

Response of the Aldringham cum Thorpe Neighbourhood Development Plan

Independent Examiner's Clarification Note – August 2025

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

QB Response: Given the context of paragraph 7.7, the intention of the policy is that any contributions should be proportionately applied depending on the scale and nature of the proposal.

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?

QB response: The PC 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.

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?

QB Response: *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.*

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?

QB: *Yes they are the same. It is acknowledged that consistent terminology would aid clarity here.*

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?

QB: 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 prevision on application which would mean the policy may not necessarily be NPPF compliant in its current form.

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?

QB: 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

Policy ACT6

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

QB: 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 also 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..

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)?

QB Response: *This issue is of such importance locally that the PC were keen to acknowledge the concerns of local people and reflect this in the NP , however it is difficult to reflect this in a smaller spatial context above that set out in the LP. 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 , the QB 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.*

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?

QB Response: *Given that the policy already includes the requirement for compliance with other policies in the plan then the 'in principle' could be removed.*

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?

QB Response: *No objection to the proposed approach*

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?

QB Response: No Objection to removal of in principle as any proposal will need to be compliant with other policies in the Plan.

Policy ACT14

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

QB Response: Yes

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?

QB Response: 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.

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).

QB Response: This is an error. The site size should be 0.8ha not 8 hectares.

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?

QB Response: Consistent with responses above. No objection to removal of 'in principle'.

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.

QB Response: These are shown in Appendix below

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.

Andrew Ashcroft

Independent Examiner

Aldringham cum Thorpe Neighbourhood Development Plan; 14 August 2025

Appendix A: QB Responses to R16 representations

Appendix A: QB Response to R16 Representations.

Respondent	Para or Policy	QB Response
Anglian Water	Para 2.23	No objection to inclusion of final paragraph of suggested text to be included in the NP
East Suffolk Council	General: Figure 1, 1.8, 1.12, 1.13, 3.5, Section 4, 8.46, 10.4, 11.5, ACT17	It is recognised that updates will need to be made to the plan post examination and that various typos etc as pointed out by ESC will be corrected.
	2.10	No objection to reference to Article 4
	ACT1	The contributions element of the policy would need to be proportionately applied. See response to examiner's questions.
	ACT2	The NP is mindful that its policies should not repeat LP policy however no objection to inclusion of thresholds .
	ACT3	See response to examiner's questions
	ACT4	See response to examiner's questions
	8.26-8.34	A reference to the Conservation Area Appraisal can be included
	9.8-9.11	No objection to insertion of cross reference to ESC SPD document.
	ACT10	A footnote could be used to explain that this 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.

Environment Agency	Biodiversity Net Gain	No objection to inclusion of metric as requested
Historic England	General	Nothing further to add
Jane Blanchflower	ACT1,	Comments noted. See also ESC comments above and Examiner's Questions
	ACT 2	Support noted
	ACT3	A number of other NPS include the exemption for replacement dwellings based on the fact that it is a replacement for the existing residential position. However in this context it is possible that a current holiday or second home is the subject of a replacement and therefore the principal residence could apply. The Examiner will reach a conclusion on this matter.
	ACT10	Support noted
	ACT12	Noted. Nothing further to add
	ACT13	Support noted
National Grid (Fisher German)	General	Nothing further to add
National Highways	General	Noted
Natural England	Standing advice	Nothing further to add
Suffolk County Council	Archaeology	This is advice and not a basic condition issue, however a note could be included in the supporting text if considered essential.
	Minerals and Waste	Suggest remove text reference for ease.
	Natural Environment – Green Gaps	Noted. There is a need for consistency of terms. See also Examiner's Questions
	Views	No objection to suggested wording amendments
	Local Green Spaces	Space 13 is 0.02 hectares
Suffolk Wildlife Trust	ACT4	No objection to this suggestion
William Pecover	7.40	No objection to inclusion of updated figures. The issue of Thorpeness Holiday village is addressed in the Examiner's Note. It should be noted that there is local support for a principal residence policy. The key point made in the NP is that the properties are not occupied by permanent residents.
	Golf course	Located adjacent to the Site of Special Scientific Interest. ESC indicated in early stages of Plan preparation that they would not support development in this location due to impact on the environmental designations. The Golf Course is too large to be a Local Green Space and therefore does not fit the criteria.

