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Sent: 07 June 2018 20:59

To: Yvonne Parker

Subject: RE: Participants at Matter 4 - opportunity to respond to Document EX75 - supplementary note EX69

We have now had an opportunity to review the documents EX75 in respect of sites H1747 and H351 and would like to make the following comments. We are conscious of not repeating comments already made in submissions and attendance at the Hearing Sessions.

Surplus to requirements case

We note that the Council acknowledge that incorrect population figures were given in respect of the catchment area from Bradley Park Golf Course. Our case is that Bradley Golf course is not surplus to requirements, a position that has been supported by Sport England. The Council justify their position on the proximity of other golf courses to Bradley and comparisons with the facilities and pricing at Willow Valley. Once again this shows the Council's lack of understanding about the uniqueness of Bradley Park Golf Course. All the other courses are private, including Willow Valley. Bradley is the only municipal course in the list and is unique in what it provides.

There is nothing in the supplementary papers that demonstrates that the facility is surplus to requirements.

Delivery

We would start by saying that, despite being identified in the emerging Local Plan for a significant period of time, neither H1747 or H351 have an identified developer. Whilst there are landowners promoting the sites, that means nothing if there is no developer. As a consequence cation must be given to the timescales projected if a developer or developers do not come forward.

In terms of the suggested phasing we question the delivery rates being projected. For example, the delivery of 50 units in Zones 1 and 2 of H1747 respectively between 2024-2028 is challenging. On the assumption that a builder or builders have been identified, they are likely to be competing with each other for sales at the same time. As a consequence we believe build rates will fall below those projected by the Council. Added to this will be dwellings suggested to come forward on site H351 that will also compete for sales. It

should also be borne in mind that Calderdale are proposing significant housing on the opposite side of the M62 that could also start to come forward in the mid to late 20's. As a result the market could be swamped and build rates slowed down as a consequence.

We note the Council suggest that some 287 of the identified dwellings would be delivered in the plan period. For the above reasons and uncertainties regarding private land acquisition to deliver the relief road, we believe this figure could be 500+

Delivery scenarios if the golf course (or parts) are not developed

The Council were asked to provide information on what various scenarios could deliver. As a starting point, our client have always acknowledged that they could not present a defensible objection to development of the part of the site allocated for housing in the Unitary Development Plan. This includes the current par 3 course. Taking account that the Council consider some 287 dwellings will be delivered beyond the Plan Period, the overall figure from both sites is projected as 1671 dwellings.

UDP Housing allocation minus the Par 3 course	345 dwellings
Site H351	381 dwellings
TOTAL	726 (Difference from identified figure -945)

These could be brought forward without any significant infrastructure requirement.

UDP allocation including the Par 3 course	465 dwellings
Site H351	381 dwellings
TOTAL	846 (Difference from identified figure -825)

As above these could be brought forward without any significant infrastructure requirement.

All the above plus the Driving Range	693 dwellings
Site H351	381

TOTAL
identified figure -597)

1074 (Difference from

Loss of Par 3, 18 hole course and driving range and provision of new 9 hole
course and driving range 1290

Site H351

381

TOTAL

1671

From the above it is clear that the existing 18 hole course and Driving Range could be retained whilst the UDP allocation and H351 could deliver some 846 dwellings. This is a more deliverable scale of development. There have been many sites promoted through the Local Plan process that have been rejected simply because they are in the *Green Belt* with no other technical reasons to preclude development. There are no shortage of such opportunities that would make up the shortfall of 825 dwellings.

We see no justification for the loss of this unique facility.

We trust our comments are of assistance.

Kind regards,

David