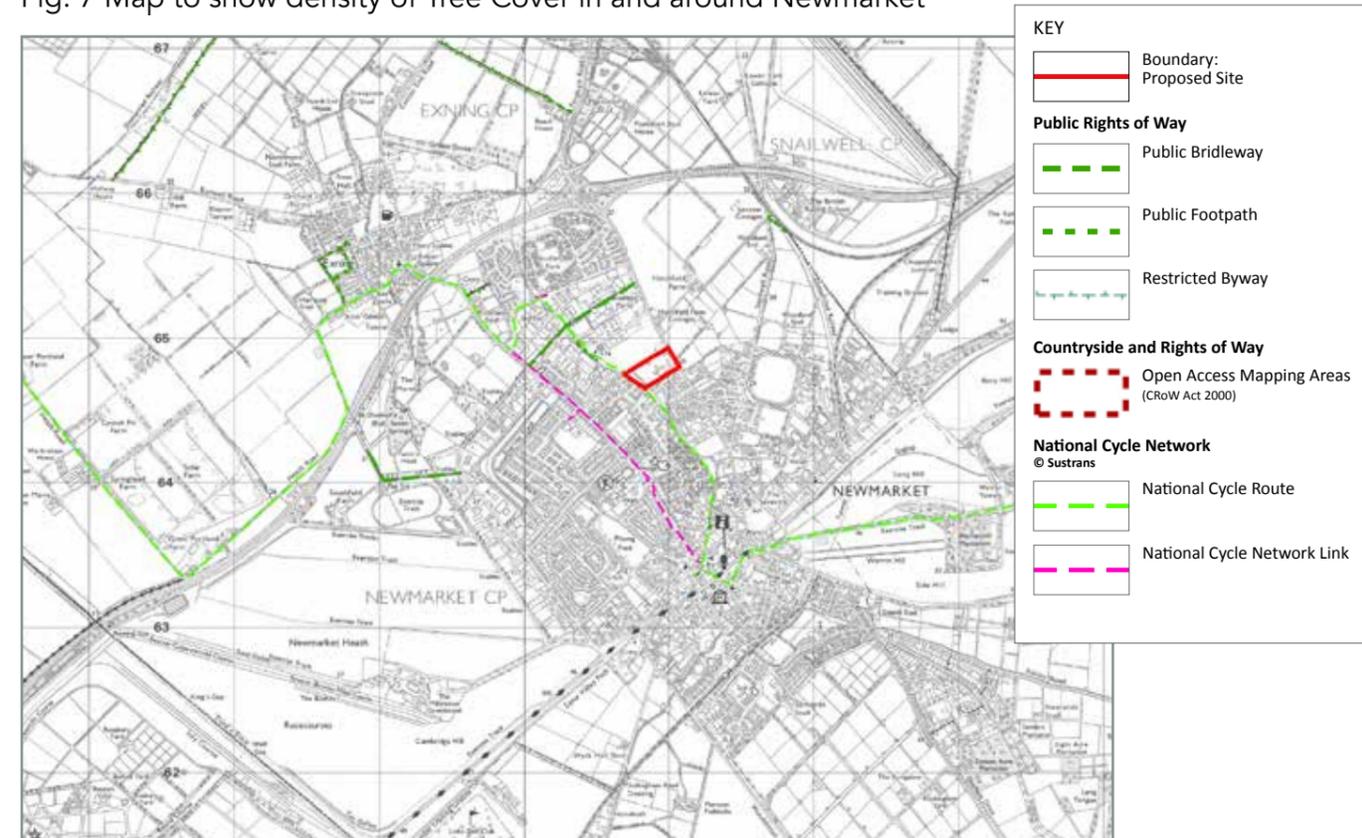


Fig. 8 Map to show footpaths, Bridleways and Cycle Routes in and around Newmarket

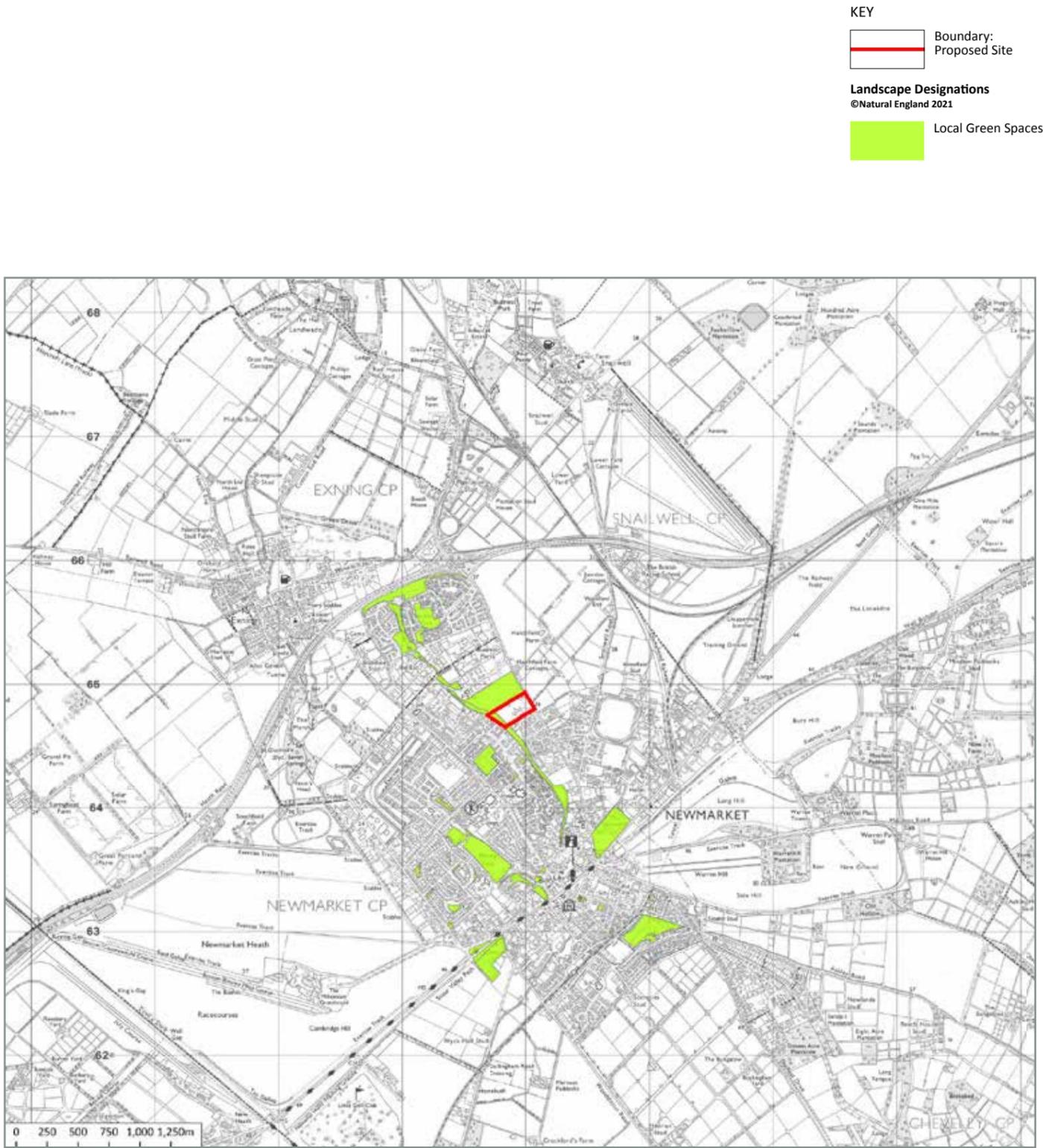


Fig. 9 Map to show Green Spaces in and around Newmarket

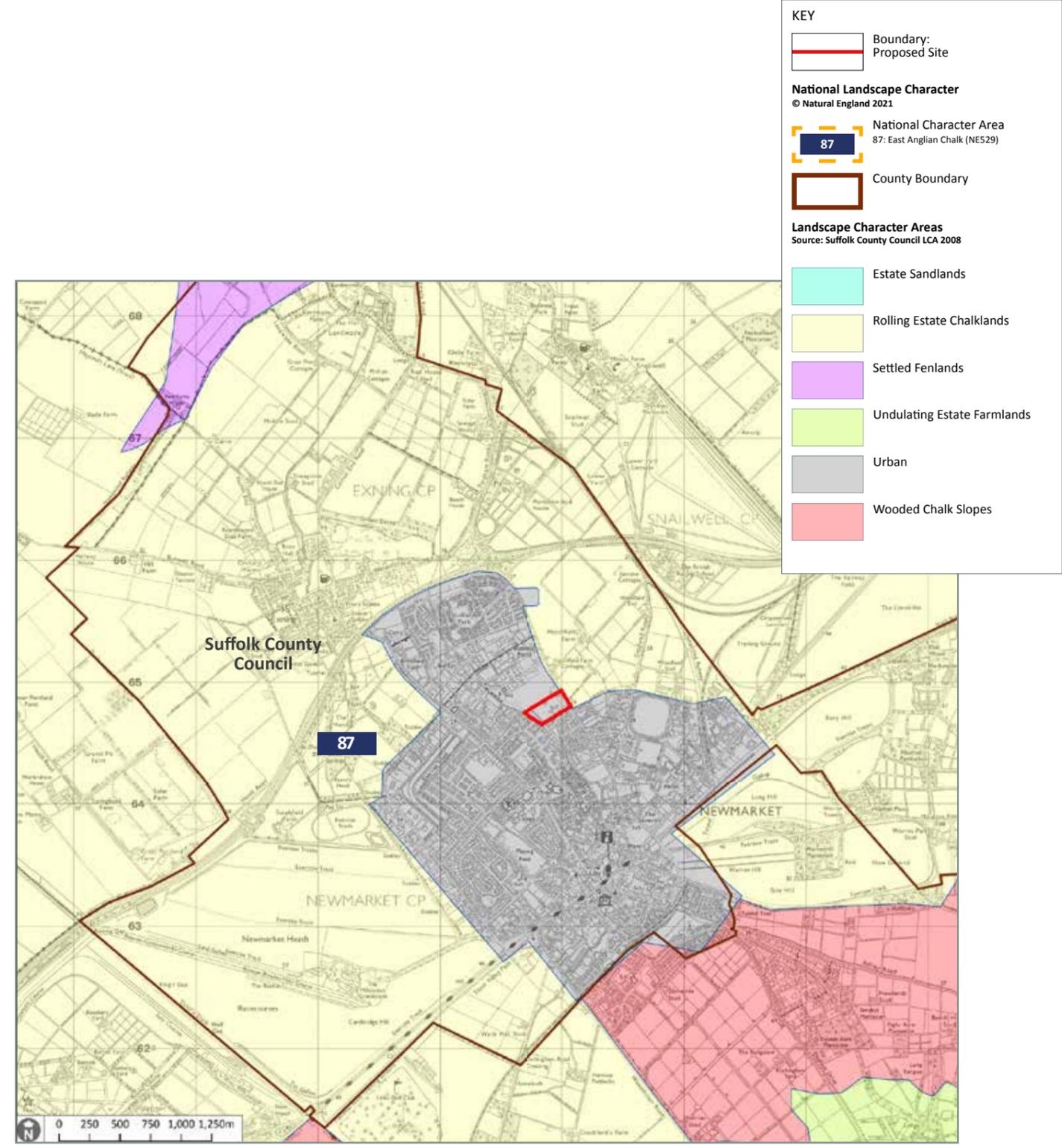


Fig. 10 Map to show Landscape Character in and around Newmarket

### 1:3.5 Townscape and Character

Newmarket has developed as traditional market town with various routes into the high street forming a roughly star shaped street pattern. The centre of the town is the high street which is enclosed by fine examples of medieval and Victorian buildings with the landmark clock tower at its north eastern end.

Many streets in the town have buildings on the back edge of the footpath. They have a variety of ridge heights and are mostly two or three storeys under pitched roofs.

Materials include an attractive range of red and gault brick, flint and some light coloured render. Roofs are slate or red plain tile.

The most notable and unique townscape element is the number of racing yards dotted within and around the town itself. In addition the segregated horse routes add another level of townscape interest. They connect the yards to The Gallops, allowing safe passage for horses and jockeys.

Newmarket is a compact town, full of interesting streets, yards and lanes. It is well maintained and attractive. There are two conservation areas in Newmarket as shown on the adjacent map.

To the north of the town, off Fordham Road is the industrial quarter with a large Tesco store. It is separated from the town by the George Lambton Playing Fields.



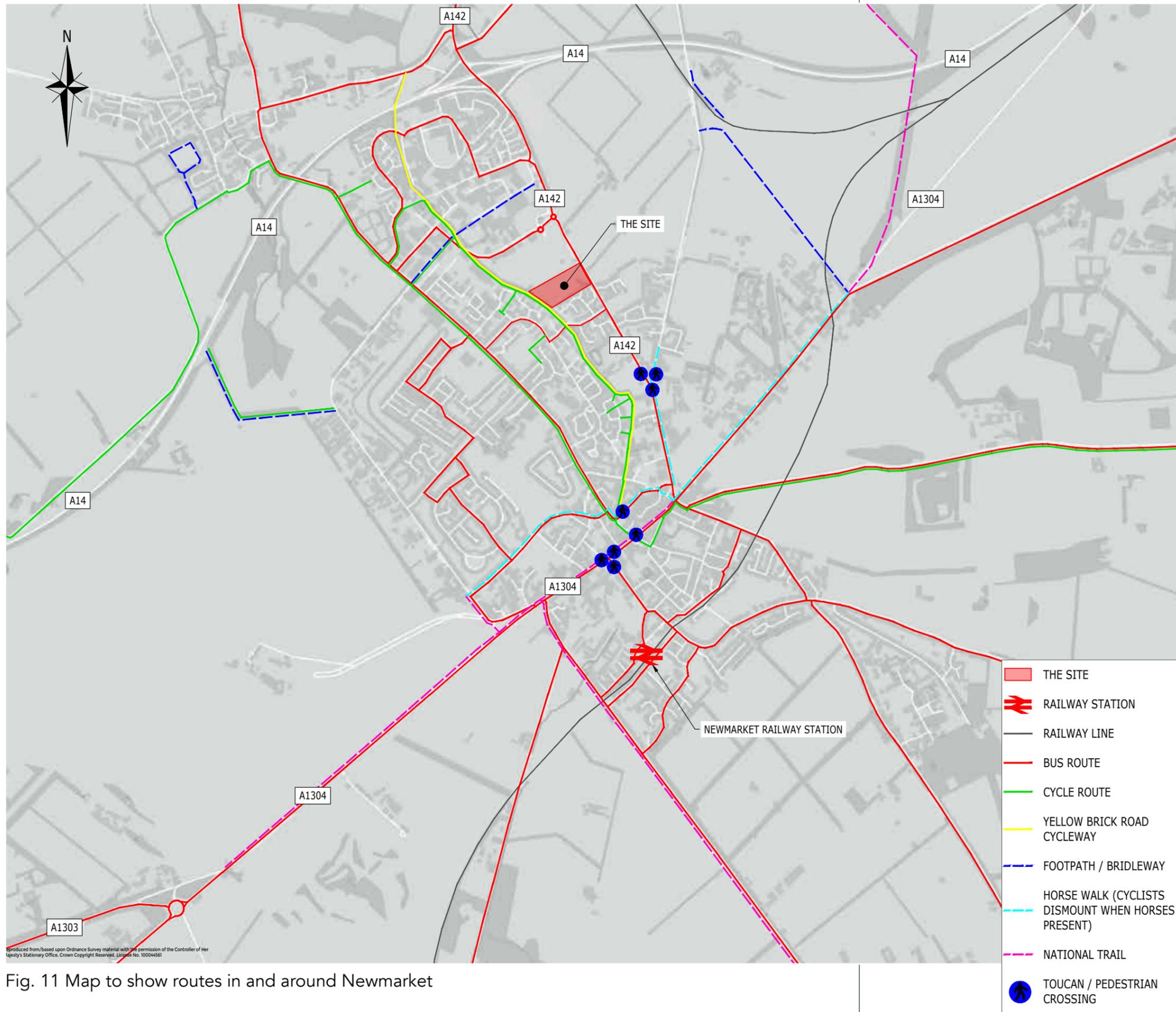


Fig. 11 Map to show routes in and around Newmarket

### 1:3.6 Access and Connectivity

The site is located on the A142 Fordham Road which provides direct and convenient access to both Newmarket High Street and the A14 Newmarket Bypass. The A14 Newmarket Bypass provides access to Bury St Edmunds and Cambridge, meaning the site is well connected for vehicular traffic.

The A142 Fordham Road is a single carriageway road benefitting from pedestrian footways on both sides of the road, separated from vehicular traffic by a grass verge. Extensive street lighting is provided meaning that there are good opportunities for pedestrians to access the site. The site currently benefits from two vehicular accesses on to Fordham Road.

The site connects in the west to a green corridor network, known locally as the 'Yellow Brick Road' which permeates through the town providing a Byway and public rights of way for walking and cycling between the town centre and Studlands Park.

Newmarket Town Centre is considered walkable or cycleable at approximately 1.5km via Fordham Road or 1.9km via National Cycle Route 51 which can be accessed at Noel Murless Drive. National Cycle Route 51 provides a mainly traffic-free route to Newmarket Town Centre and Studlands Park Industrial Estate to the north.



# Horse Routes

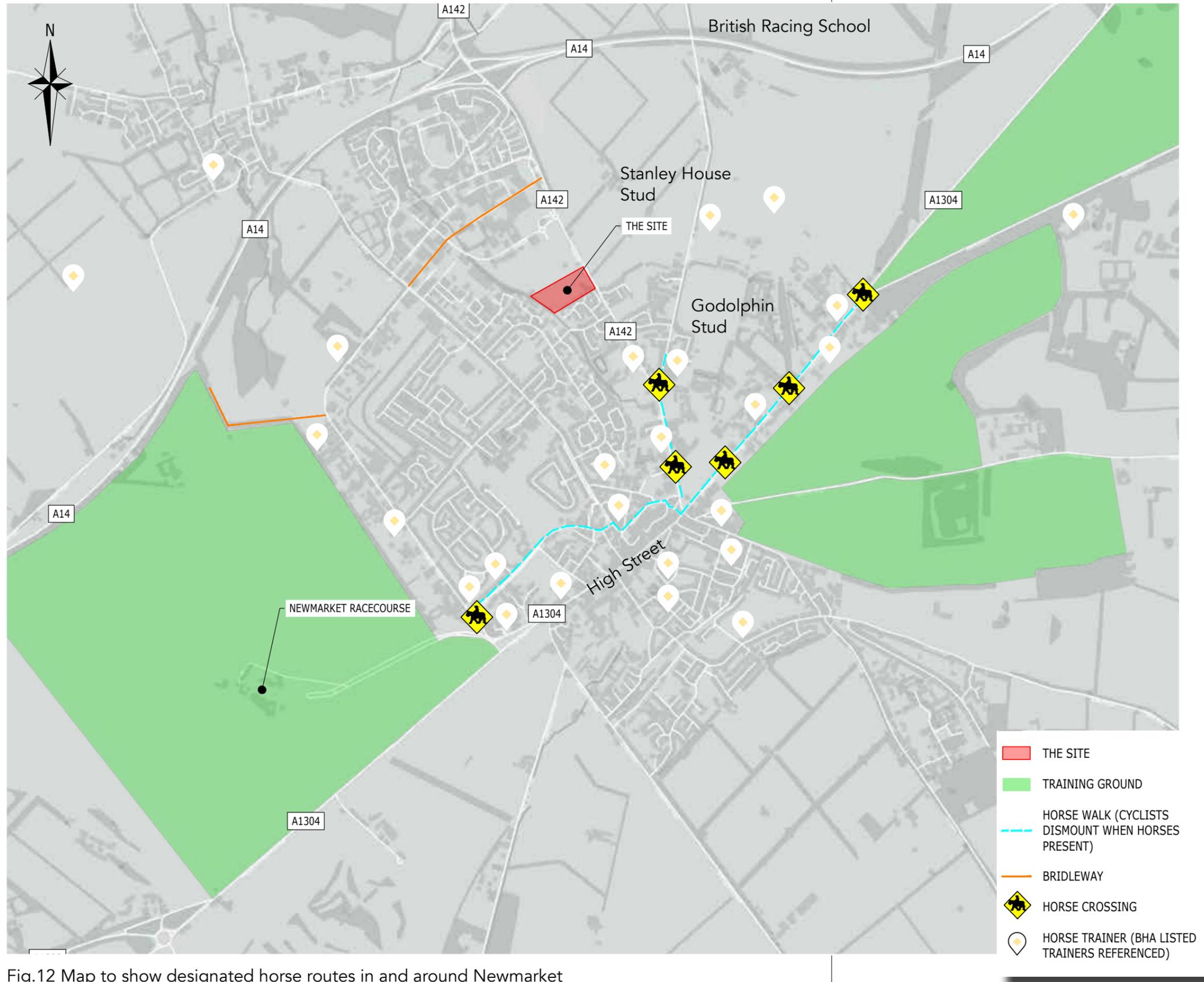


Fig.12 Map to show designated horse routes in and around Newmarket





1:4

the site

### 1:4.1 The Site

The 'Former St. Felix Middle School' site occupies an area of 4.5ha and is rectangular in shape. It is formed by two distinctive parts comprising as follows:

- the area that previously accommodated the school buildings, which now comprises tennis courts and a MUGA pitch, isolated single storey structures, associated car parking provision and hardstanding; and
- the land to the rear which comprises the former playing fields now providing a larger area of open space, interspersed with bands of mature vegetation and transecting walkways.

The site is predominantly flat in nature. The site is framed on all boundaries by continuous established trees and hedgerows, which contain and screen the site and integrates the site with its surrounding context. Internally there are a number of mature high quality trees and bands of trees that add to the townscape character worthy of preservation. These tree bands subdivide the site in to two distinctive areas comprising of the previously developed parts of the site and the former playing fields now open space.

Two existing vehicular entrances along the eastern boundary provide vehicular accesses onto Fordham Road. A footpath exists in the southern corner of the site providing access to the wider public right of way network.



Fig. 13 The Site



Fig 14. Aerial View of the site photographed in 2021

- Site Boundary
- 1970s School Building
- Modern School Building
- Tennis Courts
- Ancillary Buildings
- Areas of Hard Standing



Fig. 15 Plan showing previous land uses - The modern school building shown in orange was a temporary structure and no longer exists

## Technical Assessments

The following pages illustrate the technical studies that have been undertaken to help inform this Development Brief. At this stage the assessment and recommendations are proportionate to the preliminary stage of the design process with further work required at a later stage to clarify and confirm details in support of a future planning application(s).

## Ecology

The site comprises amenity grassland alongside introduced shrub, buildings and hardstanding, dense scrub, log piles, semi-improved grassland, and scattered trees with a species-rich hedgerow. The latter three elements are considered to have the highest ecological value, and thus are to be retained within the final development.

The Phase 1 Habitat Survey confirms that the habitats present on the site have the potential to support the following species: foraging bats, nesting birds, Badger, Hedgehog and invertebrates.

Accordingly, it has provided a number of recommendations which if undertaken and adhere to should result in only negligible impacts upon the protected species. The following recommendations have been established for consideration within the final development scheme:

- Incorporation of bat and bird bricks and boxes within the final development scheme;
- Incorporation of Hedgehog friendly fencing into the final development;
- Placement of log piles for invertebrates;
- Planting of plant species beneficial to wildlife onsite.

It is also observed that the site is within a 2km radius of four nature conservation sites. However, the site does not contain any important species associated with these sites, nor in there is any potential

habitat connectivity between them due to the nature of the intervening land uses.

A review of West Suffolk Council Housing Provision and Distribution identifies a 7.5km zone of influence for recreational disturbance for international sites. In this instance, the site is within a 7.5km zone for three international sites: Devils Dyke (SAC), Fenland (SAC), and Chippenham Fen (Ramsar). Nevertheless, these are not listed as sensitive to recreational disturbance, and therefore the proposed residential development on the site will not generate any adverse impacts upon the internationally designated sites.

The development site does not contain any habitats which could support the important species associated with either the statutory or non-statutory sites, and there is no potential habitat connectivity between the site and the statutory sites as they are separated by large areas of arable land and sizeable residential areas.

## Arboriculture

The majority of trees on the site are located along the sites boundaries, with several bands of smaller trees within the central part of the site. It can be confirmed that there are no Tree Preservation Orders (TPOs) on the site, although there is a single TPO (TPO/1972/234) immediately adjacent but outside the site to the south which is likely to include a single tree (T23) Tree band (G3) is within the site and alongside the Category A trees, should be retained as part of any new proposed development on the site.

From the tree survey, it was assessed that the majority of the tree stock is classified as either Category B or Category C trees. Whilst the former is of moderate quality and should be

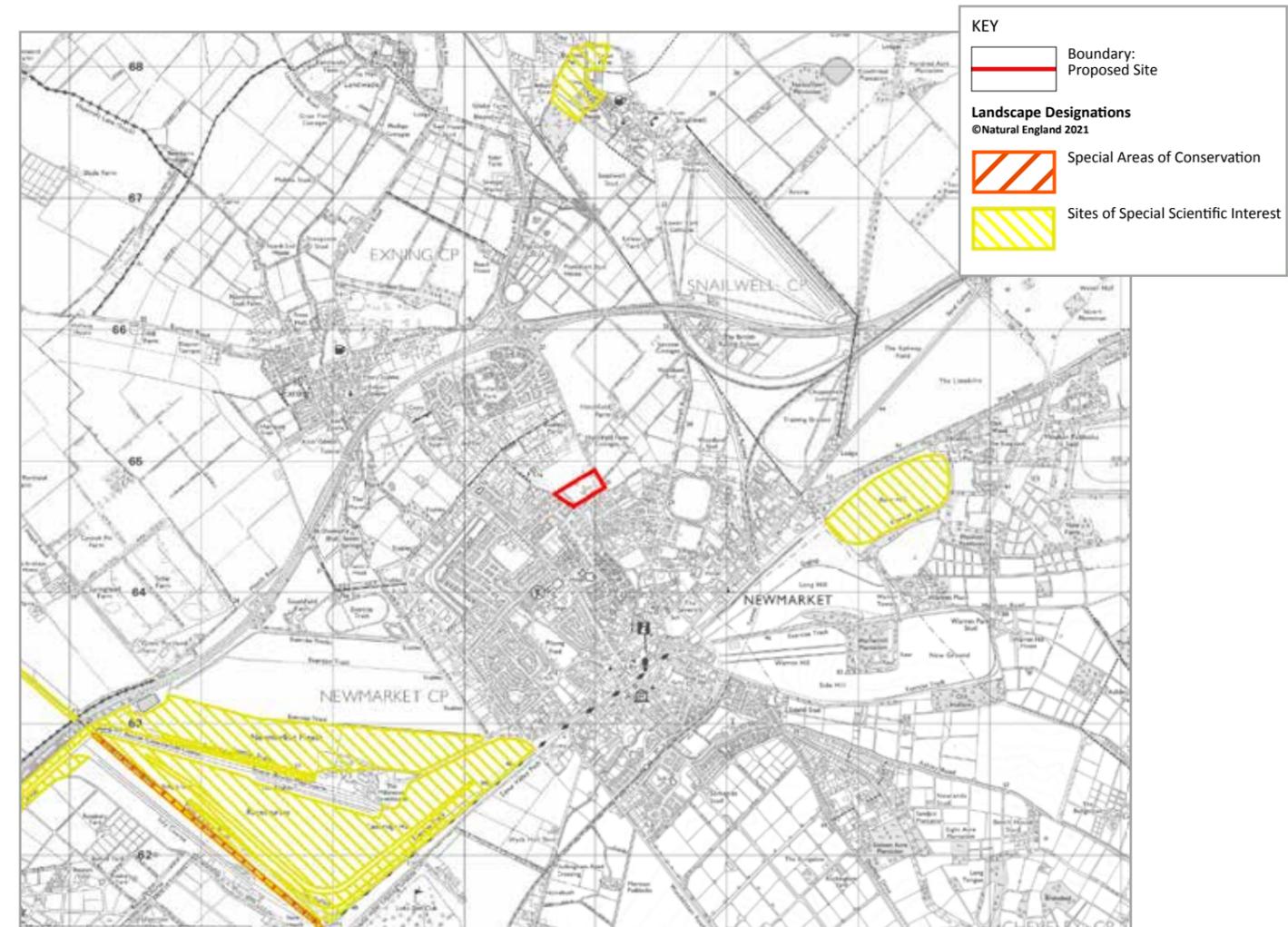


Fig. 16 Landscape Designations Map

retained where possible, the latter are of low quality and thus it may be acceptable for them to be removed where required. In this instance, the only trees that need to be removed in order to facilitate the construction of the proposed residential development are situated in the central component of the site – all Category B/C trees. A number of other Category C and Category U trees have been highlighted for removal, but these are of poor quality or dead.

A Tree Retention Plan and a Tree Protection Plan will be produced prior to commencement of construction to show the locations of trees to be retained with specified mitigatory measures, such as construction exclusion zones, to prevent any adverse impacts upon the surveyed tree stock.

## Boundaries

The photographs below show the different boundary conditions on the site.



Boundary with Fordham Road



Boundary with George Lambton Playing Fields



Boundary with Permissive Footpath



Fig. 17 Boundaries Plan

Flood Risk and SuDS

The Environment Agency’s indicative floodplain mapping identifies the majority of the site is Flood Zone 1, at a low probability of tidal/fluvial flooding.

The Environment Agency’s indicative floodplain mapping also indicates that there is an element of floodwater encroachment from an ordinary watercourse which is present along the site’s western boundary. Any future planning application will therefore be accompanied by a site-specific Flood Risk Assessment (FRA) which is prepared in accordance with the guidance outlined within the National Planning Policy Framework (NPPF). The guidance uses the concept of sequential testing and the risk-based approach to flood risk and development.

The layout will be designed so that the redevelopment scheme, which includes residential dwellings is deemed to be a ‘more vulnerable’ land class usage in terms of flood risk:

Table 3 of the Planning Practice Guidance (Flood Risk Vulnerability and Flood Zone ‘Compatibility’) determines that a residential scheme which is specifically located on the area of land defined as Flood Zone 1, is deemed to be appropriate.

The indicative mapping also indicates that the site is not at risk of flooding as a result of the breach of any nearby reservoir.

The Environment Agency’s indicative mapping also indicates that the majority of the site is not susceptible to any pluvial/surface water flooding, with the exception of the floodwater encroachment emanating from the ordinary watercourse which is present along the site’s western boundary. The risk of flooding will therefore be mitigated by sequentially locating the proposed units outside the envelope.

According to the records held on the British Geological Survey website, a borehole (BGS Reference TL66NW134) was drilled to a depth of 12m to the north of the redevelopment site. Groundwater was encountered at a depth of 5.9m below the ground’s surface level, therefore it is concluded that the site is not at risk of any groundwater flooding, even allowing for seasonal variances.

In view of this assessment, it is concluded that the scheme is not at an increased risk of flooding from any source including fluvial, tidal, a breach of any nearby reservoir, groundwater or pluvial/surface water with the implementation of suitable mitigation measures i.e. sequentially locating the units outside the floodwater envelope.

A sustainable drainage system (SuDS) will be in accordance with the NPPF to demonstrate the preferred method of disposal and will seek to utilise a range of features which follows the national SuDS hierarchy in this regard.

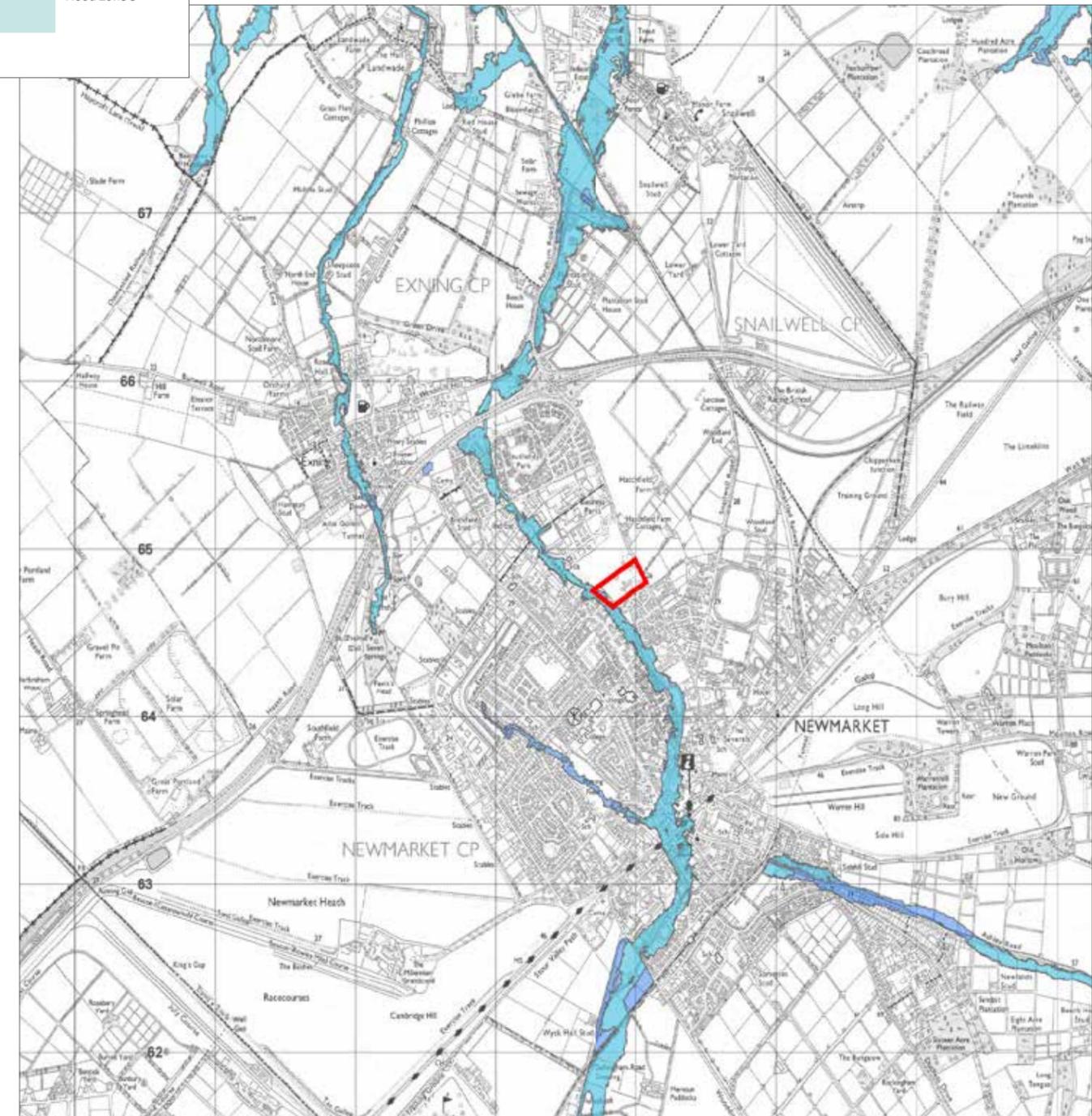
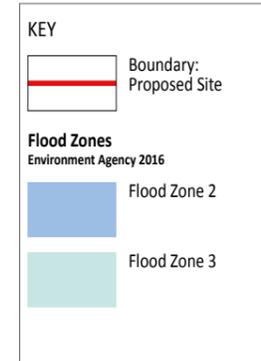


Fig.18 Map to show Flood Zones 2 and 3 in and around Newmarket

## Heritage

Despite the proximity of the site to Newmarket Conservation Area, situated approximately 900 metres to the south-east of the site, the initial assessment within the Heritage Assessment has found that there would be no negative impacts upon this designation by any changes to its setting as a result of any proposed development.

This is due to the intervening land already being dominated by dense modern housing, and the enclosed nature of the site. Moreover, the key views within the Newmarket Conservation Area are insular, and thus do not extend to the site.

Due to the significant separation distance between the site and the nearest listed buildings, it is also found that no adverse impacts upon their historical significance will also be generated as a result of any proposed development.



## Archaeology

It is noted that there may be archaeological remains across the site due to its use as arable land during the medieval and post-medieval periods but, based on the currently available evidence, these remains are not considered to be of sufficient significance as to warrant preservation in situ.

Nevertheless, it is also recognised that a potential buried archaeological resource (albeit unlikely to be of the highest significance) will constitute a material consideration in the determination of the planning application for the proposal.

Therefore, any proposal will need to be accompanied by an appropriate mitigation strategy as agreed with an archaeological advisor to the local planning authority. It is envisaged that the programme of archaeological works will be undertaken prior to the commencement of any development.

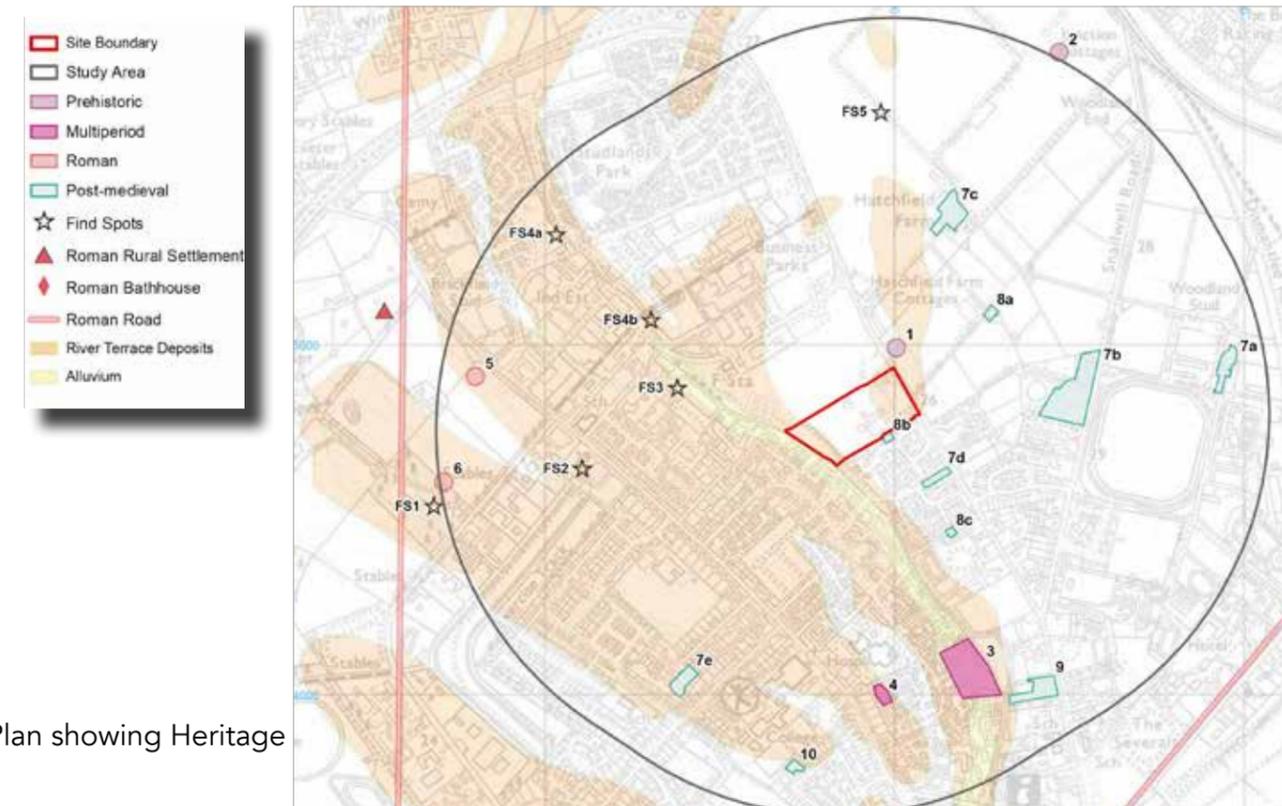


Fig. 19 Plan showing Heritage Assets

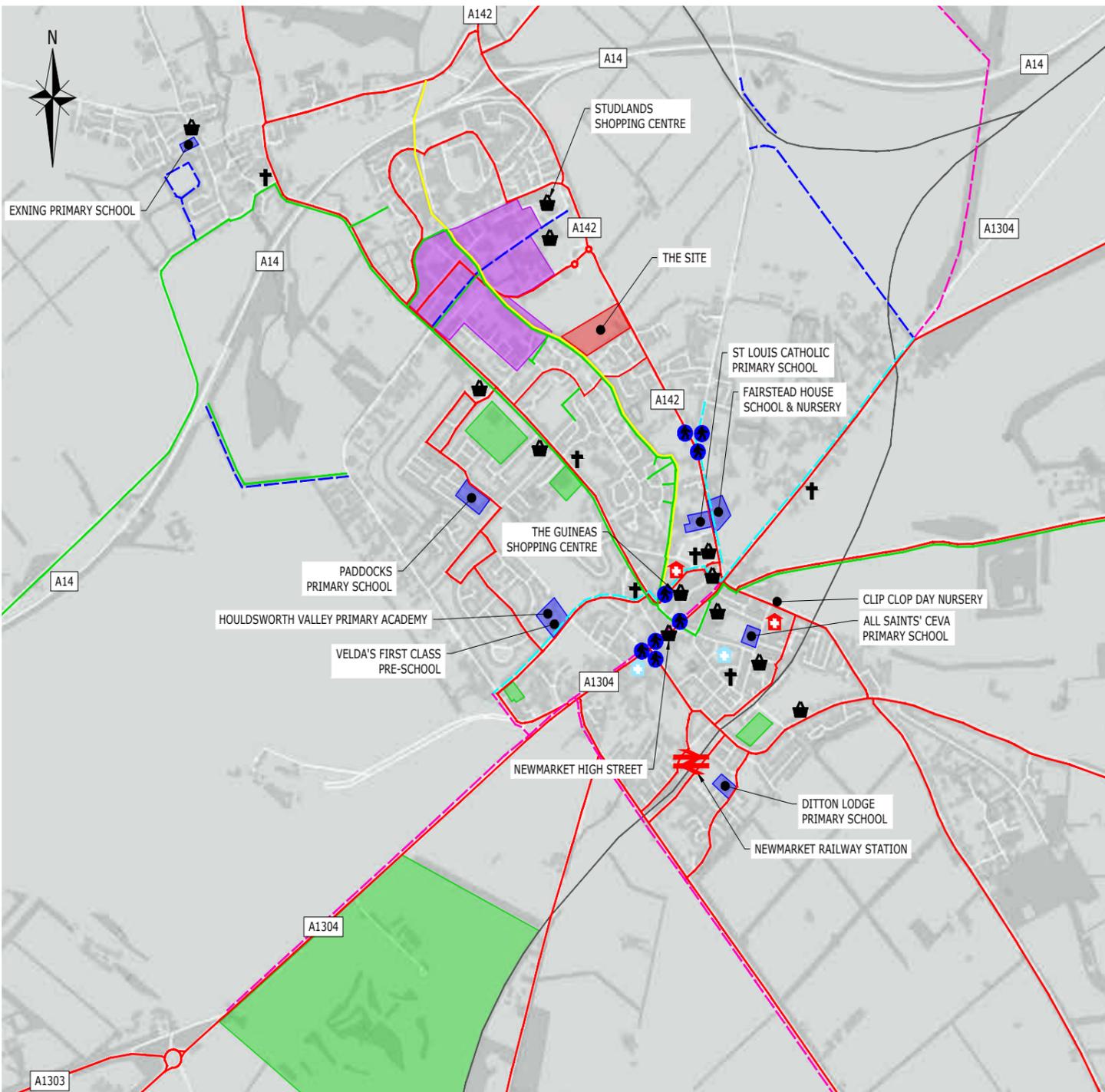


Fig.20 Map to show routes to amenities and services in and around Newmarket

- KEY:**
- THE SITE
  - RAILWAY STATION
  - RAILWAY LINE
  - BUS ROUTE
  - CYCLE ROUTE
  - YELLOW BRICK ROAD CYCLEWAY
  - FOOTPATH / BRIDLEWAY
  - HORSE WALK (CYCLISTS DISMOUNT WHEN HORSES PRESENT)
  - NATIONAL TRAIL
  - EDUCATION FACILITIES
  - EMPLOYMENT AREA
  - LEISURE FACILITIES
  - RETAIL FACILITIES / SHOPPING PARADES
  - CHURCH
  - DOCTORS
  - DENTIST
  - TOUCAN / PEDESTRIAN CROSSING

Transport

The site is well situated to encourage journeys by sustainable modes of transport with the majority of Newmarket within walking / cycling distance and a regular bus service stopping immediately outside the site.

The site connects in the west to a green corridor network, known locally as the 'Yellow Brick Road' which permeates through the town providing a Byway and public rights of way for walking and cycling between the town centre and Studlands Park.

Footways are provided on both sides of Fordham Road separated from the carriageway with a grassed verge providing a good pedestrian environment.

Fordham Road is lit in the vicinity.



Main Entrance ( to be re-used)



Secondary Entrance ( to be re-used as pedestrian/cycle route only)

### Constraints

Following the site assessment and review of technical information, a number of opportunities and constraints have been identified and mapped. These opportunities and constraints are a significant in the first phases of identifying a design framework that is responsive to these findings and identifies how any future proposal for this site can relate to its local context. Positive attributes should be retained and integrated within the design framework and solutions advanced for constraints include:

Planning Policy requires the retention of the tennis courts. This brings associated challenges in terms of physical land-take and amenity.

Trees - The site contains a number of trees of varying ages, with a well vegetated boundary. A line of mature trees is present on the frontage with Fordham Road. These trees are high quality and warrant optimum retention.

Connectivity - There is also the requirement to breakdown the barriers to movement between the Yellow Brick Road and Fordham Road, including mitigating any impacts on the existing horse walks around the site requiring optimal connectivity and accessibility with the surrounding area to encourage non car modes of travel.

Utilities - a live sub station is located in the north corner of the site requires integration or removal.

Edges - The proximity to the existing settlement along the south eastern edge will require sensitive design observing neighbouring amenity. The North western edge will require a design solution that retains the existing trees yet allows linkage to the George Lambton Playing fields.

Water Source Protection Zone - protection of ground water sources through drainage design.



Fig. 21 Constraints Plan

## Opportunities

Based on the foregoing we have identified the following opportunities:

**Setting** - by retaining the existing trees on the site and on the boundaries of the site there is an opportunity to design a development with the benefit of a mature green infrastructure, adding value to the development whilst also retaining the unique character of the site. By providing detached housing along Fordham Road, behind the trees, the character of Fordham Road will be maintained and enhanced.

**Built Form** - There is an opportunity to create built forms that are sympathetic to the unique character of Newmarket. This may take the form of detached buildings and courtyard buildings reflecting the stable yard aesthetic of the town. There are a number of large detached houses accessed by private drives off Fordham Road close to the site.

**Public Open Space** – the site presents the opportunity to unlock private secured space for public use and create enhanced sports and recreation opportunities. The site can be integrated with the adjoining George Lambton Playing Fields to facilitate a recreation hub. This will be facilitated through new public access between the two sites.

**Connectivity** – the site is well connected to an extensive range of local services and facilities within a short distance of the site. There are a number of opportunities to integrate the site within the existing public right of way network and support enhanced pedestrian and cycle links around the town aiding an extension of the existing movement corridors.

**Green Corridors** – the locally known Yellow Brick Road linear park passes the southern boundary of the site, and there is an opportunity to integrate the site within this movement and recreation corridor further enhancing the green corridor network.

**Ownership** - The entire site is in the single ownership of the Applicant – Suffolk County Council. Therefore, it can be readily developed subject to necessary planning permission.



Fig. 22 Opportunities Plan



1:5

design response

## 1:5.1 Design Development

### Design Development

This section explores the design development stages which have resulted in the recommended design framework. The design framework illustrates site-specific principles to guide future planning applications. It has regard to the sites context, policy, technical evidence base and opportunities and constraints, focussed around meeting the objectives of this development brief.

Local Plan Policy SA6(d) requires that development of the site make provision for the retention of the existing tennis courts and open space for public use, and provide connectivity between the site and the adjoining George Lambton Playing fields.

The Policy Arrangement Plan (Fig.23) on the facing page illustrates the retention of the existing tennis courts and open space alongside retention of existing trees that form the boundary and fall within the site, which are themselves worthy of retention from a landscape and ecological perspective. The Policy Arrangement Plan also illustrates the proposal to retain the northern access point and close the southern access to vehicles.

The Policy Arrangement Plan follows the basic principles established within the Local Plan site allocation policy, however, the plan making stage does not benefit from detailed site constraint mapping or design feasibility testing. The assessment undertaken within this Development Brief has tested the Local Plan policy expectations and it has been identified that the retention of the existing tennis courts in their current location is not without its constraints and will not secure the optimum public benefits or form of development on this land. It has therefore been concluded that the current policy for this site is not deliverable.

Acknowledging the policy requirement for the retention of the tennis courts in their current location, there is significant merit in their relocation within the allocated site. The existing tennis courts are currently located along the southern boundary of the site, which restricts their integration and connectivity with the adjoining George Lambton playing fields to the north, which is an aspiration of the Neighbourhood Plan. The tennis courts are currently located to the rear of the existing dwellings on Weston Way and their location and use may cause impacts on residential amenity, or be restricted in their use to avoid such impacts, i.e. no lighting and limits on times of use. Similarly, there will be impact on new residents that are located close by. This may result in conflict. Retaining the tennis courts in their current location also raises questions regarding the efficient use of this site because additional land will be required for access, parking, amenity buffers and run off areas to serve the tennis courts. This will reduce the developable area of the site and compromise the design potential of the site. There is therefore significant merit in relocating the tennis courts to a location that is more aligned with the competing policy objectives for this site.

A number of alternative locations have been considered with a clear preference to align the tennis courts with the northern boundary adjoining George Lambton playing fields. However, there are a number of site specific constraints, such as utilities, trees and vehicular access that precludes their relocation along parts of the northern boundary of the site. Notwithstanding, design options have identified the optimum relocation area is in the north west corner of the site as illustrated within the Proposed Arrangement Plan (Fig.24).



Fig. 23 Policy Arrangement Plan



Fig. 24 Proposed Arrangement Plan

The Proposed Arrangement Plan addresses the conflicts identified within the Policy Arrangement Plan by locating the tennis courts on the boundary with George Lambton playing fields, enabling better connectivity between the two recreational spaces, and provides a better relationship between the tennis courts and existing/proposed dwellings

This location would also integrate with the remaining open space on site, to the south of the site, providing activity in this area, which is otherwise more isolated and without natural surveillance. There is also the opportunity for enhanced tennis courts to be created within the relocation area. This together with fronting housing out towards the southern open space will fulfil another objective of integrating the site with the Yellow Brick Road and providing a safer environment for this space between the site and Yellow Brick Road, in light of more activity and natural surveillance.

A further final benefit of the Proposed Arrangement Plan is optimising the use of the remaining land for housing at a more gentle density that is more in keeping with local character, as opposed to pursuing high density development on a smaller site area.

The Proposed Arrangement Plan can address other policies of the Local Plan which seek to prevent the reduction in the quantum of open space on site overall (such as development of the land currently tennis courts) because the provision of new tennis courts of a greater quality which can be used more intensively, in all weathers. There is further opportunity for lighting in the proposed tennis court location, again improving the usability of the new courts which is beneficial.

### 1: 5.2 Proposed Arrangement

In light of the foregoing the Proposed Arrangement Plan is identified as the SCC preferred option for development of this site.

To inform the detailed design of this Preferred Arrangement, the character of the surrounding area, analysis of townscape, built form, appearance and materials are described on pages 65 and 66. This analysis seeks to ensure local distinctiveness and high quality design.

To inform the density of development, a study of different densities in the neighbourhood has been carried out to assess the existing urban grain and its variations within the town.



Fig.25 Indicative layout based on the Proposed Arrangement Plan

Having considered all the arrangements identified in the previous section it is considered that the optimum design solution for this site includes for relocation of the tennis courts.

Example typologies -  
subject to market  
research:

- 7% Detached
- 7% Semi Detached
- 7% Link Detached
- 50% Terraced
- 7% Mews
- 22% Apartments



Fig.26 Indicative Concept Model showing 45 new homes

### 1:5.3 Achieving Development Brief Core Objectives

CO1: To prioritise the delivery of optimum number of new homes in accordance with policy objectives.

#### Design Framework

SCC as landowner has identified a Proposed Arrangement as the optimum proposal for this site. This is illustrated on page 61 and shows the relocated tennis courts to the southwest of the housing. The remainder of the site is Public Open Space. The existing main access is re-used and the secondary access is reserved for emergency vehicles, cycles and pedestrians. There is a new network of footpaths crossing the site and connecting The Yellow Brick Road to Fordham Road and the potential tennis courts to the George Lambton playing Fields.

#### Land Use and Mix

Approximately 50% of the allocation site is shown as housing with the remainder retained as open space. The Proposed Arrangement illustrates a layout which could accommodate high, medium or low density and a mix of housing typologies. This will be determined through the Planning Application process. The intention is to provide a policy compliant development including affordable housing. The photographs opposite illustrate a range of densities and housing mix that exist within Newmarket.

CO3: To create a new network of accessible public open space integrated with George Lambton Playing fields

Careful management of the boundary trees will break down the barrier between George Lambton Playing Fields and the site. Relocating the tennis courts from the south closer to the playing fields will facilitate the Newmarket Neighbourhood Plan aspiration for a 'sporting hub' in this location. We have engaged with WSC Leisure department and will continue to do so.



Very low density: large detached as at Fordham Road - 7 dph



Low density : detached as at Noel Murless Drive - 18 dph



Medium density: terraced and semi detached as at Exning Road - 32 dph



High density: town houses and apartments as at The Maltings - more than 50 dph



CO2: To produce a design framework that reinforces local distinctiveness through sensitive architecture, public realm and materials

#### Built Form and Scale

The proposed illustrative layout would allow for different mixes of house type and different densities within a three storey maximum height.

The existing trees divide the site into three sections: Frontage, Centre and Open Space.

The character along Fordham Road is that of large detached houses set back from the road behind tall hedges, walls and trees. It may be appropriate to continue this character within the Frontage section of the site, behind the existing trees.

The Centre of the site could accommodate a different type of development, for example courtyards, terraces and apartments. The unique character of Newmarket could be reflected in housing designed to look like mews courts.

The Open Space section of the site could provide sports facilities if required. There is no proposal to show housing on this part of the site.

#### Design Standards

The indicative concept model is based around achieving WSC's design standards such as rear to rear distances, garden sizes, car and cycle parking requirements and refuse storage. These are matters of detail that will be worked through the planning application process.

### Design Density

A number of different density options were considered in order to assess the most appropriate density and mix for this site. Examples of different densities in Newmarket are illustrated on page 64 and will inform the preparation of a planning application.

### Appearance and Materials

At this stage of the design development the appearance and materials are indicative only and will be refined at the planning application stage. However it will be important that the appearance and materials are appropriate to the location and in keeping with the character of Newmarket.

Generally roofs should be of plain tiles or slate. Buildings should be soft red brick or gault brick, typical of this area, with some flint, some render and black weather board (particularly on garages and cart lodges). Windows should have white frames. Downpipes and gutters should be black.



CO4: To protect the horse racing industry and reduce carbon emissions by prioritising sustainable transport options that will reduce the impact of additional vehicular activity

### Streets and Spaces

Development should prioritise non car modes of travel and reduce vehicle movements onto the network to manage impact on horse movements around the town. The proposed illustrative layout shows an access road off Fordham Road which gives access to two minor roads. Pedestrians and cyclists are to be prioritised with shared surfaces, clear priority and low vehicle speeds. Housing fronts onto all three roads creating distinctive streets.

There is an opportunity to create attractive spaces within the site between the existing mature tree belts. Some of these spaces will be green, 'soft' spaces and some will be hard landscaped to create courtyards. Both types of space are sympathetic to the character of Newmarket.

The site is within walking distance of the town centre either along Fordham Road to the east of the site or along the Yellow Brick Road to the south of the site. The Tesco store is a few minutes walk from the site. There is an opportunity to connect all these routes using new footpaths/ cycleways within the site to encourage walking and cycling.

In accordance with Local Plan Policy DM45 (Transport Assessments and Travel Plans) a future planning application will be accompanied by a Transport Assessment, which assesses the likely extent of transport implications, and a Travel Plan which identifies the measures required to address these transport implications along with measures to secure sustainable modes of travel such as opportunities for increased walking, cycling and public transport usage.



## Movement, Access and Parking

Access to the site is proposed via a simple priority junction with Fordham Road. The proposed access will replace the former access near the northern boundary, with improvements made in order to ensure it is suitable to serve the development proposals. A second existing vehicular access formerly used to access the site near the southern boundary will be closed to vehicles but will be utilised to provide pedestrian and cycle access.

The traffic impact of the proposals will be considered adopting industry standard methodologies and will consider both the former operation of the site as a school as well as the proposed residential development. A traffic generation distribution analysis will be undertaken to understand where traffic will travel to/from the site and the impact identified, together with any necessary mitigation to accommodate the development impact. Specific attention will be given to the impact on the horse racing industry and existing movements.

The access design will follow guidance set out within the Suffolk Street Design Guide and adopt Manual for Streets guidance as necessary subject to measured vehicle speeds along Fordham Road. Excellent visibility is available from the access point along Fordham Road ensuring safe access is available.

The site access will also incorporate suitable pedestrian connections to link with existing facilities on Fordham Road, whilst an improved connection will be made via the south western boundary of the site to enhance permeability and link the site with Yellow Brick Road which is to the west of the site.

Via the new connections being made with the existing local pedestrian/cycle networks, there will be excellent connectivity with local facilities and services, including shopping destinations to the north/south, schools to the south off Fordham Road and via existing permeable streets to local leisure/recreation facilities.

Convenient public transport is available from bus stops immediately adjacent the site allowing for sustainable travel via bus services operation along Fordham Road that connect the centre of Newmarket with residential areas around Newmarket and connect with local towns in the area too. Bus services call at Newmarket station providing the opportunity for commuting/leisure trips by rail to Cambridge, Bury St Edmunds and beyond.

Parking standards are set out in the Suffolk Guidance for Parking Technical Guidance which should be met in any future development whilst the internal road network will incorporate guidance for the Suffolk Design Guide in respect to visibility splay and geometric requirements.

**CO5: To enable proposals that respond to climate change through sustainable design that reduces carbon emissions**



## Landscape and Biodiversity

It is expected that the proposed development will deliver a Biodiversity Net Gain through the inclusion of a greater spatial extent of habitat area within the site, as well as better quality habitat, than currently that which exists on site. These will be accompanied by metric calculations to show how that net gain can be achieved.

Existing hedgerows and trees will be enhanced and maintained to preserve connected foraging routes. Additional buffer planting will be added to the South eastern boundary to further protect and enhance the privacy of the adjacent properties.

A detailed Landscape Strategy plan will be submitted at Outline Application stage once the layout is fixed. The management and maintenance of the landscape may be through a management company but this will be subject to detailed design through the planning application process.

## Drainage

The supporting strategic drainage infrastructure for the redevelopment scheme will be designed in accordance with the latest/current policies and guidance including:

- National Planning Policy Framework
- CIRIA SuDS Manual C753
- Sewers for Adoption
- Building Regulations – Part H

A sustainable drainage system (SuDS) will also be prepared in accordance with the NPPF to demonstrate the preferred method of disposal and will seek to utilise a range of features which follows the national SuDS hierarchy in this regard. These forms of SuDS could comprise utilisation of infiltration drainage devices to discharge surface water to the underlying soil stratum (if soil conditions permit), basins/ponds, filter strips and

swales, permeable surfaces, geo-cellular unit, for example.

The SuDS strategy will be hydraulically modelled to demonstrate that the scheme can withstand the impact of a 1:100-year rainfall event, including an additional 40% as an allowance for any climate change impact, in accordance with the Environment Agency's latest guidance. A 10% allowance for urban creep will also be included in the hydraulic modelling as a factor of safety in case any extensions be constructed in the future.

The SuDS strategy will also be prepared in line with the requirements outlined in Table 26.2 of CIRIA's SuDS Manual 753 to ensure that the water quality is treated at source.

The FRA will therefore demonstrate that:

- The redevelopment scheme and its occupants will not be at an increased risk of flooding;
- The redevelopment scheme will not increase the risk of flooding elsewhere; and
- A sustainable drainage scheme can be implemented.

It is therefore concluded that the redevelopment scheme can be implemented in accordance with the guidance outlined within the NPPF.

A draft Drainage Strategy Plan is shown on the following pages.

This Drainage Strategy is to be reviewed upon presentation of soakage test results and a detailed layout.



Fig. 27 Draft Drainage Strategy Plan

## 1:5.4 Sustainability

The following consultations, legislation and policies were looked at to form the development brief on Sustainability for the St Felix Site, Fordham Road, Newmarket:

- UK Sustainable Development Strategy
- Climate Change Act
- National Planning Policy Framework
- Planning Practice Guidance
- Building Regulations
- The Future Homes Standard Consultation
- Core Strategy Policies CS4 and CS5 (from the adopted 'Forest Heath Core Strategy', 2010)
- Development Management Policies DM7 and DM8 (from the adopted 'Development Management Policies Document, 2015)
- West Suffolk Growth Investment strategy and Energy Framework
- Local Energy East Strategy

Any future residential development on the site will demonstrate its compliance with Policy DM7 which requires the appropriate provision of sustainable design and construction measures, and Policy DM8 which encourages the generation of low carbon or renewable energy as part of development proposals.

The following recommendations enable proposals to respond to climate change through sustainable design that reduces carbon emissions from the construction and use of the buildings. SCC has identified that all housing development on it's on land will meet at least the standards set out in the emerging Future Homes Standard 2025:

### U values

The Building design/construction will ensure that U values meet the new proposed limiting U values due to be detailed in the upcoming changes to Part L of the Building Regulations, and in the emerging Future Homes Standards, expected to be made law in 2025. The St Felix Site proposals will incorporate high levels of insulation and high-performance **double** glazing on the facades to significantly reduce the demand for space heating (refer to the table below).

U values (W/m<sup>2</sup>K)

Element	Building Regulations	Proposed
Walls	0.26	0.15
Floor	0.18	0.10
Roof	0.16	0.10
Windows	1.6	1.0

Table 1: The U-values that future buildings on the site should aim to achieve.

Through an enhanced fabric specification, the development will aim to reduce carbon emissions beyond the requirements of the current (2013) Building Regulations, and in line with the Future Homes Standard ready for its implementation in 2025.

These sustainable design principles are well suited to achieve the targets required by the Core Strategy, the NPPF, the Newmarket Neighbourhood Plan and reduce carbon emissions.

### Air Permeability

Heat loss occurs due to air infiltration. Although this cannot be eliminated altogether, good construction detailing, and the use of best practice construction techniques can minimize the amount of air infiltration. Current Part L Building Regulations (2010) sets a maximum air permeability rate of 10m<sup>3</sup>/m<sup>2</sup> at 50Pa. They should aim to improve upon this to current market standards, (and Future Home Standard Specification) of 5m<sup>3</sup>/hr x m<sup>2</sup> at 50Pa down to near Passivhaus Standards of 1m<sup>3</sup>/hr x m<sup>2</sup> at 50Pa through the application of best practice construction techniques.

These sustainable design principles are well suited to achieve the targets required by the Core Strategy, the NPPF, Newmarket Neighbourhood Plan and reduce carbon emissions

### Charging Electric Vehicles

All properties will be provided with electrical vehicle charging points as standard. Where properties have dedicated off road car parking adjacent to the property then a dedicated continuous large diameter plastic conduit with easy sweep bends and draw wire shall be provided from the electrical consumer unit within each property to the outside of the property terminating and temporarily capped just above ground level on the external wall of the property immediately adjacent to the dedicated off road parking provision for that property to provide the necessary infrastructure and easily facilitate the future installation of an electric vehicle charging point for the property. A dedicated spare way shall be provided for a suitable circuit breaker shall be provided at the consumer unit for the electric vehicle charging point. The electrical supply to the property and the consumer unit shall have sufficient capacity for a 7.2kW electric vehicle charging point to be installed.



A suitable provision in the form of underground ducts laid in footpaths to a number of locations shall be provided for future installation of smart charging electric vehicle charging points.

The primary electrical infrastructure for the development should be designed for the future provision of smart electric charging points. This technology is well suited to enable the site to respond to the Climate emergency by reducing the number of internal combustion engines on Newmarket's roads.

### Heat Pumps

An air source heat pump extracts energy from the surrounding air and upgrades it to a useful temperature. As air temperature is not consistent, the coefficient of performance (COP) of air heat pumps is not as high as that of the ground or water source heat pumps, and typically will be in the region of 3 to 3.5, although advancement of this technology has resulted in systems of up to 5 being available. Air source heat pumps will generally have a lower installation cost.

Heat pumps could be used to provide warm water, typically at 35oC to 45°C, for underfloor heating. All dwellings will be fitted with Air Source Heat Pumps as standard at construction.



### Photovoltaics

Solar photo-voltaics (PV) convert energy from sunlight into electricity using a semiconductor material. Solar PV delivers clean, silent electricity at the point of use and is only dependent upon the provision of natural daylight PV panels typically have a lifetime performance of 20-25 years. In many cases within the UK where solar PV has been installed, it has been used to demonstrate sustainable development rather than from a capital payback criteria.

This renewable technology is well suited to achieve the targets required, in particular, by the criteria of Policy DM8 which encourages the generation of low-carbon or renewable energy sources. Photovoltaics will be considered at the detailed design stage.

### Building Materials

To enhance the sustainability of the site, any future residential development on the site should aim to use a range of sustainable materials and design features, such as:

- The use of sustainable materials during the construction process, for instance the use of timber from FSC (or equivalent) sources
- Modern methods of construction to reduce the use of energy during the construction process, for instance the use of prefabricated building elements
- The minimisation and recycling of site wherever possible

These sustainable design principles are well suited to achieve the targets required by the Policies DM7 and CS4 and the Newmarket Neighbourhood Plan.

### Water Efficiency

Potable water is an increasingly important natural resource given that most of the UK, including Suffolk, classed as being in an area of moderate or severe water stress. As such, the conservation of water is becoming a more significant sustainability metric.

In this context, Policy DM7 requires proposed residential developments to target a water efficiency of 110l/p/d.

Any future residential development on the site will aim to reduce water consumption through ensuring that any water fitting does not exceed the values set out in Table 1 (or any other fittings specification that is superseded by central government guidance or legislation). This may be assisted by adopting a range of water efficiency measures such as:

- Dual flush WCs
- Water meters
- Low flow fitting
- Where appropriate, water efficient appliances

This is beyond the baseline requirement of 125l/p/d and significantly below the UK average of 150l/p/d.

The use of water in external areas will be limited through the provision of external water butts, where appropriate, to allow the capture of rainwater for garden irrigation which also contributes to reducing surface water runoff.

Water Fitting	National Base Level
WC	6/4 litres dual flush or 4.5 litres single flush
Shower	10 l/min
Bath	185 litres
Basin Taps	6 l/min
Sink Taps	8 l/min
Dishwasher	1.25 l/place setting
Washing Machine	8.17 l/kilogram

Table 1: fittings-based specification from DCLG (2014) Housing Standards Review: Approved Document G: Requirement G2 Water efficiency

### 1:5.5 Community Involvement

This Development Brief is accompanied by a Statement of Community Involvement that records all consultation undertaken during the preparation of this document. A summary of the consultation stages of the document are set out below.

### Technical Consultation

At the outset of the Development Brief process a Project Plan was entered into with West Suffolk Council (WSC). Several meetings were held with WSC, which included focused workshops as appropriate.

Statutory consultees were included within meetings between SCC and WSC as appropriate. Due to COVID-19 restrictions stakeholder workshops were largely held remotely. The relevant technical consultants from SCC project team were available to answer questions on the topic areas. In particular the following key topic areas were covered:

- Highways, access and movement – with SCC Highways Authority;
- Flood risk, drainage and topography– with SCC Lead Local Flood Authority;
- Ecology and landscape –WSC; and
- Place Making, Urban Design, and Character – with WSC design and planning officers

Presentations and workshops have also been held with the Town Council, and some District Councillors. Feedback was received verbally during the meetings and formally during the formal public consultations.

To date the following consultation has been undertaken:

- Virtual 1:1 engagement with District Ward Members
- Virtual 1:1 engagement with County Council Ward Members
- Virtual 1:1 engagement with Town Council Members
- In-person presentation to all Members of Town Council at the Town Hall on the 27.9.21, and
- Follow ups with all concerned.

### Public Consultation

SCC has held a public consultation exercise. This was held for a period of six weeks between 30th March and 11th May 2022. The consultation was held in a virtual capacity. In order to raise awareness of the virtual exhibition, and maximise the accessibility of the event, a number of publicity measures were employed as set out in the SCI but included:

- A public service announcement being placed by SCC in the Newmarket Journal.
- Approximately 10,000 leaflets being distributed to the local residents of Newmarket
- The exhibition material used for the online consultation event being displayed in the foyer of Memorial Hall, Newmarket, at the request of Newmarket Town Council.
- A newspaper article, published by Suffolk News, providing contextual background of the public consultation.

- A summary of the details surrounding the public consultation being placed on the official website of Suffolk County Council

The consultation was hosted upon a dedicated page on the Phase 2 Planning and Development Ltd website ([www.phase2planning.co.uk/planning-consultations-StFelix.html](http://www.phase2planning.co.uk/planning-consultations-StFelix.html)) which provided:

- Written text introducing the public consultation event.
- Exhibition display boards, constituting the main presentation, provided a clear explanation of the contents of the proposed Development Brief. This included an overview of what constitutes a development brief, the proposed arrangement of development on the site, and how feedback could be provided.
- A set of Frequently Asked Questions providing additional details about the proposal.
- A copy of the proposed Development Brief.

The website page also provided an online comments form for interested parties to provide their views towards the five questions asked.

The general public could also provide feedback through submitting comments to a dedicated email address or, for those without access to the internet, messages about the proposals (or requests for relevant consultation material) could be left on the dedicated phonenumber.

As detailed in Chapter 4 of the SCI, the feedback from the public consultation event has been actively considered by the project team. Any changes that are made as a result of this feedback have been incorporated into the final version of the proposed Development Brief as set out in Section 5 of the SCI.

Public feedback across both consultations can be briefly summarised as primarily identifying the following:

- Mixed reaction to the principle of residential development;
- Some desire for increased of open space provision from the site and reduced housing;
- Suggestions of increased residential density over a smaller developed footprint to optimise open space provision for the site;
- Some concern about its potential impact on traffic generation and impact on the Horse Racing Industry, and suggestion of greater connectivity for walking and cycling required; and
- Suggestion that the design guidance is not robust enough to achieve the Core Objectives of the Brief.

Key changes implemented in light of the feedback received is summarised in Section 5 of the SCI and below. Whilst all of the comments have been actively considered the project team, this has been done in the recognition that some community concerns or suggestions will not always be aligned with local or national planning policy, and therefore there will be other competing interests.

A full assessment is provided within the accompanying SCI, but an overview of the main responses to the community consultation comments are as follows:

- Principle - The site is allocated within the Site Allocations Local Plan (2019);
- Open Space – new areas of public access will be provided alongside enhanced tennis court provision;
- Density – the optimum balance between developed and non developed parts of the site has been struck and is within the range anticipated by the Local Plan;
- Connectivity – connections to all existing footpaths/cycleways is proposed;
- Traffic - a future planning application will be accompanied by a Transport Assessment, which assesses the likely extent of transport implications, and a Travel Plan which identifies the measures required to address these transport implications along with measures to secure sustainable modes of travel such as opportunities for increased walking, cycling and public transport usage; and
- Design- whilst detailed design is reserved for the planning application stage, clarity has been provided within the Development Brief to confirm that WSC design standards are to be achieved within any future development scheme, such as rear privacy distances, garden sizes, vehicle and cycle parking and refuse standards. These are matters to be worked through the planning application process.

Therefore, an extensive and comprehensive public and stakeholder consultation and communication has taken place through the process and this has resulted in the final document.



1:6

delivery

## 1:6.1 Planning Obligations

### Planning Obligations

In line with Policy CS13 (Infrastructure and Developer Contributions), any future development scheme brought forward on the identified site will be required to provide a range of financial contributions to offset any potential adverse impact on the local community in terms of service provision (e.g. education needs), community safety and overall wellbeing. It should be noted that this will be determined at the planning application stage. Contributions will include the provision of 30% affordable housing, having regard to the requirement to ensure at least 10% of the total number of homes are available for affordable homes ownership. contributions will also include the following:

- Education
- Libraries
- Affordable housing
- Future maintenance of open space

### Implementation

Once this Development Brief has been adopted by the local planning authority, following formal statutory and public consultation as set out within this document.

This Development Brief provides a series of development principles and guidelines to support the preparation of future planning applications on the site. It is expected that any planning application is consistent with the objectives and guidance contained within this document and has regard to all other relevant planning policy considerations set out within the Development Plan.

However, it is recognised that detailed design will be considered at the detailed planning application assessment stage. Therefore should a differences approach be identified, this will require justification by the applicant and will be subject to the usual considerations.



# 1:7

appendix 1

## Appendix 1

### 1:7.1 Planning Policy

Any development proposals that are brought forward for this site should be informed by and will be expected to comply with relevant local and national planning policy and associated guidance. This includes the following:

- West Suffolk Local Plan
- Newmarket Neighbourhood Plan
- National Planning Policy Framework

#### West Suffolk Local Plan

At the local level, the West Suffolk Local Plan provides further guidance for the development of the site and should be considered fully as part of any future planning application(s). The most relevant sections from the applicable Development Plan Documents (DPDs) that comprise the West Suffolk Local Plan, are elaborated below.

#### Core Strategy:

Within the adopted Forest Heath Core Strategy, Policy CS7 (Overall Housing Provision) confirms that housing development will be targeted in strategic areas over its plan period in order to a sufficient supply of housing. Under Policy CS13 (Infrastructure and Sustainable Communities), new development will be required to provide relevant infrastructure, community facilities and open space, as appropriate. In addition to the above, the following strategic planning policies are also particularly relevant to the consideration of developing a Brief for this site:

- Policy CS2 – Natural Environment: Stipulates that areas of landscape and biodiversity should be protected and enhanced through a variety of measures, aiming for an overall net gain of biodiversity.
- Policy CS3 – Landscape Character and Historic Environment: Requires developments to incorporate the characteristics of the local landscape, as informed by the Suffolk Landscape Character Assessment
- Policy CS5 – Design Quality and Local Distinctiveness: States that proposed developments should ensure no detrimental impacts to the character of the surrounding area arises.
- Policy CS9 – Affordable Housing Provision: Developments of 10 dwellings and over should provide a minimum of 30% affordable housing, unless otherwise demonstrated by a viability assessment.

#### Site Allocations:

The Site Allocations Local Plan, adopted in 2019, contains land parcels allocated for a range of uses in order to deliver the scale and growth as set out in the Core Strategy.

The site to which the development brief relates, referred to as 'SA6(d)', must meet an array of particular requirements including:

- The provision of strategic landscaping and open space to address individual site requirements and location
- A comprehensive transportation assessment of the individual and, where appropriate, cumulative impact on horse movements in the town alongside other users of the highway network.
- Retaining the existing tennis courts and open space for public use, ensuring appropriate access and

- connectivity (including from George Lambton playing fields)
- Protecting the amenity and biodiversity of the Yellow Brick Road blue/green corridor

#### Development Policies:

The Joint Development Management Policies DPD, adopted in 2015, provides detail to guide the determination of planning applications. The following policies are most relevant for production of this Development Brief:

Policy DM2 (Creating Places – Development Principles and Local Distinctiveness) identifies general principles towards securing good design and retention of local character and distinctiveness.

Policy DM4 (Development Briefs) sets out the requirements for and contents of a Brief where required by other policies of the Local Plan. This Development Brief has been prepared in accordance with the requirements of this policy as set out in detail within Table 1 of Appendix 1 of this Brief.

In addition, there are a number of policies relating to matters of detail reserved for subsequent planning applications, however broad principles will be tested through the production of this Development Brief. These policies include:

In respect of flood risk, Policy DM6 (Flooding and Sustainable Drainage) requires development to achieve Sustainable Urban Drainage Systems.

In regard to design, Policy DM7 (Sustainable Design and Construction) requires proposed developments to adhere to broad principles of sustainable design and construction. Its most notable elements include demonstrating water efficiency measures and meeting the energy standards set out within national Building Regulations.

Policy DM13 (Landscape Features) requires proposed developments to consider the relevant character landscape type(s) as identified in the Suffolk Landscape Character Assessment, whilst Policy DM14 (Protecting and Enhancing Natural Resources, Minimising Pollution and Safeguarding from Hazards) states development proposals should minimise all emissions and other forms of pollution to ensure no deterioration in either water or air quality.

Policy DM20 (Archaeology) states that development will not be acceptable if it would have a material adverse impact on sites of archaeological importance and its settings. On sites of archaeological interests, planning permission will be granted subject to satisfactory prior arrangements being agreed.

Policy DM22 (Residential Design) requires that proposals maintain or create a sense of place by employing specific schemes which respond intelligently to a clear brief articulated within a Design & Access Statement, creates a legible place, and utilises the characteristics of the locality to provide a mix of housing and unit sizes appropriate to its location. Moreover, residential developments should be laid out to optimise amenity and parking, whilst new dwellings should also be of a high architectural quality.

Policy DM37 (Public Realm Improvements) details that proposals for major development in Key Service Centres will, where reasonable and necessary to the acceptability of the development, be required to provide or contribute towards public realm improvements appropriate to the scale and nature of the proposal.

Policy DM42 (Open Space, Sport and Recreation Facilities) states that proposed developments, where necessary, will be required to provide an appropriate provision of open space. These must be well related to the topography, character and uses of the surrounding area. Moreover, it requires that any proposal which results in the loss of existing sporting facilities or open space will not be allowed unless a replacement – of at least equivalent quantity and quality – is provided in a suitable location to meet the needs of users within the existing space or facility.

In terms of transportation, Policy DM45 (Transport Assessments and Travel Plans) dictates that major developments requires the applicant to submit the following documents: a Transport Assessment which assesses the likely extent of transport implications, and a Travel Plan which identifies the measures required to address these transport implications.

Policy DM46 (Parking Standards) highlights that proposed developments will be required to ensure an appropriate level of car parking provision, with reference to the relevant standards. Nevertheless, these standards may be relaxed at the discretion of the local planning authority if the location is characterised by good accessibility to facilities and services, and/or is well served by public transport.

Policy DM48 (Development Affecting the Horse Racing Industry) states that any development that is likely to have a materially adverse impact upon the operational use of an existing site by the Horse Racing Industry (HRI), such as noise or traffic, or the long term viability of the HRI as a whole, will not be permitted unless the benefits would significantly outweigh the harm to the HRI.

Lastly, Policy DM50 (Horse Walks) notes that development proposals should consider the use of the public realm within Newmarket by equestrian users.

#### Supplementary Planning Documents:

Specific focus should be attached to the following Supplementary Planning Documents (SPDs) as they will be considered as material considerations when preparing any planning application for the site:

- Suffolk Design Guide (2000)
- Suffolk Guidance for Parking: Technical Guidance (2019)
- Technical Advice Note: Space Standards for Residential Development (n.d.)
- Forest Heath Open Space, Sport and Recreation (2011)
- West Suffolk Affordable Housing (2019)
- A suite of Supplementary Planning Documents and Guidance relating to Developer Contributions

## Newmarket Neighbourhood Plan

The Newmarket Neighbourhood Plan (NNP), setting out a vision for Newmarket up until 2031, forms part of the Development Plan.

The most relevant policies to the production of this Brief are presented below:

- Policy NKT11 - Community Sports and Recreation Areas: St. Felix Playing Fields and the Tennis Court area are designated as a 'Sports and Recreation Area'. Development proposals which provide, enhance or expand (as well as reduce) amenity/sport/recreation open space or facilities in these designated areas will be determined in accordance with Policy DM42 of the adopted local plan.
- Policy NKT12 - Local Green Spaces: Yellow Brick Road Linear Park and George Lambton Playing Fields are both designated as 'Local Green Spaces'.
- Policy NKT14 – Trees: Development proposals should protect existing trees/hedges that possess amenity value, provide appropriate planting, and prevent damage through avoiding root protection zones. Careful consideration to be provided to veteran/ancient trees.
- Policy NKT17 - Yellow Brick Road Linear Park: The Yellow brick Road Linear Park (YBRLP) is a designated green corridor. Proposals for development within its vicinity should: (i) have regard to the protection/improvement of wildlife habitats within the Linear Park, (ii) where possible, increase connectivity between the Linear Park and other areas of green space, and: (iii) where possible, increase connectivity between the Linear Park and the wider pedestrian/cycle network.
- Policy NKT32 – Attractive Entrances to the Town: Due to the position of the site along Fordham Road (the A142), the development should be visually attractive as it forms a gateway into the town.

Other policies more relevant to the determination of future planning application(s) include:

- Policy NKT15 – Air Quality: Development proposals should be able to demonstrate that, at most, they will only contribute a 'slight' adverse impact on air quality after the deployment of mitigation measures.
- Policy NKT16 – Biodiversity: Developments are required to incorporate a selection of features which support endangered or protected species, as well as including a specific variety of planting species. These should be proportionate to the scale of the development proposed and connect into wider ecological and public right of way networks as to increase ecosystem resilience.
- Policy NKT18 – Sustainable Design Features to Counter Newmarket-Specific Flood Risk: A range of specific sustainable drainage design features should be incorporated into any new development, where necessary. This includes the provision of green roofs as well as water harvesting and storage features, amongst other mechanisms.

- Policy NKT20: Affordable Housing: Where affordable housing is included within a scheme, it should be of at least the same development standard as the rest of the development. It should be also dispersed in small groups/clusters throughout the site, not exceeding 15 dwellings in any one cluster.
- Policy NKT22 - Impact of Traffic from Development Proposals: Development proposals which will generate significant amounts of traffic movement will only be supported where it will not have an adverse impact upon the capacity/safety of the local highway network. Transport assessments should consider a diverse range of users of the highway network, including equestrian users and the emergency services.

### National Planning Policy Framework

The National Planning Policy Framework (NPPF), published in 2021 will constitute a material consideration in the determination of any future planning application at the site.

It promotes the social, economic and environmental objectives required to promote the achievement of sustainable development.

The following sections of the NPPF are of particular relevance to the development of this site:

- Paragraphs 60 and 65 – Delivering a sufficient supply of homes: To significantly boost the supply of homes it is important that a sufficient amount and variety of land is brought forward which meets the requirements of a variety of groups with specific housing needs. For major residential developments, at least 10% of the dwellings should be made available for affordable home ownership unless this would exceed the level of affordable housing required in the area or would significantly prejudice the ability to meet the identified affordable housing needs of specific groups.
- Paragraph 92 – Promoting healthy and safe communities: Planning proposals should promote social interaction and promote natural surveillance as to deter crime and anti-social behaviour.
- Paragraphs 98 and 99 – Open space and recreation: It notes that access to a network of high-quality open space is imperative for the health and well-being of communities. In addition, existing open space and sport facilities should not be built upon unless one of the following criteria has been met: (i) an assessment has been undertaken to show that it's surplus to requirements; (ii) the loss would be replaced by an equivalent or better provision in a suitable location, and; (iii) the development is for alternative sports or recreational provision, the benefits of which clearly outweigh the loss of its current or former use.
- Paragraph 104 and 113 – Promoting sustainable transport: This observes that the potential impact of proposals upon the highway network should be assessed, alongside promoting opportunities for non-vehicular modes of transportation.

- Paragraph 119 and 123 – Making effective use of land: Planning decisions should promote an effective use of land for meeting the need for homes whilst ensuring safe and healthy living conditions. In particular, planning decisions should attach substantial weight to the value of using brownfield land within settlements to meet residential needs.
- Paragraph 124 – Achieving appropriate densities: It denotes that development proposals that make efficient use of land which considers, for example, the area's prevailing character and setting.
- Paragraph 126 to 136 – Achieving well-designed spaces: Developments must obtain a high standard quality of design as it is a key criterion for sustainable development.

# Part 2

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2:1

future  
development

## 2:1.1 Future Opportunities for Sport

Expansion of indoor sporting facilities within the town by reserving land for future provision.

This opportunity is indicatively illustrated as a potential indoor sporting facility. The co-location supports shared parking, changing rooms and lighting which can be accommodated in combination with the relocated tennis courts shown in the Proposed Arrangement.

The shared parking would be accessible parking for blue badge holders as well as cycle parking. The remainder of the parking would be on the existing George Lambton car park and accessed via the network of footpaths into and within the site.

The illustrative layout on the facing page shows how this could be set out on the site. This shows the potential location of the sports hall to the north of the potential location for the tennis courts, so that the sports hall could become a shared facility for activities on the George Lambton Playing field.

This is a different arrangement from the Illustrative layout in Part 1 of this document (where the tennis courts are shown nearer to the northern boundary of the site) because that layout is showing the proposed design in the event that the sports hall does not come forward.



Fig.28 Illustrative Layout based on the Proposed Arrangement with potential sports facility

Having considered the different arrangements identified in Part 1 of this document, it is considered that the optimum design solution for this site includes for relocation of the tennis courts alongside land reserved for an indoor sports facility in the future.

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