

# **Aldringham cum Thorpe Neighbourhood Development Plan 2018-2036**

**A report to East Suffolk Council on the Aldringham  
cum Thorpe Neighbourhood Development Plan**

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## **Executive Summary**

- 1 I was appointed by East Suffolk Council in July 2025 to carry out the independent examination of the Aldringham cum Thorpe Neighbourhood Development Plan.
- 2 The examination was undertaken by way of written representations. I visited the neighbourhood area on 13 August 2025.
- 3 The Plan includes a variety of policies and seeks to bring forward positive and sustainable development in the neighbourhood area. The Plan includes policies on the location of new development, biodiversity, local green spaces, and important views. It also proposes a Principal Residency policy.
- 4 The Plan has been underpinned by community support and engagement. All sections of the community have been engaged in its preparation.
- 5 Subject to a series of recommended modifications set out in this report, I have concluded that the Plan meets all the necessary legal requirements and should proceed to referendum.
- 6 I recommend that the referendum area should coincide with the neighbourhood area.

**Andrew Ashcroft**  
**Independent Examiner**  
**13 November 2025**

## **1 Introduction**

- 1.1 This report sets out the findings of the independent examination of the Aldringham cum Thorpe Neighbourhood Development Plan 2018-2036 ('the Plan').
- 1.2 The Plan was submitted to East Suffolk Council (ESC) by Aldringham cum Thorpe Parish Council (AcTPC) in its capacity as the qualifying body responsible for preparing the neighbourhood plan.
- 1.3 Neighbourhood plans were introduced into the planning process by the Localism Act 2011. They allow local communities to take responsibility for guiding development in their area. This approach was subsequently embedded in the National Planning Policy Framework (NPPF) in 2012, 2018, 2019, 2021, 2023 and 2024. The NPPF continues to be the principal element of national planning policy.
- 1.4 The role of an independent examiner is clearly defined in the legislation. I have been appointed to examine whether the submitted Plan meets the basic conditions and Convention Rights and other statutory requirements. It is not within my remit to examine or to propose an alternative plan, or a potentially more sustainable plan except where this arises indirectly from my recommended modifications to ensure that the plan meets the basic conditions and the other relevant requirements.
- 1.5 A neighbourhood plan can be narrow or broad in scope and can include whatever range of policies it sees as appropriate to its designated neighbourhood area. The submitted Plan has been designed to be distinctive in general terms, and to be complementary to the existing development plan. It seeks to provide a context in which the neighbourhood area can maintain its character and setting, and includes a package of distinctive policies.
- 1.6 Within the context set out above, this report assesses whether the Plan is legally compliant and meets the basic conditions that apply to neighbourhood plans. It also considers the content of the Plan and, where necessary, recommends changes to its policies and supporting text.
- 1.7 This report also provides a recommendation as to whether the Plan should proceed to referendum. If this is the case and that referendum results in a positive outcome, the Plan would then be used to determine planning applications within the neighbourhood area and will become part of the wider development plan.

## 2 The Role of the Independent Examiner

- 2.1 The examiner's role is to ensure that any submitted neighbourhood plan meets the relevant legislative and procedural requirements.
- 2.2 I was appointed by ESC, with the consent of AcTPC, to conduct the examination of the Plan and to prepare this report. I am independent of both ESC and AcTPC. I do not have any interest in any land that may be affected by the Plan.
- 2.3 I possess the appropriate qualifications and experience to undertake this role. I am a Director of Andrew Ashcroft Planning Limited. I have 42 years' experience either in various local authorities at either Head of Planning or Service Director level or more recently as an independent examiner. I am a chartered town planner and have significant experience of undertaking neighbourhood plan examinations and health checks. I am a member of the Royal Town Planning Institute and the Neighbourhood Planning Independent Examiner Referral System.

### *Examination Outcomes*

- 2.4 In my role as the independent examiner of the Plan I am required to recommend one of the following outcomes of the examination:
- (a) that the Plan as submitted should proceed to a referendum; or
  - (b) that the Plan should proceed to referendum as modified (based on my recommendations); or
  - (c) that the Plan does not proceed to referendum on the basis that it does not meet the necessary legal requirements.
- 2.5 The outcome of the examination is set out in Section 8 of this report.

### *Other examination matters*

- 2.6 In examining the Plan, I am required to check whether:
- the policies relate to the development and use of land for a designated neighbourhood plan area; and
  - the Plan meets the requirements of Section 38B of the Planning and Compulsory Purchase Act 2004 (the Plan must specify the period to which it has effect, must not include provision about development that is excluded development, and must not relate to more than one neighbourhood area); and
  - the Plan has been prepared for an area that has been designated under Section 61G of the Localism Act and has been developed and submitted for examination by a qualifying body.
- 2.7 I have addressed the matters identified in paragraph 2.6 of this report and am satisfied that they have been met subject to the modifications in this report.

### 3 Procedural Matters

3.1 In undertaking this examination I have considered the following documents:

- the submitted Plan.
- the Basic Conditions Statement.
- the Consultation Statement.
- the Design Guidelines and Codes.
- the ESC SEA/HRA screening reports.
- the Housing Needs Assessment.
- the Spatial Evidence for the policies.
- the representations made to the Plan.
- AcTPC's responses to the clarification note.
- the adopted East Suffolk Council - Suffolk Coastal Local Plan (2018-2036).
- the National Planning Policy Framework (December 2024).
- Planning Practice Guidance.
- relevant Ministerial Statements.

3.2 I visited the neighbourhood area on 13 August 2025. I looked at its overall character and appearance and at those areas affected by policies in the Plan.

3.3 It is a general rule that neighbourhood plan examinations should be held by written representations only. Having considered all the information before me, including the representations made to the submitted plan, I concluded that the Plan could be examined by way of written representations. I was assisted in this process by the comprehensive nature of many of the representations and the detail within the package of submission documents.

## 4 Consultation

### *Consultation Process*

- 4.1 Policies in made neighbourhood plans become the basis for local planning and development control decisions. As such, the regulations require neighbourhood plans to be supported and underpinned by public consultation.
- 4.2 In accordance with the Neighbourhood Planning (General) Regulations 2012 (as amended), AcTPC prepared a Consultation Statement. It is proportionate to the neighbourhood area and its policies. It is underpinned by more detailed appendices.
- 4.3 Section 2 summarises how AcTPC consulted on the Plan and engaged with local organisations and statutory bodies. It helpfully breaks the engagement into five key stages. It also provides details on the consultation processes that took place on the pre-submission version of the Plan (October to December 2024). The consultation and engagement process undertaken was comprehensive. It included appropriate engagement with the owners of the proposed non-designated heritage assets and local green spaces.
- 4.4 Appendix 7 of the Statement summarises the comments received on the pre-submission version of the Plan and how The Plan was refined because of this process. The overall package of information helps to describe the way in which the Plan evolved.
- 4.5 I am satisfied that consultation has been an important element of the Plan's production. Advice on the neighbourhood planning process has been made available to the community in a positive and direct way by those responsible for the Plan's preparation. From all the evidence provided to me as part of the examination, I can see that the Plan has promoted an inclusive approach to seeking the opinions of all concerned throughout the process. ESC has carried out its own assessment that the consultation process has complied with the requirements of the Regulations.

### *Consultation Responses*

- 4.6 Consultation on the submitted plan was undertaken by ESC. It ended on 18 June 2025. This exercise generated representations from the following organisations:
  - Anglian Water
  - East Suffolk Council
  - Environment Agency
  - Historic England
  - National Highways
  - Natural England
  - Suffolk County Council
  - Suffolk Wildlife Trust
  - National Grid

- 4.7 Representations were also received from three parishioners.
- 4.8 I have taken account of all the representations in preparing this report. Where it is appropriate to do so, I refer to specific representations on a policy-by-policy basis.

## 5 The Neighbourhood Area and the Development Plan Context

### *The Neighbourhood Area*

- 5.1 The neighbourhood area is the parish of Aldringham cum Thorpe. It is located south of the town of Leiston, and includes the villages of Aldringham, Thorpeness, and Sizewell. In 2021 its population was 790 people. It was designated as a neighbourhood area on 5 May 2016.
- 5.2 The parish lies about 20 miles north-east of Ipswich on the Suffolk coast within the Suffolk & Essex Coast & Heaths National Landscape. The parish's soils support gorse, heather, oak, hazel, pine, beech, aspen, alder, horse chestnut, black poplar, and it has three miles of mainly shingle beaches with some low sandy cliffs. There are several listed buildings in the parish including the nationally noted House in the Clouds. Thorpeness Meare is also a Registered Park and Garden.
- 5.3 Aldringham is located to the west of the parish. Its main built form is centred on east-west roads of the B1122 (which is the north-south route from Leiston to the north) and B1153 which runs east-west and leads to Thorpeness and the coast. The Parrot and Punchbowl Public House is located in the centre of the village. Thorpeness is located east of Aldringham on the coast. It has a winter population of approximately 180, which increases significantly during the Summer period. As the Plan describes, it is an unusual settlement in that it was developed from 1910 onwards as the country's first purpose built 'holiday village' designed by Glencairn Stuart Ogilvie.

### *Development Plan Context*

- 5.4 The development plan for the parish is the East Suffolk Council - Suffolk Coastal Local Plan (2018-2036) and the Suffolk Minerals and Waste Local Plan.
- 5.5 The Local Plan includes a comprehensive range of policies. Policy SCLP 3.2 establishes a settlement hierarchy within which Thorpeness is identified as one of a series of Small Villages. Paragraph 3.47 of the Plan advises small villages are, in principle, suitable places to accommodate new housing. It also comments that consideration has been given to other factors in determining whether a settlement is a suitable location for additional housing growth, including infrastructure capacity, the existence of suitable sites and consultation responses. Aldringham is identified as a village in the countryside.
- 5.6 Policy SCLP3.3 establishes settlement boundaries for a range of settlements including Thorpeness. Table 3.4 sets out a range of policies which apply in the identified settlement categories in the settlement hierarchy (including those in the smaller villages and the countryside).
- 5.7 Policy SCLP9.3: Coastal Change Management Area provides detailed guidance for development proposals in its identified area.
- 5.8 The Plan has been prepared within this wider context and has relied on up-to-date information. It also seeks to give a local dimension to the relevant policies in the Local



Plan. This is best practice, The approach taken is helpfully captured in the Basic Conditions Statement.

*Visit to the neighbourhood area*

- 5.9 I visited the neighbourhood area on 13 August 2025. I approached it from the A12. This helped me to understand its position in the wider landscape and its accessibility to the highway network.
- 5.10 I looked initially at Aldringham and saw its relationship with Leiston (to the north) and to Coldfair Green (to the west). I also looked at St Andrew's Church and the adjacent Ogilvie Trust houses.
- 5.11 I then drove to Beach View Holiday Park to the south of Sizewell. The significance of the Power Station was self-evident.
- 5.12 I then drove to Thorpeness. I saw its clear and distinctive nature, and the popularity of the lake (the Meare) and its various commercial facilities. The timing of the visit allowed me to understand the way in which the nature of the settlement alters in the Summer period.
- 5.13 I left the neighbourhood area to the south and drove to Aldeburgh. This part of the visit helped me to understand the relationship between the neighbourhood area and other settlements in this part of East Suffolk.

## 6 The Neighbourhood Plan and the Basic Conditions

- 6.1 This section of the report deals with the submitted neighbourhood plan as a whole and the extent to which it meets the basic conditions. The submitted Basic Conditions Statement has helped in the preparation of this section of the report. It is an informative and well-presented document.
- 6.2 As part of this process, I must consider whether the submitted Plan meets the basic conditions as set out in paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990. To comply with the basic conditions, the Plan must:
- have regard to national policies and advice contained in guidance issued by the Secretary of State;
  - contribute to the achievement of sustainable development;
  - be in general conformity with the strategic policies of the development plan in the area;
  - not breach, and otherwise be compatible with, the assimilated obligations of EU legislation (as consolidated in the Retained EU Law (Revocation and Reform) Act 2023 (Consequential Amendment) Regulations 2023;
  - not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017.

I have assessed the Plan against the basic conditions under the following headings:

### *National Planning Policies and Guidance*

- 6.3 For the purposes of this examination, the key elements of national policy relating to planning matters are set out in the National Planning Policy Framework December 2024 (NPPF).
- 6.4 The NPPF sets out a range of land-use planning principles to underpin both plan-making and decision-taking. The following are particularly relevant to the Aldringham cum Thorpe Neighbourhood Development Plan:
- a plan-led system - in this case the relationship between the neighbourhood plan and the East Suffolk Council - Suffolk Coastal Local Plan;
  - building a strong, competitive economy;
  - recognising the intrinsic character and beauty of the countryside and supporting thriving local communities;
  - taking account of the different roles and characters of different areas;
  - highlighting the importance of high-quality design and good standards of amenity for all future occupants of land and buildings; and
  - conserving heritage assets in a manner appropriate to their significance.
- 6.5 Neighbourhood plans sit within this wider context both generally and within the more specific presumption in favour of sustainable development. Paragraph 13 of the NPPF indicates that neighbourhoods should both develop plans that support the strategic

needs set out in local plans and plan positively to support local development that is outside the strategic elements of the development plan.

- 6.6 In addition to the NPPF I have also taken account of other elements of national planning policy, including Planning Practice Guidance (PPG) and the recent ministerial statements.
- 6.7 Having considered all the evidence and representations available as part of the examination I am satisfied that the submitted Plan has had regard to national planning policies and guidance subject to the recommended modifications in this report. It sets out a positive vision for the future of the neighbourhood area. It includes a series of policies on development and environmental matters and proposes a series of local green spaces. It also includes a Principal Residency policy for new homes in Thorpeness.
- 6.8 At a more practical level, the NPPF indicates that plans should provide a clear framework within which decisions on planning applications can be made and that they should give a clear indication of how a decision-maker should react to a development proposal (paragraph 16d). This was reinforced with the publication of Planning practice guidance. Paragraph ID: 41-041-20140306 indicates that policies in neighbourhood plans should be drafted with sufficient clarity so that a decision-maker can apply them consistently and with confidence when determining planning applications. The Guidance also advises that policies should also be concise, precise, and supported by appropriate evidence.
- 6.9 As submitted, the Plan does not fully accord with this range of practical issues. Most of my recommended modifications in Section 7 relate to matters of clarity and precision. They are designed to ensure that the Plan fully accords with national policy.

#### *Contributing to sustainable development*

- 6.10 There are clear overlaps between national policy and the contribution that the submitted Plan makes to achieving sustainable development. Sustainable development has three principal dimensions – economic, social, and environmental. I am satisfied that the submitted Plan has set out to achieve sustainable development in the neighbourhood area. In the economic dimension, the Plan includes policies on the scale and location of new housing (Policy ACT1), and business development (Policy ACT17). In the social role, it includes policies on Principal Residence (Policy ACT3), the Thorpeness Heritage Centre (Policy ACT9), on community facilities (Policy ACT15), and on local green spaces (Policy ACT16). In the environmental dimension, the Plan positively seeks to protect its natural, built, and historic environment. It has policies on landscape character (Policy ACT5), biodiversity (Policy UFF7), coastal protection (Policy ACT7) and design (Policy ACT11). This assessment overlaps with the details on this matter in the submitted Basic Conditions Statement.

#### *General conformity with the strategic policies in the development plan*

- 6.11 I have already commented in detail on the development plan context in East Suffolk in paragraphs 5.4 to 5.8 of this report.

- 6.12 I consider that the submitted Plan delivers a local dimension to this strategic context and supplements the detail already included in the adopted development plan. Subject to the recommended modifications in this report, I am satisfied that the submitted Plan is in general conformity with the strategic policies in the development plan.

#### *Strategic Environmental Assessment*

- 6.13 The Neighbourhood Plan (General) (Amendment) Regulations 2015 require a qualifying body either to submit an environmental report prepared in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004 or a statement of reasons why an environmental report is not required.
- 6.14 In order to comply with this requirement, a Strategic Environmental Assessment (SEA) Screening Opinion was produced by ESC in February 2025. It concludes that the Plan does not allocate land for built development and applies to a localised area. It also advises that the Plan has been prepared within the context of the strategic policies of the Suffolk Coastal Local Plan (September 2020) which has been subject to Sustainability Appraisal including Strategic Environmental Assessment and Appropriate Assessment under the Habitats Regulations Assessment. As such ESC concluded that it is not necessary for a Strategic Environmental Assessment to be undertaken of the draft Plan.

#### *Habitats Regulations Assessment*

- 6.15 ESC also prepared a Habitats Regulations Assessment (HRA) of the Plan. It addresses the potential impact of the Plan's policies on the extensive range of protected sites listed in its Table 1. It concludes that the screening of the policies in the Plan has not identified any likely significant effects on protected habitat sites, either alone or in combination with other plans or projects.
- 6.16 Having reviewed the information provided to me as part of the examination I am satisfied that a proportionate process has been undertaken in accordance with the various regulations. None of the statutory consultees have raised any concerns on this matter. In the absence of any evidence to the contrary, I am entirely satisfied that the submitted Plan is compatible with this the relevant regulations.

#### *Human Rights*

- 6.17 In a similar fashion I am satisfied that the submitted Plan has had regard to the fundamental rights and freedoms guaranteed under the European Convention on Human Rights (ECHR) and that it complies with the Human Rights Act. There is no evidence that has been submitted to me to suggest otherwise. There has been full and adequate opportunity for all interested parties to take part in the preparation of the Plan and to make their comments known. On this basis, I conclude that the submitted Plan does not breach, nor is in any way incompatible with the ECHR.

*Summary*

- 6.18 On the basis of my assessment of the Plan in this section of my report I am satisfied that it meets the basic conditions subject to the incorporation of the recommended modifications contained in this report.

## 7 The Neighbourhood Plan policies

- 7.1 This section of the report comments on the policies in the Plan. It makes a series of recommended modifications to ensure that the various policies have the necessary precision to meet the basic conditions.
- 7.2 The recommendations focus on the policies in the Plan given that the basic conditions relate primarily to this aspect of neighbourhood plans. In some cases, I have also recommended changes to the associated supporting text.
- 7.3 I am satisfied that the content and the form of the Plan is fit for purpose. It is distinctive and proportionate to the Plan area. The wider community and AcTPC have spent time and energy in identifying the issues and objectives that they wish to be included in their Plan. This sits at the heart of the localism agenda.
- 7.4 The Plan has been designed to reflect Planning Practice Guidance (ID:41-004-20190509) which indicates that neighbourhood plans should address the development and use of land.
- 7.5 I have addressed the policies in the order that they appear in the submitted Plan.
- 7.6 For clarity, this section of the report comments on each of the policies in the Plan.
- 7.7 Where modifications are recommended to policies they are highlighted in bold print. Any associated or free-standing changes to the text of the Plan are set out in italic print.

### *The initial parts of the Plan (Parts 1-5)*

- 7.8 The Plan is well-organised and presented. It has been prepared with much attention to detail and local pride. It makes an appropriate distinction between the policies and their supporting text. The overall format of the Plan, and the associated use of colour, maps and excellent photographs results in a very attractive and legible document. If the Plan is made, it will sit comfortably as part of the overall development plan.
- 7.9 The initial elements of the Plan set the scene for the policies. They are proportionate to the neighbourhood area and to the subsequent policies.
- 7.10 The Introduction comments on the national agenda for neighbourhood plans and the way in which the submitted Plan has been prepared. The process chart (Figure 1) is very helpful. The Introduction also defines the neighbourhood area (Figure 2) and identifies the Plan period (in paragraph 1.2). Finally, it comments about the national and local planning policy context within which the Plan has been prepared. In the round it is a first-class introduction for a neighbourhood plan.
- 7.11 Section 2 provides information about the neighbourhood area. The interesting and comprehensive details help to set the scene for the eventual policies. The description of the individual settlements is a major achievement of the Plan.
- 7.12 Section 3 comments about the national and local planning policy context within which the Plan has been prepared.

7.13 Section 4 comments about the way in which the Plan has been prepared. It identifies key stages of consultation and engagement. The details in this section overlap with the information in the submitted Consultation Statement.

7.14 Section 5 comments on the Plan's Vision and Objectives. The Vision is:

*'At the end of this Neighbourhood Plan period, the parish of Aldringham cum Thorpe will be a place:*

- *perceived by residents and visitors as an inclusive, great place to live, work, play and raise families; where health, transport, social, sporting facilities are available to and readily accessible by all*
- *that is an exemplar of careful husbandry of natural habitats, where the existing recreational access and use of both land and water resources is appropriately managed ensuring that the indigenous and visiting wildlife can thrive*
- *which manages and maintains its shoreline defences and inland waterways in relation to risks of climate change, sea-level rise erosion and flooding in a manner that protects its heritage and sustains its economic and social vitality*
- *where the community looks after its heritage, invites, entertains, educates and involves people from local and regional communities and from more widely dispersed parts of the country, and in so doing makes a special contribution to the cultural and communal identity of Suffolk*
- *where the recreational enjoyment of the Suffolk coastline, including its beaches, shingle foreshores, inland waterways, marshes, wetlands, heaths and Sandlings is responsibly managed.'*

7.15 Section 5 also explains the relationship between the Vision, the objectives, and the resulting policies. This is helpfully shown in Figure 36.

7.16 The remainder of this section of the report addresses each policy in turn in the context set out in paragraphs 7.5 to 7.7 of this report.

ACT1: Scale and location of new housing development

7.17 This policy sets the scene for where development will take place in the Plan period. It acknowledges that development will continue to take place in the parish in the form of infill/windfall development inside the settlement boundary for Thorpeness and some limited development elsewhere where such proposals are compliant with specific national and local policies regarding exceptions.

7.18 The policy provides local guidance and criteria on where development would be acceptable in both Aldringham and Thorpeness. The policy also advises that development proposals should ensure the retention of the distinct identity of the individual settlements of Aldringham, Thorpeness and Sizewell and avoid creating ribbon development leading to the physical joining up or coalescence of separate areas of built settlement for example between Aldringham and Leiston, between Aldringham and Coldfair Green, and between Thorpeness and Aldeburgh.

- 7.19 In general terms the policy takes a positive approach to these matters and reflects the approach taken in the Local Plan. Moreover, it will ensure that new development has ready access to existing commercial and community facilities.
- 7.20 I recommend that the Thorpeness element of the policy is recast so that it corresponds to the earlier section on Aldringham. In doing so I recommend that the expected contribution towards coastal defences is applied in a proportionate way. Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of each of the three dimensions of sustainable development.

**In the Thorpeness section of the policy delete the first sentence.**

**At the end of that part of the policy add (as a separate section):**

**‘As appropriate to their scale, nature, and location development proposals in Thorpeness should contribute towards improvement to coastal defences.’**

ACT2: Housing Mix

- 7.21 The Plan advises that this policy is based on consultation and the findings of the Housing Needs Assessment (undertaken by AECOM). The policy seeks to create a mix of housing sizes and self- build housing.
- 7.22 In general terms the policy takes a positive approach to these matters. It is based on up-to-date evidence which naturally post-dates the more general work undertaken on housing need as part of the work undertaken on the Local Plan. Nevertheless, I recommend that the supporting text advises about the relationship between this policy and the relevant policies in the Local Plan and advises that the various thresholds in the Local Plan policies will continue to apply. This approach was agreed by AcTPC in its response to the clarification note
- 7.23 Otherwise the policy meets the basic conditions. It will contribute to the local delivery of the social and environmental dimensions of sustainable development.

*At the end of paragraph 7.35 add:*

*‘Policy ACT2 has been carefully designed to achieve an appropriate relationship with this supplementary guidance and the relevant policies in the Local Plan (SCLP 5.8- Housing Mix and SCLP 5.10 – Affordable Housing). For development management purposes the thresholds in the Local Plan policies will continue to apply.’*

ACT3: Principal Residence

- 7.24 The Plan advises that this policy has been developed as a response to a specific set of local circumstances which were identified through consultation and the Housing Needs Assessment. The policy applies a principal residence policy to Thorpeness due to the concerns over the number of second homes in the village and the consequent impacts on local services and facilities and on the local housing market. The supporting text comments about the occupation of homes in the parish in general, and in Thorpeness in particular.



- 7.25 I note the general commentary in paragraph 7.45 of the Plan. However, I sought advice from AcTPC what extent it had considered the applicability of such an approach (especially in Thorpeness) given its development and heritage as a holiday village. In its response it advised that

*'(It has) considered this issue carefully. On the one hand concerns about the levels of second homes and holiday lets in Thorpeness and the viability of the community outside of the summer peak period were very common concerns raised by those remaining residents, yet the Parish Council also recognised that the origins of Thorpeness, are as a purpose-built holiday village. The original holiday village was built, owned, and operated by a single owner and there was a uniformity and consistency about how it operated and how the various buildings looked, together with how they were used in conjunction with the supporting facilities e.g. the open spaces, the country club, the tennis courts etc which were all in the same ownership and therefore consistently maintained with a consistent visual appearance. There was also a significant pool of people living locally elsewhere in the village, in Aldringham and other nearby villages who supported the economic functioning and operation of the holiday village either by being employed directly or indirectly. However, as paragraph 7.49 indicates, the position has changed with almost all of the original holiday houses sold off and now in multiple private individual ownerships. Most are now operated as single entities either as permanent homes, second homes or as holiday lets. They no longer have a relationship with the ancillary facilities, nor is there the single source of employment for local people that previously existed. The Country Club is now operated largely as a wedding venue. In terms of the buildings themselves, some of the original properties have been replaced by new dwellings and others have been extensively altered and therefore there is also no longer the consistent visual appearance or obvious physical connection between them.'*

- 7.26 The commentary in paragraph 7.50 about the geographic application of the policy is unclear. Much of the detail is about the location of existing built development rather than how the policy would apply. In this context I asked AcTPC to elaborate on its thinking and the extent to which the policy intended to apply throughout the neighbourhood area or only in Thorpeness. In its response it advised that:

*'the intention of the policy is to apply it to the main built-up area of Thorpeness only and its immediate surroundings (not Aldringham). In geographical terms this means inside of the existing settlement boundary for Thorpeness and to any new development permitted adjacent to the settlement boundary or well related to it. It would also apply to new dwellings that may be allocated in the Local Plan or permitted under Local Plan Policy SCLP5.3. which should if policy compliant accord with the geographical application referred to above. The exceptions would be replacement dwellings, agricultural dwellings, or affordable housing, which generally have other forms of occupancy condition imposed.'*

- 7.27 I have considered the approach taken in the policy very carefully, including the objection to the policy from a local resident. As I saw during the visit, Thorpeness clearly had a pleasant holiday character. Furthermore, the information in the Plan is compelling and advises that in 2011, Aldringham cum Thorpe contained 392

households and 623 dwellings, which suggests that there were 231 dwellings with no usual resident household. In a broader context this translates to 37.1% of dwellings in the parish having no usual residents, compared to 7.5% across East Suffolk and around 4.0% nationally.

- 7.28 The policy takes a measured approach which acknowledges that it will apply only to new development. The supporting text also acknowledges that there are other evolving national planning measures which may affect the popularity of the use of homes in Thorpeness as second homes.
- 7.29 On the balance of the evidence I am satisfied that the evidence supports the development of the policy and its incorporation in the Plan. Furthermore, the policy follows the format of similar policies in made neighbourhood plans which have addressed this matter. In this broader context I recommend that the policy is recast so that it addresses its approach in a combined policy rather than in the separate sections as set out in the submitted Plan. This will ensure a better distinction between policy and supporting text. I also recommend that the application of the policy is described more comprehensively in the supporting text. I recommend that this is achieved by combining paragraphs 7.46 and 7.47 and the introduction of a replacement paragraph 7.47. Collectively this will bring a sharper distinction between how the policy would be implemented (paragraph 7.46) and to which types of development it would apply (paragraph 7.47).
- 7.30 I have considered ESC's comments about the geographic application of the policy and AcTPC's response to the clarification note. I am satisfied that the evidence supports the view that the policy should apply only in Thorpeness. I recommend that this is achieved by applying the policy to proposals for new market dwellings within or immediately adjacent to the settlement boundary of Thorpeness as shown on Policies Map 60 of the Suffolk Coastal Local Plan (or any successor Plan). This approach will avoid the need for a separately defined area to be identified for the application of the policy.
- 7.31 Otherwise the policy meets the basic conditions. It will contribute to the local delivery of the social and environmental dimensions of sustainable development.

**Replace the policy with:**

**'Proposals for new market dwellings within or immediately adjacent to the settlement boundary of Thorpeness as shown on Policies Map 60 of the Suffolk Coastal Local Plan (or any successor Plan) will only be supported when it can be demonstrated that a planning condition and supporting Section 106 legal agreement will be imposed to guarantee that the dwelling concerned will be the occupants' sole or main residence (where the residents spend the majority of their time when not working away from home or living abroad).'**

**The relevant Section 106 Agreement will appear on the Register of Local Land Charges.'**

*Incorporate paragraph 7.47 into paragraph 7.46, deleting the final bullet point of paragraph 7.47.*

Replace paragraph 7.47 with:

*'The policy will operate within or immediately adjacent to the settlement boundary of Thorpeness as shown on Policies Map 60 of the Suffolk Coastal Local Plan (or any successor Plan). The policy will apply to the following developments:*

- *proposals for new dwellings;*
- *proposals which would generate any net new additional dwellings on a site which have replaced a single property; and*
- *proposals which would generate additional dwellings because of a conversion of a non-residential building.*

*The policy will not apply to replacement dwellings unless the building to be replaced has been granted with a principal residence restriction.*

ACT4: Mitigating the impacts of large-scale energy projects

- 7.32 The Plan advises that the context to this policy is that the Local Plan recognises that multiple energy proposals could have potentially significant and cumulative impacts on the East Suffolk countryside and will be working closely with Government and other agencies to ensure issues related to the National Grid are considered comprehensively and not incrementally. Figure 12 in Chapter 2 shows the routes and impacts of the of the multiple large scale energy projects located in and around the Neighbourhood Area.
- 7.33 In this strategic context the Plan seeks to ensure that the cumulative impacts of multiple energy schemes on the neighbourhood area are taken into account by the relevant determining body. The Plan also seeks to ensure that where such energy schemes are identified as being likely to have adverse impacts on the parish, (including the cumulative impacts from multiple schemes and their associated infrastructure) that those mitigations are prioritised and suitably located within the neighbourhood area.
- 7.34 ESC advise that:
- 'This policy needs revision to make it clear that under the existing (biodiversity net gain) legislation it is not possible to require that all biodiversity gain habitat is delivered within the parish where the development is taking place. Where habitat-based mitigation is being implemented for biodiversity impacts such as impacts on a protected species, then in most situations that habitat can only count as part of the development's biodiversity gain requirement.'*
- 7.35 In general terms the policy takes a positive approach to the impacts of large-scale energy projects. It reflects the obvious concerns which the community has towards such developments. I recommend that the policy is recast so that it has a simpler format and acknowledges that it may not always be practicable for biodiversity net gain to be delivered exclusively in the neighbourhood area. Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of the social and environmental dimensions of sustainable development.

**Replace the policy with:**

**‘Proposals for major energy projects should carefully address their impact, including any cumulative impacts, in combination with other schemes. Where works take place which have temporary impacts, the emphasis should be on timely restoration once works have been completed.**

**Where mitigatory or compensatory measures are identified which are considered necessary to remedy the permanent or long-term impacts of major energy schemes on the landscape, natural environment, wildlife and nature recovery historic environment or the residential amenity of the parish, such measures should be provided in the parish wherever practicable. Where such mitigations are required in respect of biodiversity the standard biodiversity net gain metric of 10% should be applied.**

**Additional biodiversity gain habitat creation and/or enhancement would also be required to meet the 10% gain requirement on the development.’**

ACT5: Landscape Character and Important Views

- 7.36 The context to this policy is Suffolk Coastal Landscape Character Assessment (2018) which indicates that the parish is covered by two specific landscape character types – Estate Sandlands and the Coastal Broads and Marshes. These character types broadly reflect the two distinctive parts of the parish. This matter is further addressed in the supporting text.
- 7.37 There are two parts to the policy. The first addresses Landscape Character settlement gaps. The second addresses Important Views.
- 7.38 The proposed settlement gaps are parts of larger agricultural areas (rather than areas fully defined by natural or man-made features). I sought advice from AcTPC about how it had approached this matter and the extent to which it would bring the clarity required by the NPPF. In its response to the clarification note it advised that:

*‘The areas were identified through early community consultation and also used to be included in a former Local Plan policy as Special Landscape Areas, which were a local (county level) landscape designation which followed river valleys. This designation and its approach was not used rolled forward into the 2020 Adopted Local Plan. The Parish Council did explore the possibility of resurrecting the SLA designation through its Neighbourhood Plan but this was not supported by ESC. In terms of the concerns raised in community consultation it was very much about ‘joining up of settlements’ and therefore preventing the coalescence of parts of settlement became the policy ambition. It is appreciated that the gaps as currently mapped are indicative and that they do not readily follow natural boundaries on the ground, which means they lack some provision on application which would mean the policy may not necessarily be NPPF compliant in its current form.*

*Acknowledge the policy and its ambition could be applied in a general way – the intention is effectively to prevent coalescence of settlements and ribbon development.*

- 7.39 I saw the significance of the settlement character of the parish during the visit and the clear separation of the various settlements. The criteria in this part of the policy provide very clear guidance of AcTPC's expectations for development proposals. In the context of AcTPC's response, I recommend that the policy is modified so that it takes a more general approach. In this context I recommend the consequential deletion of Figure 40. I also recommend that the final bullet point of the third part of the policy is recast so that it explains its intention in a clear policy format.
- 7.40 The policy identifies six important public views that it is considered should be protected from development that would have an adverse impact upon the identified view. Justification for the identified views is included in the supporting text to the policy.
- 7.41 I looked carefully at the proposed important views. I saw their local significance and the way in which they complemented the approach taken in the Plan towards landscape character. Their identification has regard to Section 15 of the NPPF. Within this context I recommend that the part of the policy addressing this issue is modified in two ways to bring the clarity required by the NPPF:
- provide clear guidance about the way in which development proposals should be prepared which have an impact on an important view; and
  - simplifying the final element by deleting two of the three adjectives which relate to the impact of a development proposal on an identified view.
- 7.42 Otherwise the policy meets the basic conditions. It will contribute to the local delivery of the social and environmental dimensions of sustainable development.

**Replace the second part of the policy with:**

**'The existing landscape breaks that physically separate the distinctive settlements within the parish will be maintained as open countryside to prevent coalescence and loss of settlement identity and distinctiveness.'**

**Replace the final bullet point of the third part of the policy with:**

**'Protecting the wooded landscape in the south of the parish including the preserved woodland adjacent to Aldringham Court and that on the eastern side of Aldeburgh Road which together form a wildlife corridor by the River Hundred.'**

**Replace the final paragraph of the Important Views section of the policy with:**

**'The scale, massing, and height of development proposals within or that would affect an important public local view should respond positively to the view concerned.'**

**Development proposals which would have an unacceptable impact on the landscape or character of an important public local view will not be supported.'**

*Delete Figure 40*

## ACT6: Biodiversity

7.43 This policy provides support for biodiversity net gain in new developments in accordance including the creation of new habitats, the repair and connection of existing networks, together with encouragement for tree planting and for the inclusion of wildlife friendly measures in new developments. It is general in nature and refers to the 10% national requirement for biodiversity net gain and sets out an aspiration for 20% net gain.

7.44 Given the general nature of the policy I sought AcTPC's views on its added value beyond national and local planning policies. In its response to the clarification note it advised that:

*'The existing Local Plan policy was developed prior to 2020 and does not reflect the latest provisions in the Environment Act 2021 or the 10% minimum net gain. We understand a review of the Local Plan is to begin in September 2025 and therefore it may be some time before a local policy which is up to date will be in place. The NP policy will fill this gap in the interim as it specifically mentions the 10% and the aspiration to 20% which is championed by Suffolk County Council and Suffolk Wildlife Trust. and adds some additional specificity in its references to the River Hundred, which is an important local natural asset. The policy's emphasis on native trees and species and the references to specific wildlife friendly measures which are not covered elsewhere do provide some local distinctiveness.'*

7.45 On the balance of the evidence, I am satisfied that the policy provides an appropriate response to this matter. The supporting text includes a much greater level of detail. Paragraph 8.38 advises that the parish includes some of the most important nature conservation sites in Suffolk and is around two thirds covered by the Suffolk & Essex Coast & Heaths National Landscape which runs parallel to the North Sea coast. It also comments that the parish contains the Leiston Aldeburgh Site of Special Scientific Interest (SSSI), Sandlings Special Protection Area (SPA) and a small part of the North Warren RSPB Reserve.

7.46 I recommend that the first sentence of the third part of the policy is modified so that it comments generally about an aspiration for the delivery of 20% biodiversity rather than that such an approach would be in place by the end of the Plan period (2036). I also recommend the deletion of the final paragraph of the policy which simply gives encouragement to measures to enhance biodiversity, several of which may not need planning permission.

7.47 Otherwise the policy meets the basic conditions. It will contribute to the local delivery of the social and environmental dimensions of sustainable development.

**Replace the first sentence of the third part of the policy with: 'The extent of any net gain in biodiversity should be in accordance with national policy and a minimum of 10% with an aspiration to deliver 20% net gain wherever practicable.'**

**Delete the final paragraph of the policy.**

## ACT7: Coastal Protection

7.48 This policy seeks to provides some specific localised detail to Local Plan Policy SCLP9.4 Coastal Change Management area which limits new development in the coastal change management area. I note that paragraph 8.58 comments about the community's views on costal protection. I saw several posters during the visit about the meeting on this matter during the week following the visit. I also saw several properties being built/redeveloped adjacent to the coast.

7.49 Plainly coastal protection is a distinctive local issue. However, in the clarification note I sought AcTPC's comments about the extent to which the issue is it a strategic matter (to be addressed by ESC and the Environment Agency) rather than a local issue to be addressed in a neighbourhood plan. On a related point, I sought advice about the extent to which the submitted policy would bring any added value beyond the content of Policies SCLP9.3 and 9.4 of the adopted Suffolk Coastal Local Plan.

7.50 In its response to these points it advised that

*'this issue is of such importance locally that the PC were keen to acknowledge the concerns of local people and reflect this in the (Plan), however it is difficult to reflect this in a smaller spatial context above that set out in the (Local Plan). The coastal zone is the same area as the Coastal Change Management Area and the orange land and the land between it and the coast is included within that area and could have been identified through a hatching. It is acknowledged that Figure 42 could usefully include a key to explain the relevant designations. If the Examiner is minded to remove the policy, (APC) ask that the explanatory text be retained so that the community can be assured that the importance of the issue is fully recognised. The pace of coastal erosion has increased over the last few months and a number of properties along North End Avenue face a very heightened risk of their homes having to be demolished in a much shorter time period. The disbanding of the former Coastal Partnership East (CPE) in favour of individual district approaches has meant that there is no longer a wider co-ordinated approach. It may assist the Examiner if he were to obtain an update on the latest position from ESC Officers including the Head of Coastal Protection.'*

7.51 I sought an update on the latest position from ESC on the Coastal Partnership East and was advised that:

*'On 31 March 2025, Coastal Partnership East, the coastal management partnership of North Norfolk District Council, Great Yarmouth Borough Council and East Suffolk Council, was dissolved. The initial partnership agreement anticipated peaks and troughs of resource sharing at different times across the three councils. However, there has been a continual demand on each local authority to manage the effects of sea level rise and climate change. Therefore, the councils agreed to dissolve the partnership to allow the three individual councils a more flexible approach and ability to focus on their own specific coastal management needs. Therefore, East Suffolk Council continue to support the residents of Thorpeness through our Coastal Management team.'*

- 7.52 I note the use of the word 'discouraged' in the policy. I am not certain that this wording provides specific clarity to East Suffolk Council throughout the Plan period in determining any further planning applications to demolish and rebuild existing houses.
- 7.53 I have considered carefully all the evidence. The policy acknowledges an important issue. Nevertheless, I have concluded that it does not bring any added value beyond the approach currently taken by ESC. As such I recommend that the policy is deleted. Nevertheless, I am happy that the supporting text should remain as it brings a local insight into this important matter. In this context I recommend that paragraph 8.58 is modified to incorporate the additional text provided by ESC on the way in which such matters are being addressed now that the Coastal Partnership East has been dissolved. I also recommend consequential modifications to paragraph 8.48.
- 7.54 Otherwise the policy meets the basic conditions. It will contribute to the local delivery of the social and environmental dimensions of sustainable development.

### **Delete the policy**

*Replace paragraph 8.48 with:*

*'The NPPF makes it clear that planning policies and decisions should take account of the UK Coastal Marine Policy Statement and relevant marine plans. Integrated Coastal Zone Management should be pursued across local authority boundaries. Until March 2025 the Neighbourhood Area was within the Coastal Partnership East (CPE) which was a partnership of East Suffolk Council and Great Yarmouth Borough, the Broads Authority and North Norfolk District. The NPPF also states that the risk from coastal change should be reduced by avoiding inappropriate development in vulnerable areas and not exacerbating the impact of physical changes to the coast.'*

*Replace paragraph 8.58 with:*

*The Policy Ideas Exhibitions undertaken for the Plan revealed mixed views on this subject with some respondents indicating that this was the most important issue likely to affect the Thorpeness area of the parish over the Plan period and that it required immediate addressing, with other respondents indicating that further coastal erosion was inevitable and resistance to it was futile. On 31 March 2025, Coastal Partnership East, the coastal management partnership of North Norfolk District Council, Great Yarmouth Borough Council and East Suffolk Council, was dissolved. The initial partnership agreement anticipated peaks and troughs of resource sharing at different times across the three councils. However, there has been a continual demand on each local authority to manage the effects of sea level rise and climate change. Therefore, the councils agreed to dissolve the partnership to allow the three individual councils a more flexible approach and ability to focus on their own specific coastal management needs. In this context East Suffolk Council will continue to support the residents of Thorpeness through its Coastal Management team. In addition, the Parish Council will support local initiatives to address coastal erosion in the parish where these are supported by public consultation.*



# ACT8: Drainage and surface water flooding

- 7.55 This policy identifies specific areas in the parish which are prone to localised flooding and requires new developments to protect against flooding and pollution and to provide biodiversity benefits.
- 7.56 In general terms the policy takes a positive approach to these matters and has regard to Section 14 of the NPPF. In this broader context I recommend the following modifications to bring the clarity required by the NPPF and to allow ESC to be able to apply the policy through the development management process:
- the clarification of the proportionate approach taken in the first part of the policy;
  - a shifting of the focus in the second and third parts of the policy so that the focus is on what development proposals should achieve and how they should be designed; and
  - the removal of subjective elements (referring to their value to residents and the wider community) from the second part of the policy.
- 7.57 Otherwise the policy meets the basic conditions. It will contribute to the local delivery of the social and environmental dimensions of sustainable development.

## Replace the policy with:

**As appropriate to their scale, nature and location, development proposals should use appropriate sustainable drainage systems which will mitigate and protect against pollution, provide drainage and wider amenity and, where appropriate, recreational and biodiversity benefits.**

**New sustainable drainage system should, meet the four pillars of sustainable drainage (Quality, Quantity, Biodiversity, Amenity) and be green and open. This includes raingardens, downpipe planted attenuation, swales, basins, rills, and other naturalised features. This approach should be prioritised over features that provide crate systems and widespread permeable paving. Development proposals should demonstrate through the submission of a drainage strategy to accompany the submission of a planning application how they will discharge surface water in accordance with lead local flood authority guidance to mitigate its own flooding and drainage impacts, whilst avoiding increases of flooding elsewhere.**

**Development proposals should be designed to avoid the exacerbation of existing localised flooding or create new areas of flooding. The following are identified as particularly vulnerable existing areas of localised flooding in the parish:**

- a) Aldringham Lane**
- b) Old Homes Road, Thorpeness**
- c) Gipsy Lane, Aldringham.'**

## ACT9: Thorpeness Heritage Centre

- 7.58 This is a very distinctive policy which expresses support for the enhancement or extension of Thorpeness Heritage Centre. I saw the significance and popularity of the Centre during the visit.
- 7.59 In general terms the policy takes a positive and criteria-based approach towards the extension of the Centre. Given its overall policy wording I recommend the deletion of the unnecessary 'in principle' element of the wording.
- 7.60 Otherwise the policy meets the basic conditions. It will contribute to the local delivery of each of the three dimensions of sustainable development.

**Delete 'in principle' from the policy wording**

## ACT10: Heritage Protection and Non-Designated Heritage Assets

- 7.61 This policy addresses designated heritage assets. It also identifies 24 non-designated heritage assets in a very positive way which is helpfully informed by relevant photographs. I looked carefully at the designated heritage assets and the proposed non-designated heritage assets during the visit.
- 7.62 I recommend that the first part of the policy is revised so that it sets out requirements for the types of development listed rather than offering support. This acknowledges that other development plan policies would also apply to the determination of any such proposals. This was agreed by AcTPC in its response to the clarification note. I also recommend that the final sentence of the part of the policy on non-designated heritage assets is modified so that it is clear about the impact of development and requires a proportionate heritage statement.
- 7.63 Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of the social and environmental dimensions of sustainable development.

**Replace the opening element of the first part of the policy with:**

**'As appropriate to their scale and nature, development proposals that would affect the character, significance and setting of the parish's designated heritage assets, including archaeological assets, listed buildings, the historic park and garden at The Meare, and the Thorpeness Conservation Area should:'**

**Replace the final sentence of the part of the policy on non-designated heritage assets with:**

**'Development proposals that would affect a non-designated heritage asset should be accompanied by a proportionate heritage statement.'**

*Replace paragraph 9.11 with:*

*'The Conservation Area Appraisal for Thorpeness completed in 2022 identifies several buildings within the Conservation Area boundary which make a positive contribution to its character and are in effect already identified as non-designated heritage assets'*

*(NDHAs) and would be treated in that way should a relevant application be submitted. This is shown in Figure 52 below. In this context the third criterion of the first part of the policy refers to those building identified within the Conservation Area Appraisal as positive buildings and NDHA 23 (Old Thorpe House) which is the only NDHA inside the Conservation Area. As a further level of detail, the Steering Group have therefore concentrated their efforts in identifying NDHA which do not currently have any other form of protection and have not been previously identified. These are outside of the Conservation Area Boundary and within Aldringham.*

#### Policy ACT11 New Design

- 7.64 This is an important policy in the Plan. The Aldringham Cum Thorpe Design Guidance and Codes supports the policy and contains clear guidance on a range of elements. The Design Guidance and Codes apply across the parish and provide specific guidance for Aldringham and Thorpeness. This approach is consistent with the views of the community as expressed later through the Policy Ideas Exhibition where it was felt to be extremely important that the Design Code work reflected the difference in character between those two parts of the parish. The Design Code preparation involved a detailed analysis of the local character of the parish, a character overview of each of the settlements and then developed some strategic design guidelines and identified a palette of materials which should influence the design of future development.
- 7.65 I am satisfied that the Design Guidance and Codes is an excellent document which properly captures the character of the parish.
- 7.66 In general terms the policy takes a very good approach to this matter. In the round, it is an excellent local response to Section 12 of the NPPF. In this context I recommend the following modifications to bring the clarity required by the NPPF and to allow ESC to be able to apply the policy through the development management process:
- the clarification of the proportionate approach taken in the first part of the policy;
  - a revision of the wording used in criteria a and e; and
  - a shifting of the focus in criterion h of the policy so that the focus is on what development proposals should achieve and how they should be designed
- 7.67 Otherwise the policy meets the basic conditions. It will contribute to the local delivery of the social and environmental dimensions of sustainable development.

**Replace the third part of the policy with: ‘As appropriate to their scale, nature and location development proposals should accord with the following criteria:’**

**In a replace ‘must’ with ‘should’**

**Replace e with ‘Walking and cycling routes should be promoted wherever practicable.’**

**In h replace ‘must take the utmost care to avoid harming the significance of listed or landmark buildings and their setting’ with ‘should respond sensitively to the significance of listed or landmark buildings and their settings’**

## ACT12: Accessibility and Connectivity

- 7.68 This policy seeks to improve the health and wellbeing of residents through the provision of safe and attractive pedestrian and cycle routes. It is underpinned by helpful supporting text. The suggested new routes in the policy reflect the findings of the East Suffolk Cycling and Walking Strategy.
- 7.69 This is a very distinctive policy which has regard to Sections 8 and 9 of the NPPF. In this context I recommend the following modifications to bring the clarity required by the NPPF and to allow ESC to be able to apply the policy through the development management process:
- ensuring that the first part of the policy ensures that development proposals are consistent with the development plan;
  - recasting the final part of the policy so that it comments about the practicability of incorporating public rights of way into development proposals; and
  - separating the element of the policy on new public rights of way from the main element which deals with proposals which would affect existing public rights of way
- 7.70 Otherwise the policy meets the basic conditions. It will contribute to the local delivery of the social and environmental dimensions of sustainable development.

**Replace the first sentence of the second part of the policy with:**

**‘Development proposals that will improve or contribute to improved connectivity for pedestrians and cyclists will be supported where they otherwise comply with the development plan and they respond positively to any sensitive nature conservation sites.’**

**Replace the final part of the policy with:**

**‘Development proposals which will affect an existing Public Right of Way should incorporate the right of way sensitively into the scheme, preferably in a wide and open green corridor. Where this is not practicable, appropriate diversions or new routes should be provided that are more or at least, equally safe, accessible, and convenient for users.’**

**The development of any new public rights of way or any proposed works to existing public rights of way should be designed in accordance with current Suffolk County Council guidance and standards.’**

## ACT13: Public car parking

- 7.71 This policy seeks to improve existing accessibility and parking arrangements for all users through the promotion and provision of high quality and well-designed amenities.
- 7.72 Paragraph 10.9 comments that there are limited opportunities for additional public car parking in Thorpeness and any additional provision would need to be balanced against the impacts on the protected nature conservation sites from the potential increase in

visitor and recreational pressure that may be generated by additional parking and possible additional visitor numbers.

- 7.73 I saw the pressures on car parking in Thorpeness during my visit. The policy takes a positive and well-considered approach to the matter. The second and third part of the policy provide a series of criteria against which proposals will be assessed.
- 7.74 I correct a typographic error in the first part of the policy. I also recommend that criterion a) is expanded so that it clarifies the geography of the close walking distance. Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of the social and environmental dimensions of sustainable development.

**In the first part of the policy remove ‘the’ before ‘Thorpeness’**

**Replace a) with ‘be located within reasonable walking distance of the centre of Thorpeness’**

ACT14: Leisure and recreational facilities

- 7.75 This policy provides support for the provision of new or improved leisure and recreation facilities such as play areas, sports pitches, and outdoor meeting places.
- 7.76 The policy takes a positive approach to these matters and has regard to Section 8 of the NPPF. In this context I recommend that the wording used in the policy is modified so that its intention is clear. Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of the social and environmental dimensions of sustainable development.

**Replace ‘are encouraged’ with ‘will be supported’**

ACT15: Community facilities

- 7.77 This policy seeks to retain the existing community facilities within the parish and provides support for new facilities identified through public consultation such as a Community Hall in Aldringham and play space in Thorpeness.
- 7.78 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.
- 7.79 The first part of the policy lists examples of community facilities. I sought AcTPC’s comments on the extent to which the examples were a definitive list. In its response it advises that

*‘It is acknowledged that a definitive list is difficult as there are occasional short-term facilities which arise and also the QB would not wish to exclude any future new facilities which may arise from being covered by the policy. It therefore may be pragmatic to remove the examples.’*

- 7.80 I recommend that the examples are removed from the policy accordingly. Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of the social and environmental dimensions of sustainable development.

**Delete ‘e.g. St Andrews Church, the public houses, the Country Club, the cafes, the allotments, the Ogilvie Pavilion, and associated sports grounds’**

ACT16: Local Green Spaces

- 7.81 The policy proposes the designation of 14 local green spaces (LGSs). They have been assessed against the criteria in the NPPF. I looked carefully at the proposed LGSs during the visit. I saw their importance to the character and appearance of the parish. I saw the way in which the various LGSs reflected the separate characters of Aldringham and Thorpeness
- 7.82 The approach taken is underpinned by the details in Appendix B. Furthermore, the policy seeks to follow the matter-of-fact approach taken in the NPPF.
- 7.83 In its response to the clarification note, AcTPC clarified the size of the proposed LGS12 (Land to the rear of Ogilvie Almhouses, Aldringham).
- 7.84 Based on the details in Appendix B and my own observations, I am satisfied that the various proposed LGSs meet the criteria in paragraphs 106 and 107 of the NPPF.
- 7.85 Whilst the policy seeks to follow the matter-of-fact approach taken in the NPPF, it does so in a clumsy way. As such I recommend that the policy is recast. Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of the social and environmental dimensions of sustainable development.

**Replace the policy with:**

**‘The Plan designates the following Local Green Spaces**

**[List 1-14]**

**Development proposals within the Local Green Spaces will not be supported other than in very special circumstances.’**

*In Appendix B amend the size of the proposed LGS12 (Land to the rear of Ogilvie Almhouses, Aldringham) from 8 hectares to 0.8 hectares*

ACT17: Business and employment development

- 7.86 This policy encourages the creation of new businesses and the expansion of existing businesses subject to a series of criteria. The policy also provides specific support for redevelopment and improvement/enhancement of the Thorpeness Golf Club and Hotel subject to criteria.
- 7.87 The policy takes a very positive approach to these issues and has regard to Section 6 of the NPPF

- 7.88 I recommend the correction of an error and the deletion of the unnecessary reference to 'in principle' in the Thorpeness Golf Club and Hotel part of the policy. Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of each of the three dimensions of sustainable development.

**In the Thorpeness Golf Club and Hotel part of the policy delete 'in principle'**

**In the final sentence of the policy delete one of the two uses of 'subject to'**

Other Matters - General

- 7.89 This report has recommended a series of modifications both to the policies and to the supporting text in the submitted Plan. Where consequential changes to the text are required directly because of my recommended modification to the policy concerned, I have highlighted them in this report. However other changes to the general text may be required elsewhere in the Plan because of the recommended modifications to the policies. Similarly, changes may be necessary to paragraph numbers in the Plan or to accommodate other administrative matters such as factual errors which have been acknowledged by AcTPC. It will be appropriate for ESC and AcTPC to have the flexibility to make any necessary consequential changes to the general text. I recommend accordingly.

*Modification of general text (where necessary) to achieve consistency with the modified policies and to accommodate any administrative and technical changes.*

Other Matters – Specific

- 7.90 ESC has made a series of helpful comments on the Plan. I have addressed them on a policy-by-policy basis where they are required to ensure that the Plan meets the basic conditions.
- 7.91 ESC suggest a series of revisions and additions to the general elements of the Plan. I have considered the various issues very carefully together with AcTPC's responses to the suggestions. To bring the clarity required by the NPPF, I recommend that the Plan is modified to address the following points as raised by ESC (and using the ESC descriptions):

- *General*
- *Figure 1*
- *Paragraph 1.8*
- *Paragraphs 1.12 and 1.13*
- *Paragraph 2.10*
- *Paragraph 3.5*
- *Section 4*
- *Paragraph 8.46*
- *Paragraphs 9.8 to 9.11*
- *Paragraphs 10.4 and 10.5*

## 8 Summary and Conclusions

### *Summary*

- 8.1 The Plan sets out a range of policies to guide and direct development proposals in the period up to 2036. It is distinctive in addressing a specific set of issues that have been identified and refined by the wider community to safeguard the character and setting of the neighbourhood area.
- 8.2 Following the independent examination of the Plan, I have concluded that the Aldringham cum Thorpe Neighbourhood Development Plan meets the basic conditions for the preparation of a neighbourhood plan subject to a series of recommended modifications.

### *Conclusion*

- 8.3 On the basis of the findings in this report, I recommend to East Suffolk Council that, subject to the incorporation of the modifications set out in this report, the Aldringham cum Thorpe Neighbourhood Development Plan should proceed to referendum.

### *Other Matters*

- 8.4 I am required to consider whether the referendum area should be extended beyond the neighbourhood area. In my view, the neighbourhood area is entirely appropriate for this purpose and no evidence has been submitted to suggest that this is not the case. I therefore recommend that the Plan should proceed to referendum based on the neighbourhood area as approved by East Suffolk Council on 5 May 2016.
- 8.5 I am grateful to everyone who has helped in any way to ensure that this examination has run in a smooth manner. The responses from Aldringham cum Thorpe Parish Council to the clarification note were both detailed and informative and East Suffolk Council managed the overall process in a very efficient way.

**Andrew Ashcroft**  
**Independent Examiner**  
**13 November 2025**