



# Phase 2

## Statement of Community Involvement

St. Felix Development Brief

St. Felix Middle School, Fordham Road, Newmarket, Suffolk, CB8 7SF

On Behalf of

**Suffolk County Council**

**June 2022**

**Our Ref: C21036**

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## Quality Assurance

**Site Name:** St. Felix Middle School, Fordham Road, Newmarket, Suffolk

**Client Name:** Suffolk County Council

**Type of Report:** Statement of Community Involvement

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## 1. Introduction

- 1.1 This Statement of Community Involvement (SCI) has been prepared by Phase 2 Planning and Development Ltd on behalf of Suffolk County Council, hereafter referred to as SCC.
- 1.2 The purpose of this SCI is to describe the consultation process and present the result of the public consultation into the production of a Development Brief for a site allocated for residential development within the West Suffolk Council Local Plan. The land in question is referred to as the 'Former St. Felix Middle School site' within the West Suffolk Council Local Plan.
- 1.3 The 4.5 hectare site is allocated in the Site Allocations Local Plan (2019), which forms part of the Local Plan, for residential development under Policy SA6(d):
- 1.4 Policy SA6(d) identifies the site with an indicative capacity for 50 dwellings. This is subject to a specific set of site-specific requirements, including:
- Making provision for the retention of the existing tennis courts and open space for public use. Access and connectivity to this facility and open space must be made available from George Lambton playing fields.
  - Protect and enhance the amenity and biodiversity of the Yellow Brick Road blue/green corridor and access route.
- 1.5 Whilst there is no planning policy expectation that a Development Brief, a strategic level document illustrating a framework for development, should be produced for the site, this document has been prepared on a voluntary basis in agreement with West Suffolk Council. The Development Brief which has been subject to consultation with West Suffolk Council and the general public will act to comprehensively inform any future planning application submitted on the site..

### Requirement for this Report

- 1.6 West Suffolk Council has produced its own Statement of Community Involvement, adopted in 2018, to provide guidance on involving the wider community in the preparation of planning documents.
- 1.7 In respect of a Development Brief, it states in preparing such frameworks there will be a need for consultation and engagement which will vary depending according to the particular proposal. In any case, it expects that at least one mode of consultation (as outlined in Table 1

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in the SCI) will be utilised. It also expects that the results of the consultation alongside any proposed changes to the Development Brief due to the feedback received will be reported. This will inform the Council's decision when assessing the merits of adopting the Development Brief as a 'material consideration' in the subsequent determination of future planning application on the subject site.

- 1.8 The role of effective community involvement in the planning process is further supported by central government as set out in Paragraph 132 of the National Planning Policy Framework (NPPF):

*"applicants should work closely with those affected by their proposals to evolve designs that take account of the views of the community. Applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot."*

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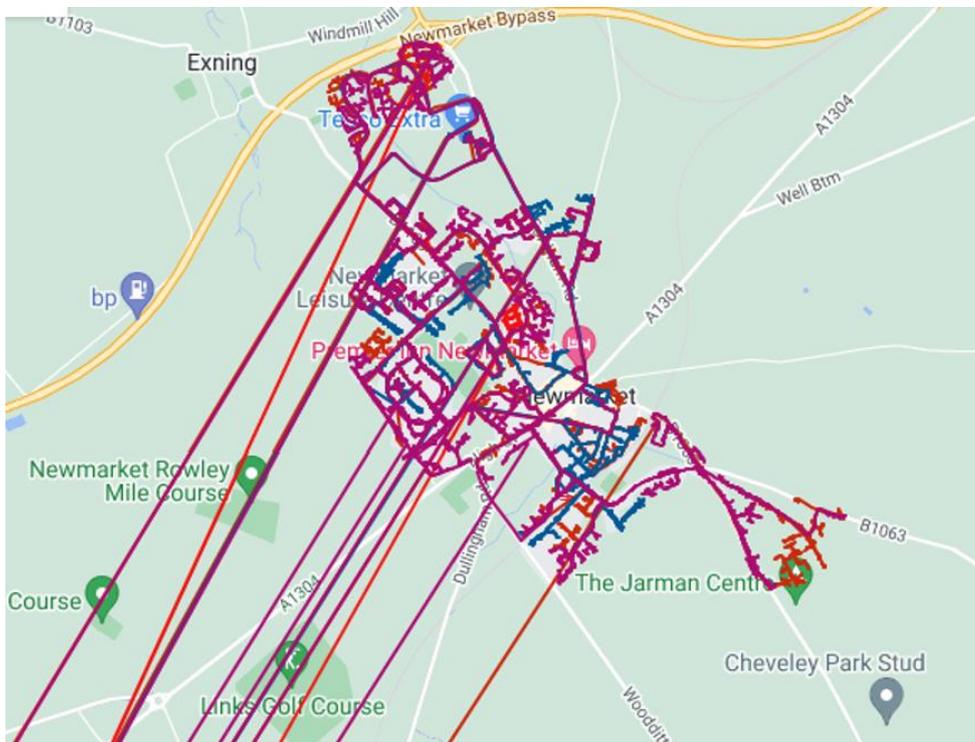
## 2. The Consultation Process

### Contextual Background

- 2.1 The community engagement process focused upon a virtual consultation held by Phase 2 Planning and Development, on behalf of SCC, between 30<sup>th</sup> March and 11<sup>th</sup> May 2022 (a six-week period).

### Public Engagement

- 2.2 A variety of mechanisms was used to promote the public consultation event, including:
- A public service announcement being placed by SCC in the Newmarket Journal – a copy is provided in **Appendix 1**.
  - Approximately 10,000 leaflets being distributed to the local residents of Newmarket as shown in Figure 1. The material summarised the contents of the proposed Development Brief and included details of the online consultation event. A copy of the leaflet is provided in **Appendix 2**.



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*Figure 1: Map showing the geographical zone of leaflet distribution for the consultation event.*

- 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 (provided in **Appendix 3**).
- A summary of the details surrounding the public consultation being placed on the official website of Suffolk County Council (contained in **Appendix 4**).

### Consultee Engagement

2.3 In addition to engagement with the general public, the Applicant has also undertaken extensive engagement with West Suffolk Council concerning the progression of the Development Brief. This has been carried out through a series of virtual workshops and meetings at key stages in the process. This formal and informal feedback has been received and informed the process.

2.4 Moreover, Newmarket Town Council were formally notified by SCC of the public consultation. This has been reciprocated through the subsequent feedback received by the consultee.

### Nature of Consultation

2.5 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 (**Appendix 5**), 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 (**Appendix 6**) providing additional details about the proposal.

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- A copy of the proposed Development Brief.

2.6 The website page also provided an online comments form for interested parties to provide their views towards the five questions asked. Each question was split into two components: (i) a tick-box for the participant to indicate their view towards that question ('Yes', 'No', 'Unsure'), and (ii) space to provide any supporting written comments. This approach permitted the project team to gauge the overall level of public opinion whilst simultaneously understanding the rationale behind their responses.

2.7 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.

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### 3. Consultation Feedback

3.1 This component of the report identifies and carefully analyses the comments received from the consultation event.

#### Consultation Statistics

3.2 The following statistics, as outlined in Table 1, are available following the completion of the public consultation event:

Engagement Medium	Consultation
Leaflets	10,000
Press Release	1 newspaper outlet
Social Media Campaign	No
Dedicated Webpage	Viewed 364 times
Virtual presentation or in-person exhibition	No

*Table 1: Statistics relating to the advertisement of the public consultation event.*

3.3 From these statistics, compared with a targeted population of approximately 16,600, it can be inferred that a wide audience was reached through this consultation.

3.4 Moreover, the statistics presented as follows in Table 2 indicate the number of responses that were received during the public consultation process:

Engagement Medium	Consultation
Online Feedback Forms	43
Direct Email	3
Dedicated Phonenumber	1

<b>TOTAL</b>	<b>47</b>
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*Table 2: Statistics relating to the responses received during the public consultation event.*

- 3.5 This level of interest represents a response within an expected average range.. Most importantly, the response rate is considered sufficient rate to engage with and understand the views of the local community.

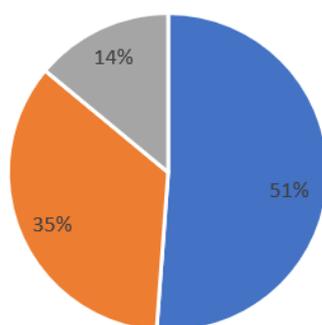
### **Consultation Results – General Public Responses**

#### Online Feedback Forms

- 3.6 As outlined in Chapter 2, the primary mechanism for the general public to impart their views was through the use of feedback forms contained on the dedicated webpage. Each question was differentiated into two aspects: (i) a tick-box for the participant to indicate their view towards that question ('Yes', 'No', 'Unsure'), and (ii) space to provide any supporting written comments.
- 3.7 The completion of a tick box answer has permitted the project team to produce a set of statistical pie charts. These pie charts provide a visual representation of the overall level of public opinion towards each question posed.
- 3.8 In terms of recording written comments, tally charts have been produced to document the frequency raised in relation to the main themes or issues raised (inductively derived from the data set). Not every participant that completed the questionnaire provided further comments to each or some of the questions. These tally charts are accompanied by a qualitative analysis of the identified themes to provide further detail.
- 3.9 We analyse below the results of the five questions that were consulted upon.

## Question 1 – Core Objectives

Question 1: Do you support the core objectives (COs) set out in the Development Brief? Are there any other objectives you would like us to consider?



■ Yes ■ No ■ Unsure ■ No Response

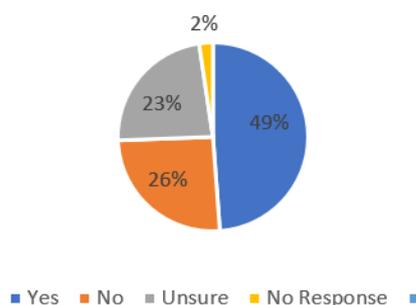
Key Themes Identified	Response Selected		
	For	Unsure	Against
Transport and Movement		1	4
Housing Quantum, Density, Design and Affordability	2	1	1
Public Open Space and Sporting Facilities	4	1	3
Additional or Alternative Land Uses			3
Other	5	1	2

3.10 Of those in favour of the stated COs (51% of respondents) it was considered that the provision of open space and potentially an additional leisure facility was welcomed (4 comments) given the limited availability in Newmarket, albeit with suggestions that the latter could be positioned elsewhere in the settlement (e.g. former Scaltback Middle School) and a concern that an existing walkway would be lost. Praise was also attributed for being a well-designed proposal and its potential to provide affordable housing (2 comments) alongside 5 other comments (e.g. benefits of regenerating a brownfield site, the suggestion of additional facilities such as a community arts centre).

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- 3.11 For the 14% of respondents who expressed uncertainty, the following was stated: access onto Fordham Road needs to be carefully considered (1 comment), more information about the proposal is required and the Development Brief is too vague (1 comment), there is a strong need for the development (1 comment), and there is worry that the site is being over-developed (1 comment).
- 3.12 Conversely, those who expressed objection to the stated COs (35% of respondents) did so most notably on the grounds that the anticipated levels of traffic generated by the proposal will adversely contribute to existing congestion along Fordham Road and adjoining roads (4 comments), as well as not enough publicly available open space being provided (3 comments). An objection was raised that the affordable housing will be sold at 80% of the market value and will thus be unaffordable, alongside there being sufficient private housing already proposed (e.g. Fitzroy Paddocks) in Newmarket (1 comment). Another objection was raised that the provision of a potential sporting facility should have constituted a CO within the Development Brief which, in turn, could have led to the scheme being re-designed; namely, switching the land area designated for housing with that allocated for sport and recreation whilst still maintaining the overall sizes (1 comment). Moreover, 3 comments suggested that no residential development should be constructed; instead, it should be utilised entirely for a new school, public open space or a woodland. The remaining comments focused upon the need for increased public awareness of the consultation event (2 comments).

## Question 2 – Site Integration

Question 2: Do you agree that all opportunities to support the integration of the site with the surrounding foot/cycle network has been explored to encourage the use of non-vehicular modes of transportation?



Key Themes Identified	Response Selected		
	For	Unsure	Against
Levels of Vehicular Traffic			4
Road Network Improvements	1		2
Non-Vehicular Connections	1		3
Impact upon the Horse Racing Industry	1		
Other		2	4

3.13 49% of respondents agreed that all opportunities to integrate the site with surrounding connections had been taken. Of this proportion, it was stated that it could not be observed how this proposal would adversely impact the horse racing industry (1 comment), it is very important in creating a sustainable form of development (1 comment), and a suggestion that a traffic calming zone is introduced outside the development (1 comment).

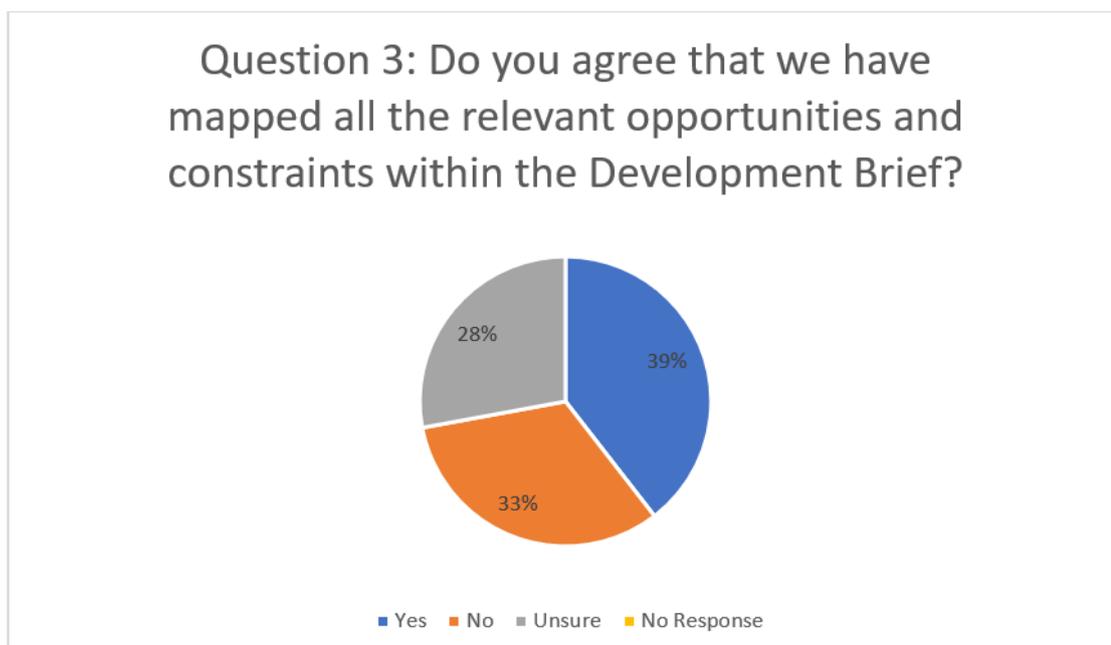
3.14 Of the 23% of respondents who indicated their uncertainty, it was queried whether a bus stop would be incorporated into the scheme (1 comment) and requested whether further

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information about what is proposed on the Weston Way boundary of the site could be provided (1 comment).

- 3.15 From the 26% who objected, it was stated that existing levels of traffic congestion on Fordham Road up to the Queen Victoria Jubilee Clock Tower (delays averaging at 20 minutes) would only be exacerbated by the proposed development, especially given the likelihood that people will predominantly use their motor vehicles to travel – with the Highways Authority unlikely to object given their connection to Suffolk County Council (4 comments). It was also mentioned within 3 comments that the existing non-vehicular connections within Newmarket are poor; for instance, a lack of cycle space provision within the town centre and a poor railway service. Other comments raised covered aspects such as the recreational open space not being given due priority by the project team, a suggestion the entirety of the site should be used for leisure purposes, and a claim that that the site is being used as a political tool to slow down the progression of sustainable development elsewhere in the settlement of Newmarket.

### Question 3- Opportunities and Constraints



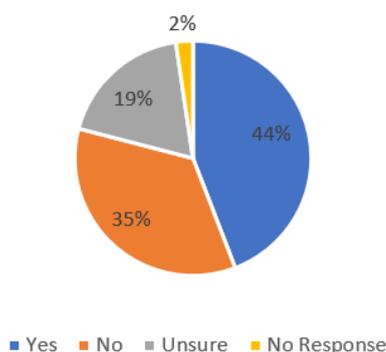
Key Themes Identified	Response Selected		
	For	Unsure	Against
Housing Quantum and density	1	1	
Levels of Vehicular Traffic			1
Sport, Commercial or Community Facilities			5
Flooding and Drainage		1	
Heritage or Wildlife			1
Other	3	4	5

3.16 39% of respondents felt that the Development Brief had mapped all relevant opportunities and constraints. Few written comments were received by this segment of the sampling frame, but included welcoming the provision on housing on the subject site – albeit with a reduced quantum – (1 comment), a request that the playing fields in the south-west corner of the site are retained (1 comment), a statement that the optimum use of the site had been attained (1 comment), and a general acknowledgement that all opportunities had been successfully identified (1 comment).

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- 3.17 28% of respondents expressed uncertainty in relation to this question. This was sourced in a concern as to whether the level of development proposed amounted to over-development (1 comment) and the potential for flooding or drainage issues (1 comment). Four other comments were received, including a concern that there does not appear to be any formal restriction to caravans accessing the public open space and two suggestions that the site should be used only for recreational purposes.
- 3.18 Lastly, the majority of respondents who disagreed with this question focused upon the ‘Sport, Commercial or Community Facilities’ theme (5 comments in total). This was grounded upon the following arguments: (i) floodlit pitches and community areas are required alongside a commercial facility such as a cinema, as well as a sports facility for Newmarket Hockey Club (comprising over 220 members) which could also possess a climbing wall and a community facility such as a cinema; (ii) the development of open space/sports hall lacks detailed consideration of aspects such as who would run the facility and likely construction costs, and; (iii) the proposed re-location of the existing tennis courts would lead to a net loss of public open space which contradicts Policy DM42 of West Suffolk’s Adopted Local Plan. Other objections focused upon frequent congestion along Fordham Road and the adjoining A14 entrance/exit (1 comment) and a potential adverse impact upon Newmarket Conservation Area (1 comment). Other generic comments included, but is not limited to, Suffolk County Council being morally bound to not obtain a profit from the proposed development and a claim that the views of local people have not been heard.

Question 4 – Re-Location of Existing Tennis Courts

Question 4: Do you agree that the proposed re-location of the existing tennis courts is preferable to its current location given its improved connectivity?



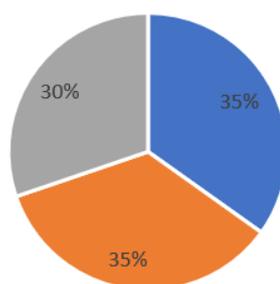
Key Themes Identified	Response Selected		
	For	Unsure	Against
Position of Tennis Courts			4
Multi-Use Capacity	1	1	
Future Maintenance	1		
Consultation with Relevant Parties	1		
Other	3	4	5

3.19 Out of the total number of respondents, 44% agreed to the proposed re-location of the tennis courts (and its potential to be upgraded to a Multi-Use Games Area). The feedback focused upon querying whether it could be used for a variety of sports such as hockey and basketball as it would be able to cater for a greater variety of users (1 comment), a reminder that the courts need to properly be maintained with the inclusion of floodlights preferable (1 comment), and viewpoints of young people must be considered (1 comment). The remaining 4 comments sought to either raise awareness of the tangible benefits to the physical health of the local community arising from the tennis courts being upgraded to a MUGA or that the facility should be built to the highest possible standards.

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- 3.20 19% of respondents indicated their uncertainty to the question. 1 comment was raised that there is potential for the project team to be more creative; for instance, two netballs courts overlaying the three tennis courts. The other 4 comments stated that they simply objected to the tennis courts being re-positioned or that it seemed like a waste of time and money.
- 3.21 Conversely, 35% of respondents objected to the aforementioned question. This was primarily on the notion (4 comments in total) that the proposed re-location of the existing tennis courts is unacceptable due to no appropriate rationale being provided (and the existing location being considered suitable or even preferable given the better overall openness). Of these, 1 comment stated that the proposed re-location of the existing tennis courts contradicts Policy DM42 of the Adopted Local Plan; this is because it will be placed on land that is already designated as open space, with the land currently siting the tennis courts being used for residential development. By implication, there will be a net loss of open space compared to the current situation. The remaining 5 comments, classified under the 'Other' theme, stated that they either had no written feedback to provide, that they objected to the whole development, or that the only reason the tennis courts are being moved is to maximise the quantum of development proposed.

## Question 5 – Design Guidance

Question 5: Do you agree that the proposed design guidance set out in the Development Brief will ensure that a residential development on the site will achieve the objectives of this brief?



■ Yes ■ No ■ Unsure ■ No Response

Key Themes Identified	Response Selected		
	For	Unsure	Against
Sustainability of the Proposed Dwellings	1		
Site Layout			
Housing Density, Mix and Appearance		2	
Other	2	4	8

3.22 Of the 35% of respondents who expressed support in the relation to the proposed design guidance set out in the Development Brief, only 3 written comments were received. This included a query as to whether there is provision for the incorporation of solar panels on the roofs of the dwellings, a statement of confidence in the proposed design guidance in permitting the set COs set to be attained, and a reminder to deliver a high-quality development for the local community.

3.23 In total, 6 comments were received by the proportion of respondents (30%) who expressed uncertainty in relation to the posed question. 2 of these were in relation to the 'Housing Density, Mix and Appearance' theme which stated that if a lower density of development was

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proposed a more aesthetically pleasing form of development would be realised, and that current level of housing density proposed is considered to be incompatible with comparable examples in the Fordham Road area. The remaining 4 comments spanned topics including two claims that they cannot provide any comments as they fundamentally disagree with the COs or more detailed information is required, an assumption that no social housing is to be provided given that only up to 50 dwellings are being proposed, and a concern that the proposed development may place undue stress upon existing service provision (including school spaces and GP capacity).

- 3.24 In comparison, 35% of respondents indicated that the guidance contained within the proposed Development Brief would not help deliver a residential development that would achieve its given objectives. 8 comments were received by this proportion which covered the following topic areas: objecting to the principle of development (with a stated preference of retaining the site purely for public open space, or alternatively utilising it for educational provision or a Country Park), concern over its contribution to existing levels of traffic congestion on Fordham Road (which will not promote safe horse movements), the potential impact upon present wildlife (such as bats and owls), and the re-location of the existing tennis courts representing a departure from relevant local planning policy.

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### Email

3.25 3 comments have been received via email from the general public as part of the virtual consultation process. Their contents are summarised in a bullet-pointed format below:

- Uncertainty as to when the impact of the proposed development upon local school capacity, by virtue of the expanded population base of Newmarket (not neglecting other upcoming developments within the settlement), will be considered.
- Scenario 2 is preferred as it gives more opportunity to sport facilities.
- The level of residential development on this site should be minimised given the plans for housing on the Hatchfield Road site.
- At the appropriate stage, it would be great if Newmarket Avenue Bowls Club could build a facility (clubhouse) with associated parking and an outdoor green on the subject site given it would not comprise a large amount of land. Commercial facilities on the site could also be constructed, such as a snooker hall.

### Voicemail Message

3.26 1 voicemail message was obtained during the course of the public consultation. The most pertinent points raised are outlined below:

- The site is not considered the most suitable for residential development given its valuable location within the settlement of Newmarket and the likely adverse impact upon Fordham Road (which constitutes a primary access route into the town).
- If residential development upon the site is to proceed, then:
  - (i) The developable area should be reduced from that currently proposed, with denser typologies, to maximise the level of open space which provide tangible benefits in terms of public amenity. By implication, it would also assist in attaining the CO of optimising the number of units on the site.
  - (ii) Although housing mix is not be determined at this stage, the Development Brief could suggest that future schemes place an emphasis on small (1-2 bedroom) dwellings. The corresponding reduction in the level of developable area required (by virtue of less parking spaces and amenity space required)

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would allow the street configuration to be designed to promote the use of non-vehicular modes of transportation.

- (iii) More comprehensive design guidance could be provided by the Development Brief to assist future development on the site; for instance, a focus upon installing extensive soft landscaping upon all sensitive edges to limit the impact of a suggested higher density development.

### Consultation Results – Stakeholder Responses

3.27 Comments have been received from two stakeholders: Newmarket Town Council and The Jockey Club. Both responses have been predominantly structured in relation to the questions posed to the general public during the consultation. Accordingly, their main comments are considered in turn below.

#### Newmarket Town Council

Question	Qualitative Summary
1	It is inappropriate to construct dwellings on a site that can be used by the public for recreational purposes.
2	There is uncertainty as to whether all opportunities for integrating the site with the surrounding foot/cycle network has been explored (in particular, to the George Lambton Playing Fields).
3	It is re-iterated that their preference is for the site to be used in its entirety as a community sports facility (as mentioned in Para 7.2 of the Newmarket Neighbourhood Plan). Also, it is believed that housing needs can be achieved through other available sites such as Hatchfield Farm.
4	It is re-iterated that their preference is for the site to be used in its entirety as a community sports facility. Moreover, the view is expressed that there has been inadequate consultation with sports clubs within Newmarket regarding their actual preferences for a future sports hall on the site.

5	It is felt that there has not been any consultation regarding the need for Newmarket to have sporting facilities on this site. In particular, it is felt that the proposed design “almost eliminates sports facilities from the St. Felix site”.
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Table 1: Statistics relating to the advertisement of the public consultation event.

[The Jockey Club](#)

Question	Qualitative Summary
1	<p>The COs referenced within the Development Brief are welcomed, especially the emphasis placed on protecting the horse racing industry (HRA). Nevertheless, it is considered that the order of these objectives should be re-prioritised – the creation of publicly accessible open space should be prioritised over the delivery of residential development.</p> <p>The potential delivery of a new sports hall is welcomed and should be considered as part of the COs.</p>
2	<p>Measures incorporated within the Development Brief to increase the network for non-vehicular transport modes is appreciated. However, it is not felt that this is sufficient to meet the CO of protecting the HRA.</p> <p>On a related note, it is felt that given the unique adequacies of the St. Felix site (e.g. its connection to George Lambton Playing Fields), it is believed that a greater proportion of the site could be made available for expanding sport amenity provision.</p>
3	<p>It is stated that they are of the view that not all relevant opportunities and constraints for the site have been identified by the Development Brief. More specifically, it is considered that there is potential to minimise the developable area of the site to allow its majority to be used for public open space (whilst still optimising housing density).</p>
4	<p>It is considered that the tennis courts should be retained in their current location as re-locating them would utilise space that could be better served with additional pitches or other sport provision opportunities. As such, the best</p>

	outcome is to retain the existing tennis courts in situ by improving and expanding them whilst providing a direct connection to the George Lambton Playing Fields.
5	<p>The design guidance is not considered robust enough to achieve the COs of the Development Brief. This is based on the following grounds:</p> <ul style="list-style-type: none"> <li>- The indicative concept model (shown on Figure 26) does not represent best practice as: (i) there are conflicting front and back arrangements, (ii) low density development is positioned on the primary frontage, (iii) multiple dead-end cul-de-sac configurations are present, (iv) setback houses allow vehicle-dominated and one-sided streets, and (v) priority of non-vehicular modes is not present in its design</li> <li>- Facilities for the provision of cycle storage, and arrangement of vehicular parking, is not covered within the Development Brief.</li> <li>- More recommendations should be provided with respect to the urban realm and proposed density ranges.</li> <li>- Greater detail could be provided about the future sports hall. Indeed, it may be better positioned in the middle of the site to allow for pitch expansion.</li> <li>- The proposal should be framed in line with the National Design Guide (2021).</li> </ul>

3.28 Following the comments made by The Jockey Club in relation to the posed questions, a written transcript summarising their position was provided. The most salient points of this transcript are presented below:

- The site is not considered suitable for residential development given the impact on the highway network; it would be better suited to publicly available open space/sporting facilities.
- If residential development is to proceed, it would be best if it is over a smaller developable area so public use of the site can be prioritised.
- More comprehensive design guidance could be provided to protect the character and appearance of the surrounding area. In particular, larger dwellings may prove

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unsuitable given the increased vehicular movements that would be generated by the proposal.

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## 4. Responses to Consultation Feedback

- 4.1 To begin, it should be observed that it is not intended that every response in this SCI is addressed where it has been possible to group key issues raised together. Instead, it the purpose of this section of the report to identify the common themes arising from the comments received during the public consultation event and provide a direct response to this feedback by the project team.
- 4.2 The full spectrum of comments received have been considered and, wherever possible, addressed. Nonetheless, it should be recognised that some community concerns will not always be aligned with national and local planning policy requirements or objectives and therefore there will be other competing interests that may outweigh the perceived shortfall of the proposal.
- 4.3 The main responses by the project team are offered in connection to the key themes identified from the comments received:
- Principle of Development: The preparation of this Development Brief is not an opportunity to re-open discussions surrounding the principle of development – this has already been established through the Local Plan process which concluded in 2019 when the site was allocated for housing under Policy SA6(d) with an identified capacity for 50 dwellings. In any case, the residential development of the site will make an important contribution towards West Suffolk being able to demonstrate a responsive and robust housing land supply position.
  - Land Use: On a related note, it is noted that a variety of alternative land uses were suggested for the subject site including, but not limited to, a new school and a woodland. Fundamentally, however, such uses would represent a marked departure from its allocated use (under Policy SA6(d)), would fail to assist West Suffolk Council from ensuring it delivers the minimum number of new homes identified within the Local Plan and would thus be contrary to the countervailing need and support to make best use of this previously developed site for housing in planning policy terms.
  - Design: It is noted that very few written comments were received in relation to the Design Framework embedded within the Development Brief, covering aspects such as scale and appearance. The Jockey Club has provided a detailed response and seeks a greater density and intensity of residential development focussed on a reduced footprint in order to optimise the open space available on the site. The Development Brief outlines that key policy decisions about the appropriateness and desirability of the site to deliver housing has been taken at the Local Plan stage and that design has

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not been presented or taken at this stage. Rather concepts are offered which are to be refined through the planning application process.

- **Housing Density:** The proposed arrangement shown on Figure 26 within the Development Brief only provides a high-level indicative layout of how development frontages could be set out across the site. The particular house typologies and mix are not seeking approval at this stage. However, it is the purpose of the formal planning application process to determine the exact density based on an identifiable scheme. Nevertheless, the Development Brief illustrates that the site would be capable of accommodating a range of development densities that have been informed by an examination of the surrounding built form (including the Fordham Road area).
- **Housing Mix:** The exact mix, will be informed by the latest Strategic Housing Market Assessment (SHMA), and will be determined at the planning application stage.
- **Affordable Housing:** The proposal will be required to deliver a policy compliant level of affordable housing which equates 30% of the total quantum of development. The exact tenure will be finalised at the planning application stage, but will comprise of dwellings (for sale or rent) purposively designed for those whose needs are not met by the open market.
- **Transport and Highways:** The proposed vehicular access will consolidate the two existing accesses with a single access point in the location of the existing north access. This will include appropriate improvements to ensure it meets current standards. A Transport Statement will accompany the full planning application to demonstrate that the sufficient visibility splays can be achieved from this proposed junction to ensure there is the ability to clearly view traffic in both directions onto Fordham Road. The same report will also assess the impact of the development proposal upon the operating capacity of the local highway network to ensure it can accommodate the anticipated additional traffic volumes. Additional scoping with the highway authority has not identified any insurmountable issues, but the objective of prioritising modes of transport other than the private car. Such measures will be secured through a combination of layout (connectivity and improvements to existing cycle and footpaths) and Travel Framework Plans to influence the travel patterns and behaviours of future occupants of the development.
- **Movement and Connectivity:** At the next stage of the process, a future planning the planning application will be accompanied by a Travel Plan which sets out a long-term management strategy which aims to increase transportation by non-vehicular modes of transportation. By discouraging single occupancy car journeys it is intended that pressure upon the local highway network arising from the proposed development will

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be avoided where possible and offset. Exact details of surfaces or connections to the surrounding foot/cycle path network will be reserved for a future consideration at the planning application stage or discharge of planning conditions. Lastly, the condition of existing non-vehicular connections within Newmarket is beyond the scope of this Development Brief but will be considered as part of a wider review of the need for infrastructure contributions during the determination of the planning application.

- Impact upon the HRA: It has been considered by some parties that the potential contribution the proposed development will make to existing levels of traffic congestion on Fordham Road will not promote safe horse movements (with a Travel Plan, in isolation, considered insufficient by the Jockey Club to protect the HRA). Whilst this will ultimately be assessed by the Highways Authority at the planning application stage, and any future provision of evidence of harm from the HRA will be considered, it should be noted that the planning application will be supported by a Horse Racing Industry Impact Assessment report to assess any mitigatory measures required to minimise any harm that may arise from development upon the HRA.
- Public Open Space Provision: In respect of concerns raised about the loss of open space, Local Plan Policy SA6(d) identifies the 4.5 hectare site for residential development with an indicative capacity of 50 dwellings and 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. There is no requirement for the tennis courts to remain in their current location and development of housing is only proposed within the previously developed built envelope of the former school buildings.

The Development Brief does review two options for the locations of the tennis courts, the first in its current location and the alternative is to relocate the courts west of their current location. The rationale for this is explained within the Development Brief but essentially locating the tennis courts on the boundary with George Lambton playing fields enables better connectivity between the two recreational spaces, complimenting each other and providing a more integrated wider recreation space, allows for better management and maintenance of the open space/courts, provides a better relationship between the tennis courts and existing/proposed dwellings, and enables a more gentle density of housing on the developed area of the site.

There is no consequential disbenefit to sport or the public use of the proposed open space. The re-located tennis courts would benefit from the option to introduce lighting for evening play and be located at a greater distance from the houses reducing the potential for conflict between the uses. It would therefore be more capable of intensive and frequent sport use in this new location, rather than a compromised

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location in its existing position. On balance, this is not considered to result in a loss of open space or ability to play sport.

Finally, there is potential for the tennis courts to be upgraded to a higher-quality tennis courts or a MUGA. More generally, it should be highlighted that: (i) exact details as to how the public open space will be utilised and managed will be determined at the planning application stage, including further discussion with local sports clubs and stakeholders, and (ii) the potential for illegal parking of caravans on public open space does not constitute a material planning consideration.

- **Flooding and Drainage:** The site is at low risk of flooding from rivers, with the majority of the site not susceptible to flooding from surface water. The proposed development will be required to use sustainable drainage systems to ensure it does not increase the risk of flooding elsewhere.
- **Community Infrastructure:** At the planning application stage a legal agreement will be signed detailing a range of financial contributions to create additional capacity for existing or new public service provision.
- **Core Objectives:** Broad support for the stated COs within the Development Brief is acknowledged. Whilst the incorporation of a potential sports facility is not included as a CO, because it is not sought by the Local Plan, it remains a desirable objective that land is reserved for the provision of enhanced recreation and sporting facilities. It should be observed that the COs are all attributed equal weight by the Development Brief.
- **Level of Detail:** The proposed Development Brief is intended to provide high-level guidance for a future planning application in terms of how the development of up to 50 dwellings across the site could be achieved. It follows, therefore, that exact details in relation to components such as the maintenance arrangements for the public open space will be formalised later in the development management process.
- **Consultation Process:** It is considered by the project team that the public consultation event was adequately advertised by virtue of the multiple mechanisms used, including the distribution of approximately 10,000 leaflets and details of the event being extensively published in the local press.

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## 5. Proposed Changes as a Result of this Consultation

5.1 As recognised earlier within this statement, whilst the full spectrum of comments received have been considered and, wherever possible, addressed, it should be recognised that some concerns raised will not always be aligned with national and local planning policy requirements or objectives and therefore there will be other competing interests that may outweigh the perceived issues.

5.2 SCC has entered into the consultation process constructively and as a consequence of the comments received and analyses within Section 4 of this Statement, the proposed Development Brief has been amended as follows:

- 1) **Connectivity** – Figure 25 of Development Brief has been updated to highlight the proposed pedestrian and cycle connections with George Lambton Playing Fields to demonstrate more purposefully the intention to integrate the new publicly accessible open space at the site with George Lambton Playing Fields pursuant to the objective of creating an integrated sports and leisure hub.

In addition, connectivity with the Yellow Brick Road is demonstrated pursuant to the objective of maximising the opportunities for walking and cycling between the site and the town centre.

- 2) **Affordable Housing** – Additional clarification has been provided within the Development Brief that a policy compliant level of affordable housing is anticipated in line with expectations of Policy CS9 of the Core Strategy.
- 3) **Design Standards** – 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.

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## 6. Conclusions

- 6.1 This Statement of Community Involvement (SCI) has set out the extent of publicity undertaken in advance as to maximise the level of engagement from the residential occupiers adjacent to the subject site. In the end, 47 comments were received from the general public and 2 comments were received from stakeholders.
- 6.2 These comments, spanning a range of topics from the principle of development to the potential impact of the proposal upon the local highway network, have been collated and examined by the project team.
- 6.3 The positive comments received are acknowledged by the project team. In terms of the concerns raised, they are not considered to be so unsurmountable that they would affect the delivery of development
- 6.4 It should be noted that further work and dialogue will be undertaken with the general public, as well as statutory consultees, to further inform the proposed scheme during the full planning application stage

## Appendix 1

**Notice of Public Consultation**  
**The Development of the**  
**Former St. Felix Middle School, Suffolk**

This is a public notice to inform you of a public consultation which is taking place between the 30<sup>th</sup> March and 11<sup>th</sup> May 2022, regarding the proposed development of the former St. Felix Middle School, Suffolk. Suffolk County Council is proposing a Development Brief to guide any future planning application on the site. The Brief proposes a residential development of up to 50 dwellings and accompanying open space.

It is expected that the proposed Development Brief will be submitted to West Suffolk Council for approval in Summer 22. Before the application is submitted, we are inviting members of the public to view the development proposals online and have their say about the plans.

The consultation is being held by Phase 2 Planning on behalf of Suffolk County Council. Please visit our website [www.phase2planning.co.uk/planning-consultations-StFelix.html](http://www.phase2planning.co.uk/planning-consultations-StFelix.html) to view the proposals and to have your say (please note the link will only be live from 4pm on the 30<sup>th</sup> March).

For those that do not have access to the internet, please contact Phase 2 Planning and Development Ltd on **01376 743811** and leave a message with your comments.

## Appendix 2

To find out more and have your say about the proposals please visit our dedicated website: [www.phase2planning.co.uk/planning-consultations-StFelix.html](http://www.phase2planning.co.uk/planning-consultations-StFelix.html).

The consultation period will run for six weeks between 4pm on 30th March 2022 and 4pm on 11th May 2022 so please ensure that all feedback is received by 4pm on the 11th May, when the consultation will close.

If you would like to provide feedback, there are several ways to do this:

**Online:** The easiest way to provide feedback directly is to do so by completing our online questionnaire that is hosted on the dedicated website.

**Email:** We will accept feedback by emailing our team on: [office@phase2planning.co.uk](mailto:office@phase2planning.co.uk)

**Freephone:** Call our freephone hotline on 0800 464 7596 to provide feedback by phone.

**By letter:** It is recommended that you use the other forms of communication however we will accept comments submitted by post. You can send your comments to our planning consultants, Phase 2 Planning at:

270 Avenue West  
Skyline 120  
Great Notley  
Braintree  
Essex  
CM77 7AA

## NOTICE OF PUBLIC EXHIBITION

FORMER ST FELIX. MIDDLE SCHOOL, NEWMARKET, SUFFOLK

Suffolk County Council (Corporate Property) invites you to view their virtual exhibition regarding the production of a Development Brief that will guide future planning applications for development of the Former St. Felix Middle School, Newmarket, Suffolk.

This land is allocated within the West Suffolk Local Plan for residential development and relates to an area of land outlined in red on the aerial photograph below.

This leaflet provides an overview of the virtual exhibition. To find out more and have your say about the proposals please visit our dedicated website: [www.phase2planning.co.uk/planning-consultations-StFelix.html](http://www.phase2planning.co.uk/planning-consultations-StFelix.html).

If you are unable to visit our website the leaflet explains alternative ways to participate.



## What is this consultation?

This is a consultation event seeking views regarding the production of a Development Brief concerning the former St. Felix Middle School, Newmarket. This concerns a site allocated in the adopted Local Plan for residential development.

## What is a Development Brief?

A Development Brief is a strategic planning document which sets out a vision and conceptual framework as to how future development on the site could be delivered. Any future planning application will be required to demonstrate its compliance with the principles established by the Development Brief.

## What are the requirements for this Development Brief?

The adopted Local Plan seeks to bring forward this 4.5 hectare site for a residential development of approximately 50 dwellings.

As part of this process, the Adopted Local Plan also requires development proposals to retain the tennis courts, include the provision of public open space, and provide connectivity from the George Lambton playing fields (to its north) as well the Yellow Brick Road Linear Park (to its west).

## What are we seeking from this consultation?

At this stage we would like to hear about your views of the local area and our initial high-level development concepts for the site. Full details of how feedback can be provided are contained at the reverse of this leaflet.

We are consulting before progressing to the next stages of the Development Brief process. This consultation commences on the 30th March 2022 and runs for a period of 6 weeks until the 11th May 2022.

## How will the proposed land uses be distributed across the site?

The Development Brief contains a single option as to how the development proposed may be laid out across the site – this indicative layout is presented as the ‘Preferred Option’ for up to 50 homes.



The Preferred Option proposes that the residential development is focussed on the developed areas of the site. The existing tennis courts will be moved to the north-west and has potential to be upgraded into a Mixed Use Games Area (MUGA). There is also the potential to reserve land to accommodate a future sports hall if required.

The Preferred Option also involves the west of the site being reserved as public open space and a vehicular access being created onto Fordham Road in its north-east corner.

More information can be found on our website.

## Appendix 3



A computer-generated indicative map for the development of the former St Felix School site in Newmarket  
Picture: BLUE PENCIL DESIGNS/SUFFOLK COUNTY COUNCIL

# Consultation to be launched on school site homes plan

**JASON NOBLE,**  
Local Democracy Reporter  
newsroom@archant.co.uk

**A six-week public consultation will be launched on plans to turn a former middle school site in Newmarket into a 45-50-home development.**

Suffolk County Council has prepared a development brief for the former St Felix School site in Fordham Road, allocated for 50 homes in the Forest Heath site allocations local plan in 2019.

On Tuesday night, West Suffolk Council's cabinet agreed for the plans to go to public consultation to gather feedback.

Sara Mildmay-White, Conservative deputy leader of West Suffolk Council, said: "I thoroughly endorse this going out to consultation. As we know the school closed in 2012 and the site has been empty for all that time. Quite frankly, it is certainly time something was done with this site."

The plans propose developing homes on the already-developed part of the school site, and moving the tennis courts onto the public open space which will be provided on the former playing fields.

David Roach, Conservative cabinet



David Roach, Conservative cabinet member for planning and ward member for Haverhill West at West Suffolk Council

Picture: WEST SUFFOLK COUNCIL

member for planning, said: "Any development must also protect and enhance the amenity and biodiversity of the 'Yellow Brick Road' which is adjacent to the site.

"The draft development brief is in line with the requirements of the allocation except that the existing tennis courts are proposed to be re-provided in the public open space in order to achieve the most efficient use of the space for the residential element of the scheme.

"Whilst this is a departure from the policy requirement, this is considered to be acceptable as it improves potential for better residential layout."

In its development brief for St Felix School, the county council said it "will be important that the

appearance and materials are appropriate to the location and in keeping with the character of Newmarket," and said it "should prioritise non-car modes of travel and reduce vehicle movements onto the network to manage impact on horse movements around the town".

It plans to keep most of the trees on the site, and 30% of the new homes would be designated as affordable.

There remains the possibility for future sports facilities to be built on the site, although that is still up for discussion between the district and county councils.

A date for the consultation is set to be announced in due course.

## Appendix 4

## Launch of public consultation over housing scheme for Newmarket

Published 31 Mar 2022

A public consultation into proposals by Suffolk County Council to redevelop the site of a former school in Newmarket has begun.

Up to 50 new homes would be built on the former St Felix Middle School, which closed in 2012.

The council's Preferred Option proposes the relocation of existing tennis courts on land north-west of their current position, with the tennis courts being converted into a mixed-use games area. The remainder of the 4.5 hectare site, which is off the A142 Fordham Road, will be developed for housing and open space, with the creation of a single priority junction with Fordham Road.

Under the proposals, previously private open space will now be made available for use by the public which, combined with better integration to the adjoining George Lambton playing fields through a new public access, will mean increased recreation opportunities for the residents of Newmarket. The final number of homes will be determined in the later planning process but 30% of them will be affordable housing.

In common with other SCC housing sites the new dwellings will meet the government's Future Homes Standard, meaning a 75-80% reduction in carbon impact. Units will have air source heat pumps and high thermal efficiency.

**Councillor Richard Smith, Cabinet Member for Economic Development, Transport Strategy and Waste, said:**

"This proposed scheme will bring new homes and investment to a prominent site in Newmarket that has been simply lying empty. The views of the public are important to us and will be incorporated wherever possible to ensure that we deliver what the community needs, so I would urge people to give us their ideas in this consultation."

For more details of the proposed scheme, and to leave comments, [go to the public consultation website](#).

**All comments must be received by 4pm on Wednesday 11 May 2022.**

Suffolk County Council

Council and democracy

The council and its committees

Councillors and elected representatives

Budget, Council tax and finance

Our aims and transformation programmes

Council directorates and senior officers

Open Data Suffolk

Consultations, petitions and elections

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Borough, district, parish and town councils

Suffolk Public Sector Leaders group

Council news

Print this page



## Appendix 5

# INTRODUCTION

Thank you for taking the time to view this public exhibition concerning the Development Brief for the former St. Felix Middle School, Newmarket which is proposed for residential development within the adopted West Suffolk Local Plan. This exhibition has been prepared on behalf of the landowner (Suffolk County Council) in consultation with West Suffolk Council.

This consultation is seeking your views on our draft Development Brief. The Development Brief contains high-level information regarding the background, constraints and opportunities, and potential development options concerning the future development of the site. It is the intention of these presentation boards to provide you with a summary of this information, with more detailed guidance contained within the Frequently Asked Questions section of our Website. Once you have reviewed this material, we would encourage you to complete our questionnaire which can be located here. [\[Link\]](#)

We are providing you with as many ways to view this presentation and provide feedback as possible. Full information on the ways to do so can be found on the next steps and feedback pages of this website.

The purpose of this consultation is to give you the opportunity to share your views on our initial proposals for the allocated site. We will consider feedback from this consultation when working up the final Development Brief, which will then be submitted to the local planning authority (West Suffolk Council) for approval in the Winter of 2021.



Photographs of the site in its current state



# DEVELOPMENT BRIEF

A Development Brief is a document that provides a number of principles and objectives, such as conceptual layout options, which will guide any future residential development on the site. This is informed by site constraints and opportunities and must comply with planning policy requirements as set out in the Newmarket Neighbourhood Plan and Adopted Local Plan. Once approved by West Suffolk Council, any future planning application submitted on the site will be required to demonstrate its compliance with the principles and guidance established within the adopted Development Brief.

It is important to understand, therefore, that a Development Brief does not itself grant planning permission. Instead, it is simply a template upon which future planning applications will be based.

Whilst we would welcome feedback on all aspects in relation to the proposed Development Brief, Table 1 outlines the type of feedback that can help shape the final Development Brief as well as those planning matters which the document cannot provide or amend.

Feedback that <b>can</b> influence the final Development Brief	Feedback that <b>cannot</b> influence the final Development Brief
<ul style="list-style-type: none"><li>• The overall vision and objectives for the site</li><li>• The opportunities and technical constraints that the proposal presents</li><li>• The design principles proposed, such as massing and style</li><li>• The landscape, movement and open space framework</li><li>• The options concerning the layout of the proposed land uses</li></ul>	<ul style="list-style-type: none"><li>• The principle of residential development on the site</li><li>• The overall number of dwellings proposed</li><li>• The precise housing mix for the site</li><li>• The exact design and materials proposed</li></ul>

Table 1



# DEVELOPMENT BRIEF

Although there has no planning policy expectation to produce a Development Brief on this site, the document has been prepared on a voluntary basis in agreement with West Suffolk Council. This is advantageous since the site-specific planning guidance contained within the document will be the product of a collaborative process between the landowner, general public and local planning authority. As a result, the Development Brief will act to comprehensively inform any future planning application submitted on the site as to raise the standard of development.

Following initial engagement with West Suffolk Council and other stakeholders, a clear set of objectives have been identified to achieve the delivery of housing on the site. These core objectives (COs) are set out in the table below:

CO1: To prioritise the delivery of an 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

Table 2



# THE APPROVAL PROCESS

The delivery of residential development on the former St. Felix Middle School site consists of an extensive process that ranges from its allocation within the Adopted Local Plan to the eventual implementation of an approved planning permission. Table 3 below has been prepared below to help you understand this multi-stage approach and the position of this current consultation within it.

STAGE 1 Background Work	STAGE 2 Development Brief Preparation	STAGE 3 Planning Application Submission	STAGE 4 Delivery of Development
<p>The Applicant put forward the site to WSC to assess its development potential. Based upon subsequent evidence that was gathered, the site was assessed by WSC to be suitable for housing. Therefore, it was allocated for residential development within the Adopted Local Plan.</p>	<p>Upon further background study and discussions with relevant stakeholders, a draft Development Brief has been prepared. It is this document that is currently subject to public consultation. Once it has been finalised, it will be submitted to WSC for endorsement as a material planning consideration.</p>	<p>Appropriate plans will be prepared by the project team. A planning application will then be submitted to WSC for approval of the residential development. It will need to reflect the high-level principles within the adopted Development Brief.</p>	<p>Upon approval, a number of planning conditions will need to be discharged and financial contributions will need to be paid. Once the relevant matters have been satisfied, construction works will be able to commence on site.</p>

Table 3



# THE SITE AND ITS SURROUNDINGS

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The application site is outlined in red on the site location plan to the left. The site is situated inside the settlement boundary of Newmarket, approximately 300 metres south of the Fordham Road roundabout. It was previously used to educate middle school aged students, but closed in the Summer of 2012 - the land is now derelict.

To the north of the site is an extensive area of playing fields referred to as the George Lambton Playing Fields. Open countryside is situated to its east, and its south and west comprises of modern estate-style residential development. Newmarket town centre is positioned approximately 1.5 km to its south.

The site connects to a green corridor network to the west, known as the Yellow Brick Road Linear Park (YBRLP), which provides a byway and public rights of way between the town centre and Studlands Park.



Fig. 1 Red Line Boundary Plan



## Adopted West Suffolk Local Plan

The current Local Plan for West Suffolk identifies the site within the settlement boundary of Newmarket. In this respect, the Local Plan (Core Strategy Policy CS1) recognises Newmarket as a suitable location for new development due to the wide range of services and facilities available alongside its good transport links.

The Site Allocations Local Plan (2019) allocates the site for residential development of up to 50 dwellings (under Policy SA6(d)). The policy details that any development proposal must comply with a range of site-specific criteria, including providing open space for public use and ensuring connectivity from the George Lambton playing fields.

The Applicant has decided to produce a Development Brief to guide any future planning application on the site to ensure a high-quality form of development. This will comply with the necessary requirements within Policy DM4 (Development Briefs of the Joint Development Policies Document 2015).

More information is provided in respect of these and other policies is detailed within the accompanying Development Brief.

## National Planning Policy Framework (NPPF)

The revised NPPF, which was published in July 2021, sets out the priorities and principles of development established by the central government. One of its key aims is to “significantly boost the supply of new homes”. This is so that a sufficient amount and variety of new land can come forward to help address the current shortfall of housing.

In particular, it states that significant weight should be given to the value of using previously developed (or brownfield) land within settlement boundaries - that is currently underutilised - for new homes.

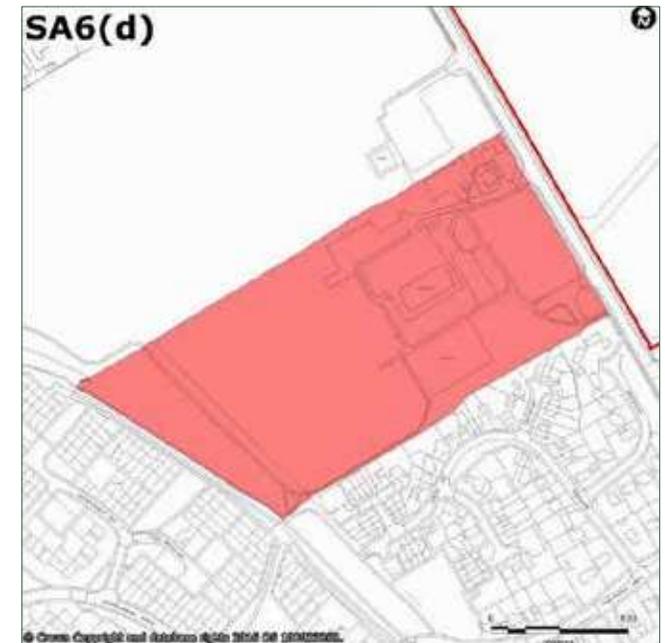


Fig. 2 Allocation Plan



# NEIGHBOURHOOD PLAN

The Newmarket Neighbourhood Plan (NNP) is a statutory development plan document that has been adopted by West Suffolk Council.

This means that the material consideration is given weight in the decision-making process for any planning application submitted in the parish of Newmarket.

The key policies are summarised below:

**Policy NKT19** requires that development proposals provide a varied housing mix to meet the needs of an increasingly diverse Newmarket community.

**Policy NK20** sets out that affordable housing on the application site should be dispersed into small clusters of no more than 15 dwellings.

**Policy KT22** establishes that development proposals which will generate significant levels of traffic movement will only be supported where it is shown that it will not adversely impact the capacity and safety of the local highway network. Any Transport Assessment must, in part, consider equestrian users.

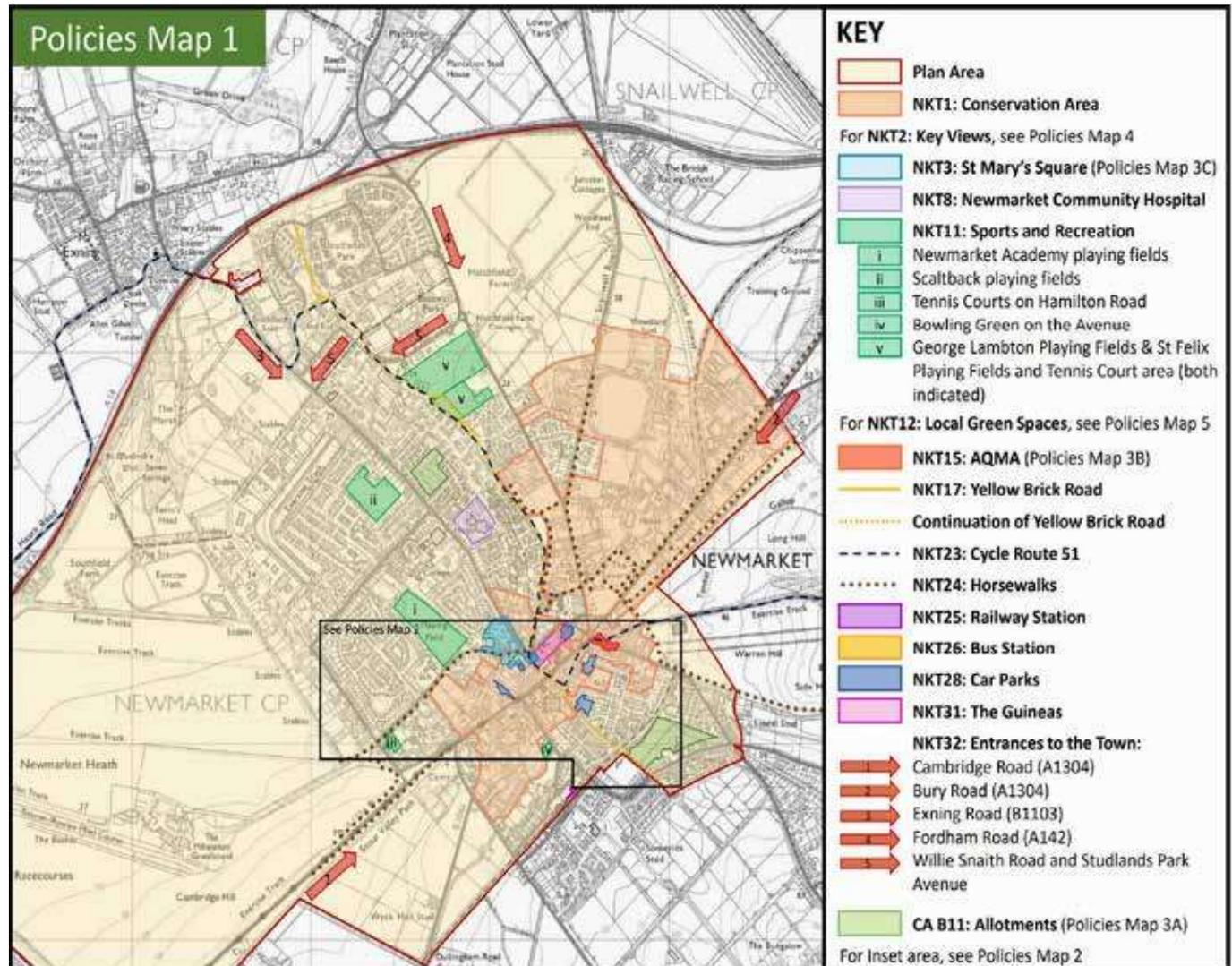


Fig. 3 Policies Map



# PROPOSED DEVELOPMENT OPTIONS

The principle of residential development on the site has already been established under Policy SA6(d) of the Site Allocations Local Plan (2019) for 50 dwellings. The Development Brief is therefore intended to provide high-level guidance as to how this level of development can be accommodated across the 4.5-hectare site. In consideration of these requirements, the project team carefully considered two different scenarios as to how the residential development could be accommodated across the site during the design development stage. These scenarios were as follows:



Fig. 4 Scenario 1



Fig. 5 Scenario 2

Scenario 1 - Policy Arrangement Plan (left) considered that the residential development be accommodated predominantly in the built envelope of the site, with the existing tennis courts retained in the same location and the remainder consisting of public open space.

Scenario 2 - Proposed Arrangement Plan (right) considered that the tennis courts could be relocated to another part of the site.



# PROPOSED ARRANGEMENT

Having analysed the relative merits of the two development options presented in the previous slide, the Development Brief ultimately discounted Scenario 1 due to the lack on integration with the adjoining George Lambton playing field and concern of potential conflict between the residential development and sport use associated with the tennis courts given their close proximity.

As such, the Development Brief identifies Scenario 2 as the proposed arrangement for how development across the site should be laid out. The 'Proposed Arrangement Plan' proposes that the residential development be constructed in developed area of the site, with the tennis courts relocated.

It should be recognised that this drawing is only illustrative - matters such as the final appearance, layout, scale and landscaping will be formally considered in a future planning application and not at this stage.



Fig. 6 Illustrative Layout based on the Proposed Arrangement Plan



# DENSITY AND DESIGN CHARACTERISTICS

Whilst the proposed density and design arrangements is reserved for future consideration as part the detailed planning application stage, the Development Brief nevertheless has carried out a range of feasibility studies to demonstrate how the proposed development could be delivered in respect to these matters.

Beginning with the first consideration, several different levels of density have been assessed from an analysis of a sample of surrounding residential estates. The sample areas and their densities are useful to illustrate what may be an appropriate density for the site. For example, low density, such as at Fordham Road, would be 13 units on the site. Medium density, as at Murless Drive would be 34 units and high density at Exning Road would be 60 units.



Fordham Road - 7 dph



Paget Place - 12 dph



Noel Murless Drive - 18 dph



Exning Road - 32 dph

It is the objective of the Development Brief to produce a design framework that reinforces local distinctiveness through sensitive architecture, public realm and materials. This includes ensuring the built form reflects the locality in terms of scale and form, creating attractive spaces that prioritises non-vehicular modes of transportation, and including materials that are characteristic of Newmarket.

Further information on both considerations is provided on pages 64 and 65 respectively.



# PROTECTING THE HORSE RACING INDUSTRY

Newmarket is a centre of the British Horse Racing Industry (HRI) which plays a pivotal economic and cultural role to the town. This is reflected in the presence of 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. It also has the largest racehorse training centre in Britain and a key global centre for horse health.

Given its renowned national and international status, it is a core objective of the Development Brief to safeguard existing horse movements within the local area and wider town - which are key to the HRI - by reducing the impact of additional vehicular traffic. This will be achieved by ensuring that the site is well connected to existing footpaths; for instance, the site access will incorporate 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 link with the Yellow Brick Road corridor to its west. These new or improved connections will encourage journeys by sustainable modes of transportation for a wide range of services/facilities within Newmarket which are within a short walking or cycling distance. Please refer to page 50 for further information about these measures.

Moreover, a Transport Assessment that will accompany any future development proposal will be required to assess the impact of the development proposal upon the surrounding area - with specific attention to be given to the impact upon the horse racing industry and existing movements. If any adverse impacts are identified, appropriate measures will be incorporated to mitigate the development impact.

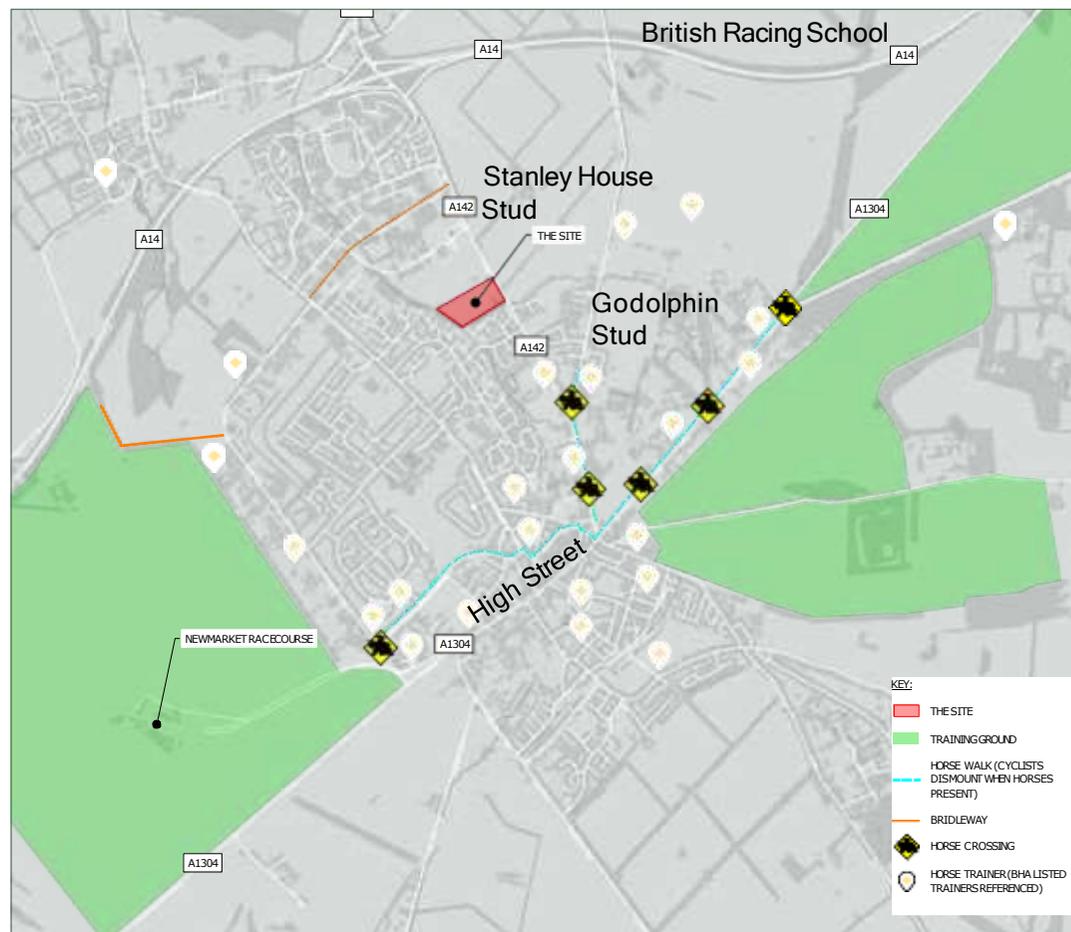


Fig. 7 Map showing Routes around Newmarket



# BENEFITS TO THE LOCAL COMMUNITY

The introduction of a residential development on the application site presents a variety of opportunities to preserve the setting of the site as well as providing new or improved assets for the wider community - as detailed on page 54. The main opportunities can be summarised as follows:

- Existing trees on the site will be preserved wherever possible to preserve the character of the local area
- The site will become integrated with the existing public rights of way network as to enhance pedestrian and cycle links around Newmarket
- Private secure space will be unlocked for public use, which can be integrated with the adjoining George Lambton playing fields to facilitate the creation of a Recreation Hub.
- The existing tennis courts will become available for public use. If The Proposed Arrangement Plan is granted planning permission, this sport facility will be relocated and upgraded.

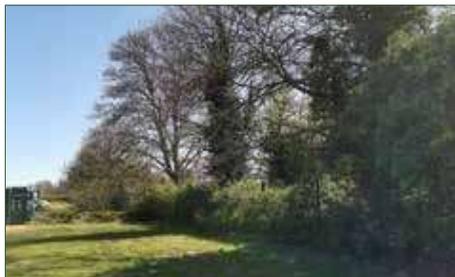


Fig. 8 Opportunities Plan



# Future Opportunities for Sport

To enable the expansion of indoor sporting facilities within the town by reserving land for the future provision.

Releasing the tennis courts to an alternative location, as shown within the Illustrative Layout on board 9, would present the optimum location to invest in further shared facilities alongside any further expansion of sporting facilities on the site to serve Newmarket, should the need arise.

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 Development Brief only indicates the potential space for a Sports Hall; provision of the facility is not being formally submitted at this time.

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.



Fig. 9 Illustrative Layout based on the Proposed Arrangement Plan with potential sports facility

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.



# WHAT HAPPENS NEXT?

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Thank you for taking the time to review this exhibition of Suffolk County Council's consultation concerning the production of a Development Brief for this site. We hope that you have found these boards informative and helpful.

Before the Development Brief is finalised and submitted to West Suffolk Council for adoption, we are inviting members of the public to have their say about the plans. All comments that are received from this public consultation event will be actively considered by the project team and will inform the development of this Development Brief.

Therefore, if you would like to provide feedback, there are several ways to do this:

**Online** - The easiest way to provide feedback directly is to do so by completing our online questionnaire on this website: [www.phase2planning.co.uk/planning-consultations-StFelix.html](http://www.phase2planning.co.uk/planning-consultations-StFelix.html).

**Email** - We accept feedback by emailing our team on: [office@phase2planning.co.uk](mailto:office@phase2planning.co.uk)

**Freephone** - Call our freephone hotline on [0800 464 7596](tel:08004647596) to provide feedback to Phase 2 Planning.

**Letter** - If you decide to submit comments by post, please submit this to our planning consultants at;

[Phase 2 Planning and Development Ltd, Skyline 120, 270 Avenue West, Great Notley, Braintree, Essex, CM77 7AA](#)

The commencement date of the public consultation is **4pm Wednesday 30<sup>th</sup> March**.

Please note that the deadline for comment submission is **4pm Wednesday 11<sup>th</sup> May**. Please note that comments after this date may still be taken into consideration.



## Appendix 6

# Former St. Felix Middle School Development Brief - Frequently Asked Questions

## DEVELOPMENT BRIEFS

### Q. What is a Development Brief?

A Development Brief is a document that bridges the gap between the planning policy requirements set out in the Local Plan and the level of information contained within a planning application. In this specific context this Development Brief highlights Suffolk County Council's proposals for the future development of the site, interpreting Local Plan and Neighbourhood Plan policies, addressing site constraints and opportunities, and presenting a number of principles and objectives that will guide future planning applications seeking development of the site.

Like a planning application, a development brief can be submitted to the local planning authority for approval so that it can form a material consideration in the preparation and determination of future planning applications.

The main difference between a Development Brief and Planning Application to understand, is that a development brief does not itself grant planning permission. Rather, it is simply a template upon which future planning applications will be based.

### Q. What is incorporated in the development brief?

The Development Brief sets out the principles and more detailed guidance on a relation of matters for this site. This includes the following:

- An overall vision for the site;
- Identification of constraints and opportunities for the site;
- Consideration of technical constraints, such as flood risk, and other general infrastructure matters;
- Options concerning the general location of proposed land uses;
- Guidance on the type and mix of housing;
- Design principles of building design, materials, scale, height, massing and style;
- Movement framework – how pedestrians, cyclists and vehicle will access and move through the site;
- Landscape, open space and green infrastructure framework;
- Developer contributions where applicable/appropriate;
- Details concerning implementation and delivery (the party who will deliver the brief).

### Q. What cannot be considered within the Development Brief?

A Development Brief cannot be used to review the principle of development which has already been established in the Local Plan, such as in this case set out in the Site Allocations Local Plan (2019), or to create new policies for land use.

It should also be clarified that whilst a Development Brief is intended to provide guidance on how a site should be developed, it is not necessary go into the level of detail appropriate to a planning application. For instance, the Development Brief cannot provide:

- The precise mix and size of house types for the site;

- A detailed specification of design and materials;
- Comprehensive site assessment work, such as Transport Assessments. These are required at the planning application stage, although the Applicant *may* wish to provide some more detailed information to inform the Development Brief.

#### Q. What is the purpose of the proposed St. Felix Development Brief?

The purpose of the Development Brief is to provide site-specific planning guidance and advice for any future development on the allocated Former St. Felix Middle School site. In practice, this means developers bringing forward schemes on the site will be informed on its respective constraints and opportunities, as well as the type of development expected or encouraged.

Whilst there is no planning policy requirement for the preparation of a Development Brief in this case, the landowner, Suffolk County Council (SCC), has prepared this document on a voluntarily basis in agreement with West Suffolk Council.

#### Q. What will happen once the Development Brief has been finalised?

Once the Development Brief has been finalised upon completion of the public consultation process, the Development Brief will be submitted to West Suffolk Council. Once approved, it will become a material consideration in determining any future applications brought forward on the site.

### NATURE OF THE PROPOSAL

#### Q. Where is development proposed?

The proposed development site, outlined in red on the map below, 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.

[Location Plan of Site]

#### Q. What is proposed?

This Development Brief is intended to provide high-level guidance as to how the development of up to 50 dwellings can be achieved across the 4.5 hectare site. It also includes the creation of single priority junction with Fordham Road and the incorporation of public open space. Moreover, it incorporates the potential provision of a Mixed Use Games Area (MUGA) should the re-location of the existing tennis courts from their current position be acceptable. Future provision is also reserved for additional sports facilities.

#### Q. How will the proposed land uses be distributed across the site?

The Development Brief contains a single option as to how the development proposed may be laid out across the site – this indicative layout is presented as the ‘Preferred Option’.

The Preferred Option proposes the relocation of the tennis courts on land north-west of their current position, with the tennis courts being converted into a MUGA (Mixed Use Games Area). It also includes the availability of land for a future sports hall (to accommodate 4 badminton courts) should this be required. The remainder of the site will be developed for housing and open space.

It should be recognised that the west of the site is reserved for the provision of public open space with appropriate pedestrian/cycle connections to the surrounding area.

#### Q. How many homes will be provided on the site?

It is proposed that up to 50 homes will be provided on the site. This will result in a density of development at around 26 dwellings per hectare (dph). This density is compatible with the surrounding built form; for instance, Exning Road to the west of the site contains a density of 32 dph.

The final number of homes that will be provided will be confirmed within the subsequent planning applications and not this Development Brief.

**Q. What type of houses will be provided?**

The exact housing mix will be determined during the course of a subsequent planning application, following the approval of the proposed Development Brief. Nevertheless, any proposal will be required to deliver a variety of housing that is appropriate in order to comply with adopted planning policy requirements.

**Q. Will there be affordable housing?**

The proposal will be required to deliver a policy compliant level of affordable housing which equates to 30% of the total housing mix proposed. In practice, the provision of 50 dwellings on the site would result in the creation of 15 dwellings for the purposes of affordable home ownership.

**Q. Will there be open space as part of this proposal?**

Open space will be provided as part of this proposal – its spatial extent is denoted by the plans within the draft Development Brief.

In particular, the proposal represents an opportunity to convert private secured space into open space that is available for use by the general public. Combined with its integration to the adjoining George Lambton Playing Fields to its north through the provision of a new public access, the proposal will facilitate the creation of a recreation hub. Consequently, the recreation opportunities for the residents of Newmarket will be increased as a result of this proposed development.

**Q. West Suffolk Council has declared a climate emergency. How will the plans address this issue?**

The Development Brief contains a set of design principles to ensure that any new development arising on the subject site is sustainable and meets future climate achievement targets. By way of example, this includes the promotion of sustainable modes of transportation, construction standards and the use of integrated surface water drainage techniques.

In any case, the proposed development would need to comply with current and future planning requirements in order to ensure a sustainable development is delivered. For instance, Policy DM7 of the adopted 'Development Management Policies Document' (2015) requires proposals for new development to optimise energy efficiency through construction techniques and its overall design.

**Q. How was the site formerly used?**

The site was previously used as an educational establishment to accommodate middle school aged students. However, the St. Felix Middle School was closed in the summer of 2012 and has not been in active use since that time.

## **TIMING AND PROGRAMME**

**Q. When will the proposed Development Brief be submitted?**

It is anticipated that the proposed Development Brief will be submitted to the local planning authority around the end of 2021.

**Q. When will any potential planning applications be submitted?**

It is anticipated that any planning applications connected to the site will be submitted in Spring 2022.

**Q. How long does it take for planning applications to be determined?**

The Council attempts to determine larger planning applications, such as this one, within 13 weeks, although sometimes this process takes longer.

## PLANNING POLICY

### Q. What does the adopted Local Plan say about this site?

The site is allocated for the residential development of up to 50 dwellings under Policy SA4 of the 'Site Allocations Local Plan' (2019). This means that the principle of development on the subject site has already been established; in other words, the provision of residential properties on the land is already considered to be a suitable form of development by West Suffolk Council.

Having established the principle of development, Policy SA4 gives specific requirements for the allocated site which forms the basis of the project. These can be summarised as follows:

- The provision of strategic landscaping and public open space that is suitable for the individual site requirements and location (the latter must ensure connectivity from George Lambton Playing Fields);
- Ensuring that no adverse impacts arise on horse movements and other highway users within Newmarket, employing mitigatory measures where necessary;
- Making provision for the retention of the existing tennis courts, with appropriate access and connectivity provided; and
- Protecting and enhancing the amenity/biodiversity of the Yellow Brick Road Linear Park.

## TRANSPORT AND HIGHWAYS

### Q. How will the proposed site be accessed by vehicles and pedestrians?

The subject site contains two existing access points on its north-eastern and south-western boundary respectively, which both adjoin onto the A142 (Fordham road).

Vehicular access will replace the former north eastern access, with appropriate improvements made to ensure it serves the development proposal. The second existing vehicular access will be closed to vehicles but will still be utilised to provide cycle and pedestrian access.

There are a number of opportunities to integrate the site within the existing public right of way network to improve pedestrian and cycle links around Newmarket. This level of detail will be finalised in a subsequent planning application, but will include connections to George Lambton Playing Fields to its north and the Yellow Brick Linear Park to its west.

### Q. What impact will the proposal have in terms of traffic generation and congestion?

A Transport Statement is currently being prepared which sets out various transport issues relating to the proposed development, alongside identifying the measures that may be necessary to deal with the anticipated transport impacts on the scheme in relation to all modes of travel, including horse movements and the horse related industry.

It should be stressed that upon submission of a future planning applications the respective Highways Authority will assess the acceptability of the plans proposed, including the Transport Statement. It is the role of the Highways Authority to ensure that any proposed developments do not have any unacceptable impacts on highway safety or severe residual cumulative impacts on the road network.

### Q. How can sustainable modes of transportation be encouraged?

There is a good level of provision in terms of public transportation through both public bus services and Newmarket Train Station. In regard to the former, there are bus stops positioned immediately

adjacent to the site allowing for sustainable travel along Fordham Road that connects with the centre of Newmarket and surrounding settlements. Concerning the latter, Newmarket Train Station provides the opportunity for commuting and leisure trips to large urban areas such as Cambridge and Bury St. Edmunds.

Moreover, Newmarket Town Centre is considered walkable or cyclable 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.

Based upon the above detail, it is considered that the future residential occupiers of the allocated site will have several viable options to travel sustainably by non-vehicular modes of movement.

#### Q. How many car parking spaces will there be for the people living in the houses?

The exact number of vehicular parking spaces will only be decided during the submission of a future planning application. However, it can be confirmed that any scheme will be required to comply with the parking standards within the 'Suffolk Guidance for Parking: Technical Guidance' (2019).

In this respect, the standards require a minimum of 1 space per 1-bedroom dwelling, 2 spaces per 2/3-bedroom dwelling, and 3 spaces per 4+bedroom dwelling. An additional 0.25 spaces per dwelling are required as unallocated visitor provision. Therefore, the total number of vehicular spaces required will depend upon the number and type of dwellings proposed.

#### Q. Does the proposal include cycle parking spaces?

It can be confirmed that the proposed development will include provision for cycle parking spaces. Although this detail will be elaborated in a future planning application, it is anticipated that this will be catered through garage or shed storage to ensure secure cycle provision. If apartments are included as part of the final housing mix, secure cycle storage will ideally be provided within the building itself. This guidance is in compliance with requirements as per the 'Suffolk Guidance for Parking: Technical Guidance' (2019).

## ECOLOGY AND TREES

#### Q. What is the main wildlife and ecology found on the site?

A Preliminary Ecological Appraisal (PEA) report has been undertaken in support of this Development Brief. A PEA is an initial assessment which assess the potential of a designated land parcel to support protected species based upon the habitats present.

The PEA report identifies the site as comprising primarily of grassland with species-rich hedgerow and trees, alongside existing buildings and hardstanding. It found that these habitats have the potential to support foraging bats, nesting birds, Badger, Hedgehog and invertebrates.

#### Q. How will potential wildlife be protected as part of the proposal?

The Preliminary Ecological Appraisal (PEA) report has outlined a series of recommendations that the final development scheme should adhere to in order to prevent any adverse impacts upon any protected species. This includes, for example, the placement of log piles for invertebrates. A more detailed consideration of these matters will be given during a future planning application.

#### Q. Will the level of biodiversity on the site increase as a result of the proposal?

Any future planning application will be required to secure an overall increase, or net gain, in biodiversity. This will likely include the proposal including more habitat area and better-quality habitat within the proposal than what currently exists on the former St. Felix Middle School site.

**Q. Will there be any impact on ecology or wildlife, including protected sites, within the wider area?**

There is one nature conservation site with statutory designation, and three non-statutory designated nature conservation sites within 2km radius of the site. However, there will not be any impacts upon these identified sites as there is no potential habitat connectivity between them.

**Q. What impact will there be on existing trees positioned on the site?**

The site is framed on all boundaries by established trees with accompanying hedgerow. Internally there are several bands of mature trees which subdivide the site between the former playing fields (now proposed as public open space) and the previously developed component (now proposed for residential development). The diagram below shows the spatial extent of the identified trees.



It is expected that the trees bordering the site will not be removed as part of any proposal due to their position within the site. In comparison, it is anticipated that some trees located in the centre of the site may need to be removed to facilitate the proposed development. Nevertheless, the quality of these trees is only moderate at most.

**Q. How will the remaining trees be protected during the construction process?**

A 'Tree Retention Plan' and 'Tree Protection Plan' will be designed once the layout of the development area has been finalised at a future planning application stage. This will ensure appropriate protection is in place to the relevant trees before any construction works proceed on site.

## **FLOODING AND DRAINAGE**

**Q. Is the site liable to flooding?**

According to the Environment Agency's indicative floodplain mapping, the site is classified as being within Flood Zone 1. This means that there is a low probability of river (fluvial) and/or tidal flooding (less than 1 in 1,000-year annual probability of river and sea flooding (<0.1%) in any year).

The same mapping tool also indicates that the majority of the site is also not susceptible to surface water (pluvial) flooding). Any residual risk from surface water risk is restricted to the western edge of the site by virtue of an existing watercourse.

#### Q. How will the risk of flooding be managed on the application site?

This will be managed by virtue of the developable area being located away from the areas to be at risk of flooding. Nevertheless, a subsequent planning application will be required to be accompanied by a Sustainable Urban Drainage System (SuDS). Its purpose will be to ensure that any surface water created by the development proposal will be controlled and thus not increase the risk of flooding off-site.

It will seek to utilise a range of features such as storing water in natural sources (such as basins or ponds). The exact details of the sustainable urban drainage systems deployed will be fully detailed at the planning application stage.

### CONTAMINATION

#### Q. Is the site contaminated?

An initial site appraisal has been undertaken which did not identify any contaminant concentrations at a level that would be detrimental to human health. A low risk of contamination associated with the former electrical substation was detected, but samples gathered nearby did not identify any elevated contaminant concentrations.

### NOISE

#### Q. Will the site be susceptible to noise impacts?

There are no notable noise sources within close proximity of the site with exception vehicular movements on the Fordham Road. This will be addressed through standard glazing specifications to new dwellings.

### HERITAGE

#### Q. Are there any heritage assets within or in close proximity to the application site?

There are no heritage assets within the application site itself, but 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. Newmarket Conservation Area is also situated approximately 150 metres to the south-east of the site. Given their distance from the site impacts are considered unlikely.

### ARCHAEOLOGY

#### Q. Is the site important for archaeology?

A desk-based study of the currently available evidence has identified that there may be archaeological remains across the site. This is due to the former use of the site as arable land during the medieval and post-medieval periods. However, these are not likely to be of sufficient significance as to warrant preservation in situ.

Any planning application 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

### INFRASTRUCTURE

Q. How will the proposed Masterplan impact upon existing infrastructure provision?

During the formulation of the proposed Development Brief there has been no identification of immediate infrastructure constraints that would preclude development from proceeding on the application site.

It is of course recognised that proposed developments of any size place an increased requirement in terms of local infrastructure and, the proposed development will be required to provide financial contributions towards the provision or expansion of infrastructure, related to the impacts placed, during the planning application stage.



# Phase 2

PLANNING &  
DEVELOPMENT  
LIMITED