

## Response of the QB (Hingham Town Council to the R16 Responses on the Proposed Modifications to HING9 – 28 July 2025

Following the receipt of the Hingham Neighbourhood Development Plan – Proposed Modifications to Policy HING9 Examiner’s Clarification Note; with regards to paragraph:

*“Representations*

*Does the Town Council wish to comment on any of the representations made to the Plan?*

*The examination provides an opportunity for the Town Council to supplement its own representation in response to the representation from Norfolk County Council should it wish to do so”*

Hingham Town Council would like to offer the responses as below, highlighted in bold blue text, not only to the Norfolk County Council representation but also from representations from members of the public, in order to demonstrate fullness in consideration of representations made from residents.

For ease, the document, *“Hingham Neighbourhood Plan: SNC HING9 proposal - consultation response summaries”*, as produced and published by South Norfolk Council has been used and annotated by the Town Council to provide responses to those representations made. The Town Council comments (on this document) supplement and are in addition to the full representation document submitted by the Town Council during the HIN9 consultation period.

Ref.	Date	Name/Dept.	Organisation	Support	Oppose	Supp w. mods	Comments	Reasons
HING9.1	25/04/2025	John Henderson				✓		<p>The revised policies are clearer and more precise following receipt of the Inspector's comments. The follow up feasibility study for Ladies Meadow provides much needed clarity on some of the issues.</p> <p>I would make two comments.</p> <p>The revised policy makes clear that suitable mitigation must be provided to ensure proposals fit with it's surrounding environment. However I still feel that this lacks the intention and focus on mitigating the impact of the proposals on the local residents that adjoin the meadow. I would recommend a further line in the policy that states that proposals must include suitable mitigation to offset the light and noise disturbance from any proposals to the neighbouring residents.</p> <p><b>This issue can be addressed through any subsequent planning application. The concept sketch within the feasibility study shows a defined tree belt at the northern end of the land to provide a barrier between the existing properties on Rectory Gardens and the proposed development. The feasibility study references low level lighting (bollard lighting) for pedestrian routes. The details of any lighting schemes would again be explored through the Planning Application process and which would be the subject of public consultation.</b></p> <p>Talking to local residents they are unaware of the proposals to further intensify the use of the footpath between Rectory Gardens and The Fairland. It appears to be only me that reads parish minutes and is aware of these consultations. As this is a fairly new proposal that wasn't available in the original consultation I would recommend that local residents adjacent are made aware of this proposal more directly and given the opportunity to respond to this further consultation. I'm trying my best but haven't spoken to everyone.</p> <p><b>The progress of the Hingham Neighbourhood Plan is published monthly in a brief report in the parish magazine (this report directs readers to the Hingham Town Council website to read more in-depth information contained within the Council minutes). The parish Magazine is delivered to most residents within Hingham free of charge (some of the more remote residents/properties do not receive a copy through their door, a copy is available in the library).</b></p> <p><b>In the magazine in July 2024 the following information was published –“ The ‘Pride in Place’ funded feasibility study to assess land off Attleborough Road for potential community uses and car parking is now underway. There is ongoing discussion with the land owner (Diocese of Norwich) regarding this land and land associated with the (former) Rectory, in the hope that a better pedestrian access could be envisaged if the land off Attleborough Road could be deemed suitable for the provision of car parking and a community hub.”</b></p> <p><b>The Reg 16 submission version of Policy HING9 has been superseded by this focused consultation. Within the consultation documents on the SNC website is the feasibility study which clearly documents the proposals including the desired pedestrian link via land associated with the former rectory (now Woodlands).</b></p> <p><b>The focused consultation was publicised in the parish magazine as follows:</b>  <b>(April/May 2025) –</b>  <b>“South Norfolk Council have advised that the Assistant Director and Planning &amp; Economic Growth Portfolio Holder have agreed that the Hingham Neighbourhood Plan should now proceed to a focused consultation on modifications to HING9 (the policy to allocate Ladies Meadow for community uses including car parking). It is expected that this consultation will take place after Easter”.</b>  <b>(May/June 2025) –</b>  <b>“Hingham Neighbourhood Plan is currently subject to a focused consultation on modifications to HING9 (the policy to allocate Ladies Meadow for community uses including car parking).</b></p>

								<p><i>Anyone wishing to make comments on the proposal must do so in writing before 5pm on Monday 9 June 2025.</i></p> <p><i>The proposed Hingham Neighbourhood Plan has undergone an independent examination by Mr Andrew Ashcroft (Andrew Ashcroft Planning Ltd). The examination concluded on 23 September 2024 and the report of findings has now been submitted to South Norfolk Council.</i></p> <p><i>The examiner's report concludes that, subject to making certain recommended modifications, the Neighbourhood Plan meets the basic conditions for neighbourhood planning and should proceed to a Neighbourhood Planning referendum within the adopted neighbourhood area.</i></p> <p><i>Having considered each of the recommendations in the examiner's report and the reasons for them, South Norfolk Council proposes to approve each of the modifications, apart from that relating to Policy HING9 – Allocation of land for community uses. This proposal also includes consequential alternate proposals for supporting text relating to policies HING9 and HING6.</i></p> <p><i>The Council is proposing an alternative modification on the basis of new evidence having been presented following receipt of the examiner's report. This evidence takes the form of a feasibility study and related assessments focusing on the proposed land for allocation within Policy HING9.</i></p> <p><i>In accordance with paragraph 13(1) of Schedule 4B to the Town and Country Planning Act 1990, the Council is now consulting on its proposal in relation to HING9.</i></p> <p><i>The proposal is set out in the 'South Norfolk Council Proposed Decision Statement – Hingham Neighbourhood Plan' <a href="https://www.southnorfolkandbroadland.gov.uk/planning/future-development/neighbourhood-plans/emerging-neighbourhood-plans-south-norfolk/hingham-neighbourhood-plan">https://www.southnorfolkandbroadland.gov.uk/planning/future-development/neighbourhood-plans/emerging-neighbourhood-plans-south-norfolk/hingham-neighbourhood-plan</a></i></p> <p><b>The Town Clerk's contact details are published in every parish magazine and residents are able to contact the Clerk to make enquires.</b></p>
HING9.2	07/05.2025	Lily Brough-Steele	Water Management Alliance				✓	Having reviewed the details specific to Policy HING9, I can confirm the Norfolk Rivers Internal Drainage Board has no additional comments to make. Please refer to the Board's comments previously submitted on 23/08/2023 under our ref 23_2491_P.
HING9.3	19/05/2025	Philip Porter	National Highways				✓	<p>It has been noted that once adopted, the Neighbourhood Plan will become a material consideration in the determination of planning applications. Where relevant, National Highways will be a statutory consultee on future planning applications within the area and will assess the impact on the SRN of a planning application accordingly.</p> <p>Notwithstanding the above comments, we have reviewed the document and note that the details set out within the document are unlikely to have an severe impact on the operation of the trunk road and we offer No Comment.</p>
HING9.4	28/05/2025	Lorraine Houseago	Norfolk Historic Environment Record				✓	Thank you for consulting with us about the above neighbourhood plan Reg 16 consultation. We have no comments to make.

HING9.5	31/05/2025	Geoff Bedford					✓	<p><i>N.B. The following is a summary. Refer to submission for full response details .</i></p> <p>1. Housing Growth - while many of the conclusions appear reasonable, the studies and figures fail to take into account the effects of housing growth during the GNLP planning period. Significant growth will be taking place in Hingham and the surrounding area during the plan period, in addition to the Government’s plans for additional housing which require an updated GNLP. These households will produce some 15-20,000 extra cars in our area of interest. This growth will impact increasingly on The Fairlands junction and existing parking within the town. The infrastructure effects of the inevitable increasing traffic warrant early and greater attention.</p> <p><b>We have noted the Housing growth locally from the GNLP and Breckland Plan in particular Great Ellingham, will have a negative impact on the Town Centre environment in Hingham and will likely increase the on-highway parking congestion, hence our policy to include a purpose-built off-road car park. The impact on the wider road network due to the housing growth is a matter for the Local Plans.</b></p> <p>2. Footpath/Cyclepath safety - the proposed footpath/cyclepath from the Rectory to Ladies Meadow is of concern: the increasing popularity of electric scooters, if permitted here, would risk physical confrontations with pedestrians and is not recommended.</p> <p><b>It is illegal to ride a privately owned electric scooter (also known as an ‘e-scooter’) in public, for example on pavements, on roads or in parks</b></p> <p>3. Parking management - how will “town centre” visiting drivers be stopped from taking local residents parking spaces attending functions at Ladies Meadow? And vice versa. Are the 40 spaces mentioned just for residents? Is this enough? What maximum number of spaces (overall) are planned/can be tolerated given the land should also be ‘sustainable’ for future generations to use?</p> <p><b>Parking spaces in a public car park would not normally be divided into visitor and resident parking, unless there was a specific need for defined resident (permit) parking, for example for flats, which is not the case for this location.</b></p> <p><b>As with the current Lincoln Hall, which has limited parking spaces, the parking is not defined into resident and visitor parking.</b></p> <p><b>The required number of spaces would be re-assessed and established through the master planning/ planning application process.</b></p> <p>4. Footpath review - A comprehensive review of Fairland footpaths, crossings, and waymarking is recommended before finalising the detail of the Rectory–Ladies Meadow path. This aligns with Recommendation 13 from the 2020 Hingham Road Safety Campaign report to Hingham Town Council (HTC). Review should include the intermittent pedestrian access from Watton Road to Lincoln Hall, Library, and Market Place, the widening of the narrow Church Street footpath; and a pedestrian-controlled crossing on the B1108 for those with mobility issues. Footpaths should be widened to modern standards, especially at waymarked crossings. Increased pedestrian use is expected, and current conditions often force people into the road. Alternative surface treatments should be used to highlight both primary and secondary pedestrian crossings—potentially extending to areas like the Market Place and Norwich Street.</p> <p><b>The Town Council have been awarded Parish Partnership funding for a feasibility study into a pedestrian priority crossing over the B1108 (Fairlands). The previous NCC Parish partnership feasibility study covers a pedestrian priority crossing point on the Market Place. The Town Council continue to engage with NCC (Highways Area Engineer and Asset, Programme &amp; Funding Department) regarding improved pedestrian facilities within Hingham, and how funding opportunities can be utilised.</b></p>
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HING9.6	03/06/2025	Carry Murphy	Anglian Water				✓	Anglian Water has no specific comments to make on the proposed modifications to Policy HING9: Allocation of land for community uses.
HING9.7	04/06/2025	Debbie Mack	Historic England				✓	<p>Historic England has no in principle objection to the Council's proposed alternative modification to the policy on the basis of new evidence having been presented following receipt of the examiners report.</p> <p>We welcome criterion d of the policy which mentions the Church. We would recommend adding reference to the Conservation Area into this criterion.</p> <p>We welcome the reference in paragraph 8.27 to the adjacent Conservation Area and nearby church and need for careful consideration of heritage implications for any proposals.</p> <p>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.</p>
HING9.8	09/06/2025	Sally Wintle	Natural England				✓	<p><i>N.B. The following is a summary. Refer to submission for full response details.</i></p> <p>Natural England does not have any specific comments on this draft neighbourhood plan.</p> <p>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 additional information as part of the submission.</p>

Hingham Neighbourhood Plan: SNC HING9 proposal - consultation response summaries

Ref.	Date	Name/Dept.	Organisation	Support	Oppose	Supp w. mods	Comments	Reasons
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HING9.9	09/06/2025	Alison Doe	Hingham Town Council	✓				<p><i>N.B. The following is a summary. Refer to submission for full response details.</i></p> <p><u>Why the policy is needed</u></p> <p>The Neighbourhood Plan runs to 2043. Allocating land for community use is essential to meet future needs as Hingham grows. Community consultation identified key shortfalls—aging Lincoln Hall, no off-road public parking, inadequate library and council facilities, and limited cemetery space.</p> <p>The town centre suffers from unregulated, congested parking. There’s no designated parking for events or the church, and concerns exist about Hingham being used as a “park and ride.” The Greater Norwich Local Plan didn’t address these community needs, so the Neighbourhood Plan has a role to play in addressing the issues.</p> <p>More housing, in addition to GNLP allocation, is expected in Hingham and Breckland area, increasing pressure on local infrastructure. Provision for new/improved facilities is essential. Without policy HIN9, the plan may fail at referendum, risking the loss of a community-led planning framework.</p> <p><u>Why Ladies Meadow?</u></p> <p>The land, owned by the Diocese of Norwich, is well-placed to serve St Andrews Church and the town centre with much-needed car parking and improved pedestrian access. The proposed car park would reduce congestion and improve safety, especially around the Fairland junction.</p> <p>A strip of adjacent garden land could link Ladies Meadow to the existing footpath network, enhancing access to the cemetery and reducing pedestrian risk on Attleborough Road. No other suitable sites were identified during the Neighbourhood Plan’s call for sites.</p> <p>Although previously considered for housing in the GNLP, the site was ultimately discounted. However, the initial assessment concluded, <i>'the site is considered to be a reasonable alternative as a smaller part could be acceptable for residential allocation, if careful consideration is given to design'</i> . There is therefore a concern it could be reallocated for housing in future Local Plan revisions, which would remove the opportunity to use it for vital community facilities.</p> <p><u>NCC Highways concerns</u></p> <p>The feasibility study demonstrates that the site constraints can be overcome. The Town Council has a history of collaboration with NCC Highways and has invested in road safety improvements through the Parish Partnership scheme. Amendments have been proposed to HING9 to address concerns, though NCC Highways remain unsupportive, citing traffic concerns at the Fairland junction and lack of deliverability of proposals. The Town Council believes that there is a lack of consistency/dialogue in the messaging between different officers at NCC Highways—it is not a major development but a modest proposal for much-needed community facilities. Throughout previous NP Reg. 14 and Reg. 16 consultations, NCC Highways had not raised representations objecting to the allocation of land in HING9.</p> <p>There’s no evidence HING9 would increase traffic at the Fairlands junction; in fact, it may reduce it by intercepting vehicles earlier. Discussions with Highways (following the Fairland/Parking feasibility study) concluded that, due to low serious accident numbers, NCC would not support engineered safety improvements to the junction - hence the Town Council applying for Parish Partnership funding for a Vehicle Activated Collision Avoidance Scheme. The Council continues to pursue highway safety improvements, including speed limit reductions and vehicle-activated signage.</p>
HING9.10	09/06/2025	Alasdair Hain-Cole	Environment Agency				✓	We have reviewed the documents, as submitted, and have no objection to the proposed modifications.

HING9.11	09/06/2025	Richard Doleman	Norfolk County Council		✓			<p><i>N.B. The following is a summary. Refer to submission for full response details.</i></p> <p>The Examiner recommended deleting Policy HING9 due to concerns about its deliverability within the Plan period, particularly around pedestrian access and the overall feasibility of the proposed community uses. Since the Examiner’s report of September 2024, the further work asked for by the Examiner to develop the pedestrian, cycle and vehicular access to the site has been carried out. That work has been shared with the Highway Authority and there have been detailed discussions with South Norfolk Council to consider proposals to provide safe highway, pedestrian and cycle access to the site.</p> <p>This proposal has been thoroughly considered and taken through the County Council's internal process for considering allocations and applications.</p> <p>There remain significant concerns over the allocation and more information gathering is required before the Highway Authority would support allocation of the site in the Hingham Neighbourhood Plan, for the following reasons:</p> <ul style="list-style-type: none"> <li>- A continuous and suitable pedestrian link on Attleborough Road is not achievable.</li> <li>- Pedestrian access to the site from Church Street depends on third-party land with no guarantee of availability.</li> <li>- The Attleborough Road/Church Street junction has poor visibility and cannot be meaningfully improved to render it suitable for the intensification of use engendered by this proposal.- Visibility at the site access is uncertain due to mature trees in the vicinity. The plan provided isn't clear on this.</li> </ul> <p>Further evidence is required that these issues can be satisfactorily overcome before the Highway Authority would support allocation of the site in the Hingham Neighbourhood Plan.</p> <p><b>The feasibility study undertaken by Pinnacle covers these points.</b></p> <p><a href="https://www.southnorfolkandbroadland.gov.uk/asset-library/ladies-meadow-hingham-feasibility-study-report-dec-2024.pdf">https://www.southnorfolkandbroadland.gov.uk/asset-library/ladies-meadow-hingham-feasibility-study-report-dec-2024.pdf</a>  <b>(associated documents are also available on the SNC website)</b>  <a href="https://www.southnorfolkandbroadland.gov.uk/planning/future-development/local-plans/neighbourhood-plans/emerging-neighbourhood-plans-south-norfolk/hingham-neighbourhood-plan/hingham-neighbourhood-plan">https://www.southnorfolkandbroadland.gov.uk/planning/future-development/local-plans/neighbourhood-plans/emerging-neighbourhood-plans-south-norfolk/hingham-neighbourhood-plan/hingham-neighbourhood-plan</a></p> <p><b>With regard to the third party land – the Diocese are seeking a firm proposal from Hingham Town Council with regard to the land acquisition.</b></p> <p><b>With regard to the Attleborough Road footway, a footway already exists from the Crossroads to the cemetery, it is already utilised by pedestrians visiting the church and cemetery, including wedding guests and mourners at funerals, who currently utilise the Fairland Green (registered village green) as parking.</b></p> <p><b>The HING9 policy gives an alternative route onto the existing footway network, while all existing footway routes could be retained. The Policy HING9 gives scope for improved (safer) footway from the car park to the cemetery by creation of a new walkway within the boundary of Ladies Meadow.</b></p> <p><b>NCC have not quantified the perceived increase in use of the Fairland Junction solely due to the policy HING9, this must be weighed against other highway issues:</b></p> <ul style="list-style-type: none"> <li>• <b>the increased use of the junction, which will occur due to housing growth within the neighbouring Breckland district (in particular Great Ellingham).</b></li> <li>• <b>the opportunity to provide parking for visitors entering Hingham from the Attleborough Rd, before they reach the junction.</b></li> <li>• <b>the benefit of removing some of the parking congestion and unsafe parking practices of parking at junctions and double/triple parking in some areas.</b></li> </ul>
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							<ul style="list-style-type: none"><li>• The “wholesale” removal of on-street parking in the Town Centre is not being sought. There will still be opportunity for parking within the Town Centre, but the provision of off street car parking will allow the on highway car parking to be defined and regulated as it is with other town centres.</li></ul> <p>It is also worth noting the NCC Highway response to a recent planning application located nearby at The Gallops, Attleborough Road, (for Glamping and wedding venue) – no objection to the application was raised in highway terms. <a href="https://info.southnorfolkandbroadland.gov.uk/online-applications/files/CABA343F87823684B1833A543DD4A0E7/pdf/2023_2495-HIGHWAY_OFFICER_COMMENTS-8510814.pdf">https://info.southnorfolkandbroadland.gov.uk/online-applications/files/CABA343F87823684B1833A543DD4A0E7/pdf/2023_2495-HIGHWAY_OFFICER_COMMENTS-8510814.pdf</a></p> <p><i>“With regards to the above, the footway on Attleborough Road stops short of the site entrance at the cemetery. The applicant is therefore requested to put forward a management plan for how the site is to operate in practise. This should include a solution for either an alternative safe footpath provision, for persons wishing to walk from the village”</i></p> <p>This response seems to suggest that there is an acceptable existing footway link from the town (Hingham is not a village), to the cemetery.</p> <p>As a result, the Highway Authority objects to the allocation of the site in the Neighbourhood Plan and agrees with the Examiner’s conclusion that no safe, deliverable access solution has been found. The Highway Authority does not consider that there is any suitable wording for Policy HING9 that would resolve the situation.</p> <p>However, it does acknowledge the importance of the issue and would support a criteria-based policy for bringing forward land for community uses outside the plan-making process, continuing to work with Hingham Town Council and South Norfolk Council.</p> <p>This comment ignores the specific purpose of Policy HING9 and the evidence behind it which is to provide a site specific solution to the problems of parking identified in the town. The work undertaken AECOM in 2023 (and NCC’s previous work) makes clear that there are no easy or obvious alternative sites or solutions which would satisfactorily address the issue and the Ladies Meadow site is the only realistic opportunity available. The comment also ignores Policy HING10 which is already a criteria based policy in the Neighbourhood Plan which covers the issue . The representation indicates that NCC will continue to work with Hingham Town Council and SNC to bring forward land for community uses but does not offer any alternative solutions or sites. With impending Local Government review for Norfolk, the Town Council feels it is more important than ever to ensure the Hingham Neighbourhood Plan positively provides for community infrastructure (not just car parking) over the coming years (through the lifetime of the plan) to ensure the community is well provided for beyond the Neighbourhood Plan.</p> <p>Including the policy within the Neighbourhood Plan (rather than working outside the plan making process) commits Hingham Town Council (as a body) to following through with the policy, as membership to the Town Council changes over the years.</p>
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Supplementary to the response above to Norfolk County Council, is the email below. A copy of the Hingham Town Council draft response to the HING9 consultation was sent to the Major and Estate Developments Officer (out of office received) and Developer Services (on 04 June 2025). It was hoped that this would provide an opportunity for this department within NCC to make contact with the Town Council and initiate a dialogue. To date no response has been received, which raises concerns regarding the relevant NCC (and SNC) department(s) availability, capacity and commitment ‘to work with the Town Council to bring forward land for community uses outside of the plan making process’ (again especially in light of the Local Government Review).



**Fw: Hingham Neighbourhood Plan - Focused Consultation (HIN9)**



Alison Doe  
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Sent from [Outlook for Android](#)

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**From:** Alison Doe <hinghamtc@hotmail.com>  
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**To:** stuart.blake@norfolk.gov.uk <stuart.blake@norfolk.gov.uk>  
**Cc:** Adam Mayo <adam.mayo@norfolk.gov.uk>; Margaret Dewsbury <margaret.dewsbury.cllr@norfolk.gov.uk>; Josh Woolliscroft <josh.woolliscroft@southnorfolkandbroadland.gov.uk>  
**Subject:** Hingham Neighbourhood Plan - Focused Consultation (HIN9)

**Dear Stuart**  
**(cc Adam, Margaret and Josh for information)**

**I am writing to you on behalf of Hingham Town Council to reach out to you, to offer your support for the allocation of land under HIN 9 within the Hingham Neighbourhood Plan, as per the current focused consultation which ends at 5pm on Monday 09 June 2025.**

**Following your receipt of the Pinnacle feasibility study (forwarded to you by Richard Squires SNC Neighbourhood Plan Officer, commissioned by Hingham Town Council, and funded mostly via Pride in Place funding), undertaken in order to provide supporting evidence for this land allocation policy, and the concerns raised by yourself, the Town Council agreed to write a supporting representation to submit to the focused consultation.**

**I have attached a (draft) copy of the Town Council comments agreed at the Town Council meeting last night 03 June 2025, noting some minor amendments to the wording is needed. This representation is intended to explain the importance of the policy within the Neighbourhood Plan, in order to provide future facilities for the town, as it and the surrounding areas continue to grow through increased numbers of housing development.**

**The land allocation is integral to a long-term vision to bring about improved facilities to Hingham, it is far more than just the provision of off highway car parking, although this is the most urgent consideration as the Town centre cannot sustain increased parking issues/congestion due to the current unregulated parking on the highway.**

**Our Neighbourhood Plan will last until 2043, and the considerations with regard to the future needs of the community have been concluded through extensive community consultation. If our Neighbourhood Plan cannot provide for future community facilities (by the exclusion of policy HIN9), there is a real risk that the community will not see the value in voting positively for the Plan and it may fail to reach a majority positive vote at the referendum, in which case the community will not benefit from having a neighbourhood plan in place.**

**We anticipate the Greater Norwich Local Plan will be reviewed and further housing will be allocated to Hingham, and this (we anticipate in view of the conclusions of sites put forward for the GNLP) will most likely to be allocated to the west of the Town on Watton Road, if this occurs it opens up further opportunity to create connectivity to the land allocation in HIN9 and to explore further opportunities for the future of community facilities (there is a much wider bigger picture here, which we can currently only consider the potential of "off paper").**

**Hingham is currently very fortunate to have a Town Council, other organisations and volunteers who work hard and are proactive in wanting to bring about change, better facilities and enable the community (including the businesses and services) to flourish, and to be able to sustain the growth that the future will undoubtable bring. Success of our visions for the future will be dependent on the support of the higher tier Authorities.**

**Thank you in anticipation of your time in reading the attached, and I hope I have managed to convey the absolute importance of what we are hoping to achieve.**

**Kindest regards**  
**Ali**

**Alison Doe**  
**Clerk to Hingham Town Council**