

## Kirklees Local Plan.

### Site H1747 Bradley Park

#### Statement by Roger Woodward

1. I wish to make representations in relation to the inclusion of Bradley Park Golf Course in the Local Plan.
2. I am a golfer and play every week. I have played on most courses in the area but have only played at Bradley Park 3 times this year. I therefore accept that if the course was to close there is adequate supply of courses to satisfy my golfing requirements.
3. Since the publication of the Golf Needs Assessment commissioned by Kirklees, the Stadium Driving Range has now closed and I now use the Driving Range at Bradley Park on a regular basis.
4. I do not believe that Kirklees Council has fulfilled its legal obligations in its decision to close Bradley Park.
5. Paragraph 74 of the Nation Planning Policy Framework (NPPF) sets out the appropriate circumstances that would allow a local authority to close a sports facility.
6. The first bullet point of paragraph 74 states that an assessment has been undertaken which has clearly shown the open spaces, buildings or land to be surplus to requirements.

7. In August 2015, the Kirklees Built Leisure and Sports Facilities Framework was published. Knight Kavanagh and Page were commissioned to prepare this report and Golf is referred to in section 13. It says that there has been a decline in golf but no course had closed in Kirklees. It goes on to say that Bradley Park remained popular and robust and goes on to say that a Golf Needs Assessment had been commissioned. It is not said when this further assessment was commissioned.
8. While stating that there had been a general decline in golf generally, the report does not say that Bradley Park was clearly shown to be surplus to requirements as required by NPPF 74.
9. Knowing that land was required for housing and the fact that Kirklees owned valuable land at Bradley Park, it would appear that the Golf Needs Assessment was commissioned in order to satisfy the requirements of NPPF 74.
10. The Golf Needs Assessment states that Kirklees asked three specific questions when commissioning the report.

Whether local demand to play golf and join clubs can be met with existing supply

The role played in meeting local demand by the golf clubs in Kirklees and surrounding local authority areas.

The golf provisions that Kirklees Council area will need to make to meet existing and local demand.

11. There is no request to assess whether or not Bradley Park is clearly surplus to requirements. By not asking the question, it would appear that Kirklees council knew that Bradley Park was a going concern and that if assessed as required by NPPF 74 it would not be able to use the land for housing.
12. Shortly after the Golf Needs Assessment was published, Kirklees announced its plans to close Bradley Park for housing development. In my view, the earlier Built Sports Facilities report adequately answered the golf requirements in Kirklees and the Golf Needs Assessment was not required.
13. The Golf Needs Assessment was then used by Kirklees to answer a question that was not asked.
14. The conclusion of the Golf Needs Assessment is that unless the decline in membership requirements is reversed over the next few years and the demands for club membership increases, it is possible one may need to close. There is no way that this conclusion can be interpreted that Bradley Park is now surplus to requirements as required by NPPF 74.
15. The second bullet point of NPPF 74 states that if a local authority wishes to close a sports facility, another of a similar or better standard will replace it. Kirklees Council appear to have attempted to go some way in addressing this when commissioning another report, this time from Mark Smith of Smith Leisure.
16. This report is dated 21<sup>st</sup> April 2016 and covers the situation of golfers needs should Bradley Park close and also the viability of providing a new course.

Mr. Smith says that he was asked to provide an independent view on future golf provision options for the council. He does not say that he needed to consider if Bradley Park was surplus to requirements.

17. The third and final bullet point of NPPF 74 does not apply in these circumstances.
18. Bradley Park is well run and makes a profit. It provides a need not met by other private clubs in the area.
19. The inclusion of Bradley Park in the Kirklees Local Plan is not lawful. In order to legitimise its inclusion and satisfy the requirement of NPPF 74, Kirklees council should either commission a report specifically asking whether or not Bradley Park is clearly surplus to requirements or announce plans to provide a similar or better facility elsewhere in Kirklees.

2<sup>nd</sup> September 2017