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Greenlands  
7 Nelson Road  
Sheringham  
Norfolk  
NR26 8BU

Director: A. Presslee

Ms I Appleyard  
Greater Norwich Development Partnership  
c/o South Norfolk Council  
Swan Lane  
Long Stratton  
Norwich  
NR15 2XE

Dear Ms Appleyard

**Greater Norwich Local Plan Regulation 18 Consultation - Barnham Broom Golf & Country Club – refs. GNLPO474-0476**

Further to my letters of 27 June 2017 and 31 July 2017, together with the updated Planning Strategy Masterplan submitted under cover of email of 17 October 2017, I hereby make associated representations pursuant to the current (Regulation 18) Consultation.

I set out below various responses to a number of questions in the Growth Options document, together with responses to both the Site Proposals Document and Suitability Assessment.

**Growth Options**

**Question 2. Do you support the broad strategic approach to delivering jobs, homes and infrastructure set out in paragraphs 4.1 to 4.7?**

Broadly yes, but in the context of our representations regarding Barnham Broom then we would in particular encourage further emphasis on the elements of the strategy that:

- Supports a thriving rural economy;
- Helps to sustain village life;
- Provides housing that is fit for purpose (e.g. starter, retirement/elderly, holiday);
- Provides choice and aid housing delivery.

These are specific elements that are being promoted by Barnham Broom Golf and Country Club through our submission.

**Question 9: Which alternative or alternatives do you favour?**

Based on the published maps and accompanying Distribution of Growth Options, option 2 (Transport Corridors) and Option 6 (Dispersal plus Urban Growth) appear to offer the most likely opportunities to accommodate the type of development being promoted by

Barnham Broom G&CC, although none would make direct provision for such an innovative approach to providing housing to meet specific group/s – and related – needs.

Whichever of the options is pursued, sufficient flexibility is necessary to facilitate the type/s of development being promoted here. We acknowledge that what we propose does not fit into the usual structured and conventional housing provision strategies. However, it does seek to address a specific and identified need (see Question 42 below). Addressing an under-met and growing need for accommodation suited to the particular demands of the 55+ ageing demographic, as well as for those seeking affordable/first-time homes, and for in-bound tourism, is not straightforward. However, for those seeking to settle within and move to the Norfolk/Norwich area, as it continues to become an increasingly popular destination and desirable place to live, we believe the existing infrastructure makes such provision at Barnham Broom desirable, viable and sustainable.

Question 12: Do you support the long term development of a new settlement or settlements?

No. This is not seen as a sustainable option or likely to deliver housing to meet requisite need. The ‘all the eggs in one basket’ approach - whilst on the face of it a more straightforward/comprehensive means of delivering housing and related infrastructure in volume in one (or a few) locations – inevitably proves more complex to fund, plan and deliver. Many such schemes fall well short of expectations, with either slow or no delivery at all. Diversity in site, location and type of housing – including that to meet specific, identified needs such as for those of retirement age or seeking to acquire an affordable or first home – is the key to encouraging early delivery, as is building in locations where people actually want to live. Our proposals for Barnham Broom would meet such requirements/objectives.

Question 33: What measures could the GNLP introduce to boost the rural economy?

Current policy includes support for the rural economy through the promotion of – inter alia – rural businesses including tourism. Our proposals for Barnham Broom would create a unique combination in supporting an established rural business – which includes growing tourism provision – together with housing for retirement groups (see below). These are specialist areas identified in the Growth Options as needing support and promotion, and Barnham Broom is able to meet both these and related development requirements in an innovative and sustainable way, and in a location with established and diverse provision.

Overall, the Barnham Broom G&CC proposals could create more than 100 new FTE jobs; we understand the local employment spin-off/multiplier is >3x, so this amounts to a stimulus that could provide between 400 and 500 jobs and add more than £30m p.a. to the local economy to generate a meaningful contribution economically as well as socially within a rural context. The proposed provision of affordable and staff accommodation at nearby Colton would add to the sustainability of such rural business development: we would look to build and offer these for a variety of short-term rent, annual letting and rent to purchase schemes, rather than release into the open market. Presently, there are challenges with staff recruitment and retention due to near ‘full’ employment and also increasing demand from other growing activities close by – such as the N&N hospital, UEA, commercial and retail parks, etc. - competing for lower income earning employees. The growth in demand for affordable housing is likely to continue outstripping supply across rural areas, or those areas in close proximity to and on the western side of Norwich. This mutually beneficial arrangement would provide for ‘in combination’ social and economic sustainability.

Question 42: Which approach or approaches to housing for older people and care accommodation do you favour?

None of the options appear to address the specifics of the development form being promoted at Barnham Broom. However, an adapted version of Option AH12 would appear to be most suitable in this context. This option refers to sites benefitting from good access to services, public transport and shops but fails to acknowledge that there are existing developments that provide for a range of services already and which could therefore have considerable merit in securing retirement and associated development, and at the same time enhance the long-term viability of those rural services. Barnham Broom G&CC offers such.

BBG&CC also has a longer term plan to secure a nearby and suitable site for the development of a fully residential, nursing care facility, enabling local residents of the adjacent villages as well as the newly developed retirement housing to move, when they are no longer able to live independently and without full time assistance.

Often strategic policies are developed to accord with where Councils believe people should live rather than addressing the demand for quality and sustainable locations. Why should an established and diverse Country Club (in terms of services/facilities) - just 1 mile from 2 villages and 10 miles from the centre of Norwich – be regarded as an unsustainable location/site? Having been developed in an open, rural environment with more limited local infrastructure over the past 40 years - than exists today and is planned to be further developed in the near future – Barnham Broom has already proven it has become sustainable and generates employment for over 100 FTEs. The expansion of BBG&CC with associated and connected housing development - in parallel to the planned hotel development - should be considered to offer a high probability of being successful as well as long term sustainability.

There are many examples abroad of the kind of development we are promoting here but only a few in the UK, and in our understanding almost none in Norfolk or in the Norwich area. The idea is that Barnham Broom becomes Norfolk's own and different development, which can draw on the best features of some of the existing examples of retirement/longer life and holiday home developments.

The published Central Norfolk SHMA, part 2 (chapter 8 of which addresses Housing for Older people) highlights that there is a structural inadequacy in suitable housing for the 'retirement+' market, with demand in 20 years expected to be as much as 5x the current provision. With purpose designed and serviced housing it has been proven that independent living can be extended and assisted living and nursing care requirements are contained to end of life.

There is also the added caveat that much of the current provision will cease to be fit for purpose. In essence, there is a reported need for 30,000+ retirement homes to be provided across mid Norfolk with 6,500 of those in South Norfolk and 7,000 in Breckland, over the next 20 years. Although this includes specialist care homes for those in palliative care, the growth is for those at a much earlier stage of their lives, albeit one where their family size and needs have diminished. A move into lower maintenance and suitably designed accommodation, also releases (often larger and under-utilised by retirees) homes better suited to younger and larger families. We understand that the provision of more homes that cater for those over 55 or that do not take out main market homes for holiday purposes, will also help to address the systemic shortage of main market housing for young families and working professionals where access to work, schools and transport facilities is even more essential.

## **Site Proposals Document**

Further to our recent email correspondence, I have amended our previously submitted Indicative Masterplan to rectify the discrepancy in land put forward. I can therefore confirm that - as amended - the entirety of the sites are integral to the plans for the development and expansion of BBG&CC. BBG&CC has an informal understanding with the underlying landowners to approach any resulting development on a joint venture basis, to ensure its deliverability.

## **Suitability Assessment**

### **Site GNLPO475 (Land South of Colton)**

It is noted that the published Site Suitability Conclusions infer that the site is intended for general market housing, when in fact it is intended as mix of affordable housing, staff accommodation for the G&CC, and market housing. We contend that the constraints and impact analyses ought therefore to reflect this, and that the overall site suitability should be more favourable in terms of the sustainability appraisal, and thereby suitability of the proposed allocation/development (see above).

### **Site GNLPO476 (Barnham Broom G&CC)**

It is noted that the published Site Suitability Conclusions infer that the site is intended for 'housing', when in fact the proposal is to see the site developed for a more nuanced form of development to meet specific needs through a combination of:

- Independent/active/keep healthy, retirement living for the Over 55s (to 80s) market, providing on and off site support: i.e. housekeeping, security, gardening, maintenance, repairs, laundry services, golf, sports, health, fitness and wellbeing facilities, transport arrangements, shopping service, visitors' (friends and family) accommodation, a new local shop, domiciliary care support where needs develop, etc., as well as a 'residents' social club' to offer a range of additional activities and facilities which would be extended to others who live in the parishes of Barnham Broom and Colton, combined with;
- second/holiday home ownership (i.e. offering all of the above, plus lettings, a range of ownership options, families and friends visiting the retirees, together with holiday bookings and guest management/services, etc.), and;
- Limited general market housing, where viability dictates.

We contend that the constraints and impact analyses ought therefore to reflect this, and that the overall site suitability should be more favourable in terms of the sustainability appraisal/suitability assessment, and thereby suitability of the proposed allocation/development (see above).



Please let me know if you require any further information or clarification.

Alan Presslee BSc. (Hons.) DipTP MRTPI  
**Director**

Cc Mr. E Beckett – Barnham Broom Golf & Country Club



**Key**

-  Alternative Routes (A or B)
-  Old road becomes internal access road system. Create new entrance and drive to hotel

 Notes

- ① Hotel Expansion
  - ①a Area for Car parking / landscaping
- ② Retirement / Holiday Village Phase 1: 11.5 acres – 55-65 dwellings
  - ②b Retirement / Holiday Village Phase 2: 17.5 acres – 70-80 dwellings
  - ②c Retirement / Holiday Village Phase 3: 15 acres – 65-75 dwellings
- ③ Retirement / holiday Homes Phase 4: 4.5 acres – 10-15 dwellings
  - ③a Retirement / holiday Homes Phase 4: 4.5 acres – 10-15 dwellings
- ④ Starter/affordable development at Colton
  - ④a Starter/affordable development at Colton Phase 1: 3.5 acres - 40 dwellings
  - ④b Starter / affordable development at Colton Phase 2: 3 acres -30 dwellings

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Planning Strategy Masterplan

March 2018

