

Aldringham cum Thorpe Neighbourhood Development Plan

Independent Examiner's Clarification Note

Context

This note sets out my initial comments on the submitted Plan. It also sets out areas where it would be helpful to have some further clarification. For the avoidance of any doubt, matters of clarification are entirely normal at this early stage of the examination process.

Initial Comments

The Plan is very well-presented. The distinction between the policies and the supporting text is very clear. High quality photographs reinforce the issues included in the Plan. The various Assessments and other supporting documents directly inform relevant policies. The structure of the Plan is very compelling and uses colour to good effect.

In the round, the Plan provides a clear and distinctive vision for the neighbourhood area and has focused on appropriate and locally-distinctive matters.

Points for Clarification and other comments on the policies

I have read the submitted documents and the representations made to the Plan. I have also visited the neighbourhood area. I am now able to raise some initial issues for clarification for the Parish Council.

The comments that are made on these points will be used to assist in the preparation of my report. They will also inform any potential modifications that may be necessary to the Plan to ensure that it meets the basic conditions.

Policy ACT1

In general terms, the policy brings added parish-based value above the content of national and local planning policies.

The section on Thorpeness comments about the need for development to enable significant community benefits in the form of contributions to coastal defences. Two issues arise. The first is the extent to which the policy relates to the helpful commentary in paragraph 7.7 of the Plan. The second is that extent to which any such approach should be applied in a proportionate way to the scale and nature of the development and its relationship to the coast

Policy ACT3

I noted the concentration of second homes/holiday lets in Thorpeness

I note the general commentary in paragraph 7.45 of the Plan. However, to what extent did the PC consider the applicability of such an approach (especially in Thorpeness) given its development and heritage as a holiday village?

The commentary in paragraph 7.50 about the geographic application of the policy is not clear. Much of the detail is about the location of existing built development rather than how the policy would apply. It would be helpful the Parish Council elaborates on its thinking. In specific terms is the policy intended to apply throughout the neighbourhood area or only in Thorpeness?

Policy ACT5

This is an interesting and locally distinctive policy.

I looked at the proposed Green Gaps (Figure 40) carefully during the visit. For clarity are they the same areas as the 'landscape breaks' as used in the policy?

The Green Gaps appear to be parts of larger agricultural areas (rather than areas fully defined by natural or man-made features). How did the Parish Council approach this matter and does it bring the clarity required by the NPPF?

Given the size of the proposed Green Gaps is their spatial definition on Figure 40 necessary? Could the policy be applied in a general way?

Policy ACT6

Does this policy bring any added value beyond national and local planning policies on biodiversity?

Policy ACT7

I note that paragraph 8.58 comments about the community's views on coastal protection. I saw several posters during the visit about the meeting on this matter next week. I also saw several properties being built/redeveloped adjacent to the coast.

Plainly coastal protection is a distinctive local issue. However, is it a strategic matter (to be addressed by East Suffolk Council and the Environment Agency) rather than a local issue to be addressed in a neighbourhood plan? On a related point, to what extent would the submitted policy bring any added value beyond the content of Policies SCLP9.3 and 9.4 of the adopted Suffolk Coastal Local Plan?

I note the use of the word 'discouraged' in the policy. Would this wording provide specific clarity to East Suffolk Council throughout the Plan period in determining any further planning applications to demolish and rebuild existing houses?

I also note that the policy refers to a 'Coastal Zone' on Figure 42. In this context:

- is the 'Coastal Zone' the same area as the 'Coastal Change Management Area' used in the title of that Figure?
- is the Zone simply the orange line? and
- should Figure 42 include a key to explain any other relevant designations/areas (as currently shown)?

Policy ACT9

I looked carefully at the Heritage Centre during the visit.

Given the final element of the policy, is the use of 'in principle' necessary?

Policy ACT10

The wider policy takes a positive approach to the built heritage of the neighbourhood area.

I am minded to recommend that the first of the policy is revised so that it sets out requirements for the types of development listed rather than offering support. This would acknowledge that

other development plan policies would also apply to the determination of any such development proposals.

Does the Parish Council have any comments on this proposition?

Policy ACT11

This is a good policy which is underpinned by the Design Guidelines and Codes. In the round, it is an excellent local response to Section 12 of the NPPF.

Policy ACT13

I noted the availability of car parking in Thorpeness during the visit.

Given the wider content of the policy, is the use of 'in principle' necessary?

Policy ACT14

In planning policy terms does 'are encouraged' mean 'will be supported'?

Policy ACT15

The policy takes a positive approach to community facilities and has regard to Section 8 of the NPPF. It acknowledges that the use and/or viability of community facilities may change in the Plan period.

I note that the policy lists examples of community facilities. Is this a definitive schedule of community facilities to which the policy would apply? If not, should the examples be deleted?

Policy ACT16

I looked carefully at the proposed Local Green Spaces (LGSs) during the visit. I saw their importance to the character and appearance of the parish.

The approach taken is underpinned by the details in Appendix B. Furthermore, the policy follows the matter-of-fact approach taken in the NPPF.

On the proposed LGS12 (Land to the rear of Ogilvie Almhouses, Aldringham) please can the Parish Council clarify the size of the proposed designation. The site area included in Appendix B has little relation to the proposed site (and plainly does not correspond to the identified scale of LGS10 St Andrew's Churchyard which is of a similar size).

Policy ACT17

I note the commentary in the policy about the Thorpeness Golf Club and Hotel.

Given the wider content of the final part of the policy, is the use of 'in principle' necessary?

Representations

I would find it helpful if the Parish Council commented on the representations from:

- Suffolk Wildlife Trust
- Suffolk County Council; and
- William Pecover.

East Suffolk Council proposes a series of detailed refinements to the policies and the supporting text. It would be also helpful if the Parish Council commented on those suggestions.

Protocol for responses

I would be grateful for responses to the questions raised by 15 September 2025. Please let me know if this timetable may be challenging to achieve. It reflects the factual basis of the questions raised.

If certain responses are available before others, I am happy to receive the information on a piecemeal basis. Irrespective of how the information is assembled, please can all responses be sent to me by East Suffolk Council and make direct reference to the policy/issue concerned.

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14 August 2025