

**Response of the Qualifying Body (QB) to the Hingham
Neighbourhood Development Plan Examiner's
Clarification Note**

Examiner's Points for Clarification

1. Policy HING1

The policy takes a very positive approach.

In this wider context I am minded to recommend that the second to the fifth sections of the policy are worded so that their contents can be applied by South Norfolk Council in a proportionate way. Does the Town Council have any comments on this proposition?

Response of the QB:

No objections.

2. Policy HING2

Does the final element of the policy have proper regard to national policy?

Response of the QB:

The policy wording could be amended to better reflect national policy as contained in the NPPF, particularly para 84, i.e. with the inclusion of a reference to either the paragraph itself or additional wording relating to essential need dwellings, enabling development to support a heritage asset and a dwelling of an exceptional quality design.

3. Policy HING3

This is a well-considered policy underpinned by the Housing Needs Assessment and other associated evidence.

Response of the QB:

Comments welcomed.

4. Policy HING4

This is another excellent policy underpinned by the equally-excellent Design Guidance and Codes. In the round it is a first-class local response to Section 12 of the NPPF.

In this wider context it would be helpful if the Town Council commented on South Norfolk Council's representation on criterion ii in the policy.

Response of the QB:

The South Norfolk representation asks whether it is the intention is to protect the current views experienced by individual properties, irrespective of the objective importance in the public interest or whether the policy seeks to guide the layout of the development to take advantage of these views and orientate new buildings, so that their inhabitants can also experience them.

The original intention of the policy is neither of these. The intention is to protect existing public views of the Church and the surrounding countryside so that as development comes forward its design and layout takes account of the existing rural setting and maintains these views as glimpses through the development, therefore preserving the rural context of Hingham. The views have been assessed from public vantage points as viewed by pedestrians or from vehicles, not private views from individual properties.

5. Policy HING5

This is another excellent policy. In this case it properly celebrates the built heritage of the town.

Response of the QB:

Comments welcomed.

6. Policy HING6

In general terms the policy takes a positive approach to community infrastructure.

I note that the context to the second section of the policy (on contributions to the proposed new community car park) is set out in paragraph 8.10 of the Plan. Nevertheless:

1. how would the policy be applied through the development management process?
2. how would South Norfolk Council determine if a development proposal generated the need for parking in the town centre?
3. is there any direct geographic relationship between the town centre and the community car park (as identified in Policy HING9 and as shown in Figure 42)?
4. what level of contributions are anticipated?
5. how would the policy be applied if it could be demonstrated that the contribution required affected the viability of the proposed development?

Response of the QB:

1. *The policy would be applied proportionately through the development management process to developments that are likely to generate a need for town centre parking.*
2. *Proposals likely to generate a need for town centre parking would include, proposals within the town centre for retail and commercial development which do not include specific visitor or customer parking within the proposal. This would not be aimed at individual residential developments in the town centre. However it is recognised that large scale development on the edges of the town are some distance from the town centre and therefore due to the distances involved, the older age profile of the residents and a lack of safe and accessible connections to the town centre, it is likely that residents will use their cars to access town centre services and facilities and therefore would also generate a need for town centre parking.*

3. *The purpose of the community car park is to cater for town centre parking. The proposed location is well related geographically to the town centre. The need for parking in the town centre is overwhelmingly supported by the local community through the Household Survey and the site itself has been reviewed independently by AECOM in both the Site Assessments and the Parking Strategy documents, which concluded that the site is suitable for a car park provided highway concerns can be overcome. Such concerns could be mitigated by the provision of an improved direct pedestrian link between the site and the town centre. This is being explored (see response to HING9 below).*
4. *The level of contribution is currently unknown however, it is anticipated that the car park will be brought forward funded by a combination of Neighbourhood CIL, grant funding and other contributions and therefore contributions under Policy HING6 would not be the only source of funding.*
5. *If a developer were to indicate that a site would be potentially unviable if a contribution to the car park was required, this would need to be proven. The contribution would be applied proportionately to the size of the development and therefore is unlikely to be disproportionate or unreasonable. The provision of the car park is a key priority for the Town Council and for the Neighbourhood Plan and therefore development is expected to contribute to it. Furthermore it would raise concerns about a developer's ability to ensure their own site was viable in any case, if even a modest contribution towards a car park was not able to be accommodated.*

7. Policy HING9

I looked at the proposed site for the community car park carefully during the visit.

Plainly the policy is ambitious. Nevertheless, is it deliverable within the Plan period?

It would also be helpful if the Town Council commented on the site-specific points in South Norfolk Council's representation on the policy.

Response of the QB:

The Plan period for the Hingham NP is 2043 and therefore this allows a realistic opportunity for the car park to be delivered during the plan period. The creation of the car park is the key priority for the Town Council. Hingham is defined as a Key Service Centre in the GNLP and is also a South Norfolk Market Town, it is the only South Norfolk market Town without a car park.

The Town Council has been in active and positive dialogue with the owners of the land which is the Diocese of Norwich (Including Director of Property Services) since September 2023. In addition the Diocese have offered to make available to purchase a strip of land (part of the former Rectory garden) to enable better footway provision from the site to the town centre.

In January 2024 an application was made by the Town Council to SNC for 'Pride of Place' funding and this was approved in March 2024. (See separate attachments). This provides £19,750 for a feasibility study looking at options to bring forward the car park and other community facilities including options for providing improved pedestrian access into the existing footway network, and alternative vehicular access rather than the existing field access. The feasibility study will be complete by the end of 2024 and is currently in progress. Initial meetings and dialogue with the consultant undertaking this feasibility study have been positive.

We enclose the Pride in Place application form which gives more detail with regard to the community uses envisaged for the land. On making the Pride in Place application to South Norfolk Council, supporting information was provided including (a copy of an email) proof of the Diocese agreement for the Town Council to pursue interest in the land. The Diocese recognise the benefit to themselves with regard to the land coming forward for (in part) car parking as the

church has no parking provision, (registered village green is utilised as parking by visitors to church events). Significant investment has been made in the church building, including heating, lighting, kitchen and toilet facilities, to enable the greater use of the church for events (such as concerts) however it's use is constrained by a lack of formal parking provision in the town.

The site was assessed and rejected as part of the GNLP process (ref: GNLP0395), the site was promoted and assessed for approximately 200 houses, which is a different proposal to that being put forward under this policy. The site was also looked at through the AECOM Site Assessments and the Parking Strategy documents which concluded that the site could be suitable for a car park subject to Highway constraints being overcome. The feasibility study is actively looking at options for overcoming those constraints. NCC Highways have not objected to the site being included in the Hingham Neighbourhood Plan, for car parking and community uses. It is envisaged that bringing forward the site for car parking/community uses would include a reduction of the speed limit on Attleborough Road which would in turn improve the safety of access/ingress to/from the existing cemetery (currently within the 60mph speed limit). Bringing forward the site as envisaged would better join the cemetery to the town.

8. Policy HING14

The policy takes a positive approach to employment development.

It would be helpful if the Town Council commented on South Norfolk Council's representation in the policy.

Response of the QB:

Support for the protection of existing employment sites is noted, together with the difficulties of retaining some sites in employment use (particularly those outside of the defined industrial areas) where it can be demonstrated that the site is no longer viable in its current use. However, there are 'purpose built' and defined employment sites in Hingham e.g. Ironside Way where individual sites within the larger site would clearly not be desirable for other uses e.g. such as residential use without potential detriment to those new occupiers at the expense of the existing industrial and commercial uses. In those circumstances the retention of those sites in employment and commercial uses is paramount and therefore some flexibility to respond to changing circumstances within a broader employment or commercial framework of uses. On this basis there would not be an objection to some additional wording in the policy to reflect this desired flexibility along the lines suggested by SNC.

9. Policy HING18

This is a good policy underpinned by the site-specific details in Appendix C.

Response of the QB:

Comments welcomed

10. Policy HING20

Is the reference to biodiversity net gain in the fourth paragraph of the policy now needed given that key elements of the Environment Act 2021 are in place (and as addressed in paragraph 11.24 of the Plan)?

Response of the QB:

Given the change in circumstances since April 2024 in relation to Biodiversity Net Gain, there would not be an objection to the removal of the reference in the first sentence of the fourth paragraph. However, the remainder of the paragraph sets out how this net gain would be achieved and contains some local specificity and therefore the preference is that this part should be retained.

Representations

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

It would be helpful if the Town Council responded to the representations from Norfolk Constabulary and Glavenhill Limited.

South Norfolk Council proposes a series of revisions to certain policies in the Plan. It would be helpful if the Town Council commented on the suggested revisions.

Response of the QB to the R16 comments is shown below:

Respondent	Representation	QB Response
South Norfolk Place Shaping Team	General: A policies map has not been provided with the submitted Neighbourhood Plan. There are a number of policies in this Neighbourhood Plan where the Council considers that it would be beneficial to be able to refer to a policies map, in order to aid clarity in decision making.	A policies map can be provided for the final version of the NP.
South Norfolk Place Shaping Team	HING2: Consistent reference to the Settlement Boundary as suggested in our previous comments has mostly been addressed. However, there is still reference to a 'development boundary' in the second paragraph under 'Scale'. The Council considers that this should be amended for consistency. The final paragraph lacks clarity in terms of how it relates to national and local exception policies that would allow housing outside defined settlement boundaries, specifically whether the purpose of the term 'essential need' is intended to	No objection to this proposed amendment. See also response to Examiner's Question in relation to HING2.
South Norfolk Place Shaping Team	HING4: The Council made several representations on this policy during the previous, Reg. 14 consultation. One of these related to point (ii) under 'Layout', which states that 'new development at the edge of the settlement must not impede the quality of the existing outward views into the Norfolk countryside'. The Council considers that there is still an issue of clarity as regards this point. Is the policy requirement that views for existing residents should not be impeded, or does this mean that development should take advantage of these views and orientate new buildings, so that their inhabitants can also experience them? Development that takes place on the edge of a village will by its nature impact	See response to Examiner's Question in relation to HING4.

	<p>the views from existing properties. The purpose of the planning system is to protect views that are objectively important in the public interest, such as the protection of important public views through policy HING19, rather than necessarily to protect the current views of the countryside experienced of one or group of private individuals. If the intention is to protect the current views experienced by individual properties, irrespective of the objective importance in the public interest then the Council considers that such proposals would not be in accord with national planning legislation. To ensure the policy is in accordance with the requirements of paragraph 16(d) of the NPPF, the Council consider this statement should be revised in a manner consistent with the following : 'Any perceived loss of residential amenity, such as loss of outward views into the countryside, resulting from development should be taken into account with appropriate mitigation measures put in place.'</p>	
<p>South Norfolk Place Shaping Team</p>	<p>HING9: Despite being, in principle, supportive of this aspiration, the Council has previously raised planning concerns regarding this allocation policy which do not appear to have been directly addressed by any discernible changes in the submitted version of the Neighbourhood Plan. Therefore, the Council re-iterates its concerns, below.</p> <p>The Council has not been able to identify evidence that demonstrates that the site is reasonably likely to come forward for the development being outlined.</p> <p>The site is not owned by the Town Council and whilst it has been stated that the landowner has been consulted, there is no evidence that the landowner has provided consent for a particular proposal to be delivered.</p> <p>In addition, the site assessment clearly shows that there are considerable vehicular access issues as regards the site and yet it has been allocated for a potential car park and a mix of community uses of unspecified scale and intensity of use.</p>	<p>Also - See response to Examiner's Question in relation to HING9.</p> <p>SNC have approved £19,750 Pride in Place funding – to assess the site, this must have been based on an assumption that there is a reasonable prospect of the site being viable.</p> <p>Evidence was provided with the Pride in Place grant application made to SNC (the Place shaping team stated they are aware of that application being made)</p> <p>The feasibility study is assessing an alternative vehicular access from a better point on the Attleborough Road – not the current field access.</p>

	<p>The GNLP Appendix B, included in the Site Assessment document, clearly states that the site was not allocated in the GNLP due to Attleborough Road being too constrained and not suitable.</p> <p>This concern has been repeated in the Neighbourhood Plans own Site Options Report, which states that “existing site assessment evidence and site visit indicate the site is not suitable for development with access from Attleborough Road including the community uses sought due to potential vehicular access constraints”. The Council has not been able to identify any evidence within or supporting the Neighbourhood Plan that indicates these issues have been explored and that it has been identified that such constraints can be adequately addressed.</p> <p>Also, it is clearly stated in both the site assessment and the supporting text that the potential for pedestrian connectivity to the town centre would require third party land, which again cannot be guaranteed.</p> <p>While the Council does not object to the principle of pedestrian connectivity and agrees that this should be delivered as part of such a scheme, as outlined previously, the absence of evidence brings into question the suitability of the land for the uses proposed and whether there is a reasonable prospect that the site will be developed for the uses proposed. Due to the apparent absence of evidence that constraints can be overcome and that there is a reasonable prospect that the site can be developed for the uses proposed, the Council considers that this policy does not currently meet the requirements of paragraph 16(b) of the NPPF, which states that Plans should ‘be prepared positively, in a way that is aspirational but deliverable.’ It is also not in accord with paragraph 31 which requires all policies to be underpinned by relevant and up-to-date evidence. In addition, the policy text does not clearly state what mix of community uses the land is actually proposed to be allocated for. As such and as written, the Council does not consider that the policy as drafted meets the requirements of paragraph 16(d) of the NPPF that requires policies to be “clearly written and unambiguous, so it is evident how a decision maker should react to</p>	<p>GNLP was assessing the site for approx. 200 dwellings. The site was not assessed with an alternative pedestrian route as is currently being explored</p> <p>AECOM conclusion did not include consideration of an alternative access point from Attleborough Road (as is now being considered by the Pride in Place feasibility study) or alternative pedestrian route via land at the former Rectory</p> <p>NCC highways have not objected to the policy/land allocation.</p> <p>The Diocese have invited the Town Council to make an offer on the land.</p> <p>It is recognised that the needs of the community may change during the plan period and therefore some flexibility is required. In the same way an area defined as employment area would not specify types of commercial activities.</p> <p>The vision for the Pride in Place feasibility study includes car parking, cemetery extension, community hub building (which could include community space, town council office/storage, archive centre, and potential for relocating the library facility in Hingham, remainder of the land would be given</p>
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	development proposals". For these reasons the Council does not consider that the current policy meets the basic conditions. Should evidence not be available to justify the allocation of land for a specific use, that is defined with sufficient precision, then it may be appropriate to amend the allocation to a criteria-based policy that would allow for the delivery of the uses the Neighbourhood Plan wishes to achieve outside of the defined settlement boundary, should a demonstrably suitable and deliverable site be able to be identified in the future.	over to wildlife habitat area.
South Norfolk Place Shaping Team	<p>HING5: The Council raised a concern during the Reg. 14 consultation regarding point (b) of this policy, where it refers to the use of reclaimed materials. Generally, the use of reclaimed materials is discouraged in new buildings/extensions as this can lead to the creation of demand for materials that results in other heritage assets being demolished to meet the supply. This statement remains in the policy of the submitted Neighbourhood Plan and the Council re-iterates its objection to the inclusion of this point, within the context of the historic environment. Although the broader concept of re-using materials from a sustainability point of view is understood, the presence of this point within a policy relating to the historic environment implies that materials could be reclaimed from historic structures and/or buildings, which may well be heritage assets. Historic England advise against using reclaimed materials for repairs of heritage assets - https://historicengland.org.uk/advice/your-home/maintain-repair/materials/ In addition, the Council previously raised a concern that a focus in HING5 on preserving the town's Georgian heritage risks ignoring other key elements of the town's heritage which do not date from the Georgian era. On this basis, the Council would recommend re-wording the first sentence of paragraph 3 of the policy to read, 'New development must avoid or fully mitigate any potential harmful impact on heritage assets with particular consideration given to preserving Hingham's Georgian heritage. 'The Council considers that these changes are necessary in order for the policy to contribute to sustainable development, as required by the Basic Conditions.</p>	<p>The QB does not agree with the assumption that supporting the use of reclaimed materials automatically leads to the creation of demand for materials which in turn t would result in the demolition of heritage assets to meet the supply. The demolition of designated heritage assets would require the benefit of planning permission and listed building consent and given the national significance of a listed building would be unlikely to be granted.</p> <p>No objection to the suggested re-wording of paragraph 3 of HING5.</p>
South Norfolk Place Shaping Team	HING12: The Council considers that Figure 18 should be cross referenced within the policy wording, so as to provide clarity and guidance to developers and decision-makers (in accordance with paragraph 16[d] of the NPPF) as to the	No objections to inclusion of cross reference.

	layout of the existing footpath and cycleway network within the parish.	
South Norfolk Place Shaping Team	<p>HING13: The Council has previously commented that Public Rights of Way are overseen by Norfolk County Council and, while South Norfolk Council would support the protection and enhancement of this network, we would expect NCC to comment on specific proposals. The Council also consider it necessary to make a greater distinction in this policy between Public Rights of Way and the general footpath network. The last paragraph of this policy conflates both of these; however, they are distinct from each other. The Council would recommend that the reference to Public Rights of Way in the final paragraph should be removed and this paragraph focus solely on the wider footpath network. This is necessary in order to provide clear guidance, in accordance with paragraph 16(d) of the NPPF.</p>	<p>The QB is aware that NCC is responsible for PROW. NCC have not objected to the NP policy or wording and therefore the preference of the QB is for the wording to remain.</p> <p>The paragraph/Policy is about PROW – (not the wider footway network)</p>
South Norfolk Place Shaping Team	<p>HING14: The Council supports the protection of existing employment sites. However, the Council has previously questioned exactly how these sites will be protected in the future. This could be questioned if it is shown through marketing that the site is no longer viable in its current use. As written, the policy would prevent the site from being used for any other purpose and it does not provide any flexibility to respond to changing circumstances. The Council considers that it is necessary to address this point in order for the policy to contribute to the achievement of sustainable development, in accordance with paragraph 16(a) of the NPPF.</p>	See response to Examiner's Question in relation to HING14.
South Norfolk Place Shaping Team	<p>HING15: The Council considers that it is necessary for that the policy makes explicitly clear the location in which it applies (Figure 44) as currently this is not clearly defined within the policy itself. This amendment will bring the clarity and precision required by the NPPF, including paragraph 16(d).</p>	No objection to the cross reference to Figure 44.
South Norfolk Place Shaping Team	<p>HING17: The Council supports the consideration of renewable energy. However, as written, the policy appears to imply that 'appropriate locations' (as stated in the opening paragraph) may be separate from the criteria of the policy, which does not appear to be the intention. For clarity, the Council would consider it necessary to reword the final paragraph to state that 'Proposals for the development of decentralised, renewable and low carbon sources of energy will</p>	No objection to proposed wording .

	be supported where they satisfy the following criteria’.	
South Norfolk Place Shaping Team	Para 7.8 Typo	Agree to amend typo
Norfolk and Suffolk Constabularies (joint Estates and Facilities)	<p>General: The National Planning Policy Framework (NPPF) gives significant weight to promoting safe communities (in section 8 of the NPPF). Nationally the Police have sought to provide advice and guidelines to support and create safer communities, most notably reflected in their ‘Secured By Design’ initiative which seek to improve the security of buildings and their immediate surroundings to provide safe places to live. In terms of creating and maintaining safer communities in your area, it is requested that the Neighbourhood Plan satisfactorily addresses NPPF provisions by including: - A Neighbourhood Plan objective to ‘Create and maintain a safer community and reduce crime and disorder’. - The Neighbourhood Plan policy to include ‘All new developments should conform to the ‘Secured by Design’ and the Neighbourhood Plan will ‘Support development proposals aimed at improving community safety’.- The Neighbourhood Plan to recognise that ‘Police infrastructure to be supported and provided to enhance community safety and reduce crime and disorder’. Where your Neighbourhood Plan identifies new residential dwellings and / or commercial development are planned to be provided in the area, this will result in an increase in the population and local employment which will add some pressure to existing police resources in the area. To address this, further upfront investment may be required to enhance police provision and infrastructure. If additional provision / infrastructure is not partially funded and delivered through the planning system (including through development plan policy provision), the consequence is that additional pressure will be placed on existing police resources in your area. We trust that these matters can be incorporated into your Neighbourhood Plan objectives / policies.</p>	<p>Policy HING4 contains a specific section on safety and includes a criterion which makes reference to Secured by Design and a requirement for new developments to be designed consistent with its advice.</p> <p>Police resources are a matter for the Police Authorities and are not appropriate to be covered in the NP objectives.</p>
National Highways	<p>General: 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</p>	No comment

	planning application accordingly. Notwithstanding the above comments, we have reviewed the document and note the details of set out within the draft document are unlikely to have an severe impact on the operation of the trunk road and we offer No Comment.	
Sport England	<p>N.B. The following is a summary. Please see full response for details. It is essential that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 102 and 103. It is also important to be aware of Sport England's statutory consultee role in protecting playing fields and the presumption against the loss of playing field land. Sport England's playing fields policy is set out in our Playing Fields Policy and Guidance document - https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing_fields_policy Sport England provides guidance on developing planning policy for sport and further information can be found via the link below. Vital to the development and implementation of planning policy is the evidence base on which it is founded - https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning_applications A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery. Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. If new or improved sports facilities are proposed Sport England recommend you ensure they are fit for purpose and designed in accordance with our design guidance notes. Any new housing developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are</p>	<p>It is noted that the NP includes a policy to protect Local Green Spaces. (HING18),</p> <p>In recognition that new or improved sports provision is encouraged the Neighbourhood Plan includes a specific policy (HING7)</p>

	secured and delivered. Consideration should also be given to how any new development, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Active Design, which includes a model planning policy, provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity	
Anglian Water	Anglian Water has previously submitted comments on the pre-submission version (Reg 14) of the neighbourhood plan. We welcome the amendments in the submission version of the neighbourhood plan, following our comments and recommended changes. I can confirm, I have no further comments to make and wish the neighbourhood plan group every success in taking this forward.	Support noted
Historic England	We are pleased to note the historic environment features throughout the Plan, and in particular, we welcome the inclusion of Section 2, and Policy HING5 which includes both designated and non-designated heritage assets. 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 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	Support noted
Water Management Alliance	Having reviewed the submission, I can confirm that Norfolk Rivers Internal Drainage Board have no additional comments to make further to the comments previously submitted on 23/08/2023.	No comment
G Bedford	Vision: I agree that the NP Vision for Hingham looks rather bland and could be applied to almost any modest sized town .Suggested alternative Vision -"Hingham	The QB do not consider it necessary to include a reference to 'key service

	<p>is a former market town with a historic conservation area at the centre of a caring community. It provides its residents an attractive, green and pleasant environment with an eclectic mix of housing, often reflective of its gradual growth as a rural hub of social, farming and business activity. Now designated a 'key service centre' for the surrounding area, housing or industrial/commercial development will be in harmony with this historic role but will emphasise sustainability, good design, layout and environmental sensitivity with the necessary accompanying community and hard infrastructure to support this. Attention will be given to improving Hingham's Identity with consideration being given to a more focused central community hub along with associated visitor amenities. Interconnectivity within and outside the town will be improved to encourage safe walking, cycling and general access especially for those with mobility issues. Amenities that provide social, sporting or leisure activities across the ages, and that complement the growing tradition of Hingham being a caring community, will be encouraged and supported. The provision of well considered green spaces will contribute to this and special regard will be given to extending these where possible for the benefit of our natural flora and fauna, residents and visitors. To maintain Hingham's pleasant character and quality of life, the growing problem of town centre car parking needs urgent resolution, in association with other road safety and traffic calming issues."</p>	<p>centre' in the vision. Reference to being identified as a key service centre is included under the national and local context for the Neighbourhood Plan. Hingham is still a market town.</p> <p>A Neighbourhood Plan vision should be aspirational but also relatively concise. The proposed vision wording here is more of a statement, is relatively lengthy and also includes wording which is already included as objectives.</p>
G Bedford	<p>SNC have suggested that the valuable resident survey work undertaken by the NP Steering Group to understand all that's good or should be better about life in Hingham should be represented somehow in the final plan as an associated "to do list". I totally agree. The NP is a planning development document but we all know that these things depend to a huge degree on the all encompassing infrastructure investment, as well as the natural environment. And, to be successful, before development rather than "sometime"! Somehow these two have to become proper bedfellows not distant cousins! Five years or so ago I led a small group of concerned residents and set up the Hingham Road Safety Campaign (HRSC), focused primarily on the longstanding speeding and safety issues on the B1108 Watton to Norwich arterial road. It had the support of many residents, the police, Community Speed Watch, Highways, the Hingham Society, the Church and financially by a grant from the Town Council. After much research and comment</p>	<p>The respondent has made representations throughout the evolution of the Neighbourhood Plan to date and also prior to the Neighbourhood Plan. At each stage the NP Steering Group or the Town Council (as appropriate) have considered in detail, comments and representations made and have responded accordingly. The Town Council has established a specific Working Party which seeks to explore a number of highway issues, some of which have been identified by this</p>

	<p>by residents, in 2020 it produced a 30 page report to the Town Council. It proposed that the findings, once discussed and improved as necessary by the Town Council, and others, should form the basis of a strategic statement of intent, alongside the NP, as a complete TOWN Plan. A former rather simpler holistic town plan was produced itself by the Town Council in 2015. Most regrettably, after publication, the Council declined to engage with the small team producing the plan to develop it further and it was eventually batted into the court of the Hingham NP steering group who in turn said "not our function". Since then, as you may know, the TC have set up a Highways, Transport and Environment Working Party with wide powers to consider, inter alia, the area covered by our (HRSC) and the Resident Survey findings. This group appears to be a legitimate home for the legacy of our report to inform its deliberations. To date, although we have suggested a way the resident survey findings might now be tackled, prioritised, adopted (or not) and fed into such a Town Plan' (inside or outside the NP), we have not had an answer. These views are expressed in Response 36 on page 143.</p>	<p>respondent, such as the lack of a safe crossing of the B1108 and the issues of traffic congestion and parking. Where issues are highway related, it is imperative that the co-operation and involvement of the NCC as Highway Authority is part of that process and that any solutions are endorsed by them.</p>
<p>Avison Young obo National Gas</p>	<p>National Gas Transmission has appointed Avison Young to review and respond to Neighbourhood Plan 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 Gas Transmission - National Gas Transmission owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use. Proposed sites crossed or in close proximity to National Gas Transmission assets: An assessment has been carried out with respect to National Gas Transmission's assets which include high-pressure gas pipelines and other infrastructure. National Gas Transmission has identified that no assets are currently affected by proposed allocations within the Neighbourhood Plan area. National Gas Transmission provides information in relation to its assets at the website below. • https://www.nationalgas.com/land-and-assets/network-route-maps Please also see attached information outlining guidance on development close to National Gas Transmission infrastructure. Distribution Network Information regarding the gas distribution</p>	<p>No comment</p>

<p>Norfolk County Council as Lead Local Flood Authority</p>	<p>The Lead Local Flood Authority (LLFA) welcomes that the Hingham Neighbourhood Plan (Submission Version) and its proposed policies retain references to flooding from various sources such as surface water and fluvial flooding and to the implications of climate change. It is noted that some reference is also now included within the document to groundwater flooding. Of the 22 policies proposed, Policy HING1: Sustainable Development, Policy HING4: Design, Policy HING18: Local Green Spaces, Policy HING20: Biodiversity, Policy HING21: Climate Change and Flood Risk and Figures 4, 22, 23, 24 and 45, are of most relevance to matters for consideration by the LLFA. The LLFA further welcomes references retained in the document to the Hingham Neighbourhood Plan and its proposed policies complimenting Strategic Planning Policies (at both Local and National Levels).The LLFA also welcomes reference retained in the document to the need for guidance of relevant Agencies including the Norfolk County Council LLFA, the Internal Drainage Board and Environment Agency, being adhered to in respect of flood risk management, drainage and flooding matters. It is further welcomed that some EA mapping for fluvial flood risk, showing a small area in the south-east of the Parish being located within Flood Zone 3, has been included within the latest document (Figure 24), with Figure 22 showing river (fluvial) flooding and Figure 23 identifying areas of surface water flooding. The LLFA are aware of AW DG5 records within the Parish of Hingham however, this will need to be confirmed with/by Anglian Water. According to LLFA datasets (extending from 2011 to present day) we have no records of internal flooding and 4 records of external/anecdotal flooding in the Parish of Hingham (one additional external record than at the time of our response to the Regulation 14 consultation). The LLFA highlight the importance of considering surface water, groundwater and flooding from ordinary watercourses within the Neighbourhood Plan in the best interest of further development in the area. We note that all external flood events are deemed anecdotal and have not been subject to an investigation by the LLFAWe advise that the LLFA publish completed flood investigation reports at https://www.norfolk.gov.uk/38645.According to Environment Agency datasets, there are significant areas of localised surface water flooding (ponding) and surface water flowpaths present within the Parish of Hingham.</p>	<p>No comment</p>
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Norfolk County Council as Lead Local Flood Authority	The LLFA still recommend that the Neighbourhood Plan document would benefit from reference being made to the 'Norfolk County Council LLFA Statutory Consultee for Planning: Guidance Document (the latest being Version 7.0 published in May 2024 regarding surface water risk and drainage for any allocated sites or areas of proposed development, available from the "Information for developers" section of the Norfolk County Council website.	No objection to a reference to the document being included in the NP.
Norfolk County Council as Lead Local Flood Authority	Whilst the LLFA note that some flood risk mapping has been included in the document, the LLFA recommend that mapping be provided for all sources of flooding including groundwater, with any mapping covering the entirety of the Neighbourhood Plan Area. Information on this and associated tools/reference documents can be found at:• GOV.UK - Long Term Flood Information – Online EA Surface Water Flood Map (https://www.gov.uk/check-long-term-flood-risk)• Norfolk County Council (NCC) – Flood and Water Management Policies (https://www.norfolk.gov.uk/article/39011/Flood-and-water-management-policies)• Norfolk County Council (NCC) – LLFA Statutory Consultee for Planning: Guidance Document (https://www.norfolk.gov.uk/38642)	No objection to inclusion of additional mapping if the Examiner is minded to include.
Norfolk County Council as Lead Local Flood Authority	HING21: The LLFA welcome the retention of references in the document to flood risk and climate change, the inclusion of the 'Climate Change and Flood Risk' Section, and in particular Proposed Policy HING21: Climate Change and Flood Risk which refers to the need for developments to consider flood risk and drainage, along with the implications of climate change. The LLFA further welcomes references made to ensuring new developments do not exacerbate existing flooding or drainage problems or lead to new ones, either through surface water run-off or displacement, and that development proposals should include appropriate drainage details that conform to the relevant standards of bodies such as the LLFA.	Support welcomed
Norfolk County Council as Lead Local Flood Authority	HING4 and HING21: Furthermore, the LLFA welcomes references retained in Policy HING4: Design and Policy HING21: Climate Change and Flood Risk to the use of SuDS systems and recognises the benefits of new developments incorporating SuDS to help reduce run off rates by providing attenuation by storing water to help slow its flow, improve water quality by filtering pollutants and	Support welcomed

	<p>avoiding environmental contamination to clean water, whilst also providing benefits for biodiversity. It is noted that Policy HING4 also recognises the need for sustainable drainage systems to be well designed to integrate into the landscape and where used, SuDS should not be included in the open space calculation for the site. Reference is also made to avoiding the inclusion of features in new developments such as non-porous materials for driveways and pavements to help reduce issues such as surface water pooling and localised flooding. The LLFA particularly welcomes the retention of Policy HING21: Climate Change and Flood Risk which highlights the benefits of including SuDS features such as lagoons and wetland features on drainage and flood risk, and the wider amenity, recreational and biodiversity benefits of doing so. The LLFA also welcome that Policy HING21 has been enhanced from the previous version with the policy text now making specific reference to developments seeks to achieve the four pillars of SuDS, namely water quality, water quantity, amenity and biodiversity.</p>	
Norfolk County Council as Lead Local Flood Authority	<p>HING18: The document proposes 15 no. open spaces which are identified in Policy HING18: Local Green Spaces, Figure 45 and Appendix C. The LLFA note some proposed Local Green Spaces Designations have been removed since the publication of the Regulation 14 document. It is understood that designation of LGSs provides a level of protection against development. The LLFA do not normally comment in LGSs unless they are/are proposed to be part of a SuDS or contribute to current surface water management/land drainage. If it is believed that a designated LGS forms part of a SuDS or contributes to current surface water management/land drainage, this should be appropriately evidenced within the submitted Neighbourhood Plan. The LLFA have no comments to make on the proposed LGSs in the plan.</p>	No comment
Norfolk County Council Transport	<p>HING18: The following proposed LGS designations are dedicated highway:2. Grass area at the junction of Hall Lane and Hall Close3. Grass verge of west side of Dereham Road10. Green space at Hardingham Street and Admirals Walk11. Green space at Dereham Road near junction with Greenacre Road The proposed LGS designations 2, 3, 10, and 11 are on dedicated highway land. The Highway Authority objects to these LGS designations as they could be seen as conflicting</p>	<p>The highlighted proposed green spaces, provide an important contribution to the rural character of Hingham and help to 'green' the residential development within the town.</p> <p>The green verges and visions splays are</p>

	with the powers of the Highway Authority and could be used to frustrate operations within public highway.	<p>a prevalent feature within Hingham, which contribute to the softening of the street scene and built environment. In some areas, the wide grass vision splays have been utilised for bench seating helping to enhance the “village feel” of Hingham, as identified in many responses to the Household survey. Inclusion of these as local green spaces is to protect this feature Hingham, Policy HING4 seeks to replicate this design feature.</p> <p>However in respect of LGS 3 (West side of Dereham Road), this does provide the potential for a portion of the grassed area to be given over to create a continuation of the existing footway which would improve pedestrian links to the employment are at Hall Farm.</p>
Norfolk Wildlife Trust	HING18: We support this policy and the identified 15 Local Green Spaces. Green spaces provide important habitats for wildlife and can act as wildlife corridors.	Support welcomed.
Norfolk Wildlife Trust	We welcome the preamble wording which includes reference to important wildlife sites within the NP area. However, we would also recommend including a list of all the Priority Habitats which are found in the NP area in this section. (MAGIC maps identifies a number of Priority Habitats within the NP area.)We are also pleased with the careful consideration given to the policy wording regarding 'Tree Planting' and 'Wildlife measures' and the inclusion of wording referring to the creation of new wildlife corridors. We support the following aim in section 11.23: 'Policy HING20 below seeks to protect locally designated sites such as County Wildlife Sites from development that would damage their wildlife value.' As County Wildlife	No objection to the inclusion of a reference to Priority Habitats.

	<p>Sites (CWS) are some of our most valuable wildlife areas we therefore recommend that the first paragraph of the policy specifically includes reference to County Wildlife Sites and Priority Habitats, for example: 'All development proposals will be expected to protect, improve and enhance existing ecological networks, wildlife corridors (such as the area around Sea Mere), Priority Habitats and species in the parish. Important sites for wildlife, including County Wildlife Sites, must also be protected and opportunities taken for enhancement. 'To further strengthen protection for County Wildlife Sites and other important habitats within the NP area, we recommend policy wording to incorporate 'buffer zones'. These are designed to protect sensitive landscape patches and areas of high biodiversity from the impacts of development. We therefore recommend the following additional policy wording, or similar: 'Buffer zones should be considered and encouraged around sensitive sites, where appropriate, and where this will provide ecological benefits.</p> <p>'We advocate the addition of green roofs/walls to buildings as they provide many benefits: increasing biodiversity, reducing run-off, improving air quality and improving thermal performance by providing shading and insulation which contributes to greater energy efficiency. (NPPF Para 164) We therefore recommend that this is considered in the policy wording, particularly with respect to any new community buildings. (Please also see Part 2 of our response to the Biodiversity policy.)</p>	<p>No objection to the inclusion of the reference to buffer zones if the Examiner is so minded.</p> <p>No objection to the inclusion of the references if the examiner is so minded.</p>
Norfolk Wildlife Trust	<p>The State of Nature report highlights the significant historical losses that have occurred across the UK and safeguarding what remains of our natural heritage is a vital cornerstone in nature's future recovery. The Environment Act 2021 makes a 10% biodiversity net gain mandatory. However, given the pressures facing biodiversity, we recommend a greater ambition of 20% Biodiversity Net Gain should be encouraged to provide greater confidence in genuine gains for biodiversity and ensure the successful recovery of nature in Norfolk. Natural England's biodiversity net gain study (Vivid Economics, June 2018) considered the impacts on the economics and viability of development and concluded that a biodiversity net gain requirement was not expected to affect the financial viability of housing developments (up to 20% biodiversity net gain scenario); it also suggests there is a strong case for greater ambition.(State of Nature 2023 - report</p>	<p>See Examiner's Question re Biodiversity Net Gain.</p>

	on the UK's current biodiversity)	
Norfolk Wildlife Trust	<p>HING21: The UK government has committed to reach net zero emissions by 2050. This policy will be important in helping to tackle climate change at a local level and contribute to the goal of net zero emissions. We therefore support the policy wording regarding climate change in principle, but recommend stronger policy wording to ensure that it is robust and effective, for example, rather than 'Proposals are encouraged...', we recommend the following: 'Proposals must include....' We support the policy wording relating to Sustainable Urban Drainage Systems (SuDS). SuDS are important in reducing flood risk, reducing pollution downstream and locally, increasing biodiversity and when used effectively can provide habitat connectivity.</p>	No objection to proposed wording .
Norfolk Wildlife Trust	<p>HING22: Due to the known adverse impacts on nocturnal wildlife from light pollution, we welcome the focus on Dark Skies and minimising adverse effects on wildlife , but recommend the following additional wording which is more detailed and specific to ensure robust protection for wildlife: 'Development proposals should demonstrate compliance with best practice guidance for avoiding artificial lighting impacts on bats: (https://theilp.org.uk/publication/guidance-note-8-bats-and-artificial-lighting/) . Where lighting cannot be avoided altogether in proposals then it must be designed to avoid light spill onto wildlife roosts, foraging habitat, and commuting routes for bats, birds, and other species.'</p>	No objection to proposed wording
Natural England	<p>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.</p>	No comment
Norfolk and Waveney Integrated Care System	<p>I write following the above consultation on behalf of the Norfolk and Waveney Integrated Care System (ICS), incorporating Norfolk & Waveney ICB, Norfolk Community Health and Care NHS Trust, Norfolk and Norwich University Hospital NHS Foundation Trust, Norfolk and Suffolk NHS Foundation Trust and the East of England Ambulance Service NHS Trust. The local Primary Care Network (PCN) that would cover the health needs of Hingham residents is the Ketts Oak PCN, and is a collaboration between primary, secondary, community, social, voluntary, and</p>	Comments noted.

	<p>mental health care providers to form an integrated health and social care service to patients. Hingham Surgery is the nearest Primary healthcare facility to the Hingham Neighbourhood Plan boundary and falls within the parishes catchment area. Having a GP practice within Hingham itself the next easily accessible GP practices closet to the area are situated in Watton and Wymondham. Residents new to the area will be required to register and visit a GP practice which would likely be at one of the above mentioned locations. In terms of premises space, Hingham Surgery is already constrained in terms of physical infrastructure capacity and with the addition of new developments in the surrounding area healthcare provision may not be sustainable. The PCNs are looking at ways to better integrate the community teams with Primary care provision. It is noted the household survey conducted indicated that residents would like to see an expansion to the Hingham doctors surgery. Objective 2 'Community Infrastructure' addresses and acknowledges this need and states that the Town Council will support health to providers in ensuring suitable and sustainable provision of healthcare services across all health sectors for the parish residents through utilisation of (Local) CIL. This is supported by the ICS estates team. Section 2.27 'Public Transport' indicates that there are bus services in place to the major towns located outside the parish boundary which also host mainline train stations for access to Norwich and Ely. Maintaining and enhancing travel links to and from main towns and cities is vital to allow residents who do not drive to have access to healthcare services that may not be available in the Hingham parish. It should also be noted that, if unmitigated, the impact of developments on healthcare in and around the Hingham parish would be unsustainable, including that of Primary Care, Community Care, Mental Healthcare, and the Acute Trust.</p>	
Lanpro obo Glavenhill Ltd	<p>N.B. The following is a summary. Please see full response for details .My client Glavenhill Ltd is currently in dialogue with representatives of Hingham Cricket Club (HCC) to facilitate and enable the delivery of a new Centre for Cricket in Hingham on land off Hardingham Road.</p> <p>Our discussions to-date are well advanced and it is clear that the new Centre for Cricket off Hardingham Road will be a tremendous asset to both Hingham and Norfolk Cricket. As such Glavenhill working with Hingham Cricket Club supports</p>	<p>Comments noted.</p> <p>The QB has not been involved in any specific discussions in respect of a new centre for Cricket at land off Hardingham Road and was unaware of such a specific proposal. The wider site which included a proposal for housing</p>

	<p>emerging Policy HING1 within the Neighbourhood Plan. Glavenhill further supports emerging Policy HING6 and Policy HING7. Glavenhill can further confirm the view contained in paragraph 8.18 of the Neighbourhood Plan that states that a household survey conducted as part of preparing the Neighbourhood Plan has concluded that “high levels of support for formal sports” provision exists within the village is correct.</p> <p>Glavenhill does however wish to encourage the Neighbourhood Plan Steering Group and Hingham Town Council to consider slowing down the current evolution of the emerging Neighbourhood Plan so that a series of late references to the new Centre for Cricket can be inserted into the document. The references should acknowledge Glavenhill and HCC’s work to-date and that Site HNP2 off Hardingham Road could potentially be suitable for the development of the new Centre for Cricket. This late request is made as to-date Glavenhill’s efforts to engage with representatives of the Neighbourhood Plan Steering Group have been resisted pending the output of the work being undertaken by AECOM to assess the sites being promoted. Despite several requests to engage and understand the AECOM work and their findings, the outcome of this assessment work in relation to Site HNP2 was not known until the current Regulation 16 Neighbourhood Plan was published. To be very clear Glavenhill and its partners do not agree that Site HNP2 is inappropriate for the development of the new Centre for Cricket nor that any related and enabling development required is unsuitable due to its physical distance from the Town Centre, or due to as yet unspecified highways constraints as identified by AECOM. This simply doesn’t make any sense and Glavenhill would request a meeting with the Neighbourhood Plan Steering Group / Hingham Town Council with a suitably qualified highway engineer and representatives of Hingham Cricket Club present to discuss the Centre for Cricket proposal, and how this could be facilitated to meet the high-level of support within the village and across Norfolk. Until such time as the requested meeting is facilitated with the Neighbourhood Plan Steering Group, Glavenhill now wishes to object to the emerging Neighbourhood Plan on the basis that it doesn’t fully address, nor contain, the most effective growth strategy for sport within Hingham (based on all the evidence put forward to-date and outlined in this letter). The submitted Neighbourhood Plan further does not comply with</p>	<p>development and some recreational/community uses was put forward through the NP Call for Sites process (and through the GNLP process). It was rejected both times on the grounds of highway access. It is also noted that new housing on this site is not required to meet any housing targets for the town which have been met through allocations in the newly adopted GNLP.</p> <p>However, the delivery of a new Centre for Cricket on land off Hardingham Road, in isolation would not be prejudiced or resisted by the policies in the NP. The NP is at an advanced stage and the community is keen to see the process continue to adoption, in a timely manner, so that its policies may be used in the determination future applications.</p> <p>An application for a Centre for Cricket can be made at any time in the usual way.</p>
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	<p>South Norfolk Local Plan Policy DM 3.16 entitled Improving the level of community facilities as no other sites within Hingham are suitable to meet the needs of HCC on which to develop the Centre for Cricket. Importantly, the Regulation 16 Neighbourhood Plan fails to maximise South Norfolk Council's strategic objective to encourage the development of healthy and active lifestyles within Hingham that could be enabled by the inclusion of the Hardingham Road site as the new Centre for Cricket in the final version of the Neighbourhood Plan. To resolve this objection Glavenhill would welcome the opportunity to discuss the Centre for Cricket proposals with the Neighbourhood Plan Steering Group and Hingham Town Council as soon as is practically convenient.</p>	
Environment Agency	<p>N.B. This is a late response - received 25/06/2024 and will be considered at the examiner's discretion.</p> <p>The following is a summary. Please see the full response for details. We note the Greater Norwich Local Plan was recently adopted in 2024 and that the submitted Neighbourhood Plan does not allocate any additional sites, while there are no important environmental constraints affecting this Neighbourhood Plan area that fall within our current screening matrix. Nevertheless, we have set out some standard advice below.</p> <p>Water Resources. Although the Neighbourhood Plan does not currently allocate sites for development, we recommend the Plan includes a Policy that captures the important emerging issue of Water Resources in the event of any in-fill development coming forward during the plan period, not yet allocated. The following text should assist you. Being in one of the driest areas of the country, our environment has come under significant pressure from potable water demand. New developments should make a significant contribution towards reducing water demand and mitigate against the risk of deterioration to our rivers, groundwater and habitats from groundwater abstraction. We recommend you check the capacity of available water supplies with the water company, in line with their 2024 Water Resources Management Plan. The Local Planning Authority's Water Cycle Study and Local Plan may indicate constraints in water supply and provide recommendations for phasing of development to tie in with new alternative strategic supplies. New development should as a minimum meet the highest levels</p>	No comment

	<p>of water efficiency standards, as per the policies in the adopted Local Plan. In most cases development will be expected to achieve 110 litres per person per day as set out in the Building Regulations &c. (Amendment) Regulations 2015. However, a higher standard of water efficiency (e.g. 85 l/p/d) should be considered, looking at all options including rainwater harvesting and greywater systems. 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. The Local Authority will be able to advise if there are areas at risk from surface water flood risk (including groundwater and sewerage flood risk) in your neighbourhood plan area. The Surface Water Management Plan will contain recommendations and actions about how such sites can help reduce the risk of flooding. This may be useful when developing policies or guidance for particular sites and sustainable drainage measures can complement other objectives such as enhancing green spaces. We trust this advice is useful.</p>	
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