

The Planning Inspectorate
National Infrastructure Planning
Temple Quay House
2 The Square
Bristol, BS1 6PN

24 August 2023

Submitted via the online portal

Dear Sir/Madam

Application by National Highways for an Order Granting Development Consent for the Lower Thames Crossing ('the Project')

Examination Timetable and Procedure (the Rule 8 Letter dated 27 June 2023)

Deadline 3 – Responses to Written Representations

**Summary Submission on behalf of Swing Rite Golf Ltd
(an Interested Party – Unique Reference 20035410)**

I am making this response on behalf of my client, Swing Rite Golf Ltd ('Swing Rite'), an Interested Party who operates Gravesend Golf Centre ('the Golf Centre').

Our main D1 Written Representation is Rep1-424 and our summary D1 Written Representation is Rep1-423.

Our response now relates primarily to the Applicant's D2 Response to our D1 Written Representation which is contained in the Applicant's document '9.53 Comments on WRs Appendix F – Landowners' (Rep2-052).

The structure of our main submission is as follows:

- In section 2 we discuss the closure of the Par 3 Course.
- In section 3 we discuss the 'preferred mitigation option for the Golf Centre' as referenced within our D1 Written Representation.
- In section 4 we discuss the loss of Southern Valley Golf Course ('SVGC') because of the Project.



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- In section 5 we discuss Covid's major positive effect on golfer demand.
- In section 6 we discuss Gravesham Borough Council's position regarding Gravesend Golf Centre and the loss of SVGC because of the Project.
- In section 7 we discuss whether Chalk Park is fair mitigation for the loss of SVGC.

Our main points arising from the above are as follows:

1. In section 2 we explain the primary reason for the current closure of the Par 3 Course. It is due to the blight caused by the Project.
2. In section 3 we acknowledge the points made by the Applicant about its draft DCO position regarding mitigation for the loss of the Par 3 Course. I misunderstood the correct position when making our D1 Written Representation. I apologise for this.
3. In section 4 we respectfully challenge the Applicant's assertion that its draft DCO mitigation for the loss of Southern Valley Golf Course ('SVGC') is sufficient to satisfy the test under para 5.174 of the NPSNN. In the draft DCO, the Applicant acknowledges that SVGC was not 'surplus to requirements' under the first part of the para 5.174 test, and confirms it is relying on the second part of the test. In section 4 of our submission:
 - We contend that the Applicant had not disclosed sufficient evidence for the Secretary of State to be able to reasonably test the Applicant's assertion of compliance with para 5.174.
 - We provide the independent golf needs assessment prepared for the Applicant by Knight Kavanagh & Page in August 2019 which clearly demonstrates that SVGC was not 'surplus to requirements' and, as a mitigation option, suggested a new replacement golf course. The Applicant is currently not proposing any golf mitigation for the loss of SVGC.
 - From the KKP assessment it is apparent that as at August 2019 there was a clear lack of golf provision in the key catchment area for SVGC, which is a 20-minute drive time by car. The golf provision was well below the national average and even further below the average provision rate in south east England.
 - It is also clearly apparent from the KKP assessment that SVGC was an important, affordable 'open to all' 18-hole golf course and now that it is closed, local golfers and potential local golfers have limited access to considerably more expensive nearby golf clubs.
4. In section 5 we discuss the boom in golfer participation caused by Covid. If significant golf mitigation was recommended to the Applicant by KKP in its August 2019 golf needs assessment, we contend that it is even more important now given the surge in golfer participation caused by Covid.

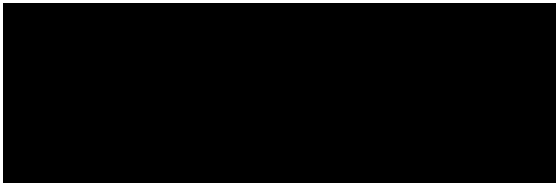
5. In section 6 we comment on Gravesham Borough Council's position regarding Gravesend Golf Centre and the loss of SVGC, as stated in its D1 Local Impact Report. Its view is consistent with ours. The Council states that the level of golf mitigation proposed by the Applicant in the DCO is insufficient and not acceptable.
6. In section 7 we discuss whether Chalk Park, along with other measures proposed by the Applicant, are sufficient mitigation for the loss of SVGC. The Applicant's position is that they are sufficient. We believe they are not, given the acute lack of golf provision in the locality. This ought to be a benchmark test.
7. In section 8 we explain the history of Gravesend Golf Centre and highlight its main current deficiencies which make it fall short of modern golf market expectations in an area where there is a lack of good, relevant golf provision. We welcome the Applicant's comments about working with us and Gravesham Borough Council to seek a solution which provides a legacy. We ask that this legacy is also a golf related legacy. In this section we put forward our suggested golf mitigation solution, although there may be variants which are significantly better than the Applicant's current draft DCO position.

We ask that the Examining Authority considers our proposed solution for golf mitigation in respect of the draft DCO and directs that the Applicant should provide significantly better golf related mitigation than that currently proposed in the draft DCO.

If the Examining Authority would like any further information from us then we would be happy to provide it.

Thank you for considering this representation on behalf of my client, Swing Rite Golf Ltd.

Yours faithfully



Mark Smith BA MRICS MBA