**Forest Heath District Council** 

Site Allocations Local Plan Examination in Public

## Matter 4

# "The Spatial distribution of housing in the Market Towns: Brandon, Mildenhall and Newmarket"

Newmarket Issue 4.20

Written Statement Submitted by the Unex Group (Mr. Stephen Walsh)

September 2017

Stephen Walsh BSc (Hons).B Arch.RIBA.ARIAS

#### 1.00 Introduction

- 1.01 This written statement has been prepared by the Unex Group on behalf of the freehold owners of the site identified as SA6(b) in Forest Heath District Council's Site Allocations Local Plan ("SALP").
- 1.02 The site consists of a mix of brownfield land, including the site of the former swimming pool and a former public house together with the Queensbury Lodge derelict former stable complex (all fronting the High Street in Newmarket) and un-used redundant former paddock land bounded by Black Bear Lane and Rowley Drive.
- 1.03 The overall site is in various ownerships. The site of the former swimming pool and the former public house are owned by Unex (No.3) Limited. The Queensbury Lodge site is owned by the Gredley Charitable Trust. The former paddock land is owned by TAP Investments Limited.
- 1.04 The SALP allocates site SA6(b) for mixed use development.
- 1.05 Site SA6(b) is an ideal location for a mixed use development because it is a key gateway site on the High Street in a highly sustainable location within easy walking distance of the town centre shops and services. The site benefits from excellent public transport links including close proximity to the railway station (10 minute walk).
- 2.00 "4.20 SA6(b) how has the quantum of development for the site been considered? Is the site deliverable? With reference to the Historic England (24933) representations regarding the viability of the listed stable to be refurbished how has this been considered?"
- 2.01 The Unex Group has spent many years considering various options for the site and meeting with officers and members of the Council on a regular basis. This has culminated in the Council's allocation within the SALP.
- 2.02 In terms of the quantum of development, it is noted that, in Appendix 3 to the SALP, the Council does not identify a specific quantum of development nor does it identify a specific number of dwellings. Instead, the SALP states that "the potential uses and capacity of the site will be explored by the Council and other stakeholders through the preparation of a development brief in line with Policy DM4 of the Joint Development Management Policies Document (2015)".

- 2.03 West Suffolk's Strategic Housing Land Availability Assessment ("SHLAA"), Final Report April 2016, also does not specify a final yield pending the outcome of the development brief process. Instead the SHLAA notes that the overall site could deliver between 66 and 165 dwellings.
- 2.04 Other than the general mixed use designation, and the reference to a development brief, the only other stipulations in the draft allocation are that there must be a sympathetic restoration and viable reuse of the listed buildings together with the retention of a horse racing industry related use as part of the mix and that the appearance and character of the conservation area should be preserved or enhanced.
- 2.05 Attached to this written statement as Appendix 1 is an indicative site concept masterplan drawing which shows the quantum of development which could be accommodated on the site in accordance with the mixed use designation and requirements.
- 2.06 As shown on this indicative concept masterplan, the mix of potential uses includes:
  - (a) An 80 box racehorse training yard together with a trainer's house, two staff flats and associated facilities etc.
  - (b) A 90 bedroom hotel on the former swimming pool site.
  - (c) 24 houses, including the restored/rebuilt as necessary (with reclaimed materials) Queensbury Lodge and Cottage.
  - (d) 49 flats, 21 of which are on the Queensbury Lodge site.
  - (e) An office and/or restaurant in the former public house.
- 2.07 This concept masterplan, although indicative, has been prepared by the Unex Group's inhouse architects department but includes houses and apartments designed by the award winning architects Alison Brooks Architects. Input and design advice has also been obtained from specialist equine architects regarding the new racehorse training facility.
- 2.08 This site consequently will provide both jobs and homes whilst making provision for a new racehorse training yard. The job opportunities will come from the new hotel, the office and/or restaurant and, obviously, on the new racehorse training yard. The 73 new dwellings, in addition to the staff accommodation on the new training yard, will help to meet the district's housing need, including affordable housing.

- 2.09 The site is deliverable because, if the SALP is found to be sound and is then formally adopted by the Council, the owners of the various elements of the site have confirmed their willingness to work with the Council to deliver a scheme such as indicated on the indicative concept masterplan. There are, therefore, no land ownership or access constraints etc. which would prevent or delay the delivery of the site.
- 2.10 The representation from Historic England (24933) should not be considered by the Inspector because it was not submitted during the statutory consultation period. It was submitted on 17th March 2017 and the Regulation 19 consultation period ended on 21st February 2017.
- 2.11 The Newmarket Conservation Area covers an area of approximately 186 hectares. Only 3.4 hectares of site SA6(b) is within the Conservation Area on the western perimeter (the former swimming pool site and former public house are outside the Conservation Area). Therefore, the part of site SA6(b) which is within the Conservation Area equates to only 1.8% of the Conservation Area.
- 2.12 The Council's own Conservation Area Appraisal assesses this part of the Conservation Area to be the lowest in terms of significance. The former paddock land is private and is screened by mature trees and hedges. Development on the former paddock land will not harm the Conservation Area. The overall development, however, will materially enhance the appearance and character of the Conservation Area by restoring and rebuilding as necessary the listed Queensbury Lodge and Queensbury Cottage buildings on the High Street frontage, by renovating and reusing the former public house building and by providing a new high quality hotel building and public realm on the site of the former swimming pool. In preparation for the proposed redevelopment, the swimming pool has already been demolished. This building had been a local eyesore in that, prior to it being acquired by Unex, it had been vacant for some time and had been covered in graffiti. This led to numerous complaints from local residents and requests for it to be demolished. Unex was happy to take on board local views and to commence works to improve the appearance of the area. The public benefits from the enhancement of the appearance of this important gateway site at the western end of Newmarket's High Street will be significant.
- 2.13 The Inspector has correctly identified the viability issue surrounding the derelict listed stables. These stables are in a seriously derelict condition. The stables have been vacant and unused for over 60 years with the exception of an unsuccessful period of circa 1 year in 1988. In January 2001 approximately one third of the stable range was destroyed in a fire with part of the remaining stable range being seriously damaged by the fire fighters' water hoses. It is

neither viable nor acceptable to return horses to this location. The stables are not only derelict but the site is on an extremely noisy and busy road with no access to the horse walk network.

- 2.14 Historic England is currently considering an application (ref: 1449173) to de-list the stable range.
- 2.15 The only viable use for the Queensbury Lodge site is residential and the indicative concept masterplan shows the Lodge being restored to provide two houses with the cottage being restored/rebuilt as necessary with reclaimed materials and returned to residential use. A further 21 flats are proposed for the remainder of the site and some photographs of an indicative model are included in Appendix 2.
- 3.00 Conclusion
- 3.01 In response to the Inspector's questions:
  - (a) The concept indicative masterplan gives an indication of the likely quantum of development with the final mix and numbers to be identified via the proposed development brief.
  - (b) The site is deliverable as the land owners have confirmed their willingness to work with the Council to deliver a scheme along the lines of the concept masterplan. There are no site access or other land ownership constraints.
  - (c) Re-use of the listed stable block is not viable and an application to de-list the stables is currently being considered by Historic England. A proposed redevelopment of the site to restore and rebuild as necessary Queensbury Lodge and Queensbury Cottage for residential use together with the provision of new residential apartments behind these listed buildings is proposed in lieu.
- 3.02 The Inspector is respectfully requested to confirm the allocation of site SA6(b) and to find the Site Allocations Local Plan document "sound".

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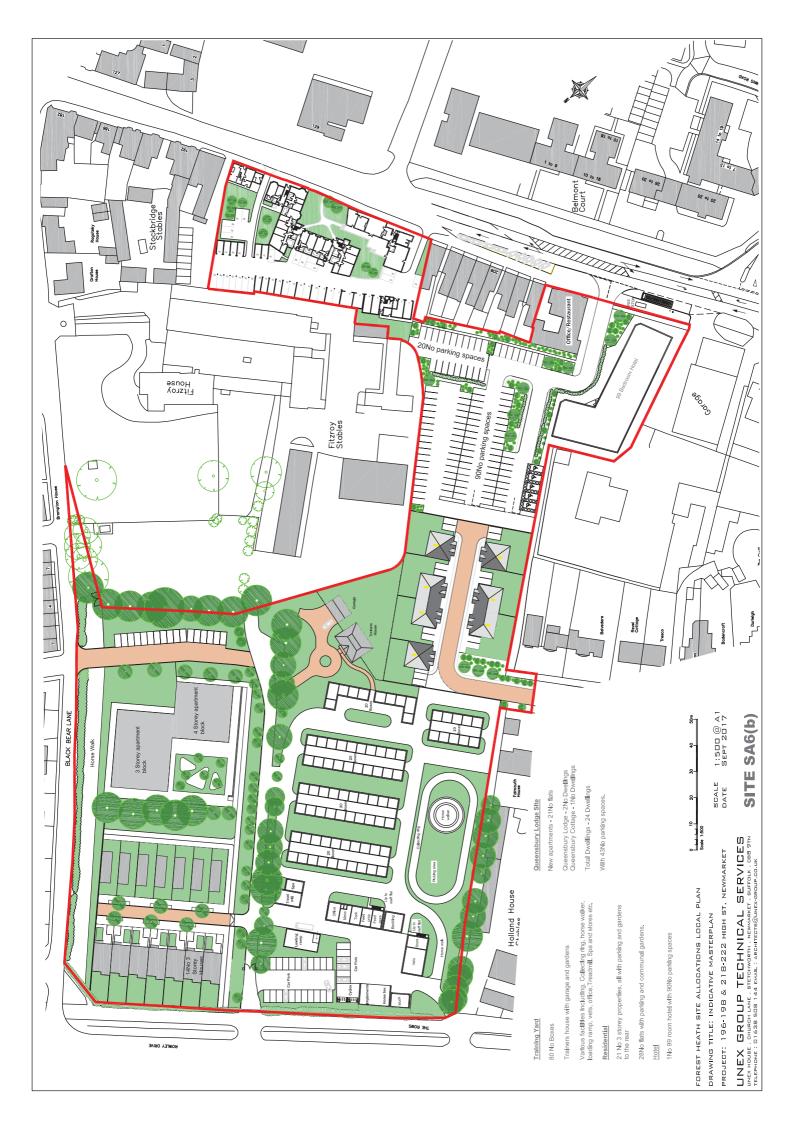
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Appendix 1

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No.24681

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Appendix 2

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