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Greenlands
7 Nelson Road
Sheringham
Norfolk
NR26 8BU

Director: A. Presslee

Our Ref: AP/sp/067-01
Your Ref: GNLPO474-0476 Barnham Broom
Tel: 01263 824068
Mob: 07702174892
Email: alan@cornerstone-planning.co.uk
Date: 09 March 2020

Mr M Burrell
Greater Norwich Development Partnership
c/o Broadland District Council
Planning Department
Thorpe Lodge
1 Yarmouth Road
Norwich
NR7 0DU

Dear Mr Burrell

**Greater Norwich Local Plan
Regulation 18 Draft Consultation, 29 January – 16 March 2020
GNLPO474-0476 - Barnham Broom Golf & Country Club**

I hereby make representations pursuant to the current (Regulation 18) consultation on behalf of Barnham Broom Golf & Country Club.

It is apparent that the GNDP has not fully appreciated what has been proposed, through various representations to previous iterations of the Plan/consultation stages.

We are disappointed to note that the Draft Local Plan has failed to acknowledge or identify the proposals put forward by Barnham Broom Golf & Country Club, nor their obvious potential to address and meet particular needs of the Plan's Sustainable Growth, housing and employment strategies, including in the provision/consolidation of a sustainable community (Policy 2) and its objectives.

The Draft Local Plan

This talks of "Planning Flexibility for a Changing World" (page 7) but in practise fails to apply this to the unconventional.

Paragraph 50 of the Draft Local Plan says:

"Due to the projected increase in the numbers of older people, local evidence in the Strategic Housing Market Assessment suggests that around 3,900 additional communal establishment places for over 75s will be required to 2038. The plan will need to have policies which specifically support the delivery of housing suitable for older people."

And at paragraph 118:

"Our plan envisages delivering the right number of homes to meet a variety of housing needs for those living and working in Greater Norwich. These include the rising ageing population...."

Paragraphs 244-245 note:

“244. An increasing proportion of the population is over 65 or disabled, increasing the demand for supported accommodation such as sheltered housing, extra care housing and care homes, residential care and supported living. The local plan seeks to assist Norfolk County Council’s aim to reduce residential care home and nursing home dependency and support people to remain more independent in their own homes or in supported housing.

245. The policy therefore supports the provision of housing to meet the needs of older people and others with support needs, including sheltered housing, residential/nursing care accommodation and extra care housing. Norfolk County Council’s strategy⁸⁷ identifies the need for 2,842 additional extra care units by 2028. The policy includes locally requiring the national optional Building Regulation standard for adaptable homes. To do so, the policy requires 20% of homes on major developments to be designed to be adaptable to meet changing needs over time, thus enabling people to stay in their homes longer.”

Barnham Broom Golf and Country Club does not sit readily into the settlement hierarchy and related growth strategy as proposed by the Draft Local Plan, albeit that it is located within the identified Strategic Growth Area, between the A11 and A47, just west of Norwich. Nor do its proposals sit within the Plan’s policy approach for the provision of “*specialist housing option for older people’s accommodation*” (Policy 5 – Homes), although we would argue that it would do exactly that. “Good access to local services” is taken to mean – in the terms of the Plan – a conventional application to such in relation to the settlement hierarchy, whereas in fact the facilities and proposals for Barnham Broom meet many of the services/objectives (see below).

Barnham Broom Golf and Country Club

Barnham Broom was developed from a green field site, across a mix of river (Yare) valley water meadows and surrounding agricultural land, over the 1970s and 1980s, to provide what it offers today and which has generated valuable employment and amenities to its local communities. Today, it is well established as a vibrant and successful business: employing over 130 local people and serving a community of over 700 local resident golfers, 800 health & fitness club members as well as many others connected to local businesses and communities, from whom it draws for its suppliers and customers.

With 46 bedrooms and 45 holiday apartments and an array of events and leisure activity facilities located on its circa 300 acre site, Barnham Broom is uniquely situated 11 miles due west of both Norwich City Centre & Airport, 1 mile south of the A47 and Norwich Ring Road route, as well as 7 miles north of the A11, situated between Barnham Broom and Colton villages. However, this can become the hub of a much greater and more ambitious scheme.

Uniquely for a Norwich-based hotel and leisure business the company remains under the same independent ownership of a local family, over 40 years since it was founded, and who are keen to implement plans that can serve the needs for the next 40 years and beyond.

The management is keen to progress the next phase of development and to address the needs of the future on several levels, **and for this it is seeking the support of the Greater Norwich Development Partnership through the emerging Local Plan.** There are opportunities for the existing site and activities, as well as all its planned/extant development, to become self-sufficient in utility resources (heat, light, power and water). There is also a unique opportunity to embrace some of the future demands of both wider society and local communities by creating a second phase of sustainable development that will break new ground, with its unique designs and implementation plans, as it addresses various poorly-met needs in the Greater Norwich and local area.

On and around the site there is scope to increase the scale of the hotel, to offer up to 150 bedrooms with an international standard spa and therapy retreat centre that would provide

the only 5 star quality hotel and resort in Norfolk (or Suffolk) and in close proximity to the City: able to serve a vibrant and expanding local community of active older people as well as to attract additional holiday makers and visitors to our region. This will complement and strengthen rather than conflict or compete with the local population's needs. There are also identified sites for the nearby development of affordable housing: offering a supply of local accommodation for local families as well as employees of Barnham Broom or other key local public organisations such as the N&N NHS Trust, UEA, Research Park and emerging Food Hub, all immediately accessible within 5 to 10 minutes' drive but unable to afford homes in many of the other recent and local housing developments [These are addressed separately through the concurrent South Norfolk Village Clusters Housing Allocations Document consultation].

The hotel has planning permission to more than double its capacity. The plan is for this to commence a new phase in Barnham Broom's development: as it will strive to step-up what it can offer in terms of diversity, scale and quality; to differentiate it from anything else in East Anglia and to enhance its appeal as a destination, as well as a facility that will serve the wider interests of local communities. Barnham Broom is looking to provide a range of additional facilities that have been successfully initiated and proved elsewhere. These can quickly prove successful as well as be sustainable over the long term. Unusually, Barnham Broom is geographically unconstrained. Committed local infrastructure improvements to the local road networks will increase both accessibility to and from Barnham Broom for both local residents and destination visitors without disruption or adverse impact on local residents.

With the plans to expand the hotel and enhance its well-regarded golf related activities, there is also an opportunity for Barnham Broom to broaden its appeal to serve the emergent 'well-being' market and create what will be a unique five star standard venue in Norfolk. The management is keen to work with and gain the support of South Norfolk Council to be able to support additional amenities and services to provide a wider range of wellness activities: incorporating mindfulness, dietary, relaxation and anxiety-based therapy activities. This can become an integral part of the permanent residential community as well as strengthen the appeal to visiting guests (in particular over the winter periods), seeking relief from the increasingly high-pressured world of today.

However, Barnham Broom will not forget its origins and history and has bold plans to build on these by enhancing and improving the quality and status of its golf courses, tuition academy and facilities to gain greater recognition and profile for the benefit of its local Golf Club and Health Club members, as well as to attract destination travellers to South Norfolk from across the UK and further afield.

Proposed Development

In relation to the existing development and consented facilities at Barnham Broom, these have proven to be sustainable and a valuable source of wider community benefits in terms of the amenities Barnham Broom offers, long-term full and part-time employment, wider spin-off benefit to the local economy through the supply chain and the discretionary spend of visitors/residents at Barnham Broom in the local economy. Meanwhile, Barnham Broom's demands on local public services (education, healthcare, waste (privately contracted) is expected to remain minimal and its plans to be self-sufficient in its utility supplies should also be regarded positively.

The attached Masterplan focuses the proposed development in and around the existing development. The masterplan illustrates:

- 1: Existing Hotel: 46 bedrooms with 92 sleeper capacity hotel, restaurant, bar, health & fitness club, golf clubhouse, retail, spa, meetings and event facilities
- 1a: the existing holiday apartments (45 dwellings with a bed capacity of 224 sleepers);

- 1b: Consented hotel extension: 49 new bedrooms with 98 sleeper capacity, car park extension, parkland and landscaping; planning permission granted, and due to be completed in 2022

(Note: please note that 1 and 1a combined currently provide employment for over 160 people)

- 2: a proposed retirement settlement (to provide a mix of 65 dwellings) specifically for the over 55s market, and;
- 3: a proposed holiday home development (to provide a mix of 15 dwellings);

All of which will inter-relate geographically and functionally, to provide a complementary and sustainable expansion that builds on Barnham Broom's initial successful development and a differentiated offering for the marketplace.

Responding to the Draft Local Plan consultation, we are strongly of the opinion that these proposals promote/encourage emphasis on the elements of the strategy that:

- Support a thriving rural economy;
- Help to sustain village life;
- Provide housing that is fit for purpose (meeting a specific, identified need: retirement/elderly, holiday);
- Provide choice and aid housing delivery in key categories.

Housing

We acknowledge that the scale and spatial distribution of housing across Greater Norwich needs to be determined by consideration of need, constraint and capacity. However, what a preferred approach must also do - fundamentally – is seek to address where and how people might choose to live (in essence, to provide a supply where there is demand) within the area, as we contemplate the future needs of and impact upon communities. We understand a Greater Norwich-wide needs assessment seeks to address demand within it, if housing delivery (in meeting all identified needs) is to be successful.

We also acknowledge that constraints in an area mean that a hierarchical/settlement-based approach should not be cast aside in favour of unconstrained development in places where most people would like to live. However, housing choice – in locational and housing type terms – should not be overlooked. For a development to be sustainable, apart from anything else, it is essential that residents choose where to move to, that their daily needs are conveniently accessible, and local services can accommodate and benefit from the expanded community created.

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 (providing higher levels of mental health and personal wellbeing) can be extended and supplemented by assisted living, so that nursing and elderly care requirements are contained to end of life. Revised Government policy/Guidance places an increased emphasis on this.

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 and their working and social lifestyle patterns commonly change. A move into lower maintenance and suitably designed accommodation, also releases (often larger and under-utilised by retirees) homes better suited to and located for 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.

There is a growing array of 'older generation living spaces' being developed across the UK but these tend to be urban-based. Barnham Broom is clearly not that, but nor is its location remote, being based just 10 miles west of Norwich city centre. Its target market is identified as those most probably living outside of urban environments or living within suburbia, who are affluent and, increasingly, wish to change their lifestyle and living environment, as their family needs change from the age of 55 upwards. They are not determining their next property move based on how close they are to a public bus route, or a convenience store; moreover, they seek the sorts of social interaction, common interests, amenities, concierge services, facilities management and activities for a high quality of life and convenience, that Barnham Broom is able to provide. Until recently this market has been satisfied in the main by moving overseas to retirement properties in desirable locations such as southern Europe, the Caribbean, or Florida, etc. However, there are comparable – and increasing - examples of such developments in the UK. These cater for those not wishing to move overseas, which can isolate them from life-long friends and family for the extended part of their lives whilst they remain active. In some cases, such developments offer a combination of retirement/over 55s specialist housing with holiday housing as well as an array of hotel, golf, spa, woodland and water features, most of which Barnham Broom already offers; e.g.:

- Pebble Ridge (Devon): <http://www.pebble-ridge.com/Buying-your-Home.aspx> or <http://www.royalnorthdevongolfclub.co.uk/news.php?newsitem=897>;
- Wiltshire Leisure Village (formerly Wootton Bassett GC): <http://www.express.co.uk/life-style/property/604711/Wiltshire-Leisure-Village-Eddy-Shah-retirement-village-homes> and <http://the-wiltshire.co.uk>.
- Archerfield near Edinburgh: <http://www.kingscairnatarcherfield.com/about-kings-cairn>;
- Celtic Manor in South Wales (<http://www.celtic-manor.com/hunter-lodges>);
- Maudsley Park in Warwickshire (<http://www.maudslaypark.co.uk/the-village>)
- Birchwood Lakes in Devon (<http://lowermillestate.com/birchwood-lakes-north-devon>)
- Silverlake in Dorset (<http://https://www.habitatescapes.com/luxury-cottages/cotswolds/apartments/>)
- Hill Wood in Suffolk (<https://www.somerleyton.co.uk/fritton-lake/hill-wood/>)
- Moat Park in Essex (<https://www.retirementvillages.co.uk/our-villages/moat-park/>)

Barnham Broom's proposed retirement village would not be targeted at the mass, resource-constrained and higher dependency over 75s market. It will look to offer a higher level of design specification and serviced accommodation that would appeal to the more affluent and active sector of society and developed with a level of exclusivity and uniqueness as a key attraction. Indeed, there is a longer-term scope for this also to be extended to provide additional facilities for single person dwelling (i.e. those bereaved or separated later in their lives) or needing assisted (not full-time care) living in more of an apartment/semi-detached type of complex.

In this context the NPPF indicates that: *"In rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs"* (paragraph 77); and: *"To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities."* (paragraph 78)

Rural Economy

Another key point is the 'secondary sustainability' to the local community as the overall complex incorporating the hotel, holiday and non-residential activities today supports 160 jobs to those mostly living in close proximity. The further extension of the complex as envisaged should support further employment opportunities for another 80+ jobs. In this sector the employment multiplier is put at 3x, so this equates to over 460 local jobs at present, which we expect would grow to more than 240 on site and some 720 local jobs in total in future, should Branham Broom be allowed and able to grow and develop as planned. These are significant figures, which combined with the broader economic impact for local suppliers should be considered in the wider assessment of the benefits – sustainability and more broadly – on offer.

Current planning 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 and successful rural business – which includes growing tourism provision – together with housing for retirement groups. These are specialist areas identified in the Draft Local Plan as needing support and promotion. 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.

Barnham Broom Golf and Country Club is already a well-established business/community, with an integral range of facilities and services on site (including a 46-bed hotel, health and fitness club, swimming pool, spa, restaurants and associated facilities; existing holiday apartments (45 no.). And with consent for an extension of a further 49 rooms/car park/parkland. In a rural area, but not significantly distant from other established/planned facilities (UEA, NNUH, Food Hub), villages, market towns and our regional capital city, that at one time also required a leap of imagination. What is being proposed is – with some further imagination and perhaps lateral thinking in terms of diversity in housing provision and rural economic development – a sensible, logical and sustainable next step in the facility's growth and development.

In this context the NPPF indicates that: *"planning policies and decisions should (inter alia) enable the sustainable growth and expansion of all types of businesses in rural areas both through conversion of existing buildings and well-designed new buildings."* (paragraph 83)

Deliverability

Barnham Broom Golf and Country Club has undertaken its own detailed assessment – including financial viability – of the development hereby proposed and is confident of its deliverability, including within the Plan period. Additional work has also been undertaken, including a Landscape and Visual Impact Assessment and Ecological Appraisal, demonstrating that there is no obstacle in principle to the new development as indicated on the accompanying Masterplan. This can be shared with the GNDP as appropriate.

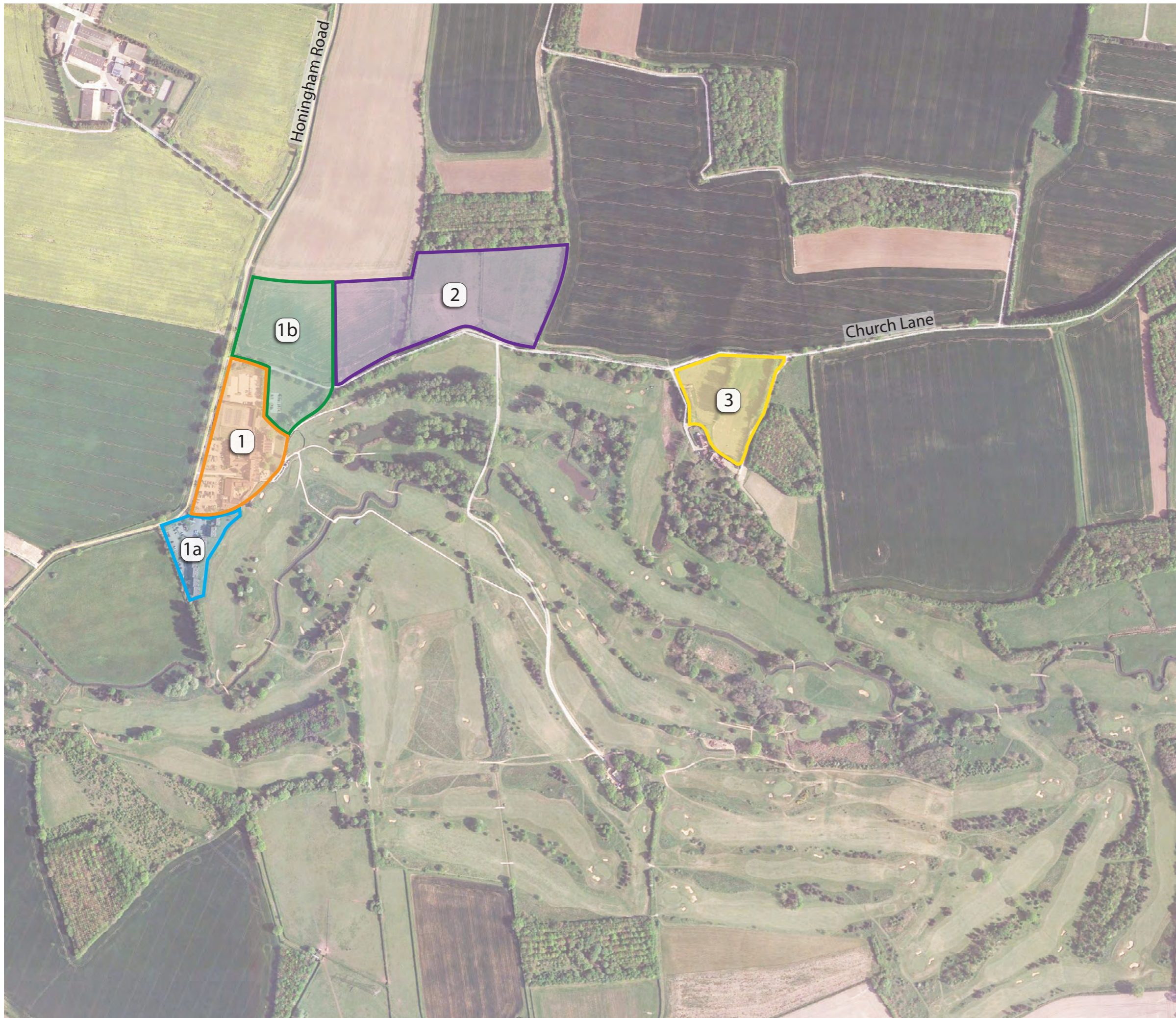
In summary, Barnham Broom Golf and Country Club plans to grow and develop its unique, socially and economically important facilities with innovative and sustainably creative new development. In order to do so, it seeks the understanding and support of the Greater Norwich Development Partnership through the emerging Local Plan. The plans are ambitious but it also provides the GNDP with a unique opportunity to support a project that is seeking to achieve new, higher levels of excellence with the added eco/environmental credentials (self-sufficient in its energy and water sources), which will add to the long term sustainability of growth and prosperity in our region.

In the meantime, please let me know if you require any further information or clarification.

(For context, we have previously submitted 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, and then associated representations in March 2018 pursuant to the Regulation 18 Consultation and a further letter of 19 June 2019.)

Alan Presslee BSc. (Hons.) DipTP MRTPI
Director

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



Key

- 1 Existing Hotel: 46 bedrooms with 92 sleeper capacity hotel, restaurant, bar, health & fitness club, golf clubhouse, retail, spa, meetings and event facilities
- 1a Existing Apartments: 45 apartments with sleeper capacity for 224 residents
- 1b Consented hotel extension: 49 new bedrooms with 98 sleeper capacity, car park extension, parkland and landscaping; planning permission granted, and due to be completed in 2022
- 2 Proposed Retirement Village: 11.5 acres mix of 65 detached and semi-detached dwellings
- 3 Proposed Holiday Homes: 15 semi-detached dwellings

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Planning Strategy Masterplan

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June 2019

