

# Responses to Aldringham cum Thorpe Neighbourhood Plan

## Regulation 16 Publicising a Neighbourhood Plan

Publicity period: 7 May to 18 June 2025



August 2025

# Responses

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# What is the purpose of this document?

Aldringham cum Thorpe Parish Council submitted their Neighbourhood Plan to East Suffolk Council ahead of it being submitted for independent examination.

East Suffolk Council publicised the Plan and invited representations to be forwarded to the examiner for consideration alongside the Plan.

This document contains all representations received during the publicity period of 7 May to 18 June 2025.

## Anglian Water Services

Thank you for consulting Anglian Water on the Regulation 16 of the draft Aldringham Neighbourhood Plan.

Anglian Water has previously submitted comments on the pre-submission version (Reg 14). We welcome the amendments in the submission version of the neighbourhood plan, following our comments and recommended changes. However, in respect of Water Supply and Drainage under Section 2.23 updated text has only been inserted in part which does not assist in fully explaining the position regarding infrastructure capacity.

We respectfully request that amendments are made in line with the original representation made (see below). In order to meet the Basic Conditions in respect of contributing to the achievement of sustainable development, the draft neighbourhood plan should clarify how infrastructure capacity will be assessed in the event development is proposed. Pre-planning engagement is encouraged with Anglian Water on development proposals given the area is served by descriptive works.

For background you may wish to refer this guidance note: [descriptive-works-position-statement-march-2025.pdf](#)

As previously suggested, I would be happy to assist with proposed wording.

### **Previous Regulation 14 representation (dated 11/12/24)**

#### *Infrastructure capacity*

*The neighbourhood plan includes policies on the consideration of development proposals which may come forward within the Parish i.e. Policies ACT1 and ACT 17. Infrastructure capacity is, therefore, a key consideration and it is relevant to require new development to be served by a sustainable provision.*

*To support the sustainable development principles of the plan, we would advise that suitable wording is added to the neighbourhood plan to cover infrastructure capacity, so that proposals demonstrate this and to ensure that development does not result in a detrimental impact on the environment and water infrastructure, including sewers and surface water and other flooding. This should also take account of climate change.*

*It is recommended that developers undertake pre-planning engagement with Anglian Water at the earliest opportunity to assess infrastructure capacity, and any specific requirements that may be needed to deliver the proposed development, which may include sustainable points of connection (SPOC) to our water supply and wastewater networks to minimise*

*impacts on existing communities and the environment. [Developing \(anglianwater.co.uk\)](http://anglianwater.co.uk). This is to ensure that connections or any upgrades to our network are addressed when planning applications are submitted to the local planning authority.*

*It is imperative that there is sufficient capacity or the ability through a phased approach to support new development prior to the sites being occupied for use. This may need to be secured using appropriate planning conditions.*

*The neighbourhood plan area is served by both the Thorpeness and Aldeburgh Water Recycling Centres (WRC). These are located south of the B1353 between Aldringham and Thorpeness.*

*The Aldeburgh WRC is a small facility with descriptive permits. Such permits apply to small WRCs serving a small number of properties or small settlement – often collectively referred to as “descriptive works”. As a result of the limited and sometimes very constrained parameters for descriptive permits, there is a risk that incremental housing growth within or close to the WRC catchment could exceed the capacity of these small WRCs and potentially cause environmental harm. Such works are not designed to accommodate additional flows that may arise and therefore there is a presumption that there is no existing headroom to minimise environmental harm.*

*Anglian Water recommends that areas served by descriptive works are excluded for growth where a connection to a public sewer is likely to be required; OR if very small-scale growth to meet local needs through infill development is proposed a policy measure must require the developer to monitor flows for one year to prove that there is capacity for the proposed development to connect or alternative sewerage treatment is provided.*

**Comment:**

*Anglian Water respectfully requests that these matters, in addition to surface water drainage, be under included within the neighbourhood plan.*

*If you wish to discuss this further or would like some assistance on the drafting of proposed wording, please do not hesitate to contact me.*

## Arthur Day

As a permanent resident of Thorpeness I welcome the proposals to limit the number of new holiday/second homes in the village.

Thorpeness is slowly dying as the number of permanent residents has dwindled in recent years, being replaced by holiday homes and buy-to-lets.

## East Suffolk Council

The preparation of the neighbourhood development plan for Aldringham cum Thorpe is supported, and it is considered that, overall, it is a well-presented plan that complements the strategy and policies contained in the East Suffolk Council- Suffolk Coastal Local Plan (September 2020).

The Council has had good liaison with the Neighbourhood Plan group and submitted comments during the preparation of the Plan, including in response to the Regulation 14 consultation. It is noted that many of the changes suggested as part of the Regulation 14 consultation response have been made, as set out in the Consultation Statement but some have not. Whilst the Council does not have any 'basic conditions' objections to the submission Neighbourhood Plan, there are a number of comments on the Submission Neighbourhood Plan, which are set out below:

Section/Policy	Comments
Figure 1	This process diagram is helpful for the purposes of the consultation and Examination. It will need to be updated, or removed, prior to the finalisation of the Plan. If the diagram is to be removed figure numbering will need to be updated throughout the rest plan.
1.8	While this is explained in 1.2, for the avoidance of doubt para 1.8 should make it clearer that Suffolk Coastal District no longer exists.
1.12 & 1.13	These paragraphs are helpful for the purposes of the consultation and Examination. They will need to be updated prior to the finalisation of the Plan.
2.10	The East Suffolk Design and Heritage Team have recently consulted on the creation of an Article 4 direction area in Thorpeness. Consideration should be given to the inclusion of reference to Article 4 directions: <a href="#">Article 4 Directions » East Suffolk Council</a>
3.5	We welcome the changes made to this section in response to our Reg 14 comments. For further clarity the word 'again' should be removed: "As mentioned before the parish comprises two main areas of built settlement. Aldringham is identified in the Local Plan as 'Countryside'. Thorpeness is identified <u>as</u> a 'small village' <del>again</del> with a specific settlement boundary."
Section 4	Again, this section is helpful for the purposes of the consultation and Examination but will need to be updated prior to the finalisation of the Plan.
Policy ACT1	We remain concerned that insufficient consideration has been given to the viability of the requirement for all new development in Thorpeness deliver significant community benefits the form of contributions to coastal defence measures. Furthermore, it is unclear what mechanism would be used to secure these contributions and what projects any contributions would be spent on.

Policy ACT2	This policy (or the supporting text) should more clearly reference the requirements of the Local Plan policies and the supporting Affordable Housing SPD, particularly in relation to the thresholds for affordable housing delivery. As currently worded it is not clear the circumstances in which affordable housing is likely to be delivered on sites.
Policy ACT2	This policy would benefit from stronger reference to viability considerations and the need for discussions with developers and social/registered providers to ascertain the viability of a potential development with this particular affordable housing mix.
Policy ACT3 and para 7.50	We welcome the additional clarity that has been added in para 7.50 in response to our Reg 14 comments, however we still consider that the policy should more clearly set out exactly where the policy applies. If the intention is that the policy applies only to development <u>immediately</u> adjacent to the settlement boundary then that should be stated in para 7.50.
Policy ACT4	This policy needs revision to make it clear that under the existing BNG legislation it isn't 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 (usually up to 'no net loss' <a href="https://www.gov.uk/guidance/what-you-can-count-towards-a-developments-biodiversity-net-gain-bng">https://www.gov.uk/guidance/what-you-can-count-towards-a-developments-biodiversity-net-gain-bng</a> ). Additional biodiversity gain habitat creation and/or enhancement would also be required to meet the 10% gain requirement on the development.
8.26-8.34	As stated in our Reg 14 response, key views within the Conservation Area are identified in the Conservation Area Appraisal. Much of the text in this section is taken from the Conservation Area Appraisal but this is not made clear. The relationship between the views identified in the conservation area appraisal and the neighbourhood plan should be explained.
8.46	This paragraph should be updated to reflect that consultation on the Suffolk LNRS ended in June 2025. Completion of the strategy is still anticipated by the end of 2025.
Policy ACT6	Given the lack of a definitive timeframe around the aspiration to deliver 20% biodiversity gain by then end of the Plan period, we would suggest this is removed from the policy text.
9.8-9.11	We welcome the inclusion of appendix C in response to our Reg 14 comments. We suggest a cross reference to that be included somewhere in these paragraphs and a reference to East Suffolk's criteria for the identification of Non Designated Heritage Assets <a href="#">Non-designated heritage assets » East Suffolk Council</a> .
Policy ACT10	In point 3 it is still ambiguous which buildings this refers to. If they are identified in the Conservation Area Appraisal then that should be stated here, or if they are identified elsewhere then should be explained.
10.4	The text here seems to have merged together. Suggest an additional



	return between the final bullet and the text that starts 'When taken....'
11.5	The final sentence seems to be missing a word '...support <u>for</u> a...' ?
Policy ACT17	Typo in final sentence '.... <del>subject to</del> subject to compliance with the other policies in this Plan.'

# Environment Agency

Thank you for consulting us on the Submission Publication for the Aldringham Cum Thorpe Neighbourhood Plan.

We aim to reduce flood risk, while protecting and enhancing the water environment.

Having commented previously on this plan we are pleased to see that our previous comments have been taken on board. We therefore have no further detailed comments to make in relation to this plan.

## **Biodiversity Net Gain**

We note the Biodiversity Policies within the plan, however without the inclusion of a watercourse metric for windfall developments.

On 12 February 2024, Biodiversity Net Gain (BNG) became mandatory under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021). This means that unless exempt, Developers must deliver a net gain in biodiversity of at least 10%. Consequently, a development will result in more or better-quality natural habitat than there was before End 2 development.

For any windfall developments where development falls within 10m of a watercourse, a watercourse metric should be applied to the assessment.

## **Additional Advice**

We encourage you to seek ways in which your neighbourhood plan can improve the local environment. For your information, together with Natural England, Historic England and Forestry Commission, we have published joint guidance on neighbourhood planning, which sets out sources of environmental information and ideas on incorporating the environment into plans. This is available at: [How to consider the environment in Neighbourhood plans - Locality Neighbourhood Planning](#)

We trust this advice is useful.

## Historic England

Having reviewed the plan and relevant documentation we do not consider it necessary for Historic England to provide detailed comments at this time. We would refer you if appropriate to any previous comments submitted at Regulation 14 stage, and for any further information to our detailed advice on successfully incorporating historic environment considerations into a neighbourhood plan, which can be found here: <https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/>

We would be grateful if you would notify us on [eastplanningpolicy@historicengland.org.uk](mailto:eastplanningpolicy@historicengland.org.uk) if and when the Neighbourhood Plan is made by the council. To avoid any doubt, this letter does not reflect our obligation to provide further advice on or, potentially, object to specific proposals which may subsequently arise as a result of the proposed plan, where we consider these would have an adverse effect on the historic environment.

# Jane Blanchflower

## Act 1 New Housing

I don't agree with significant community benefits in the form of contributions to coastal defences' – this is too narrow a focus. The forces of coastal erosion will continue and contributions should focus on enhancing the natural landscape away from vulnerable coastline and more long-term benefits

## Act 2 Housing to meet local needs

Agree with 7.42 new dwellings should be required to be principal residences and planning permission for all holiday lets and new class of short-term lets. These should be gradually diminished as properties sell to avoid erosion of community sense and local services/facilities The Council can control this through the planning system and Council Tax. Thorpeness is no longer solely a 'holiday village' run by the 'company' and many properties remain vacant for long periods

## Act 3 Principal Residences

All this should apply to replacement dwellings unless they are principal residences.

## Act 10

Agree with NDHA designations. Stone House has associations with the Stanford family (map makers)

## Act 12 Accessibility and Connectivity

Keep joggers and walkers of the Thorpeness/Aldeburgh road where they put themselves in danger. Likewise B1353

## Act 13 Car Parking

Agree with policy. Residents' parking ~~can't be~~ is reduced by second home owners leaving parked cars when not in residence to avoid London parking charges – these should be parked within property boundaries

# National Grid (Fisher German)

## **Aldringham cum Thorpe Neighbourhood Plan Submission Consultation May – June 2025 Representations on behalf of National Grid Electricity Transmission (NGET)**

National Grid Electricity Transmission has appointed Fisher German LLP to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

### **About National Grid Electricity Transmission (NGET)**

National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. NGET manage not only today's highly complex network but also to enable the electricity system of tomorrow. Their work involves building and maintaining the electricity transmission network – safely, reliably and efficiently. NGET connect sources of electricity generation to the network and transport it onwards to the distribution system so it can reach homes and businesses.

National Grid Electricity Distribution (NGED) are the electricity distribution division of National Grid and are separate from National Grid Electricity Transmission's core regulated businesses. Please also consult with NGED separately from NGET.

National Grid no longer owns or operates the high-pressure gas transmission system across the UK. This is the responsibility of National Gas Transmission, which is a separate entity and must be consulted independently.

National Grid Ventures (NGV) develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States. NGV is separate from National Grid's core regulated businesses. Please also consult with NGV separately from NGET.

National Energy System Operator (NESO) has taken over the electricity and gas network planning responsibility from National Grid Electricity System Operator Limited (NGESO) as of 1st October 2024. Please also consult with NESO separately from NGET.

### **NGET assets within the Plan area**

Following a review of the above Neighbourhood Plan, we have identified one or more NGET assets within the Plan area. Details of NGET assets are provided below.

**Asset Description**

4ZX ROUTE TWR (001B - 001A - 001 - 120): 400Kv Overhead Transmission Line route:  
BRAMFORD

- SIZEWELL 3 and BRAMFORD - SIZEWELL 2

4ZW ROUTE TWR (001B - 001A - 001 - 119): 400Kv Overhead Transmission Line route:  
BRAMFORD

- SIZEWELL 1 and BRAMFORD - SIZEWELL 4

A plan showing details of the site locations and details of NGET assets is attached to this letter. Please note that this plan is illustrative only. NGET also provides information in relation to its assets at the website below.

<https://www.nationalgrid.com/electricity-transmission/network-and-infrastructure/network-route-maps>

**New Infrastructure**

Currently there are no known new infrastructure interactions within the area, however demand for electricity is expected to rise as the way NGET power our homes, businesses and transport changes. As the nation moves towards net zero, the fossil fuels that once powered the economy will be replaced with sources of low-carbon electricity, such as offshore wind farms.

The UK Government has committed to reach net zero emissions by 2050. This means achieving a balance between the greenhouse gases put into the atmosphere and those taken out. Decarbonising the energy system is vital to this aim.

NGET's infrastructure projects in England and Wales will support the country's energy transition and make sure the grid is ready to connect to more and more sources of low carbon electricity generated in Britain.

The way NGET generate electricity in the UK is changing rapidly, and NGET are transitioning to cheaper, cleaner and more secure forms of renewable energy such as new offshore windfarms. NGET need to make changes to the network of overhead lines, pylons, cables and other infrastructure that transports electricity around the country, so that everyone has access to clean electricity from these new renewable sources. These changes include a need to increase the capability of the electricity transmission system between the North and the Midlands, and between the Midlands and the South. It is also needed to facilitate the connection of proposed new offshore wind, and subsea connections between England and Scotland, and between the UK and other countries across the North Sea.

Accordingly, we request that the Council is cognisant of the above.

### **Further Advice**

NGET is happy to provide advice and guidance to the Council concerning their networks. Please see attached information outlining further guidance on development close to National Grid assets.

If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us.

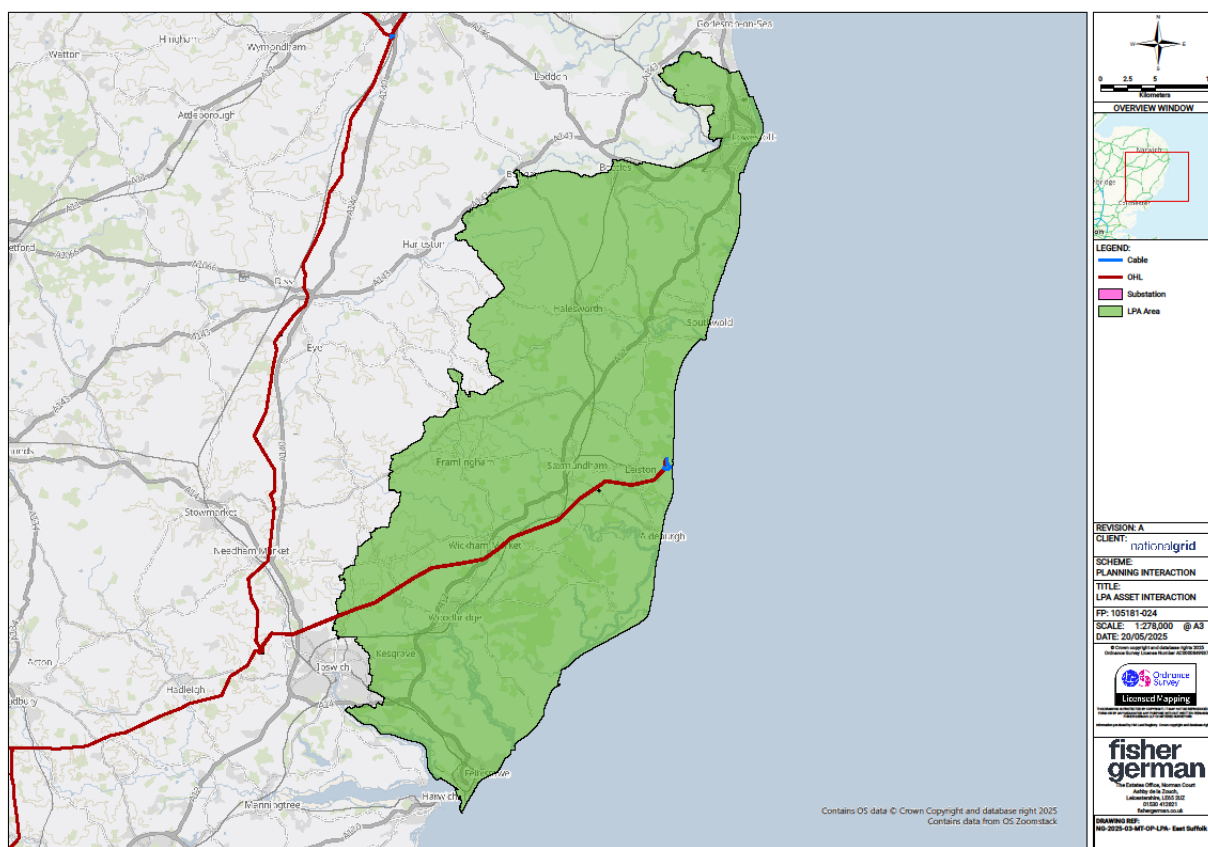
To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, NGET wishes to be involved in the preparation, alteration and review of plans and strategies which may affect their assets. Please remember to consult NGET on any Development Plan Document (DPD) or site-specific proposals that could affect our assets.

We would be grateful if you could add our details shown below to your consultation database, if not already included:

Angela Brooks MRTPI, Partner  
ngplanning@fishergerman.co.uk  
Fisher German LLP  
The Estates Office  
Ashby de la Zouch  
LE65 2UZ

Tiffany Bates, Development Liaison Officer  
box.landandacquisitions@nationalgrid.com  
National Grid Electricity Transmission  
National Grid House  
Warwick Technology Park  
Gallows Hill  
Warwick  
CV34 6DA

If you require any further information in respect of this letter, then please contact us.





## National Highways

National Highways welcomes the opportunity to provide comments on the consultation under Regulation 16, dated 07 May 2025.

National Highways has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority, and street authority for the Strategic Road Network (SRN). Our role includes ensuring the safe and efficient operation of the SRN and acting as a partner in delivering national economic growth.

In relation to the Aldringham cum Thorpe Neighbourhood Plan, we note the nearest SRN junction is the A14 Junction 58 (Seven Hills Interchange), where the A14 connects with the non-trunk section of the A12. National Highway's principal interest is in safeguarding the safe and efficient operation of the A14 trunk road.

Upon reviewing the plan, we observe that the Neighbourhood Plan area is located some distance from Junction 58. As such, we do not anticipate that the draft policies outlined within the plan will have any adverse impact on the operation of the A14 trunk road. Therefore, National Highways has no further comments on the proposed policies.

We have also reviewed the supporting document titled, "Aldringham cum Thorpe Neighbourhood Plan Basic Conditions Statement" dated March 2025. In relation to the Focus Consultation on General Conformity with Basic Conditions, National Highways have no further comments.

At this stage, we have no additional comments to offer.

## Natural England

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

**Natural England does not have any specific comments on this draft neighbourhood plan.**

However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan and to the following information.

Natural England does not hold information on the location of significant populations of protected species, so is unable to advise whether this plan is likely to affect protected species to such an extent as to require a Strategic Environmental Assessment. Further information on protected species and development is included in [Natural England's Standing Advice on protected species](#).

Furthermore, Natural England does not routinely maintain locally specific data on all environmental assets. The plan may have environmental impacts on priority species and/or habitats, local wildlife sites, soils and best and most versatile agricultural land, or on local landscape character that may be sufficient to warrant a Strategic Environmental Assessment. Information on ancient woodland, ancient and veteran trees is set out in Natural England/Forestry Commission [standing advice](#).

We therefore recommend that advice is sought from your ecological, landscape and soils advisers, local record centre, recording society or wildlife body on the local soils, best and most versatile agricultural land, landscape, geodiversity and biodiversity receptors that may be affected by the plan before determining whether a Strategic Environmental Assessment is necessary.

Natural England reserves the right to provide further advice on the environmental assessment of the plan. This includes any third party appeal against any screening decision you may make. If an Strategic Environmental Assessment is required, Natural England must be consulted at the scoping and environmental report stages.

## Annex 1 - Neighbourhood planning and the natural environment: information, issues and opportunities

### Natural environment information sources

The [Magic](http://magic.defra.gov.uk/)<sup>1</sup> website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: **Agricultural Land Classification, Ancient Woodland, Areas of Outstanding Natural Beauty, Local Nature Reserves, [National Parks \(England\)](https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england), National Trails, Priority Habitat Inventory, public rights of way (on the Ordnance Survey base map) and Sites of Special Scientific Interest (including their impact risk zones)**. Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available from [the Association of Local Environmental Records Centres](https://www.local-environmental-records-centres.org/).

Priority habitats are those habitats of particular importance for nature conservation, and the list of them can be found [here](#)<sup>2</sup>. Most of these will be mapped either as **Sites of Special Scientific Interest**, on the Magic website or as **Local Wildlife Sites**. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.

**National Character Areas** (NCAs) divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found [here](#)<sup>3</sup>.

There may also be a local **landscape character assessment** covering your area. This is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area. Your local planning authority should be able to help you access these if you can't find them online.

If your neighbourhood planning area is within or adjacent to a **National Park** or **Area of Outstanding Natural Beauty** (AONB), the relevant National Park/AONB Management Plan for the area will set out useful information about the protected landscape. You can access

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<sup>1</sup> <http://magic.defra.gov.uk/>

<sup>2</sup> <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

<sup>3</sup> <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>

the plans on from the relevant National Park Authority or Area of Outstanding Natural Beauty website.

General mapped information on **soil types** and **Agricultural Land Classification** is available (under 'landscape') on the [Magic](#)<sup>4</sup> website and also from the [LandIS website](#)<sup>5</sup>, which contains more information about obtaining soil data.

### **Natural environment issues to consider**

The [National Planning Policy Framework](#)<sup>6</sup> sets out national planning policy on protecting and enhancing the natural environment. [Planning Practice Guidance](#)<sup>7</sup> sets out supporting guidance.

Your local planning authority should be able to provide you with further advice on the potential impacts of your plan or order on the natural environment and the need for any environmental assessments.

### Landscape

Your plans or orders may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds, woodland or dry stone walls and think about how any new development proposals can respect and enhance local landscape character and distinctiveness.

If you are proposing development within or close to a protected landscape (National Park or Area of Outstanding Natural Beauty) or other sensitive location, we recommend that you carry out a landscape assessment of the proposal. Landscape assessments can help you to choose the most appropriate sites for development and help to avoid or minimise impacts of development on the landscape through careful siting, design and landscaping.

### Wildlife habitats

Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed [here](#)<sup>8</sup>), such as Sites of Special Scientific Interest or [Ancient woodland](#)<sup>9</sup>. If

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<sup>4</sup> <http://magic.defra.gov.uk/>

<sup>5</sup> <http://www.landis.org.uk/index.cfm>

<sup>6</sup> <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

<sup>7</sup> <http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/>

<sup>8</sup> <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

<sup>9</sup> <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

there are likely to be any adverse impacts you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.

### Priority and protected species

You'll also want to consider whether any proposals might affect priority species (listed [here](#)<sup>10</sup>) or protected species. To help you do this, Natural England has produced advice [here](#)<sup>11</sup> to help understand the impact of particular developments on protected species.

### Best and Most Versatile Agricultural Land

Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 112. For more information, see [Guide to assessing development proposals on agricultural land](#).<sup>12</sup>

### **Improving your natural environment**

Your plan or order can offer exciting opportunities to enhance your local environment and should provide net gains for biodiversity in line with the [National Planning Policy Framework](#). If you are setting out policies on new development or proposing sites for development, you should follow the biodiversity mitigation hierarchy and seek to ensure impacts on habitats are avoided or minimised before considering opportunities for biodiversity enhancement. You may wish to consider identifying what environmental features you want to be retained or enhanced or new features you would like to see created as part of any new development and how these could contribute to biodiversity net gain and wider environmental goals.

Opportunities for environmental enhancement might include:

- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.

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<sup>10</sup> <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

<sup>11</sup> <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

<sup>12</sup> <https://www.gov.uk/government/publications/agricultural-land-assess-proposals-for-development/guide-to-assessing-development-proposals-on-agricultural-land>

- Think about how lighting can be best managed to reduce impacts on wildlife.
- Adding a green roof to new buildings.
- Providing a new footpath through the new development to link into existing rights of way.

Site allocations should be supported by a baseline assessment of biodiversity value. The statutory [Biodiversity Metric](#) may be used to understand the number of biodiversity units present on allocated sites. For small development allocations the [Small Sites Metric](#) may be used. This is a simplified version of the statutory [Biodiversity Metric](#) and is designed for use where certain criteria are met. Further information on biodiversity net gain including [planning practice guidance](#) can be found [here](#).

You may also want to consider enhancing your local area in other ways, for example by:

- Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your community.
- Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision. Natural England's [Green Infrastructure Framework](#) sets out further information on green infrastructure standards and principles
- Identifying green areas of particular importance for special protection through Local Green Space designation (see [Planning Practice Guidance](#)<sup>13</sup>).
- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks or on verges, changing hedge cutting timings and frequency).
- Planting additional street trees.
- Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition, or clearing away an eyesore).

Natural England's [Environmental Benefits from Nature tool](#) may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside the statutory [Biodiversity Metric](#) and is available as a beta test version.

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<sup>13</sup> <https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space>

# Suffolk County Council

SCC welcome the changes made to the plan in response to comments made at the Reg. 14 pre-submission consultation stage.

As this is the submission draft of the Plan the County Council response will focus on matters related to the Basic Conditions the plan needs to meet to proceed to referendum. These are set out in paragraph 8(2) Schedule 4B to the Town and Country Planning Act. The basic conditions are:

- a) having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the neighbourhood plan
- b) the making of the neighbourhood plan contributes to the achievement of sustainable development.
- c) the making of the neighbourhood plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area)
- d) the making of the neighbourhood plan does not breach, and is otherwise compatible with, EU obligations.

Where amendments to the plan are suggested added text will be in *italics* and deleted text will be in strikethrough.

## Archaeology

Within SCC's response to the pre-submission (Regulation 14) consultation stage, the following addition was recommended to be included in Section 9. Heritage, Design and Tourism:

*"Suffolk County Council Archaeological Service (SCCAS) would advise that there should be early consultations of the Historic Environment Record (HER) and assessment of the archaeological potential of any potential development site at an appropriate stage in the design stage, in order that the requirements of NPPF and Suffolk Coastal Local Plan (2020) are met. SCCAS would be happy to advise on the level of archaeological assessment and appropriate stages to be undertaken."*

The parish has decided not to include this in the Neighbourhood Plan because it is a "general statement providing guidance on archaeology and planning applications". However, to accord with Paragraph 5 (Ref: 18a-005-20190723) of the Planning Practice Guidance (PPG) which states that "the historic environment record is a useful source of information on the local historic environment. The local planning authority heritage advisers can advise on local heritage issues to be considered when preparing a neighbourhood plan."

It is important and useful to outline this information because Neighbourhood Plans are a statutory planning document once adopted and should include all the necessary information. Therefore, the above wording should be included for conformity and to be in line with Basic Condition A.

### Minerals and Waste

#### *Paragraph 3.4*

SCC welcomes that the parish council has taken in board the comments made at Regulation 14 stage. To clearly inform the parish and evidence our claims SCC had included maps showing the location of the Water treatment facilities and the minerals consultation area that falls within the parish boundary. These maps do not need to be included in the Neighbourhood Plan, but they can be if the parish council wishes to add them in.

This paragraph states “The majority of the Neighbourhood plan area is also within the minerals consultation area (shown in the map below)”, however no map has been added in underneath. While not a Basic Conditions matter SCC would recommend that the parish reviews this for clarity and either adds in the relevant map or removes the reference.

### Natural Environment

#### *Figure 40 & Policies Map*

At Regulation 14 stage, SCC commented that “Green gaps and settlement breaks should be referred to uniformly as “settlement gaps” as this is the terminology typically used for planning purposes”. The parish responded that they “Agree this section requires clarification” and actioned to “Amend this section and Policy ACT5 for clarity”.

Policy ACT5 references to Figure 40 which is labelled as “Figure 40: Green gaps in Aldringham”. For consistency and to be in line with our previous comments which the parish agreed to this should be amended as follows:

“Figure 40: *Green Settlement gaps* in Aldringham”

This amendment should also be reflected on the key of the Policies Map in Appendix E:

“*Green Settlement gaps*”

This will ensure the plan would be clear and unambiguous, as per NPPF paragraph 16, part d, and accord with Basic Condition A.

*Policy ACT5 - Landscape Character settlement gaps and important views*



In SCC's previous response the following amendment was recommended as the term "significant" is defined in Landscape and Visual Assessment methodologies and widely used in Environmental Impact Assessment:

'Development proposals within or that would affect an important public local view should take account of the view concerned and developments which would have an unacceptable significant adverse impact [...]'

The parish council has added "significant" as recommended but has not removed the term "unacceptable" from the policy wording. Therefore, the policy now read as "[...] developments which would have a significant unacceptable adverse impact on the landscape or character of the view concerned will not be supported."

This may have been a typographical or formatting error where the parish forgot to remove the term "unacceptable". Or if that is not the case, SCC recognises that the parish may prefer to keep the term "unacceptable" for decision making reasons. However, the use of the phrasing "significant unacceptable" implies that there could be insignificant unacceptable adverse impacts which would be supported, and this contradicts established planning policy principles. If an impact is unacceptable in this context, then it is significant by default.

Thus, SCC recommends either of the following minor but important amendments:

"[...] developments which would have a significant, unacceptable adverse impact on the landscape or character of the view concerned will not be supported."

Or

"[...] developments which would have a significant unacceptable adverse impact on the landscape or character of the view concerned will not be supported."

#### *Appendix B: Local Green Spaces*

At Regulation 14 stage SCC noted that "Space 11 to 17 do not include the site size. Whilst it is believed that the sites are likely not an extensive tract of land, inclusion of the site sizes would clarify this and support their justification in accordance with NPPF paragraph 106, part c."

While sizes have been added for most of the spaces, Local Green Space 13 (formerly Space 16) does not have a size included in its description. This is assumed to be a brief oversight and not a Basic Condition matter, but SCC recommends that A site size in hectares is added as per our previous comment.

## General

### *Typographical errors*

Objective 2, page 39:

“[...] effects of climate change, flood-risk, sea level rise and [...]”

Objective 2, page 54:

“[...] effects of climate change, flood-risk, sea level rise and [...]”

Paragraph 8.5:

"Policy relating to such proposals is contained in the National Policy Statements for Energy Infrastructure (EN-1 to EN-6)."

Removal of a comma from the following sentence in Policy ACT6 is suggested:

‘Otherwise, acceptable development proposals, [...]’

### *Formatting*

There are two paragraphs labelled as 7.11 and two labelled as 7.12 across pages 44 and 45.

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If there is anything that I have raised that you would like to discuss, please use my contact information at the top of this letter

## Suffolk Wildlife Trust

Thank you for sending Suffolk Wildlife Trust notice of the Regulation 16 Consultation for the Aldringham cum Thorpe Neighbourhood Plan. Our comments relate only to Wildlife Conservation, Biodiversity, and Ecology – our charitable remit.

We thank the Aldringham cum Thorpe Parish Council for taking on board our previous comments and congratulate them on a plan which is ambitious and strong in its desire to protect and enhance biodiversity and aid nature recovery.

### *Natural Environment: Objective 2*

Suffolk Wildlife Trust note that wording within Objective 2 has been amended following the Regulation 14 consultation in November 2024 and now includes reference to the Biodiversity Crisis as well as the Climate Crisis. Suffolk Wildlife Trust thank the Parish Council for including this important amendment.

We support this objective.

### *Policy ACT4 Mitigating the impacts of large scale energy projects*

The final sentence of this policy (“Where such mitigations are required in respect of biodiversity the standard biodiversity net gain metric of 10% should be applied.”) should be amended to make clear that 10% is the statutory minimum in terms of delivering Biodiversity Net Gain.

### *Objective 3: To protect and enhance the parish’s important wildlife habitats and landscape*

Suffolk Wildlife Trust support the objective to protect and enhance important wildlife habitats – such as statutory and non-statutory sites of nature conservation value and priority habitats – within the parish.

### *Objective 5: To encourage the provision of appropriate visitor facilities at key destinations, consistent with the protection and conservation of the environment, to facilitate responsible enjoyment, recreation, research, education, involvement, and communication.*

Suffolk Wildlife Trust highlight the importance of this objective, notably the essential consideration regards the protection and conservation of the environment. The balance between recreational pressure on protected sites, the importance of tourism, and people’s ability to connect with nature are all hugely important and balance between all three is essential; therefore, the inclusion of this objective is of great significance.

### *Policy ACT6 Biodiversity*

Suffolk Wildlife Trust support this policy and its ambition for Biodiversity Net Gain to deliver above the statutory minimum of 10% and provide 20%. This is supported by significant evidence, partly provided by our response to the Regulation 14 Consultation (dated: 12th November 2024) in addition to the newly published, *Neighbourhood Planning Guidance for Climate Change*<sup>1</sup> produced by East Suffolk Council which clearly states that neighbourhood plans can include such aspirations (Pg. 57) within policies.

We further support the encouragement that development should provide features of benefit for key species, including swifts, bats, and hedgehogs.

Should you have any further questions, please get in touch, with us. We look forward to hearing of further progress for the Aldringham cum Thorpe Neighbourhood Plan

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<sup>1</sup><https://www.eastsuffolk.gov.uk/assets/Planning/Neighbourhood-Planning/Preparing-a-Neighbourhood-Plan/NP-Guidance-for-Climate-Change-Final-May-2025.pdf>

## William Pecover

I have read the Parish Council's submission to you. I also attended the exhibition at Thorpeness Country Club, and wrote detailed comments to the Parish Council in the pre-submission period Wednesday 16 October to Wednesday 11th December 2024. There appears to have been minor acknowledgement of these detailed observations in the revised plan now submitted, but there remain significant internal inconsistencies, inaccuracies, and omissions.

The main internal inconsistency is the description, assessment and understanding of the unique nature of Thorpeness. The report does acknowledge (2.4) that Aldringham and Thorpeness are 'distinctly different villages', and (2.8 and 7.49) it notes that Thorpeness was created as the country's first holiday village. It also notes (8.9, 11.3) that 'tourism is a key driver of the economy'. But the report then notes how (7.36) the issue of holiday lets is more acute in Thorpeness than Aldringham (!!!), and then (7.40) shows complete misunderstanding of the holiday let/rental dynamics and gets the numbers hopelessly wrong as I previously pointed out. The report (7.40) claims that the average monthly cost of a holiday let is £8,969 versus £1,149 for a rental. This is demonstrably false. Simply visit the website of Aldeburgh Coastal Cottages (<https://aldeburghcoastalcottages.co.uk>) to check; ACC rents out over 200 properties. Once you discount the very high end rentals (eg House in the Clouds, Lakeside Avenue, Dune House etc) the average monthly rental is around 50% of that claimed at 7.40. And additional related costs for rentals are substantial: private renters pay utility and council fees and minor repairs, where lets have to pay all costs including management, cleaning, and substantial repair and renovation costs to keep properties viable. I have studied 25 years of cost comparisons and believe that, when you account for unlet periods for holiday lets, the annual revenue is closer to twice (not six times) rental income, and profits are even when all costs are included. The reason for so many holiday lets versus rentals is not financial but so owners can cover some costs and make the properties available for themselves to enjoy year in year out – and to contribute to the community as 7.42 encourages. This lack of understanding is also demonstrated at 7.38 in the analysis of second homes - most of these 'second homes' are also made available for others to enjoy and to bring in substantial economic benefits to the village.

7.42 bemoans the lack of vitality that so many 'second homes' can create especially during the winter months in Thorpeness, and it is true that winter is considerably quieter than summer - but will another 10-30 houses as envisaged across the whole parish really change this? We should celebrate the unique history and concept of Thorpeness as a specially created holiday village, where tourism drives the vast majority of the local economy, and do

more to encourage tourism. This makes the Policy Act3 (p53) diametrically opposed to what drives the success of Thorpeness. New houses should not be restricted to principal residences - completely daft policy. Build on the village's core strength. And, over the past three decades, that 'vitality' has improved dramatically - where the Dolphin pub was a desert, it now thrives; where multiple restaurants by the Meare failed, The Kitchen now is buzzing (and, to my observation, busy throughout the year).

P42 summaries the various policies. The Environmental Policy Act4 acknowledges the need to mitigate the 'impacts of large scale energy projects', but this should also be noted under Housing Policies Act1. The scale of work (how did the County Council ever allow such a collection of massive projects on such a precious coastline at the same time?) on the energy projects will be vast, and any proposed major housing projects must take into account the dreadful increase in construction traffic we will face over the next decade. We have heard rumours, for instance (not denied at the submission exhibition), that permission might be sought to build on the golf practice range at the golf club as you enter Thorpeness from Aldringham. This cannot be allowed: a) because of the construction traffic entailed at the same time as cable work across the Aldringham Road; b) thin end of wedge for ribbon development from Thorpeness to Aldringham which residents have said they don't want; c) loss of precious green space close to the village - and , in fact, this land should be designated 'green space' (p96 Policy Act6) in the list of designated green spaces. There is still plenty of space around the current Golf Club building to expand current services.

The problem with a community referendum on such a report is that there is no possibility to amend important details. Overall the submission contains a lot of sensible work and analysis, and therefore respondents may be inclined to overall agreement. But that shouldn't enable key elements that are manifestly wrong to go ahead.