

Planning Inspector
Kirklees Local Plan Examination
c/o Programme Officer

Date: 25 April 2018
Our ref: 50511/JG/CD/15809298v1
Your ref:

Dear Inspector

Kirklees Local Plan - Bradley Park Golf Club (H1747) - Response to correspondence from Sport England

I write on behalf of my client KeyLand Developments Ltd, following your invitation to provide a response to the recent correspondence from Sport England regarding their position on whether the proposed housing allocation at Bradley Park Golf Club (Ref. H1747) complies with Paragraph 74 of the NPPF. You will recall that we have previously commented on this matter as part our statement in respect of Matter 30. We also participated in the hearing session on 21st February 2018.

Sport England verbally confirmed at that hearing session that the loss of the existing golf courses and their replacement with a 9-hole facility alongside a driving range and 3G sports pitches failed to satisfy any of the three bullet point criteria of paragraph 74. This aligns with our position as set out with our statement in respect of Matter 30.

It is, however, noted that in their more recent correspondence Sport England confirms that whilst it remains their position that the proposal fails to satisfy the first and third bullet points of paragraph 74, their position in respect of the second bullet point (i.e. the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location) is less clear. Their latest email dated 5th April 2018 states that "*the second bullet point is not properly met by partial re-provision*", yet this email goes on to repeat their position as set out in the earlier Statement of Common Ground with the Council that in the context of the second bullet point the "*purpose of paragraph 74 was substantially met*".

This position is clearly contradictory to that set out by Sport England at the hearing session and as such requires further interrogation. Even if this altered position is accepted (which we do not consider should be the case), it still does not provide an endorsement that the requirements of paragraph 74 of the NPPF are fully met. This matter is discussed in greater detail below.

We consider that the only way that the second bullet point could be fully met would be for a full size 18-hole golf course and clubhouse to be retained on the site, as part of the wider development and for this to be referenced in the allocation policy wording. Indeed, we recall that as part of the hearing session on 21st February 2018 you asked the Council what the master planning implications would be of retaining such a facility on the site. We are not aware that this information has been provided to you. Certainly, as of the date

of this letter such information is not within the Examination library. In all likelihood, the retention of a viable 18-hole facility would result in the extent of land presently identified for housing (and ultimately the capacity of the site) needing to be reduced. If this were the case, any shortfall could be met through the allocation of additional housing sites in the Local Plan.

In summary therefore, it is our position that compliance with the second bullet point of paragraph 74 can only be achieved, and therefore compliance with this policy demonstrated, through the retention of an 18-hole facility, with any necessary reduction in housing capacity made up elsewhere through additional allocations.

If this position is not accepted and it is concluded that bullet point 2 can be met through the provision of a 9-hole facility (alongside the proposed driving range and 3G sports pitches) it is essential that such a facility is of a size and of a quality whereby it is capable of being viable in the way that Sport England acknowledge the current facility to be. In this regard we note that the advice provided by England Golf to Sport England in their email dated 9th March 2018 concludes that the Council should utilise the skills and experience of a specialist golf course architect in order to review the current indicative layout and shape future proposals. We are not aware that this has occurred.

The advice from England Golf also refers to Churchdown and Blakehill Golf Course in Worcestershire as an example of a 9-hole facility that is deemed to be a successful and viable course. This facility according to its website¹ has a course measuring 6,510 yards alongside a large and modern clubhouse capable of accommodating a range of functions. The total land take of this facility has been calculated as amounting to 24.7 hectares, based on the area of the course as shown on the plan appended to this letter. It is important to note that this area is considerably larger than that which has been earmarked for the replacement golf course on the masterplan framework for Bradley Park. Page 18 of the 'Bradley Masterplan, Huddersfield – Stage 2 Report – Preferred Urban Design Strategy Approach – August 2016' (Library Ref. SS2) identifies an area of open space in the north-east corner of the site amounting to 19.4 hectares. This same area has then been translated into the proposed "Sports and Leisure Hub" at Figure 4.3 of the 'Bradley Park Delivery Statement – January 2018' (Appendix D of the Council's Matter 30 Statement) and contains not only the proposed golf course, but also the driving range, sports pitches and other areas of incidental recreation space. These masterplan extracts are also attached to this letter, which demonstrates that the proposed Golf Course accommodates approximately two thirds of this 19.4 hectare area (i.e. circa 12.8 hectares) and therefore a considerably smaller area than the example given by England Golf of what constitutes a successful and viable 9-hole facility (24.7 hectares).

Even allowing for some flexibility, it is therefore clear that the site is not physically capable of accommodating an appropriately sized 9-hole facility (meeting the advice of England Golf) alongside all other proposed uses and the level of housing proposed. This is particularly important in light of our wider submissions made in respect of this site, whereby we have highlighted the required density to achieve the required housing numbers within the area identified by the masterplan. Furthermore, as currently worded there is presently no requirement for replacement golf facilities as part of the proposed allocation policy wording, providing no certainty as to the nature of the facility to be provided. In the absence of being able to secure an appropriately sized 9-hole facility alongside the other sporting facilities, no weight can be given to the basis of Sport England's conclusion that *"the purpose of paragraph 74 is substantially met"*.

¹ www.churchillandblakedowngolfclub.co.uk

Conclusion

We agree with Sport England that the proposed allocation fails to satisfy either the first or third bullet points of paragraph 74 of the NPPF. It is also our position that in its current form that proposals do not accord with the second bullet point. We therefore disagree with Sport England that “*the purpose of paragraph 74 is substantially met.*”

It is therefore our position that bullet point of Paragraph 74 can only be satisfied through the retention of an 18-hole golf course on the site (with an associated reduction in housing). If, however, you are of the view that the requirements of the second bullet can be achieved through the provision of a 9-hole facility alongside the other proposed sporting facilities, then in accordance with the advice of England Golf, the course must be of a sufficient size and quality to ensure that it meets the requirements of the users of the existing course and remains viable in the long term. The area identified at Figure 4.3 of the 2018 Delivery Statement is clearly incapable of achieving this. Following the advice of England Golf, the Council should work with a specialist golf course architect and for the outcome of that process in terms of location and land take to be specified in the allocation policy wording, to provide greater certainty of delivery. The knock-on effect on the quantum of housing land should then also be reflected in the overall housing capacity identified by the allocation, with any shortfall picked up by new sites.

In light of the issues raised within this letter and the apparent contradictory nature of Sport England’s advice, we consider that the hearing session in respect of this site should be re-opened to allow these matters to be discussed more fully.

Yours sincerely

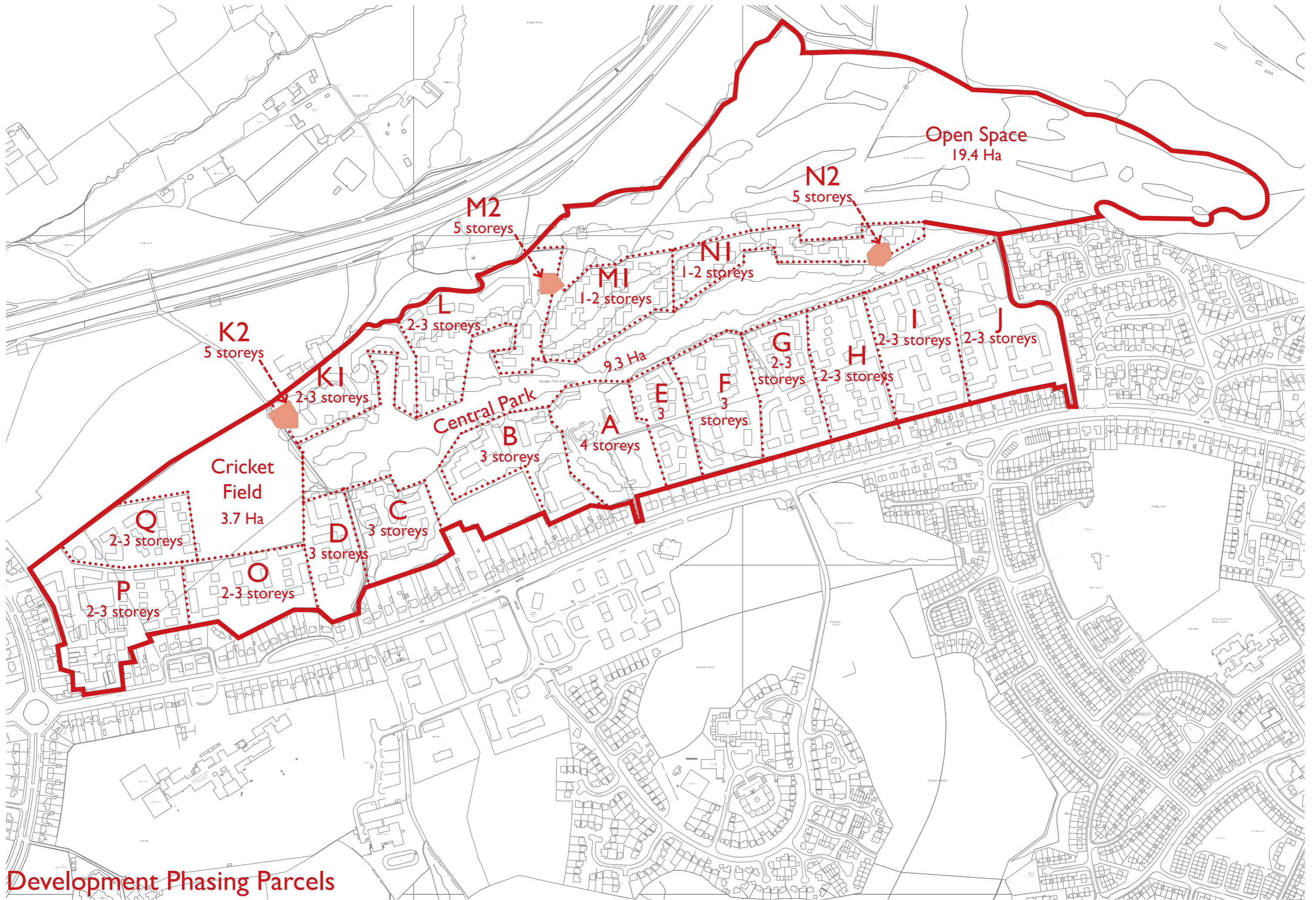
Christopher Darley
Planning Director



Churchill and Blakedown Golf Club - Site Measurement (24.7 ha.)



Measure distance
Total area: 247,159.27 m² (2,660,400.23 ft²)
Total distance: 2.24 km (1.39 mi)



Development Phasing Parcels

Figure 4.3 Bradley Park Masterplan Revision, September-November 2017



4.13 Good planning is about creating places where people want to live and spend time. The urban design strategy is focussed around the creation of a central park. *In summary conclusion:*

- i. A masterplan has been completed, progressed through different iterative stages
- ii. There is a clear overall vision established for the development of the site
- iii. The approach aims to create a new sense of place to the new development
- iv. A new urban village is proposed with a new community park 'Central Park' at its centre
- v. A sports and leisure hub will provide facilities for existing and new communities
- vi. Development principles have been established. including high-quality housing and infrastructure for walking, cycling and buses.
- vii. The development will be integrated in to the existing maturing landscape of the site and with the neighbouring communities.