



Kirklees Local Plan Examination – Stage 4, Matter 30
Hearing Statement

For: Bradley Park Golf Club, Huddersfield
SHF.1381.001. P.R.001



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Stage 4 Hearing Statement

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1 MATTER 30 – HUDDERSFIELD HOUSING ALLOCATIONS: GREEN BELT RELEASES

Issue- Are the proposed Green Belt release housing allocations in the Huddersfield Sub-Area justified, effective, developable/deliverable and in line with national policy?

1.1.1 This Hearing Statement has been prepared by **Enzygo Environmental Planning Consultants** on the instructions of Bradley Park Golf Club. We have submitted representations on their behalf through the consultation process carried out by the Local Planning Authority.

1.1.2 At the Publication Draft Local Plan consultation stage we expressed concern about the Council's strategy for housing provision relying heavily on three large Strategic Green Belt releases that would potentially account for some 25% of the required housing provision in the plan period. Site H1747 – land north of Bradley Road, Bradley (1577 dwellings) in the Publication Draft Local Plan is one of the Strategic sites. We also comment on the adjoining site H351 – land north of Bradley Road, Bradley (381 dwellings). A copy of our representations at the Publication Draft Stage are attached at **Appendix A**. Nothing in the examination process to date has changed our view on this matter.

a) What is the relationship between sites H351 and H1747? Should they be combined in a single text box/policy and a joint Masterplan required?

1.1.3 Whilst the sites are in separate ownership they are clearly linked with a common boundary. The Council have published a number of Masterplans following the Publication Draft Local Plan with a recent iteration appearing in the last month. A joint Masterplan would be appropriate.

b) Is the allocation of site H1747 consistent with paragraph 74 in the National Planning Policy Framework (NPPF) in relation to the potential loss of open space, sports and recreational buildings and land? What does the evidence show regarding the need for pay and play golf facilities in the local area?

1.1.4 The allocation of site H1747 is not consistent with paragraph 74 of the NPPF. A submission on this has been made by Golf Club member Mr Nick Howe on behalf of Bradley Park Golf Club and we fully endorse it.

c) What are the key access and transport infrastructure requirements/costs associated with the proposed scheme? Are there any delivery issues or phasing implications? To what degree is development of later phases dependent on a connection to a new Bradley link road and/or access to new junction 24a of the M62?

1.1.5 Traffic impact from the scale of development proposed is so significant that of-site highway network and access improvements are necessary before a large part of the development can commence. This has implications on delivery within the plan period. Who is responsible for financing the Bradley link road where we understand third party land is required. Impact of

the development on the highway network could be greater given the recent announcement that Junction 24a proposals have been dropped.

d) Has the necessary third party land been secured for access and drainage solutions?

1.1.6 This is for the Council to answer.

e) Does the Plan clearly specify the number of access points required and transport infrastructure requirements?

1.1.7 We don't think this is clear in the current submission and clarity is required to fully understand the implications and impact.

f) Does the Plan provide sufficient detail on other infrastructure requirements, including education, open space, sports and recreation facilities, and the provision of a local centre? Should the Plan specify the amount of land required for the provision of these facilities, along with details of timing/phasing? How will provision be made for early years/childcare and secondary education facilities?

1.1.8 We don't believe that sufficient detail has been provided on these matters. The Council have recently produced a revised Masterplan. We have had limited access to this, only seeing a copy of a plan presented to the Council Cabinet on the 23rd January 2018. It is of a scale where it is difficult to take measurements and make informed comments.

1.1.9 The recently published Masterplan iteration now proposes a 9-hole golf course. Whilst we welcome the Council's recognition that golf provision at Bradley Park is not surplus to requirements, we have concerns about the viability of a 9-hole course. Notwithstanding our view that development of the site is at odds with NPPF paragraph 74, the golf club members have critiqued the provision. **This is attached at Appendix B.** The conclusion is that the scale of the 9-hole course proposed would not be sustainable in the long term and not meet the needs of those currently using Bradley Park Golf course.

g) Have constraints relating to heritage, biodiversity, air quality, noise, odour, contamination and land stability been satisfactorily investigated and addressed? Are related mitigation measures and requirements clearly expressed in the Plan? How have these constraints and measures impacted on the viability of the scheme?

1.1.10 We don't believe that matters relating to heritage, biodiversity, air quality, noise, odour, contamination and land stability have been satisfactorily addressed as yet with mitigation

measures clearly detailed in the Plan. It is also unclear of the cost of mitigation and how this impacts on viability.

h) Is the indicative site capacity justified, having regard to environmental and other constraints and the provision of necessary infrastructure?

- 1.1.11 The site is made up of three distinct areas. Part of the site is a housing allocation in the Unitary Development Plan (UDP). This covers the par 3 course and driving range. It is acknowledged that, given this development plan allocation, it could come forward for development in advance of the Local Plan. The latest Masterplan shows this area accommodating a high density of development although it is difficult to ascertain exact numbers from the scale of the plan we have had access to. A guesstimate would be circa 800 dwellings?
- 1.1.12 The second distinct area is H351. This indicates a capacity of 381 dwellings. The third distinct area is the Bradley Park Golf Course. The latest Masterplan shows a lower density of development in this area. It begs the question as to whether the loss of the golf course is justified given the scale of development proposed in that area. The majority of the housing will come from the existing UDP housing allocation and site H351.
- 1.1.13 Given the above and having regard to the environmental and other constraints associated in developing all of site H1747 along with the cost and impact of the necessary identified infrastructure, we don't believe developing on the golf course is justified. We believe the golf course should be retained as is. The reduced scale of development would equally reduce the infrastructure, education and local centre needs associated with the larger development.

i) The housing trajectory indicates that 360 dwellings will come forward within five years, with the first units delivered in 2019/20. At the Stage 1 hearings the Council confirmed that a development partner(s) has yet to be appointed and a planning application is not anticipated until Summer 2018. Are the estimated delivery timescales reasonable and justified? Why do the trajectory timescales differ from the 15 year phasing approach established in the Bradley Park Phase II Masterplan Delivery Statement (page 23) (September 2016) (SS2)?

- 1.1.14 We have real concerns about the deliverability of the site within the plan period. We don't believe it is. We reserve the right to comment further on this once we have seen the Council response to this question.

j) What effect would the proposed boundary changes and allocations have on the Green Belt and the purposes of including land within it? In particular, how would the existing gap between Huddersfield and Brighouse be affected? Are there exceptional circumstances that justify altering the Green Belt? If so, what are they?

- 1.1.15 The proposed allocation will significantly reduce the gap between Huddersfield and Brighouse/Rastrick. This gap will be further reduced if Calderdale's proposed Green Belt releases are allocated for housing in their emerging Local Plan with the M62 motorway being the defensible boundary between the two settlements. We believe that this erosion is unjustified urban sprawl that will lead to an unacceptable coalescence of the two settlements. The exceptional circumstances previously advanced by the Council are the need to meet the housing need for the district. We believe that these needs can be met by allocating a number of rejected sites that are available and deliverable within the plan period and of a scale that do not require infrastructure or other improvements to ensure delivery.
- 1.1.16 In our initial submission on the Publication Draft Local Plan we identified a number of rejected sites that could accommodate deliverable development within the plan period. A lot of these sites were rejected solely for Green Belt reasons. We believe the reason to justify the release of H1747 should equally apply to these sites. The list of alternative sites is not exhaustive and the Inspector will no doubt be aware of other rejected sites being promoted that could take up the housing if H1747 was to be deleted or the housing numbers reduced.



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23/12/16 10:17

Comments

PDLP Allocations & Designations (07/11/16 to 19/12/16)

Comment by	Bradley Park Golf Club (Mr David Storrie)
Comment ID	PDLP_AD694
Response Date	19/12/16 14:07
Consultation Point	Site H1747 (View)
Status	Submitted
Submission Type	Web
Version	0.1

Do you consider the Local Plan is: (Please tick)

Legally Compliant	Yes
Sound	No
Complies with the Duty to Co-operate	Yes

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

We consider the emerging Plan to be unsound. The delivery of the required housing numbers within the Plan period relies heavily on 3 large Strategic Green Belt land releases at Chidswell (1535), South Dewsbury (2310 and Bradley Park Golf Course (1577). This equates to some 5422 dwellings of the 21324 that need to be allocated in the new Local Plan out of an overall housing provision of 31,140 dwellings. In other words, three sites account for 25% of the required housing on new allocations. This is not an insignificant amount.

These Strategic sites will require significant infrastructure and highway network improvements to be completed before they can come forward. Given this and likely build rates, it is questionable whether the housing numbers can be deliverable in the plan period.

This objection, whilst questioning the soundness of the Plan as a whole, is specifically focused on Bradley Park Golf Course. As a starting point we comment that the Council have not had due regard to advice in the National Planning Policy Framework at paragraph 74. This is set out in full below :-

74. Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or 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;

or the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.

There is nothing in the emerging Local Plan to suggest that the well used facility at Bradley Park is surplus to requirements or that an alternative provision of equivalent or better quality is being provided in a suitable location. Bradley Park Golf Course is the only municipal golf course within Kirklees and is unique in what it provides and the broad spectrum of people that it caters for that cannot be matched by private golf clubs in the district.

In failing to demonstrate that paragraph 74 of the NPPF has been met we consider the Plan to be unsound.

To add weight to this objection, we also consider the strategy of delivering a significant number of houses on 3 large Green Belt releases to be flawed and not meet the needs of the whole of Kirklees. Kirklees is a very diverse area with the West Yorkshire Green Belt tightly drawn around settlements. The review of the Green Belt is long overdue. Unfortunately it does not relieve the pressure around settlements and threatens their futures.

As part of the Local Plan process, many fringe Green Belt sites were advanced to the Council for consideration. In reviewing the Rejected Sites, it is clear that many have been rejected only because they lie within designated Green Belt. Many of these sites would assist in sustaining settlements as well as adding to the housing numbers to make up for the loss of Bradley Park Golf Course. Some of these are listed below but this will be expanded on in an ongoing dialogue with the Council post submission of these representations.

H653 - Capacity 315 dwellings

H649 - Capacity 412 dwellings

H534 - Capacity 43 dwellings

H593 - Capacity 177 dwellings

H440 - Capacity 190 dwellings

H177 - Capacity 67 dwellings

H571 - Capacity 301 dwellings

H664a - Capacity 117 dwellings

H475 - Capacity 143 dwellings

H322 - Capacity 216 dwellings

H1766 - Capacity 23 dwellings

H180 - Capacity 75 dwellings

H2582 - Capacity 47 dwellings

H249 - Capacity 125 dwellings

H258 - Capacity 25 dwellings

H16 - Capacity 39 dwellings

H315 - Capacity 53 dwellings*

*This site has Environmental Protection issues identified by the Council that can be overcome.

This provides some 2368 dwellings.

Kirklees also have a number of settlements that are 'washed over' as Green Belt. This is an historical carry over from the Unitary Development Plan with no logical explanation as there are also many settlements in the District that are inset.

Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the Matter you have identified above where this relates to soundness. (N.B. Please note that any non-compliance with the duty to co-operate is incapable of modification

at examination). You will need to say why this modification will make the Local plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The proposed housing allocation should be deleted. If the Council persist in promoting it then alternative provision of the same quality or better should be identified within the District and provided for before the site is released for housing.

Notwithstanding the above comment, the housing numbers lost as a result of the deletion of this allocation are replaced by appropriate allocation of those Green Belt fringe sites that were rejected on Green Belt grounds.

If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? Yes, I wish to participate in the oral examination

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

To present the case fully and allow the matter to be properly and fully debated in front of the appointed Inspector.

APPENDIX B

MATTER 30 - HUDDERSFIELD SUB-AREA

H1747 & H351 Bradley Road

A CRITIQUE OF THE PROPOSAL TO REPLACE BRADLEY PARK GOLF COURSE WITH A 9 HOLE ALTERNATIVE FACILITY

1.1 In preparing this paper we have consulted with professional PGA staff and golfers at Bradley Park Golf Course (BPGC), Lightcliffe Golf Club, Crow Nest Park Golf Club and Roundhay Park Golf Club. These clubs provide a cross section of the local facilities available in that one is a private members club, one is a municipal club and one is a Proprietary club.

2. Background

2.1 Kirklees Council (KMC) has recently proposed that as part of the Local Plan and the Bradley Master Plan that they could meet their obligations under NPPF Para 74 by providing a 9-hole golf facility and 2 3G football pitches within the Housing development. The new course location as identified on the new masterplan will be from the existing 6th tee through to the 7th green, along to behind the 8th green, across toward the 16th tee and back to the 6th tee. This area for the course is approximately 22 acres, which is substantially less than 50% of the existing area of the course. While the final proposed layout has yet to be determined an idea of how the holes would run has been provided. The majority of these proposed holes would appear to be par 3 holes with one or two short par 4's.

2.2 Additionally there is a proposed driving range which runs from the area close to the current 16th Tee and down towards the low point of the 12th hole. The two 3G pitches are on and around the current 13th, 14th and 15th holes along with a new clubhouse facility. It is not clear from the drawings the size and function of the clubhouse facility. No car park is readily identifiable and so provision of this will limit further the area available for the 9-holes.

3. Size of the Course and Impact

3.1 The area of the proposed course is approx 22 acres (information taken from google maps).By comparison, Lightcliffe is 30 acres, Crow Nest Park is 45 acres and Roundhay is 50 acres.

3.2 The smaller the area of the course the more problems there are likely to be with health and safety issues. Liability for injury caused during golf rounds has been demonstrated in UK courts to lay jointly with the individual golfer and the course owners.

3.3 The length of the course layout is determined by available space. For a course to be affiliated to the English Golf Union (EGU) it must be in excess of 3000 yards for 18 holes and cannot be made of only par 3 holes. Without affiliation handicaps cannot be issued and formal competitions under the rules of golf cannot be played.

4. Financial Impact and Sustainability

4.1 To operate a 9-hole course tee times will have to be restricted and organised differently. These are organised in blocks, the group with the last tee time of each block have to have reached and started the 9th hole before the next block can commence. Providing different tees for each hole does not change this requirement. BPGC currently operates a 7 minute tee time gap. In peak summer months the course is largely full from 0630 hrs until after 1400hrs. The pay and play public play in 4 balls. Club competitions are either 3 or 4 balls depending on the type of competition.

4.2 The other courses structure their tee times as follows:

3 balls every 8 minutes.

Block one would be approximately 0730 (some start later) until 0900

Block two would be approximately 1130 until 1300

No-one can then play until after 1530.

This system allows for approx 60 people to play between 0730 and 1530

With the BPGC current system, if we assume all groups are 3 balls, then a total of 186 people can play between 0730 and 1530.

4.3 Given that tee times are often full between 0630 and 0730 in summer months and that there continues to be players playing after 1430, the loss of revenue is clear. Between the peak of 0730 to 1530 there would be a potential loss of income from green fees in excess of 66%, plus the times outside of those peak hours.

4.4 A 9-hole short course is also less attractive to visitors, particularly established golfers, who make up the majority of Visiting Parties and Golf Societies. Having spoken to PGA staff and those who organise Visiting Parties and Golf Societies, they believe a short 9-hole facility would restrict tee time availability and see a dramatic reduction in such bookings. This would be further adversely affected if the length and quality of the course is reduced as appears to be proposed.

4.5 The Bradley Park Club currently run approx 70 Gents competitions and 52 Ladies competitions annually (usually concurrently). The number of participants in total on each of the 70 days varies between 60 and 100. This figure does not include the numerous inter-club matches, the season-long knock-out competitions or the regional Union matches played there.

4.6 .1 Assuming the above tee time structure, were member numbers to remain the same, many would not be able to play their own course due to access issues. For a Club competition to run at 75% of current numbers the course would have to be completely closed to the public. In summer months this would be most Saturday's and Sunday's. Obviously some form of accommodation would be required here.

4.6.2 Green fees for a short 9-hole course would need to be considerably lower than for an 18-hole championship facility. Season ticket prices would also need to be reduced.

4.6.3 66% fewer tee times at peak periods, a significant reduction in Visiting Parties, reduced green fees and season ticket prices, and no public pay-and-play at peak summer weekend times would drastically reduce income potentially making the facility economically unsustainable in our opinion.

4.6.4 The reduced costs of managing the course would offset some of this loss, but reductions in staff numbers is limited, It still has to be staffed, machine costs are unlikely to reduce much as the cost of mowers, for example, would be the same whether they are used to cut 9 greens or 18. There would be some reduction in materials costs such as feeds and sand, etc, but these would be minimal by comparison to the loss of revenue.

5. Driving Range

5.1 The area of land outlined on the Masterplan for the new Driving Range runs from what is currently the 16th Tee to the low point of the 16th / 12th hole.

5.2 The impact on houses that are currently adjacent to that tee is likely to be significant in terms of noise and traffic. It is unclear how many bays there will be, but it is assumed approximately 20. 20 bays of golfers hitting balls between 9.00am and 8.00pm are likely to generate significant noise. As the range would be floodlit, there would also be light pollution close to the residential areas

5.3 Modern driving ranges need to be in excess of 300 yards in length to accommodate modern technology and to prevent issues with health and safety with balls leaving the enclosed area.

5.4 The current plans do not show the length of the proposed facility but the site identified has a significant loss of height over the length of the range of between 20 and 30 yards, making it unsuitable for golfers as a serious practise facility as balls cannot be seen landing, false data about length of shot hit due to the slope etc.

6. Local Alternative Facilities

6.1 The area in and around Kirklees (within 20 minutes drive of BPGC) already has twelve 9-hole (or less) golf courses, all fully established, and most on larger areas of land than has been allocated at Bradley. While none are municipal, two are proprietary, so some pay-and-play is possible.

6.2 Given the smaller numbers of golfers willing to join short courses and the hugely reduced numbers of Visiting Party and Golf Society numbers wishing to play such courses, added to the already saturated local 9-hole market by courses of arguably better quality than the one being proposed, there would appear to be no place in the market for this scheme.

7. Additional issues

7.1 The establishment costs for the revised course are likely to be significant, requiring new greens and tees, drainage improvements to deal with the excess water from the new housing, a new clubhouse, land works for the car park and driving range, etc.

7.2 In 2014 Golf Business magazine suggested that to convert an existing 18-hole course in to a high quality 9-hole facility would cost approximately £2.4 million. Whilst the development cost of the current proposal is unlikely to be that high due to its size and the fact that it can in no way be considered high quality, it is still likely to be significant.

7.3 BPGC is described as “unique” in the Golf Needs Report commissioned by KMC. It is further described as being high quality. It is the only municipal course in Kirklees and there is no equivalent

facility in either Calderdale or Bradford. The nearest municipal would be significantly more than KMC's 20 minute commute criteria. Because BPGC is a truly open and affordable facility it is the breeding ground for new golfers of all ages, genders and background. Many current members of other courses in the district were introduced to the game at BPGC. A short, largely par 3 golf course, is unlikely to attract new players in the same numbers and, we consider, would therefore not encourage the development of golfers in this locality as it has in the past.

7.4 The majority of BPGC users are ordinary pay-and-play ones, they make up the majority of course, range, pro-shop and clubhouse customers. At peak times the general public fill the tees from before 6am and still utilise the afternoon and twilight offers available. On Club drawn-competition days, the public can make up two thirds of the total golfers. A total of 300 golfers playing the course in a day is not inconceivable in peak season.

7.5 Whilst some of the club members may be absorbed by other clubs locally, this will be at a significantly greater cost to the Bradley Park member, Joining fees, higher green fees, and additional competition fees, would potentially see costs for members increase by between 200 and 600 percent based on the two geographically closest alternatives to Bradley Park.

7.6 The public majority cannot be absorbed into private clubs where pay-and-play is severely restricted, particularly at peak weekend times. Costs to pay-and-play are significantly higher than at BPGC, where access is allowed.

7.7 The "unique" position of BPGC in introducing people to golf and developing their on-going participation in the game in the locality is key to the sport. Given the "unique" status, and the number of users from all walks of life, it cannot be considered "surplus to requirements".

7.8 The gap left by closing the "unique" BPGC would hit the ordinary non-member golfer hardest and the average working person hardest of all. Both private clubs and proprietary courses are operated on a 'for profit basis' and have restrictions on access, particularly at peak weekend times. Alternative courses are significantly more expensive to play.

8. Conclusions

8.1 The proposed 9-hole alternative to BPGC is small in area and length and is likely to be of noticeably poorer quality in terms of lay-out and condition than the existing 18-hole course.

8.2 It is unlikely to be economically viable due to the reduction in total available tee times and reduced popularity

8.3 The Impact on local property is likely to be negative

8.4 There is no evidenced need for another short course in this locality.

8.5 The 9-hole course cannot under any circumstances be considered to be "an equivalent facility of the same or higher quality".

8.6 Given the BPGC position within golf in Kirklees as an open access, fully inclusive and affordable facility for all, and the fact that it is well used, busy and profitable, it cannot be considered to be "surplus to requirements".

Prepared by:

Gary Ward, Phil Smith and Michael Hanson

Members of Bradley Park Golf Club

January 2018