



9 am to 4 pm Mondays to Fridays

Planning Policy and Delivery Team  
East Suffolk House  
Station Road  
Melton  
Woodbridge  
IP12 1RT

1 November 2017

Dear Cllr Fryatt,

### **Local Plan Review Issues & Options Consultation**

Thank you for the opportunity to respond to the Suffolk Coastal District Council Local Plan Review Issues & Options Consultation.

Felixstowe Town Council has carefully considered the consultation documents and our full response to the consultation questions is provided on the pages following this letter. In addition, the Town Council wishes to submit the following as part of this response:

The Local Plan Review document suggests three scenarios for housing growth to 2036.

Members of the Town Council discussed the need for a robust Local Plan which can stand up to scrutiny and successfully reject inappropriate speculative planning applications. It is also critical that appropriate infrastructure is delivered in a planned way to meet the needs of Felixstowe and its community. Town Council is therefore supporting Scenario C, the infrastructure delivery-led scenario, as follows:

*If a carefully considered infrastructure-led approach can deliver a credible authoritative plan, growth should be planned on this basis in order to steer appropriate and sustainable developments with a sense of place and community with the ability to create the essential infrastructure required.*

Though the Town Council favours a housing distribution option that combines elements of all three of those put forward in the document, the Local Plan Review Issues & Options document suggests that the maximum number of houses that Felixstowe, plus the Trimleys, would be required to deliver under Scenario C, Option 4 is 1,479<sup>1</sup>

Q.143 asks "Which sites do you consider appropriate for future consideration by the Council"

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<sup>1</sup> <http://www.eastsuffolk.gov.uk/assets/Planning/Suffolk-Coastal-Local-Plan/Local-Plan-Review/Issues-and-Options-Consultation/Issues-and-Options-for-the-SCDC-Local-Plan-Review-document.pdf> Page 41, Table: Option 4 - Continuation of existing approach (Suffolk Coastal), final column)

In part of its response, the Town Council has suggested the following plots as potentially viable:

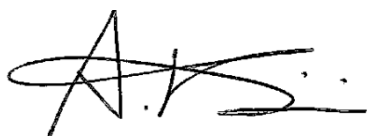
<b>Plot no</b>	<b>No. Houses</b>	<b>FTC considers potentially viable</b>
625	59	Application now in for mixed development of 59 dwellings with commercial ground floor use
644	570	Site has Outline permission for 570 homes granted by Secretary of State
800	247	Only as part of a carefully and strategically planned development, well-related to the town and its links with Plot 644 which has Outline permission for 570 homes
801	174 (est. 5.8ha. @ 30pha.)	Only as part of a carefully and strategically planned development, well-related to the town and its links with Plot 800 and Plot 644 which has Outline permission for 570 homes
802	114	Only as part of a carefully and strategically planned development, well-related to the town and its links with Plots 800 and 801 and Plot 644 which has Outline permission for 570 homes
941	122	Former high school site, well related to the town
1091	54 (est. 5.8ha. @ 30pha.)	Could provide housing if local re-provision of leisure facilities is guaranteed
<b>Total</b>	<b>1,340</b>	

The total housing that could be delivered from the plots listed above is believed to be at around 1,340 (an average of approx. 75 homes per year from 2018-2036). Subject to further consideration of the housing distribution options for the district as a whole; under Scenario C, Option 4, a further 139 homes could be required and it is expected that this would be achieved in conjunction with Trimley St. Mary and Trimley St. Martin.

Thank you for the opportunity to have been consulted at this early stage in the Local Plan Review process. The Town Council welcomes any opportunity to help Suffolk Coastal District Council plan for and shape the future of Felixstowe as a successful, vibrant, attractive town, where people want to live, work, study, visit and play.

We look forward to hearing from you in due course.

Yours sincerely,



Ash Tadjrishi  
Town Clerk

## Local Plan Issues and Options Consultation – Response from Felixstowe Town Council.

Q	Question	FTC Response
1	Are there any other issues that the Local Plan should consider?	<p>The sustained health and viability of the Port of Felixstowe.</p> <p>Social Housing.</p> <p>Innovative use of SCDC/authority owned land.</p>
2	What are the advantages of your area that should be protected through local plans?	Felixstowe's unique position as a modern and thriving coastal resort, its heritage and quality building, the Landguard peninsula, the AONB, its estuarial character and countryside. The strength of its vibrant town centre.
3	What are the disadvantages of your area that the local plans could try to address through the way land is used or developed?	<p>There are clear land constraints for any future expansion projects for the port and associated logistics which need to be carefully planned for.</p> <p>Being on a peninsula, accessibility by road and rail is key. The Orwell Bridge has limited capacity and resilience. Local Plan should provide for an Ipswich Northern Bypass.</p> <p>Felixstowe has a lack of diversity of employment opportunities.</p>
4	What are the key priorities you would like to be addressed by 2036 – in the places across Ipswich and Suffolk Coastal where you live, work or study?	<p>Upgrade of Seven Hills and Foxhall roundabouts.</p> <p>An Ipswich Northern Bypass</p> <p>Upgrading freight capacity and passenger rail services.</p> <p>Improving links across the Deben and Orwell rivers.</p> <p>More affordable homes.</p>
5	What is your vision for the Ipswich HMA and Ipswich FEA by 2036?	To support the development of Felixstowe, east of Ipswich and Martlesham as thriving communities which retain their own social and geographic identities.
6	Which growth scenario should we plan for across the Ipswich Housing Market area?	If a carefully considered infrastructure-led approach can deliver a credible authoritative plan, growth should be planned on this basis in order to steer appropriate and sustainable developments with a sense of place and community with the ability to create essential infrastructure required.
7	Do you have evidence to suggest that the housing and/or jobs targets should be different from the forecasts or scenarios outline above - either higher or lower?	There are widespread indications and statistics relating to insufficient housing supply nationally.

8	Would communities be prepared to accept more growth if that growth meant that significant new or enhanced infrastructure could be provided?	Yes. If carefully planned and well-related to the town.
9	What key pieces of transport infrastructure should be sought? Would it be roads such as an Ipswich northern route, or sustainable transport infrastructure (public transport, park and ride, cycling), or both?	Ipswich Northern Bypass to trunk road standards. Rail improvements are required to address all of the constraints of the freight rail capacity. Roads improvements to the Seven Hills roundabout and Martlesham complex. Sustainable public transport and cycle links from Felixstowe to Ipswich. Adequate car parking in retail and other centres.
10	Should the Local Plan Review seek to address the issue of temporary closure of the Orwell Bridge by planning for a scale of development that can help to deliver infrastructure?	Yes.
11	Do you agree that providing a high growth scenario would help to deliver the affordable housing required?	In conjunction with robust policies, yes.
12	Are there alternative scenarios which should be considered?	No.
13	Which distribution options do you think would be most appropriate to take forward?	An approach which combines elements of options 4,5,6 whilst retaining in principle a clear separation between Felixstowe and Ipswich. Options 4 and 5 preclude the rural economy. Option 6 has inadequate provision in the Felixstowe and Ipswich areas. All options currently indicate inadequate provision in other major district centres.
14	Are there any other distribution options that the Councils should consider, including across the whole of the Ipswich Housing Market Area?	See Q13.
15	Should the spatial distribution of jobs growth align with housing growth or should we take a different approach which focuses on improving accessibility between homes and work places?	They are mutually complementary.
16	Do you have evidence which indicates that building at higher densities in Ipswich and Suffolk Coastal would be viable financially?	No.

17	Should the policy approach of maintaining the physical separation of villages from Ipswich be continued or should infill in gaps between settlements be considered a source of housing land?	Yes, in principle.
18	If development cannot be accommodated within Ipswich, should it be focused within the communities close to Ipswich or distributed within the larger Ipswich Housing Market Area? What criteria should guide its location?	See 13.
19	Should Ipswich switch employment land to housing use, even though the Borough has a high jobs target? where should the Council prioritise protecting employment land?	No comment submitted.
20	Is there other land within Ipswich Borough which should be considered for residential development? Is the approach to protecting open space the right one?	No comment submitted.
21	Where do you think the most appropriate locations are to meet this need?	No comment submitted.
22	Which town centres should we plan to expand	The Felixstowe Peninsula Area Action Plan addresses this question, seeks to improve and enhance the link between Felixstowe town centre and the seafront and should be retained.
23	Are there town centres that should be reduced in size	Felixstowe Town Centre should be preserved and further enhanced in line with the aims of the Felixstowe Peninsula Area Action Plan.
24	Which sites should be identified through the Local Plan reviews for future retail growth?	Haven Exchange. A general objective to retain existing sites for retail and/or leisure use should be considered where feasible.
25	How do we increase the range of uses or activities in Ipswich town centre, given its role as a regional centre, and what should they be?	No comment submitted.
26	What range of uses or activities would you like to see in the smaller town centres?	Town centres should be developed in accordance with their own local character with a strong sense of place and as destinations in their own right.
27	What approach should be taken to further out of centre shopping? Does out of centre shopping complement or compete with the existing town centres?	Out of town shopping may compete with town centre offers and therefore a mutually complementary approach should be taken. Town centres however are able to offer a flexible, high quality experience with a sense of place.

28	Should the existing retail parks be considered as centres in their own right, or should town centres continue to be the first choice location for new shops and leisure uses?	Both of these are appropriate in different circumstances.
29	What infrastructure is currently required in your area and what additional infrastructure do you think would be needed, and where, to support the future distribution and levels of growth outlined?	Upgrading the A14, widening Candlet Road; Sewerage; Electricity supply upgrade especially around Port area; Broadband; Mobile phone coverage.
30	How can the strategic transport connections be enhanced and improved?	Seven Hills roundabout should be upgraded. Work with rail authority to increase capacity for freight. Another relief road should be sought.
31	In which areas should “super surgeries” be considered?	Walton Surgery needs upgrading and will received increased demand The premises need improving and the number of doctors needs to be increased.
32	Is there a need for additional education provision in certain areas of the Housing Market Area, including early years and special educational facilities, and if so what is the need and where?	One or two more primary Schools in the Felixstowe/Trimley area with pre-school provision attached should be provided. Future capacity of Felixstowe Academy needs to be planned for.  Felixstowe needs a college specialised in training for associated commerce such as tourism, shipping, engineering and port-related careers.
33	What kind of outdoor recreational spaces would you like and where should we locate them to reduce pressure on the more sensitive coastal areas? What other measures could be put in place to protect sensitive environments?	There is a need for easily-accessible informal recreational green spaces in Felixstowe that are well-located for all residents.  Each new housing development should also have its own green space.
34	What makes a successful community in Suffolk Coastal?	An evolving place where diversity and development has been successfully managed.
35	What services/facilities/developments are needed to make a community successful?	Capacity and appropriate range of health services, opportunities for informal and organised leisure activities, safe and well maintained road and rail network, good private and public transport links, education, policing etc... etc...
36	What is your vision for your local community?	That Felixstowe is a successful, vibrant, attractive town, where people want to live, work, study, visit and play.
37	How should the Council define housing requirement figures for Neighbourhood Plan groups?	N/A



38	Are the existing policy approaches and planning policies operating appropriately in relation to affordable housing?	No. 'Viability' is frequently used as an argument to undermine the policy. This is not helped by national policies.
39	Is the existing affordable housing policy coverage and scope sufficient? Do you have any suggestions for what else might be included in a comprehensive approach to affordable housing?	No. The concept and meaning of affordable housing needs to be clearly defined in policy so that it is easy to understand. Money should be freed up for social housing. There are also other forms of low-cost housing which do not meet the current planning criteria for affordable housing. East Suffolk should build local authority housing in the Suffolk Coastal area. A variety of options need to be considered to meet demand, such as innovative housing projects, good quality factory built housing and covenants restricting sale price of starter homes to keep them affordable.
40	Where provision for affordable housing on an 'exception site' is supported by, and can be shown to meet the needs of, that local community should planning policy be sufficiently flexible to allow for this?	Yes, having regards to the particular circumstances of the site.
41	Should we continue to allow market housing to enable the delivery of affordable housing where the financial viability of a development is challenging?	The affordable housing policy should be rigorously applied and only waived or relaxed in exceptional circumstances. S106, CIL or commuted sums should be reinvested in the community from which they originate.
42	Do you consider it appropriate for the Council to consider directing growth to a cluster of villages?	Yes. This can spread the pressure across the villages and enable them to thrive.
43	What criteria should be used to identify a cluster of villages?	Separate villages with a mutual dependence on key services such as GPs, Dentists, Schools, Pubs, Shops, Post Offices and other community essentials, that can be well connected by roads and footpaths.
44	How can the Council encourage the provision of fully serviced building plots for self build/custom build properties?	By creating a policy that enables some plots to be provided outside settlement boundaries thereby avoiding the creation of 'hope value' and managing developers' expectations.
45	Should these serviced plots be provided as part of a larger housing development?	Possibly. Subject to the circumstances of any particular site.
46	Should we continue with the current policy approach to housing size or take a more flexible approach that reflects the site location and characteristics?	Policy should consider how the site can meet local demand/need and be regularly reviewed to ensure the appropriate mix.

47	How can the Local Plan promote an increase in smaller units to meet specific needs?	Potentially by earmarking appropriate sites for higher density developments.
48	What more could be done to help ensure that more housing is provided specifically to meet the needs of older people, or those with specialist care needs?	There should be a comprehensive survey of current needs and trends to ensure that demand can be adequately planned for. It should set out how the plan meets any aspirations for improved social care provision.
49	Should starter homes be part of the type and mix of units required?	Yes. Local Plan should have a specific policy to ensure these must remain as starter homes. Consider removal of Permitted Development rights as a condition on starter homes.
50	Should the Council encourage greater use of modular construction to provide a range of residential accommodation?	Yes
51	Should specialist housing be delivered on specific sites or alongside other forms of residential development?	Alongside other forms of residential development. Integration is beneficial.
52	Are there any other specific types of residential use that need to be planned for?	HMOs Trailer Homes Houseboats
53	The district contains a small number of houseboats. Existing planning policies limit the areas within which houseboats are permitted and the number of houseboats within those areas. Do you think this type of approach remains appropriate?	The Felixstowe Peninsula Area Action Plan reflects our views.
54	Should the physical limits boundaries be tightly defined around existing built development or more loosely defined to allow for small scale development in communities?	Physical limits boundaries do not have to be tightly drawn and could take the shape of a 'rubber-band' around the settlement if the concept of boundaries is to be retained.
55	Can criteria based policies more appropriately deal with growth in the rural areas than physical limits boundaries?	This should be investigated further to determine practicality.
56	Do all settlements require physical limits boundaries?	No
57	Do you think the current policy approach to development in housing clusters is working successfully or does it need to be amended?	Needs amending to provide greater flexibility according to specific local circumstances.
58	How should the Council consider applications for the re-use of redundant buildings in the countryside?	The objective should be to primarily sustain the social and economic vitality countryside communities.



59	Should the Council introduce a sequential approach to the re-use of redundant buildings with priority given to, for example employment or tourism use?	Yes.
60	Should we continue to identify both strategic and general employment areas?	Yes. Strategic employment areas in Felixstowe should be defined Port-related operations and its expansion. General employment areas which are not suitable for heavy industries should be identified. E.g. Bridge Road and Carr Road in Felixstowe.
61	Should we continue to stipulate the uses on sites allocated for employment or should policies be more flexible to allow a wider variety of uses?	In accordance with our comments to Q60, some flexibility of use classes can be accommodated to support the growth of new and existing business and enterprise.
62	Should planning policies take a flexible approach to new employment development where there is an identified need by allowing development outside of allocated sites and physical limits boundaries?	The new plan should fully accommodate the expansion of the Port as it is recognised that the Port is running out of land. However, it is essential that Port-related operations and the town remain separate. The Local Plan should provide for this insofar as possible with a flexible approach to new employment opportunities so as to not stifle growth.
63	Should the Local Plan allocate more land than is required for employment uses or should we only allocate what is needed?	The Plan should be prepared to allocate land for employment use if required.
64	What land is required to support the main economic sectors across the district?	Businesses, in particular logistics should have adequate land provided both in SC and neighbouring areas to accommodate need.
65	In which locations or specific economic sectors would a co-locating policy be appropriate?	Particularly appropriate in the Port Area.
66	Should the Council continue to identify rural employment sites?	Yes and protect them where it is possible to do so.
67	What criteria should be used to define a rural employment site?	Uses which are commensurate with the rural community served by the site.
68	Are the existing boundaries of town centres, primary shopping areas, primary shopping frontages and secondary frontages still appropriate?	Yes, as per existing boundaries which were amended during the Area Action Plan process (FPAAPP 13) and shopping frontages are still appropriate.
69	What areas or locations should be considered for inclusion or exclusion from these boundaries?	None.
70	Should the Council introduce a local impact assessment threshold to help demonstrate no impact on existing town centres in an objective way?	Yes.

71	Should the Local Plan continue to protect retail provision within district and local centres?	Yes, in Felixstowe & Walton. There should be some controls but diversification will be needed to ensure shops remain occupied.
72	What uses are appropriate within district and local centres?	Retail, catering, commercial, professional services, offices (A1- A5 & B1) but industrial (B2-B8).
73	What areas or locations should be considered for inclusion or exclusion from a district or local centre?	As new developments come along, it may be beneficial to provide new district centres which link well with the new housing provision.
74	Are there particular opportunities in relation to commercial leisure across the district?	A new Sports and Leisure Centre for Felixstowe should provide opportunity for a wide variety of activities. Other commercial leisure such as tenpin bowling, ice/roller skating and resort attractions should be considered too.
75	Do the existing Local Plan and Neighbourhood Plan policy boundaries assist opportunities for accessible new leisure provision?	Question is not applicable to Felixstowe which does not have a Neighbourhood Plan. The Felixstowe Peninsula Area Action Plan covers most of the issues which would otherwise be covered by a Neighbourhood Plan.
76	What is a successful mix of retail and commercial leisure uses across the district?	Felixstowe should be able to provide a wide range of attractive retail and leisure facilities which does not lead to its residents/customers being required to travel great distances from the town.
77	Where is the best place for new retail development to meet the needs of areas east of Ipswich?	Sites such as the Haven Exchange, Anzani House & Routemaster sites should be considered for retail purposes which could potentially include a major hotel.
78	Does out of town retail at Martlesham affect your town centre or local area? If so how?	Yes. However the town centre does already have, and will continue to development a diverse offer which does not directly compete with retail parks such as Martlesham.
79	Are the existing policy approaches and planning policies operating appropriately in relation to retail?	Policies should be modernised to recognise innovations in the ever-changing retail landscape.
80	Is the existing town centre and leisure policy coverage and scope sufficient? Do you have any suggestions for what else might be included in a more comprehensive approach?	Current policies are sufficient.
81	What specific types of tourism accommodation are required across the district and in which locations?	Tourism in Felixstowe is different to other parts of the District and the variety on offer across the whole of the town should be taken in to consideration, not just the seafront area. From caravans, self-catering and AirBnB type options to budget and luxury hotels. The objective should be to provide a variety of accommodations which can appeal to a range of tourists and promote longer stays in Felixstowe.

82	Should tourist accommodation be encouraged across the whole district or just in specific areas?	Yes, across the whole District. Different areas of SCDC offer different opportunities for tourism which, as a whole, mutually complementary for the region. Self-catering accommodation should be encouraged in a wide variety of locations.
83	Do we need to protect existing tourist accommodation from conversion and redevelopment to other uses?	It would be preferable to protect existing tourist accommodation from conversion/redevelopment; however we question whether this is achievable through policy alone.
84	What is the most effective way of ensuring that tourism accommodation is not occupied for full time residential use?	Introducing a zoned policy such as in the original local plan & strengthen the policy to prevent change of use in prime tourism areas (i.e. seafront). Continue to enhance the tourism offer within the town, improve transport links.
85	How can planning policy better facilitate the development of tourism attractions to support the resort of Felixstowe?	Consideration should be given to the nature and type of attractions that would work in the different areas of Felixstowe and the policy should define this in order that such development can be appropriately guided.
86	What type of resort activities will help extend the tourism season and increase visitor spend?	A wide range of events, especially those which support tourism outside of the summer season e.g. improved modern leisure centre facilities that are able to accommodate an expanded variety of commercial and informal leisure activities, cycling, walking & animal watching and more events throughout the year. Exhibition/conference centre. More activities for the 16-25 age group.
87	Do we need a different approach to tourism development in the AONB as opposed to areas outside the AONB?	Yes.
88	Are the current SCC parking standards appropriate in the context of Suffolk Coastal? If not, what changes would you wish to see and why?	Currently unrealistic. New developments should consider appropriateness of underground/undercroft parking for efficient use of land.
89	Is the need for and the importance of, vehicle parking sufficiently reflected in existing planning policies?	No. More thought needs to be made to peripheral parking and, as Felixstowe develops, the possible benefit of a Park and Ride provision.
90	Should we continue to protect all existing community services and facilities?	Yes, to meet existing and future need as the population of the town increases and changes. It is vital to retain community centres, nurseries, Felixstowe Community Hospital, the library and fire service.
91	Should some types of services and facilities be given more protection than others?	Depending on community need but as Felixstowe is the largest urban area in the District, preservation of large informal open space is essential. Vital to protect are hospital, fire Service & police service.

92	Where it is not possible to retain the existing community use should we require an alternative community use to be investigated prior to allowing redevelopment?	Yes.
93	Which areas lack appropriate provision of community facilities?	Depends on future developments, i.e. facilities may not currently be lacking but need should be assessed ongoing. Enhanced provision of social services and mental health support for the town should be considered as new developments increase pressure on services.
94	Should the Council continue to CIL or section 106 agreements or a mixture of both?	A mixture of both.
95	Should specific sites be allocated for community facilities?	As may be necessary if need is shown.
96	Should future Local Plan policies provide greater protection for facilities identified as assets of community value?	Yes.
97	How can the Local Plan assist the enhancing and re-development of modern leisure centres and sports hubs facilities across the district?	Discussion should be had regarding the relocation of existing facilities. The need for open spaces to be preserved, enhanced or otherwise re-provided locally for recreational use is essential.
98	What policies are needed to ensure that appropriate leisure provision is provided across the district?	As stated in the Area Action Plan, existing provision – including informal recreational open space - should be protected and enhanced to meet growing local demand.
99	Is the provision of a new modern leisure facility for Felixstowe, enabled through the redevelopment of the existing facilities for other uses, better than seeking to refurbish the existing ageing leisure facilities?	Yes – if there is potential for state-of-the-art facility such that bigger County/UK/international sports events could be held – this would increase tourism and attract visitors from a much wider catchment area. Any provision needs to be easy to access, provide ample free parking and not exacerbate local traffic issues. Any new facility should remain well-related to the resort. If the seafront leisure centre is replaced the area must be prioritised for an attractive modern development which will increase facilities for tourism activities (e.g. resort leisure, visitor attractions, bars, restaurants, cafes).
100	Should we continue with the existing standards, or should the provision of new open space and play space be guided by the deficiencies identified in the Leisure Strategy?	Open space is adequate at present but essential.

101	What type of facilities/provision should be considered as Open Space?	Parks, play areas, trim trails, walking routes, skatepark, sports grounds, Landguard Common, AONB, Clifflands/Brackenbury, Seafront Gardens, Millennium Wood.
102	Under what circumstances may it be acceptable to allow the loss of open space to development?	Only acceptable if open space/park is utilised in a way that benefits the town as a whole and is re-provided in convenient locations for both existing & new developments.
103	What type or size of development should provide new on-site Open Space?	Needs to be determined in the context of existing provision and other forthcoming new developments.
104	Which areas of the district experience deficiencies in health facilities?	Facilities are currently under pressure and challenged. With potential further growth there will be a need for additional capacity and provision of adequate health services in Felixstowe.
105	How can the Local Plan Review further promote the provision of high speed broadband and communication networks across the district?	The provision of new transmitter masts should be encouraged. Medium & large new developments should include provision for fibre broadband facilities. FM radio must be retained. There is currently a deficit in DAB radio and mobile phone coverage in Felixstowe.
106	How can the Local Plan Review create safe and accessible communities which do not undermine the quality of life across the district?	Infrastructure – roads, connectivity with public transport. Making it viable for increasing public services and a mix to ensure leisure facilities & green space.
107	Should we continue with the CCMA existing policy approach?	Yes, CCMA's should only be applicable to areas "likely to be affected by physical changes to the coast" (NPPF para 106). That is not the case where SMP policy is to "Hold the Line". Hence we believe that CCMA details are not relevant for Felixstowe as we expect an ongoing policy of 'Hold the Line' for the town.
108	What types of development should be considered appropriate within a CCMA?	Not relevant for Felixstowe as we expect an ongoing policy of 'Hold the Line' for the town.
109	Should the CCMA boundaries also be redrawn to reflect the topography and infrastructure?	Not relevant for Felixstowe as we expect an ongoing policy of 'Hold the Line' for the town.
110	If required, should the Council proactively allocate land for the relocation of property at risk from erosion?	Not relevant for Felixstowe as we expect an ongoing policy of 'Hold the Line' for the town.
111	Could houseboats, floating homes or caravans be used as an alternative or temporary means of rehousing those affected by coastal erosion?	Not relevant for Felixstowe as we expect an ongoing policy of 'Hold the Line' for the town.

112	How can the council attract buy-in from coastal business owners to contribute to the costs of coastal protection?	In the future, the Hold the Line policy may no longer attract 100% funding from government under the current Partnership Funding policies. While, due to recently completed defence schemes, this is not expected to affect Felixstowe in the short term, SCDC should maintain a record of relevant economic data for future cost-benefit analysis so that it may be able to demonstrate the value of coastal protection works to business.
113	Should the CCMA be defined in an area where the SMP policy is to 'hold the line', subject to evidence of how coastal protection can be funded in this area?	No. The role of CCMA's is to carefully manage or restrict development in undefended areas, not the provision of funding in "Hold the Line" areas. See Q112 above
114	What wider sustainability benefits to the community could justify development taking place in an area of flood risk?	The new Local Plan should contain policy to clearly interpret "appropriate" to encourage regeneration of declining areas, to avoid undevelopable "waste land", to support the health and vitality of the town and similar. However, there should be clear policies to ensure that any such development is safe, e.g. for residential property always an escape route to first floor level, and constructed or modified using Flood Resilient techniques. Policy should recognise that the modern coast defences of the town ensure an extremely low risk of a flood event, but that any exceptional event could involve serious flooding, which should be taken into account in design of development as above.
115	Are there any particular uses that land at risk of flooding could be used for?	Most commercial and recreational uses could be suitable, given proper flood response plans. Equally, within existing protected communities such as Felixstowe appropriately designed residential accommodation, as above (see Q114) may be considered for planning permission having regard to the suitability of the setting and any other environmental factors.
116	Should the Local Plan Review identify sites for renewable energy development across the district? Which areas across the district would be appropriate and for which types of technology?	Renewable energy (such as wind, solar, wave, battery storage technologies etc.) should be encouraged through the Local Plan where appropriate sites can be identified.
117	How can the Local Plan Review encourage new residential developments to reduce carbon emissions?	Encourage energy efficient building, heat and light, waste and recycling etc.



118	Should the Local Plan Review require other kinds of development like employment, retail, leisure and tourism to meet higher standards of energy efficiency?	This should be encouraged but not mandated by local policies.
119	How can we improve the design and quality of estate scale development?	Encourage developers to be more creative. The council should be more proactive in matching quality developers to potential development projects. Developers should be provided with an outline design brief for each area.
120	How can we improve design quality through planning policy?	See 119. Mandate the use of high-quality materials. Discourage standard 'national housing' designs.
121	How do we promote locally distinctive design?	Discourage large housing developers from using national standard designs.  Encourage quality materials and diversity of design.
122	Is it possible to secure high quality design which is locally distinctive through factory build development?	Yes. The techniques can be applied to any shape and size.
123	Should large scale developments be required to follow the "Garden City" principles?	Encourage Garden City principles in appropriate circumstances
124	Should the principles of "Building for Life 12" be used as a tool to improve the design quality of new development?	They are a tool but not the only tool.
125	Should local housing densities be set for new development?	They should encourage efficient use of land, commensurate with the site setting etc.
126	Should different design principles be applied to housing developments at high/low densities? For example, avoid using detached housing at higher densities in order to maintain sufficient space between buildings?	Yes. No one pattern fits all.
127	When would development of residential gardens be inappropriate?	When it is not in keeping with the street scene, or would result in a cramped form of development. In accordance with current principles under DM7.
128	Should the Council adopt additional optional standards in respect of accessibility, internal space and water efficiency?	No. The market should determine these needs.
129	What should be included in a positive strategy for the protection of heritage assets across the district?	Clearly define the heritage assets first, then have policies that seek to protect them, without being overly restrictive to avoid them falling in to disrepair.

130	What does the Council need to include in a positive strategy for the protection and enhancement of heritage assets?	See 129.
131	What level of protection should be given to non-designated heritage assets and locally listed buildings?	None.
132	Is a Landscape Character approach to considering the impact of development on the landscape preferable to retaining Special Landscape Areas for this purpose?	Yes.
133	Other than those protected as part of the AONB and Heritage Coast, which other sensitive landscapes require special protection?	Landguard Common and Nature Reserve; Listed Buildings, Conservation areas and SSSIs.
134	Should areas of tranquillity be identified and protected and if so, which areas should be considered?	No, but there should be criteria by which tranquillity could be measured in judging applications for areas such as Landguard Peninsula, the Grove and its immediate environs.
135	In which areas should development be resisted to avoid settlement coalescence?	Separation space between the Trimleys and Felixstowe should be retained where appropriate.
136	Which areas require special protection from development?	Landguard; the Deben side of the A14; Eastward Ho; SSSIs, Conservation Areas and AONB.
137	Do breaks and gaps in-between buildings need to be given specific protection against development?	No. Each case should be assessed on its own merits.
138	Should development be promoted in areas which are deficient in Green Infrastructure provision with respect to biodiversity and geodiversity?	No.
139	Should the Council explore further options to work collaboratively with neighbouring authorities and Natural England to determine a consistent policy approach to biodiversity and geodiversity?	Yes, it is hoped that this is already being done.
140	What level of protection should be given to locally designated sites of biodiversity value?	Appropriate protection should be given according to the circumstances of each particular site.
140a	Should the Council consider a policy which requires the creation of new habitats and enhancement of wildlife corridors on new development sites?	Yes
141	Do you have any suggestions for local plan policies to support biodiversity retention and enhancement?	There should be a local plan policy to recognise areas whose circumstances have created biodiversity, such as the Dockspur Roundabout

142	Do you have any other comments on how current Local Plan policies are working and whether they need to be amended?	Current policy does not go far enough to ensure that developments are built in a timely manner following permissions being granted. Firm delivery schedules should be mandated.
143	Which sites do you consider appropriate for future consideration by the Council? (Q143)	<p><b>FTC Rules out</b></p> <p>Plot no 144: No - Unsuitable for housing. Retain for retail/business</p> <p>Plot no 338: No - Unsuitable for housing. Should be retained for commercial use.</p> <p>Plot no 413: No - Unsuitable for housing. Retain for tourism/resort</p> <p>Plot no 623: No - Unsuitable for housing. Prime resort use</p> <p>Plot no 624: No - Unsuitable for housing. Prime resort use</p> <p>Plot no 631: No - Unsuitable for housing. Proximity to the AONB</p> <p>Plot no 633: No - Unsuitable for housing. Within the AONB</p> <p>Plot no 750: No - Relates poorly to the town, across dual-carriageway and number of houses far exceeds all requirements when forthcoming developments are added. Consideration of this land must not come before other, more appropriate developments. Revisit in next plan period.</p> <p>Plot no 935: No - Unsuitable for housing. Retain for tourism/resort</p> <p>Plot no 936: No - Unsuitable for housing. Retain for tourism/resort</p> <p>Plot no 989: No - Unsuitable for housing. Retain for tourism/resort</p> <p>Plot no 1023: No - Unsuitable for housing. Retain for Port-related commercial use.</p>

143	Which sites do you consider appropriate for future consideration by the Council? (Q143)	<p><b>FTC has not ruled out</b></p> <p>Plot no 1081: Mixed - Site at Garrison Lane has huge potential for development but must retain expanded car parking as well as commercial and potential residential development</p> <p>Plot no 1092: Any development of this site should retain the significant informal green open space of Eastward Ho and the Grove woodlands.</p> <p>Plot no 1093: Mixed - Must be Leisure/Tourism-led development</p> <p>Plot no 1094: Mixed - Must be Leisure/Tourism-led development</p>
143	Which sites do you consider appropriate for future consideration by the Council? (Q143)	<p><b>FTC considers potentially viable</b></p> <p>Plot no 625: Application now in for mixed development of 59 dwellings with commercial ground floor use</p> <p>Plot no 644: Site has Outline permission for 570 homes granted by Secretary of State</p> <p>Plot no 800: Only as part of a carefully and strategically planned development, well-related to the town and its links with Plot 644 which has Outline permission for 570 homes</p> <p>Plot no 801: Only as part of a carefully and strategically planned development, well-related to the town and its links with Plot 800 and Plot 644 which has Outline permission for 570 homes</p> <p>Plot no 802: Only as part of a carefully and strategically planned development, well-related to the town and its links with Plots 800 and 801 and Plot 644 which has Outline permission for 570 homes</p> <p>Plot no 941: Former high school site, well related to the town</p> <p>Plot no 1091: Could provide housing if local re-provision of leisure facilities is guaranteed</p>

144	Are there any other sites you are aware of which the Council should consider?	North Sea Hotel site; Convalescent Hill Car Park and surrounding area; land at the old Deben school to provide new education facilities. Langley Avenue playing field should be earmarked for cemetery expansion if at any time it is no longer required for its current use.
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