

16 March 2020

To

GNLP Joint Planning Policy Team

Representation on behalf of  
Mr James Boddy  
Colney Hall  
Norwich  
NR4 7TY

**RE: Stage C Regulation 18 Draft Strategy and Site Allocations: Land at Colney Hall, REF GNLP0253**

Colney Estate is outside but close to the current development boundary of Colney. It comprises Grade II listed Colney Hall and gardens, outbuildings which are now occupied for mixed uses and a large area of mixed woodland and open land to the north. The site is bounded by the River Yare to the north and Watton Road to the south which is also the main access point.

The site is not chosen as a preferred site to form part of the site allocations in the GNLP. The summary of the officer assessment has stated two main reasons for not allocating:

“

1. *Currently there is no detailed evidence to quantify the need for retirement housing per se, although the County Council's strategy Living Well – Homes for Norfolk identifies a need for 2,842 additional extra care units in the county by 2028;*
2. *There is no definite site-specific proposals yet promoted by an extra care housing provider, and so a generally supportive policy of allowing extra care housing in a sustainable locations is the preferred policy approach through GNLP. ”*

Whilst we welcome the council's perspective of appreciating the need of elderly care, we believe the plan has failed to act proactively to address the potential need.

Policy 119 of NPPF urges Local Authorities to “... take a proactive role in identifying and helping to bring forward land that may be suitable for meeting development needs ...” Norfolk is home to one of the highest proportions of older people in the country and the demographic projection shows that the demand for elderly services and support will continue to grow. It is however short sighted to generalise the development need for elderly care without recognising its unique characteristics and challenge.

Tackling the fundamentals of elderly care is set in the very heart of the Colney project by partnering with the University of East Anglia and Norse Care. The representations below sets out the reasoned justifications of why we believe Colney Hall site should be allocated.

### **Key Delivery Partners – UEA and Norse Care**

The site was initially submitted for consideration in the Local Plan in 2016. Since then the landowner has established a team of strong delivery partners and has made exciting progress.

The University of East Anglia is a formally committed delivery partner of the proposal. UEA proposes to undertake research into extending and enhancing independent living, where proximity of this site to the UEA would be important for monitoring and that this research would feed directly into the national industrial strategy in terms of developing assisted living communities. **Therefore, the site location is critical to meet UEA’s research need.**<sup>1</sup>

Norse Care is wholly owned by the Norfolk County Council; it operates in the private sector whilst delivering public value. Norse Care, also working with UEA in many other projects, has shown strong interest in being a main delivery partner of this project. Both UEA and Norse Care have been actively seeking to design the elements needed for the research project. Notably, a workshop conducted at national level, chaired by UEA and the tech giant IBM, was organised in 2018 to seek the potential solutions for future elderly care, exploring how Colney Hall site can meet such need.

UEA’s ambition is to pioneer in a sector in desperate need of transformation: it plans to create an exemplar project and play to its strengths in research, teaching, training and employability. Opportunities for placements in health and other services will multiply, as will employment opportunities. But the real benefit, beyond those to the residents and their loved ones, will come from the beacon effect in the sector locally, regionally and nationally.

### **New Anglia LEP Local Industrial Strategy**

Promoted by LEP’s key local partner UEA, the New Anglia LEP Local Industrial Strategy requires its local partners together “*developing next-generation innovation infrastructure including: an exemplar assisted-living community (living laboratory) for an ageing society, linking up researchers and clinicians to trial and test new technologies.*” (page 41)

---

<sup>1</sup> This proposition is documented during meetings with South Norfolk Planning Officers and UEA representative, and acknowledged in the officer’s Pre-app response in 22 November 2019

This strategic requirement is backed up by the future research need of UEA and indicates the need of collaboration with local partners for its successful delivery. Colney Hall site is currently the only site that meets UEA's criteria for such a "living laboratory" research facility.

### **UEA Healthy Ageing Trailblazer bid to Innovate UK**

UEA made further progress by submitting a bid with the potential Colney Hall assisted care project recently to Innovate UK as part of the Healthy Ageing Trailblazer Challenge. This bid has gained strong support from Norfolk County Council. Council Leader Cllr Andrew Proctor has written a specific letter to support this bid<sup>2</sup>. In the letter, Cllr Andrew Proctor acknowledged there is an increasing demand of the County Council's services and support to local elderly population. It stated the council's support of *"the development proposals for a new community which act as a test bed for new technological products and services at Colney Hall"*, it went on to explain further that *"Statutory Authorities need the market to help them deliver better services for older people, and for older people living independently, and thereby reduce the burden on the public purse."*

### **Update on Surrounding Use**

Since the site submission was made in 2016, the surrounding land uses have also evolved. Adjacent to the core area of Colney Hall, the old stable site (approx. one acre) has been used and occupied by the Global Clinic, with the immediate availability of clinical care. The Global Clinic has recently completed major expansion work and increased their capacity and collaboration with the NHS and NNUH, making it an ideal adjacent neighbour and potential partner for the Colney project. An outdoor focused Montessori school also operates within the Victorian walled garden, part of the old hall. There are proven benefits from co-locating children's nurseries and elderly communities.

### **Progress in Planning Application**

In 2019, we have submitted an informal planning application outlining the proposal below:

- 82 bed dementia care unit
- 92 extra care apartments
- 100 apartments within the woodland (optional care)
- 30 apartments within an extended Colney Hall (optional care)
- 48 co-living units (optional care)
- UEA research space
- GP surgery

---

<sup>2</sup> A copy of Cllr Proctor's letter representing Norfolk County Council's support is appended.

The pre-application received positive responses from the case officer, who states:

*"It is considered that this proposal may represent sustainable development and overriding benefits in the context of policy DM1.3 of the SNLP subject to detailed consideration of the proportions of class C2 and C3 development proposed, acceptable details in terms of design, scale and proportion for both new development and the conversion of Colney Hall, satisfactory mitigation of landscape impacts and effective travel planning proposals."*

This view is also reflected in the Site Allocations Assessment Booklet: Stage 7 Site Assessment HELAA conclusion: "... mitigation could be possible and on balance, 90% of the site (approx. 23.70 ha) is considered suitable for the land availability assessment."

It is likely that the planning application will be progressed in tandem of the GNLP process, if not more advanced than the GNLP, and the key planning considerations and decisions will gradually become material considerations in the Local Plan Site Allocations process.

(The Pre-application advice is appended with this representation as part of the supporting material.)

In the meantime, the project team (comprising UEA, SDH LLP and Bidwells) of Colney Hall site also met the GNLP planners on 17<sup>th</sup> December 2019 regarding this proposal. The response was positive.

### **Suggested Policy Approach**

We do understand the challenge the LPA faces under the tight scrutiny of the evidence-based plan making approach. However, one cannot assume the plan should not address the need for housing with care without proactive allocation because of "*no detailed evidence to quantify*", whilst firmly recognising there is indeed a strong and increasing demand on the other hand.

It is also somewhat narrow minded to only expect site-specific proposals promoted by an existing extra care housing provider. The strong influence of UEA's research in shaping future care needs cannot be ignored. Utilising its strengths in research, teaching, training and employability, as well as the expertise of Norse Care, an innovative exemplar project can well set the new standard for future care models, with further opportunities presented from the beacon effect in the sector locally, regionally and nationally.

In conclusion, we suggest the GNLP Site Allocations Plan to include Colney Hall site as an allocation for a mix of community of elderly care and research activities, with possible development quantum comprising:

- 82 bed dementia care unit
- 92 extra care apartments

- 100 apartments within the woodland (optional care)
- 30 apartments within an extended Colney Hall (optional care)
- 48 co-living units (optional care)
- UEA research space
- GP surgery

We would also appreciate representation opportunities at future public examination stage.

**16 March 2020**

**Appended with this representation:**

Appendix 1: Pre-application Document/Colney Hall Master Plan

Appendix 2: Planning Officer's response to Pre-application Proposal

Appendix 3: Support Letter from Norfolk County Council Leader Cllr Andrew Proctor