

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

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

1. Introduction

- 1.1 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').
- 1.2 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).
- 1.3 The structure of this representation 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 in our D1 Written Representation.
 - In section 4 we discuss the loss of Southern Valley Golf Course ('SVGC').
 - 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.
- In section 7 we discuss whether Chalk Park is fair mitigation for the loss of SVGC.

2. Closure of the Par 3 Course

2.1 In our D1 Written Representation we said the following:

'The Par 3 course was forced to close during the first national lockdown for Covid. It has not reopened since, partly because of the prospect of its permanent and imminent loss for the LTC, and partly because of vandalism caused by closure.'

'At this point in time, it is not economically viable to reopen the Par 3 Course given that it will then have to close again to make way for the LTC works.'

2.2 In its D2 Response the Applicant says the following:

'The Applicant notes that the Par 3 Course has not re-opened since the COVID-19 pandemic. The Applicant understood there were commercial reasons for this and was not aware that the decision not to reopen the course was related to the Project.'

2.3 The Applicant first wrote to Swing Rite about the Project on 27 January 2020. This was just before the first national lockdown for Covid, which started on 23 March 2020. Swing Rite therefore knew about the Project before the course was forced to close for Covid.

2.4 Swing Rite's impression from the Applicant was that the Par 3 Course was required early in the Project because it forms an important construction hub for the proposed tunnel under the River Thames.

2.5 This impression is supported from the comments made in Knight Kavanagh & Page's ('KKP') August 2019 golf needs assessment report for the Applicant which we attach in Appendix B. Its para 5 on page 2 says: *'Subject to statutory processes construction could start in 2021'*.

2.6 The Project therefore blighted the Par 3 Course as a golf course. This is the primary reason why it has not reopened. There was a high probability of enforced early permanent closure due to the Project.

2.7 Without the Project the Par 3 Course would have reopened early. This is because Swing Rite leases the Par 3 Course from Gravesham Borough Council. There is a tenant's covenant in the lease to keep the Par 3 Course open. The Council has waived this given the blight caused by the Project.

3. The 'Preferred Mitigation Option' for Gravesend Golf Centre

3.1 The Applicant's D2 Response on pages 69 and 70 includes the following statements:

'The Plan included at Appendix 1 to the Written Representation is not and should not be interpreted as the Applicant's preferred mitigation option, as the Written Representation suggests. All references in the Written Representation to that plan as 'National Highways' preferred option', or similar, are therefore not accepted by the Applicant. Furthermore, the Applicant does not seek to respond to criticisms levelled at 'National Highways' preferred mitigation option for the loss of the Golf Centre's Par 3 Course' on page 6 of the Written Representation, again because this does not reflect the Applicant's preferred option.

Instead, the plan represents an alternative configuration to some of the current recreational facilities in this location, which has been subject to discussion between the Applicant, the Interested Party and Gravesham Borough Council during engagement to date.

To be clear, however, the Development Consent Order (DCO) application makes provision for a replacement recreational facility to be located on part of the site of the former Southern Valley Golf Course (SVGC). This corresponds to the area shown coloured red on the plan enclosed at Appendix 1 to the Written Representation. This has been identified by the Applicant as a suitable site for the relocation of the Par 3 Course. However, the discussions which have been taking place between the Applicant, the Interested Party and Gravesham Borough Council have been with a view to progressing an alternative configuration to that provided for within the DCO application. Subject to the development of those discussions, any alternative proposal would be progressed on a separate basis to the DCO and subject to its own consenting and approval process.'

3.2 We accept the Applicant's position here as being fair and accurate.

3.3 My involvement in this process has been recent (the last few months). I was not involved in earlier discussions between the Applicant, Swing Rite and Gravesham Borough Council.

3.4 Given the Applicant's Response I have researched the matter and confirm that I misunderstood the Applicant's specific DCO position when drafting our D1 Written Representation. I apologise for this.

4. **The Loss of Southern Valley Golf Course**

4.1 The Applicant's D2 Response on page 70 includes the following statement:

'The Applicant notes that several comments have been raised on behalf of the Interested Party in relation to SVGC. Smith Leisure, the author of the Written Representation, act for the Interested Party, who operate Gravesend Golf Centre. It is relevant to note that no Written Representation was submitted by Southern Valley Golf Course Limited, the former operator of SVGC, who have not registered as an Interested Party in relation to the Examination. Nevertheless, the Applicant has addressed in this response points made in the Written Representation insofar as they relate to SVGC.'

4.2 Given the Project's major physical effect on SVGC's 18-hole golf course, which forces its total extinguishment, SVGC's owner, Southern Valley Golf Course Ltd, faced two practical choices:

1. request that the Applicant provides a replacement course on an alternative site
2. or agree compensation from the Applicant for the total extinguishment of its golf club business.

4.3 The Applicant has acquired SVGC and it permanently closed as a golf course in August 2022. It appears that Southern Valley Golf Course Ltd has chosen the second option. Given this, there would be no need for Southern Valley Golf Course Ltd to register as an interested party for the Examination.

4.4 Regarding the issue of mitigation for the loss of SVGC, we ask that the Examining Authority places little, or indeed no weight on the fact that Southern Valley Golf Course Ltd has not registered as an interested party.

4.5 We ask that the Examining Authority considers the clear difference between the following two positions:

- what Southern Valley Golf Course Ltd chooses from a commercial perspective – taking compensation for total extinguishment
- and what is required from a wider public golf need perspective in this location – which is the subject of an independent golf needs assessment.

4.6 Because Southern Valley Golf Course Ltd chose not to pursue a new course in an alternative location does not mean that its loss is acceptable in planning policy terms from a golf needs perspective in the locality.

4.7 In the penultimate paragraph on page 70 of the Applicant's D2 Response, the Applicant confirms that there is no local authority or independent assessment which identifies SVGC as being surplus to requirements.

4.8 The Applicant then goes on to say:

'However, in relation to the loss of SVGC, the Applicant considers that the proposal is consistent and complies with NPSNN paragraph 5.174. This is on the basis that the benefits of the Project (including the need for the Project) outweigh the loss of SVGC, taking into account the positive proposal made by the Project for the creation of Chalk Park, which is an entirely new recreational site to be created in the same locality. The Written Representation does not engage with this element of the policy test in NPSNN paragraph 5.174.'

4.9 The Applicant then cites paragraph 5.174 and underlines the following element for emphasis:

'The Secretary of State should not grant consent for development on existing ... sports and recreational buildings and land ... unless an assessment ... has shown the ... buildings and land to be surplus to requirements or the Secretary of State determines that the benefits of the project (including need) outweigh the potential loss of such facilities, taking into account any positive proposals made by the applicant to provide new, improved or compensatory land or facilities'.

4.10 The Applicant then says:

'It is the Applicant's position that the Project complies with paragraph 5.174 of the NPSNN, specifically that part of paragraph 5.174 in relation to which emphasis is placed above.

4.11 We respectfully contend that if the Applicant is specifically relying on the Secretary of State's determination in accordance with the underlined policy wording, then the Secretary of State ought to have sufficient evidence from the Applicant to quantify the true extent of the loss of SVGC from a golf needs perspective.

4.12 We contend that the logical position is as follows: for the Secretary of State to be able to consider *'any positive proposals made by the applicant to provide new, improved or compensatory land or facilities'* there needs to be a proper assessment setting out the baseline position of what sports and recreational buildings – in this case SVGC – are being lost.

4.13 Without this evidence, we contend that it is difficult for the Secretary of State to be able to fairly evaluate the extent of needed mitigation for the loss of SVGC.

- 4.14 With such evidence, the Secretary of State is considerably more informed on whether the Applicant's proposed mitigation is genuinely *'improved or compensatory'* compared to the baseline position, or whether it falls materially short of this.
- 4.15 From NPSNN's paragraph 5.174 we contend that the baseline position is the *'assessment'* to which it refers. If the Applicant cannot demonstrate that SVGC is *'surplus to requirements'* from the assessment, then the assessment ought to provide a good steer as to the level of potentially required mitigation.
- 4.16 In national planning policy terms, the accepted norm for the *'assessment'* is a sports needs assessment prepared in line with Sport England's *'Assessing needs and opportunities guide for indoor and outdoor sports facilities'* (ANOG). This is a lengthy document. We attach in Appendix A its first three pages which gives a flavour of ANOG requirements.
- 4.17 We recently made a 'Freedom of Information' request ('Fol') to the Applicant. We attach in Appendix B the Applicant's response.
- 4.18 The Applicant confirmed that it commissioned an independent golf needs assessment from Knight, Kavanagh & Page ('KKP') in August 2019. In its Fol request reply, the Applicant states that *'It is an independent report, and the conclusions reflect the views of KKP and are not necessarily the views of National Highways'*.
- 4.19 Our Fol request asked the Applicant to share any important supporting correspondence that it has relating to its proposed mitigation for the loss of SVGC. The Applicant, in its reply, states that it will provide this information by 12 September 2023.
- 4.20 KKP is a well established and respected firm for providing comprehensive sports needs assessments in accordance with Sport England's ANOG requirements.
- 4.21 We ask that the Examining Authority considers the KKP assessment in Appendix B. We set out below some of KKP's comments to assist with context:

Page 1, para 1: the assessment relates to the following clubs affected in some way by the Project – SVGC, Rochester and Cobham Park Golf Club, Orsett Golf Club, Cranham Golf Course, and Top Meadow Golf Club.

Page 1, para 2: *'This report is a detailed assessment of current provision of golf facilities, identifying need (demand) and gaps (deficiencies in provision) affecting all of the above courses/clubs, but with specific regard to Southern Valley Golf Course which is directly affected'*.

Page 1 para 3 confirms that KKP consulted with various stakeholders, including Sport England and England Golf (golf's national governing body).

Page 1 para 4 states 'key deliverables' for the assessment including considering the potential closure of SVGC.

Page 2 para 7 '*... Consultation with SVGC proprietor indicates that the crossing will affect 14 holes [out of 18] and that much of the remaining land will be required for storage and containers for contractors*'. This confirms the required total extinguishment of the 18-hole course.

Pages 3 & 4, para 8 & Table 2.1 refers to the Open Space Sport and Recreation ('OSSR') initial findings report: '*OSSR initial findings of the impact of LTC on golf courses (2019) – Actions required to determine the final impact*'. For SVGC: '*Carriageway runs through site. Potential mitigation will include replacement provision to equivalent or better quantity and quality. Golf assessment needs to investigate requirements. ... the primary focus of this study is the Southern Valley Golf Club which will be disturbed the most by the LTC route*'.

Page 5 para 16 '*... the construction of SVGC began in January 1998 on 138 acres ... The course has been designed and built in sympathy with a traditional Links Course. It features large greens and tees and undulating fairways. The subsoil is predominantly chalk which provides excellent drainage conditions. The tees and greens have been built to modern specifications and this ensures no temporary tees at any time of the year. It is fair to conclude from this that the 18-hole course was good and 'fit for purpose*'.

Page 6 para 19 relates to the study area. '*The catchment area (drive time) covers 20 minutes' drive times from SVGC (as is common practice and advised by Sport England). ... It is recognised that catchment areas vary from person to person, day to day, hour to hour. This problem has been overcome by accepting the concept of 'effective catchment', defined as the distance travelled by around 75-80% of users (and is a model used by Sport England). This concept is also accepted and used by England Golf*'.

Page 9, Table 2.4 and para 21 identifies the other golf facilities within the 20 minutes' drive time of SVGC. '*In summary, there are three 18-hole courses, one 9-hole course, a par 3 academy course and 82 driving range bays*'. The other 18-hole courses are Mid Kent Golf Club, Rochester & Cobham Park Golf Club and Pedham Place Golf Centre.

Page 11 para 29 relates to Sport England's 'Active Lives Survey' ('ALS') data. '*Golf is identified as the eighth most popular sport/activity in Gravesham with 2.1% of the population indicating that they take part at least once per month. This is commensurate with national figures but lower than the average in the south east (2.7%)*'. The seven most popular sport/activities in Gravesham, in popularity order, are: walking (leisure), athletics, cycling, structured programme classes, fitness, swimming and badminton.

Page 14 para 36 relates to population projections. *'The most recent ONS projections (MYE 2017) indicate a rise of 17.0% in Gravesham's population (+18,062) over the 25 years from 2016 to 2041'.*

Page 14 para 38 relates to population make up. *'Sport England data suggests that the three highest market segments of the population are Comfortable Midlife Males who are identified as professional sporty males, Retired Singles or widowers (predominantly female) and Settling Down Males; the first and third of these segments, may have the time and/or desire to play golf'.*

Page 14 para 39 says: *'The loss of any golf facility in Gravesham is likely to lead to a reduction in the number of people taking part in golf, which has the potential to impact negatively on the levels of physical activity in the area, thereby contributing to the already lower than average levels of activity in the Borough'.*

Page 16 para 46 says: *'In KKP's opinion it is highly likely that displaced golfers [from SVGC] would look to play at either Mid Kent Golf Club or Rochester and Cobham (assuming that they could afford the fees which are identified in Paragraph 64) as they are the closest facilities. In addition, Corinthians is difficult to access and only offers 9 holes, whilst the travelling distance to Pedham Place Golf Club via the A2 and M25 is likely to deter many golfers from accessing it'.*

Page 17 para 49 says: *'In order to ascertain the level of supply of golf facilities within 20 minutes' drive time of SVGC, the supply of holes was analysed and set against national and regional averages to help gauge standards in terms of number of standard holes per population'.*

Page 17 para 50 says: *'Table 3.2 indicates 0.59 holes per thousand population in England, with the regional average being higher at 0.77 per thousand. (This is similar to the county of Kent which has 0.78 holes per thousand). Gravesham is comparable with the national average at 0.59 holes per thousand but lower than Kent and the south-east.*

Page 18 para 53 says the following (which we have underlined for emphasis): *'When considering the number of holes within 20 minutes' drive time of SVGC, there is an estimated 0.35 holes per thousand population, which is significantly lower than the Gravesham, Kent and national averages. When Southern Valley closes due to the construction of LTC, the average number of holes per thousand population falls to 0.28. This does not compare favourably with national (0.59) and county averages (0.77) indicating that supply of standard golf hole facilities, which is already low will be even worse'.*

Page 24, paras 65 and 66 cover prices charges at the 18-hole courses within the 20 minutes' drive time. They say (we have underlined for emphasis): *'SVGC is at the cheaper end of the golf experience in comparison with its immediate 18-hole competitors. The two nearest facilities both require joining fees (Mid Kent Golf Club -*

£750, and Rochester & Cobham £1,000) [SVGC did not]. They also are more expensive on an annual basis with Mid Kent GC charging £1,155 (an additional c.£150) and Rochester & Cobham GC charging £1,795 (over £700 more expensive). There is also a requirement for new members to be interviewed and play nine holes with a Board Director before membership is offered at Rochester & Cobham GC. ... Pedham Place Golf Centre, which as identified above is on the cusp of 20 minutes' drive time of SVGC has a very similar pricing point to that of SVGC'. It is clear from this statement that the two nearest local clubs are less 'open to all' and more expensive than SVGC. Its loss therefore matters in terms of affordable, accessible golf.

Page 27, paras 73 and 74 say: 'England Golf published the 'Raising Our Game' strategy in 2014. ... A market segmentation specific to golf was devised. Research identified that 24% of adults in England are potential players. This is made up of 9% current players, 8% lapsed players and 7% latent players, amounting to c.9.6 million people in total. It also provided England Golf with nine defined profiles and clearly identified behaviours, motivations and barriers within each one. ... England Golf then worked with LCMB, facility consultancy, to utilise the segmentation work to develop a facility strategy and create some practical tools to overlay supply with demand.

Page 28 para 75 says (we have underlined for emphasis): 'The LCMB findings (2019) are that within Gravesham there is significant demand for golf, much greater than the average for the south-east region. The demand cuts across all nine golf and profiles'.

Page 28 para 76 says (we have underlined for emphasis): 'The level of golf provision within the catchment area is made up of traditional 18 hole courses with only one driving range open to the public, with a 9 hole course attached [which is Gravesend Golf Centre]. Providing/developing entry level facilities that offer more informal playing opportunities would be key, as without them the playing opportunities in Gravesham will continue to be limited to traditional 18 hole golf. Based on LCMB's initial analysis, clubs are not proactively targeting new audiences through coaching programmes or a wider range of membership/playing options'.

Page 28 para 79 relates to consultation with England Golf's Regional Development Manager ('RDM') and says the following (we have underlined for emphasis): 'SVGC offers the only genuine pay and play opportunity in Gravesham. This allows for both entry level golf and for the more experienced and discerning golfer. The RDM identified the importance of SVGC to the local and wider golfing community, especially given that the facility is open all year round, with no need to play on winter greens. This is due to the temperate climate and chalky base'.

Page 28 para 80 says (we have underlined for emphasis): 'The RDM also pointed out the lower annual fees and lack of a joining fee at SVGC, which is significantly lower than, for example, Mid Kent and Rochester & Cobham Golf Clubs [the two nearest 18-hole courses to SVGC] which both require a joining fee and have higher annual fees. SVGC is a popular local amenity. SVGC is priced to attract local golfers who want to

golf within a specific budget. They are unlikely to be able to afford the higher cost of neighbouring courses. The RDM is keen to see mitigation of some golf provision following the potential loss of the course to the LTC.

Page 29 para 81 relates to consultation with SVGC's Managing Director ('MD') and says: 'Consultation with the MD confirmed that ... Most of the members live locally and use the facility all year round. ... Management is keen to keep the business as active as possible, despite the proposed future developments. ... It reportedly had c.34,000 rounds of golf during the 2018 season [which is busy by golf course standards] (which included a very wet winter and particularly parched arid summer)'.

Page 31 para 94 says: 'SVGC is a successful business venture which supplements its golf income with wedding and events (not uncommon for most golf clubs). Consultation indicates that the business has taken over 20 years to grow and that the development of LTC will destroy it. It is highly likely that the current management will not consider being involved in developing a new business based on a new course, should the outcome of the Golf Needs Assessment suggest this as a way forward'.

Page 31 para 98 says (we have underlined for emphasis): 'The loss of the 18 holes at SVGC will have a major negative impact upon golf participation within the area with the loss of c.34,000 rounds of golf per annum (2018). This comes on top of the loss of the closure of Deangate Ridge Golf Course in April 2018. Given the difference in the cost of memberships (and the interview requirement at Rochester & Cobham Golf Club), different market segments catered for and lack of 7 day memberships available at both clubs [meaning Mid Kent and Rochester & Cobham GCs as the two nearest 18 hole courses to SVGC], it is highly likely that there will be minimal movement from SVGC to other golf clubs in the area, following its closure.

Page 34 final bullet point says (we have underlined for emphasis): 'Consequently, it cannot be stated that SVGC is considered surplus to requirements when taking account of the NPPF Planning Test. There is clear justification to replace SVGC with a full size (18 hole) course in the local/Gravesend area. This will also require appropriate ancillary facilities in order to ensure it is financially viable ...'.

5. Covid's Major Positive Effect on Golfer Demand

- 5.1 The KKP golf needs assessment was prepared in August 2019, which is before the onset of Covid (March 2020).
- 5.2 Whilst Covid's impact on many parts of the UK economy was severely negative, it created a boom in golfer participation. This was because after the first national lockdown, golf was able to be played when many other sports and activities were barred.
- 5.3 In England Golf's 2014 'Raising Our Game' strategy document, it identified 24% of adults in England as potential players. This was made up as 9% current players, 8% lapsed players and 7% latent players, amounting to 9.6 million people in total.
- 5.4 Covid has changed how many of us lived and now live. Examples include the following:
- furloughed staff had more free time with limited sports/activities to pursue
 - there is more working from home which reduces commute times to work, which releases more free time
 - there are more video meetings and less meetings in person, which encourages more people to play golf as a way of real social interaction
 - many people used the Covid period to rethink their work/life balance and to prioritise what is important to them.
- 5.5 As a consequence, many people turned to playing golf. England Golf's 'current players' generally played more; 'lapsed players' rekindled their interest in the game; and 'latent players' took up the game.
- 5.6 We attach in Appendix C some articles showing the positive effect that Covid has had on the UK golf industry. Headlines and comments from these include the following:

The Sunday Times on 16 August 2020

Headline: *'Golf's Unstoppable Rise'*

Text: *'According to SMS [Sports Marketing Surveys] figures, the number of rounds played in June and July was up 60% on 2019 and is trending towards the same increase for August'*

Golf Business News on 19 August 2020

Headline: *'The 'Golf Boom' Continues'*

The Golf Business Magazine on 1 September 2020

Headline: *'The UK has seen the biggest golf spike in the world'*

BBC Sport on 26 May 2021

Headline: *'Golf participation up 2.3 million in UK and Ireland – and must be seized upon, says R&A'* [The R&A is widely considered as golf's global governing body]

Text: *'The numbers playing on a nine or 18-hole course in the UK increased by 2.1 million players to 5.2 million – the highest figure recorded this century.*

Phil Anderton, chief development officer at the R&A, said: "we have seen a real surge in the number of golfers in Great Britain and Ireland".

In the UK, the average age of golfers fell by five years to 41. Some 25% of female golfers were new to the sport and tried it for the first time during the Covid-19 pandemic.'

The Golf Business Magazine on 22 November 2021

Headline: *'Golf rounds in 2021 are up by 46% compared with 2019'*

Golf Business News on 14 December 2021

Headline: *'Golf enjoying record global growth, reports The R&A and SMS'*

Text: *'The new figure reflects a positive trend in golf in which participation levels are now rising worldwide after a period of decline*

Phil Anderton, Chief Development Officer at The R&A said: "Golf is enjoying a real boom in popularity at the moment and we are seeing substantial increases in participation in many parts of the world, particularly the last two years when the sport could be played safely outdoors during the Covid-19 pandemic".

The Golf Business Magazine on 2 August 2023

Headline: *'Golf participation strong in first half of 2023'*

Text: *'Golf's leading provider of tee time management booking technology, BRS Golf, and the world's biggest tee time marketplace, GolfNow, have reported a strong first half of 2023 for both member play and visitor play in the UK and Ireland, with more rounds played so far this year than in the whole of 2019'.*

- 5.7 If significant golf mitigation was recommended by KKP prior to Covid in August 2019 then given the boom in golfer participation since, we contend that it is even more important now,

from a golf need perspective, for the Applicant to fairly mitigate, in golf terms, for the loss of SVGC.

6. Gravesham Borough Council's Position Regarding Gravesend Golf Centre and the Loss of SVGC

6.1 We note and welcome Gravesham Borough Council's ('the Council') position on these two golf venues in its D1 Local Impact Report.

6.2 We note the following in its Executive Summary (page 2 paras 1.36 to 1.38):

'The Council is also concerned that National Highways is disregarding issues that would be unacceptable from a private promoter and this is not acceptable. Gravesham's environment, business and residents will bear the brunt of the insufficient mitigation and compensation, and in some cases will have the added indignity of having to put up with poorer services as a result of that impact not being recognised and funded.

Through CPO, the project removes a pitch at course at the rear of Cascades Leisure Centre, which is owned by Gravesham Borough Council and provided as an important local asset, and the Southern Valley Golf Course (18-hole pay and play). The latter has now closed as a direct result of uncertainties due to the proposed scheme, but although private provided for public use. Discussion is ongoing on the pitch and putt but there is no replacement for the golf course or another active outdoor recreation facility. Chalk Park, and other mitigation/compensation areas, extend the open space offer but in an area that is already well provided for.

As such, the Council anticipates making further representations through the Examination Hearing process, to seek the most favourable resolution for Gravesham residents and businesses in anticipation of its concerns being resolved. If not, the Council will maintain its objections to the current formulation of the Scheme'.

7. Is Chalk Park Fair Mitigation for the Loss of SVGC?

7.1 In the Applicant's D2 Response on page 71 it says the following:

'Paragraph 5.174 of the NPSNN states (emphasis added)

'The Secretary of State should not grant consent for development on existing ... sports and recreational buildings and land ... unless an assessment ... has shown the ... buildings and land to be surplus to requirements or the Secretary of State determines that the benefits of the project (including need) outweigh the potential loss of such facilities, taking into account any positive proposals made by the applicant to provide new, improved or compensatory land or facilities'.

It is the Applicant's position that the Project complies with paragraph 5.174 of the NPSNN, specifically that part of paragraph 5.174 in relation to which emphasis is placed above. Again, the Written Representation does not acknowledge or engage with this part of the test in paragraph 5.174 of the NPSNN.

Chalk Park is greater in area than the former SVGC site and would be functional and accessible for the wider community with connections to the wider environment as well as providing a similar setting with open views. The provision of over 35ha of new open space at Chalk Park is secured by Design Principle S3.04 [APP-516].

Paragraph G.4.16 of Planning Statement Appendix G: Private Recreational Facilities [APP-502] goes on to state:

'The mitigation of any adverse effects on the green infrastructure and recreational facility arising from the Project would be adequately provided for by means of the general provision and enhancement of the local recreational infrastructure including Chalk Park. Whilst this provision is not an identical substitution for the loss of private golf facilities, it would significantly improve the general provision of green infrastructure and recreational facility in the same locality to counterbalance the loss of green infrastructure and recreational facility caused by the loss of Southern Valley Golf Club. This provision is secured by means of Requirement 3 (detailed design) of Schedule 2 (requirements) of the draft Developing Consent Order (DCO) (Application Document 3.1) to carry out the Project in accordance with the general arrangement drawings.'

The Applicant acquired the land formerly known as SVGC by agreement dated 17 March 2023 and has since implemented a range of safety and security measures at the site. As noted, no Written Representation has been received from Southern Valley Golf Course Limited'.

- 7.2 We ask that the Examining Authority tests the Applicant's assertion that the above proposed mitigation is sufficient for the loss of SVGC.
- 7.3 It appears that the Council's view is that it is not (see our previous comments in section 6).
- 7.4 It is also our view that it is not, bearing in mind just how damaging the permanent closure of SVGC is in terms of lost 'open to all' golf provision for the local community.
- 7.5 We highlighted in section 4 some of the observations in KKP's August 2019 golf needs assessment, and in section 5 we highlighted the boom in golfer demand since the onset of Covid. Prior to its permanent closure, there was a proven strong golfing need for SVGC, and this need, had the venue remained open, would be even stronger today.
- 7.6 It is perhaps worth revisiting the following important statistics in KKP's golf needs assessment. Its page 18 para 53 says the following:

'When considering the number of holes within 20 minutes' drive time of SVGC, there is an estimated 0.35 holes per thousand population, which is significantly lower than the Gravesham, Kent and national averages. When Southern Valley closes due to the construction of LTC, the average number of holes per thousand population falls to 0.28. This does not compare favourably with national (0.59) and county averages (0.77) indicating that supply of standard golf hole facilities, which is already low will be even worse'.

- 7.7 To frame the above statistics another way, in August 2019, and before the Covid golf demand boom:
- prior to SVGC's closure, the course provision within the primary 20 minutes' drive time catchment area was 41% less than the national average; and 56% less than the average in south east England; and
 - after SVGC's closure, the equivalent course provision became 53% less than the national average; and 64% less than the average in south-east England.
- 7.8 Thus, in today's golf market, with the loss of SVGC due to the Project, the primary 20 minutes' drive time catchment area is seriously under provided for in terms of normal and reasonably expected golf provision. We respectfully contend that this is the true baseline position for determining whether the Applicant's proposed mitigation, primarily in the form of Chalk Park, is sufficient. We believe that it is not.
- 8. What Might be Fair Golf Mitigation for the Loss of SVGC?**
- 8.1 If the Examining Authority agreed with our and Gravesham Borough Council's assertion that specific golf mitigation for the loss of SVGC is appropriate and required, then what might the mitigation be?
- 8.2 The starting point for mitigation considerations is usually the replacement of the facilities being lost. This would mean building another similar 18-hole course in the locality on an alternative site.
- 8.3 Indeed, this was KKP's view in its August 2019 golf needs assessment. On its page 34, the final bullet point says: *'Consequently, it cannot be stated that SVGC is considered surplus to requirements when taking account of the NPPF Planning Test. There is clear justification to replace SVGC with a full size (18 hole) course in the local/Gravesend area. This will also require appropriate ancillary facilities in order to ensure it is financially viable'.*
- 8.4 As mentioned in our D1 Written Representation, our 'high level' initial estimate is that this is likely to cost in the region of £6 million to £8 million. It might be more than this if detailed costings were done.

- 8.5 It is, however, impractical to pursue this option given that Southern Valley Golf Course Ltd chose total extinguishment rather than pursue a replacement facility.
- 8.6 A practical option, however, is to invest significantly in upgrading the adjacent Gravesend Golf Centre.
- 8.7 We welcome the Applicant's positive and constructive comments about legacy on page 72 of its D2 Response which say:

'The Applicant notes the Interested Party's desire to upgrade Gravesend Golf Centre to address '... technological advances in the game, the passage of time, and changing golf market expectations...'. The Applicant is, as noted, working with the Interested Party to seek to develop a solution which works for all parties involved and provides a lasting positive legacy for the residents of Gravesham and potentially beyond, whilst being mindful of its duties to deliver value for public money. The Applicant is committed to continuing these discussions with the Interested Party and will update the Examining Authority accordingly, as the examination progresses.

- 8.8 The Applicant's DCO position regarding Gravesend Golf Centre is to relocate the Par 3 Course needed for a construction hub for the Project to part of the land of the former SVGC.
- 8.9 On page 71 of the Applicant's D2 Response is the following statement:

'The Applicant proposes as part of the DCO application to provide a relocated recreational facility on land within the Order Limits and previously forming part of SVGC, to compensate for the permanent acquisition of the Par 3 Course. This relocation land provision is set out at Section 5.13 of the oLEMP [REP-173] and Design Principle S3.17 [APP-516] which are secured by Schedule 2 (requirements) Requirement 3 (detailed design) and Requirement 5 (landscape and ecology) respectively of the draft DCO [REP1-042].

An assessment of the Project's impact on Gravesend Golf Centre and the Applicant's proposals for the replacement of the site are set out at paragraph G.4.17 onward of Planning Statement Appendix G: Private Recreational Facilities [APP-502]. Tables 13.57 and 13.69 of Environmental Statement Chapter 13: Population and Human Health [APP-151] provide an assessment of Gravesend Golf Centre for the construction phase and operational phase respectively'.

- 8.10 The Applicant's statement on mitigation for the loss of the Par 3 Course in Planning Statement Appendix G: Private Recreational Facilities includes the following:

Para G.4.20 *'The Project proposes to provide a replacement golf facility on land at the former SVGC within the Order Limits, adjacent to Gravesend Golf Centre, to*

compensate for the permanent loss of the existing facility. The substituted facility would be larger than the existing site and could be accessed directly off Thong Lane via the existing access road for SVGC. It would accommodate a nine hole par 3 golf course to compensate for the loss of land at the Gravesend Golf Centre used for the same purpose. The replacement facility is located next to the existing Gravesend Golf Centre and would provide a setting equivalent to or better than land to be permanently acquired by the Project. ... It should be noted that there is ongoing engagement with the current operator on the detail of the replacement facility'.

Para G.4.21 *'There is no local authority or independent assessment which identifies Gravesend Golf Centre as being surplus to requirements.'*

Para G.4.22 *'The loss of the existing nine-hole par 3 golf course at Gravesend Golf Centre would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location. In accordance with paragraph 5.166 of the NPSNN, the replacement facility would be larger in quantity, equally or more accessible, useful and attractive, and its overall quality would be comparable. Moreover, the benefits of the Project (including the need for the Project) outweigh the temporary loss of the golf course availability, which is currently closed to the public in any event, taking into account the positive proposal made by the Project to provide a replacement facility on land adjoining the existing course. Therefore, the project complies with paragraphs 5.166 and 5.174 of the NPSNN'.*

- 8.11 We disagree with elements of the Applicant's assertions above. The proposed new par 3 course will repeat the deficiencies of the current Par 3 Course and is the reason why we are in dialogue with the Applicant to find a better, practical solution which is better suited to modern golf market needs.
- 8.12 We believe that it may assist the Examining Authority if we briefly explain Gravesend Golf Centre's history and highlight some of its current physical and operational issues.
- 8.13 The Golf Centre was built in the 1980s. Today it comprises the following main components:
- A 30 bay single storey floodlit driving range plus two teaching bays. The range outfield is surrounded by safety netting with the intention of minimising ball escape onto adjoining land areas.
 - A small reception hub leading to the range bays. This includes a reception desk, a cafe area and a golf shop (retail area of around 1,200 sq.ft.).
 - The 9-hole Par 3 Course which has a length of 1,146 yards (average 127 yards per hole) and which is currently closed due to blight caused by the Project.
 - A practice putting green area to the rear of the range building.

- A maintenance compound with storage containers.
 - Parking for about 34 cars.
- 8.14 The Golf Centre's general commercial trading location is sound, and this is an important ingredient for a financially viable golf business. Gravesend is a substantial town, and the Borough of Gravesham has a resident population of around 107,000.
- 8.15 The normal primary customer catchment area for a golf centre like this is a 15-minute drive time by car. For most 18-hole golf courses their primary catchment area is wider, at 20 minutes (as used in the KKP golf needs assessment for SVGC).
- 8.16 Within the general area there is a relative lack of competing golf centres/driving ranges, and so there is a healthy need for a golf offering at this specific location.
- 8.17 A key question is whether the current Golf Centre set up is fit for modern golf market needs. The overarching answer is 'no'.
- 8.18 Undoubtedly, when the Golf Centre was first built, it was fit for golf market needs at that time. However, golfers' expectations and design trends have evolved a lot over the last 30 plus years. Whilst the Golf Centre is a popular destination for local golfers, and so still makes an important contribution to local golf need today, it does so with a number of modern design weaknesses.
- 8.19 The two main weaknesses of the driving range element are the shortness of the driving range outfield, at around 240 yards, and the fact that the driving range bays are primarily designed for single users.
- 8.20 In 1985 the average drive length of the longest hitter on the PGA Tour (golf's main professional golf tour) was 278.2 yards. Given this statistic, it was reasonable for the Golf Centre's range outfield to be built with a length of 240 yards with safety netting at the rear. The probability of a significant number of balls landing over the end safety netting would have been very low indeed.
- 8.21 In 2021 the average driving length of the longest hitter on the PGA Tour was 323.7 yards. This is a 16.4% increase. Generally, a lot more golfers can now hit the ball significantly further than they could in the 1980s due to advances in golf club and golf ball technology, better fitness, and better swing technique.
- 8.22 The increase in how far modern golfers can now hit the ball puts significant pressure on the current dimensions of the range outfield. There are now health and safety issues with ball escape at the far end and to the right-hand side of the range outfield. These areas are currently used for football pitches.

8.23 To compensate, the 240 yard range outfield ought to be expanded. A 16.4% increase in length would take it to a length of 280 yards. The preferred driving range length these days is around 300 yards. However, extending the range outfield is not currently a deliverable option because the land take would encroach on the land needed for the existing football pitches.

8.24 The second driving range issue is the configuration of the driving range bays. In the last few years, ball tracking and digital technology (such as Toptracer) have transformed the thinking of what constitutes a modern commercial driving range design. Prior to this technology, the normal core design was as follows:

- The bays were designed primarily for one golfer to use one bay. Thus, a 30 bay range would have a full capacity of 30 golfers.
- The access corridor to the rear of the bays would be relatively narrow (to avoid unnecessary build cost).

8.25 Nowadays, the core design for new build commercial driving ranges is as follows:

- The bays are wider to allow groups of players (say up to 4 to 6 per bay) to use a single bay. This considerably increases usage capacity (30 bays with an average of 4 players per bay means 120 users instead of just 30).
- There is ample space around each bay for standing or sitting. Tables and chairs allow food and beverage consumption on the range itself, as opposed to just in the bar/lounge area.
- The access corridor needs to be wider as a result of the above.

8.26 Whilst the Golf Centre has installed Toptracer, its original 1980s design of 30 single user bays with a narrow corridor means it falls short of modern design thinking.

8.27 Three other areas of significant weakness regarding the current Golf Centre set up are as follows:

- The 9-hole Par 3 Course occupies a separate parcel of land to the rest of the Golf Centre. To access this, golfers have to walk over the area where the football pitches are laid out.
- The size of the golf shop is small at around 1,200 sq.ft. Leading golf retailers usually prefer more space with around 3,000 sq.ft. being a common size.
- The general sense of arrival and 'curb appeal' are rather weak. To get to the Golf Centre one has to drive past the recycling centre. Ideally, a golf centre has some main road visibility, but Gravesend Golf Centre has none.

- 8.28 The 9-hole Par 3 Course was added some years after the construction of the driving range element. Normal 'good design practice' is to make sure that the starting and finishing point of a 9-hole course is close to the main clubhouse reception area, the range bays and customer car parking.
- 8.29 Unfortunately, in this situation the football pitches were already in existence next to the driving range, so the only solution available at the time was to create the course in the location of the existing Par 3 Course.
- 8.30 This is far from ideal for several reasons:
- It is an inconvenience for golfers to have to walk so far away from the car park and main Golf Centre reception to play the course.
 - It is difficult for the Golf Centre to maintain good operational control given the physical separation of the Par 3 Course from the rest of the Golf Centre.
 - The Par 3 Course's relative isolation makes it prone to vandalism on a regular basis.
- 8.31 The collective result of the various current weaknesses of Gravesend Golf Centre is a set up which falls short of modern golf market expectations in a local market which is already very short on golf provision, as explained by the KKP golf needs assessment.
- 8.32 It is our contention that a major problem with the Applicant's specific DCO proposal for Gravesend Golf Centre is that the problems associated with an isolated new par 3 course on the former land of SVGC largely repeat the operational problems associated with the current Par 3 Course as outlined above in para 8.30.
- 8.33 Given the acute lack of local golf provision within the 20-minute drive time catchment area, which has been compounded by the loss of SVGC without any specific golf mitigation from the Applicant, and the current deficiencies of Gravesend Golf Centre, is there a better golf mitigation solution than that proposed by the Applicant in the DCO relating to Gravesend Golf Centre and SVGC?
- 8.34 We believe that there is one which is worth exploring in detail, and we ask the Examining Authority to consider this. It is not the only solution – there may well be others that are significantly better than the Applicant's current draft DCO golf mitigation position.
- 8.35 The suggested option is to create a modern 'fit for purpose' golf centre on the available land from the former SVGC.
- 8.36 We attach in Appendix D an initial concept design for relocating Gravesend Golf Centre. We believe that the scheme has merit for several strategic land planning reasons:

- Gravesham Borough Council are spending a large sum of money in creating a new Cascades Leisure Centre. This was required because the old leisure centre building and set up were no longer 'fit for purpose'.
- There is merit in moving Gravesend Golf Centre to a separate stand-alone location to free up land nearer to the north of the new Cascades Leisure Centre for new, good quality football pitches and any other use that the Council may wish to pursue (shaded light green on the plan).
- By moving Gravesend Golf Centre's driving range and reception building to the area shaded red on the plan, there is then the space to build a proper length driving range (300 yards instead of the current 240 yards length).
- The relocated golf centre would have its own separate access and the site would enjoy better 'curb appeal' compared to the current location.
- A par 3 course could be created in the area shaded green, so the golf centre as a whole occupies one single plot (the areas shaded red and green) rather than the current separation of the Par 3 Course from the rest of the Golf Centre.
- A new, modernised Gravesend Golf Centre would have a wider appeal to the local community of golfers and potential golfers. The primary catchment area would increase from the current 15-minute drive time to 20-minute drive time, which is comparable with SVGC's.
- The new golf centre should attract a high volume of users, partly because it would allow affordable, 'open to all' golf in a modern setting, and partly because it provides access to golf for those who are 'time short'. One can hit balls on a driving range for 30 minutes to an hour and have an enjoyable session, whereas it takes around 4 hours to play a full round on an 18-hole course. The venue is likely to attract a younger audience as well as more female players. A key focus of the centre would be on much needed golf tuition.

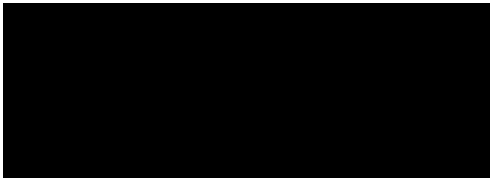
8.37 A modern, vibrant 'fit for purpose' golf centre, which could also include an adventure golf course, a larger golf shop, a café area and better teaching facilities would be a meaningful lasting golf and recreational legacy relating to the Project, if funded by the Applicant as mitigation for the loss of SVGC and the existing Par 3 Course. A modern golf centre would also sit well with the new, modern Cascades Leisure Centre as positive regeneration in this area.

8.38 To reiterate, we welcome the Applicant's positive and constructive comments about legacy on page 72 of its D2 Response where it says: *'The Applicant notes the Interested Party's desire to upgrade Gravesend Golf Centre to address '... technological advances in the game, the passage of time, and changing golf market expectations...'. The Applicant is, as noted, working with the Interested Party to seek to develop a solution which works for all parties involved and provides a lasting positive legacy for the residents of Gravesham and*

potentially beyond, whilst being mindful of its duties to deliver value for public money. The Applicant is committed to continuing these discussions with the Interested Party and will update the Examining Authority accordingly, as the examination progresses’.

- 8.39 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.
- 8.40 If the Examining Authority would like any further information from us then we would be happy to provide it.
- 8.41 Thank you for considering this representation on behalf of my client, Swing Rite Golf Ltd.

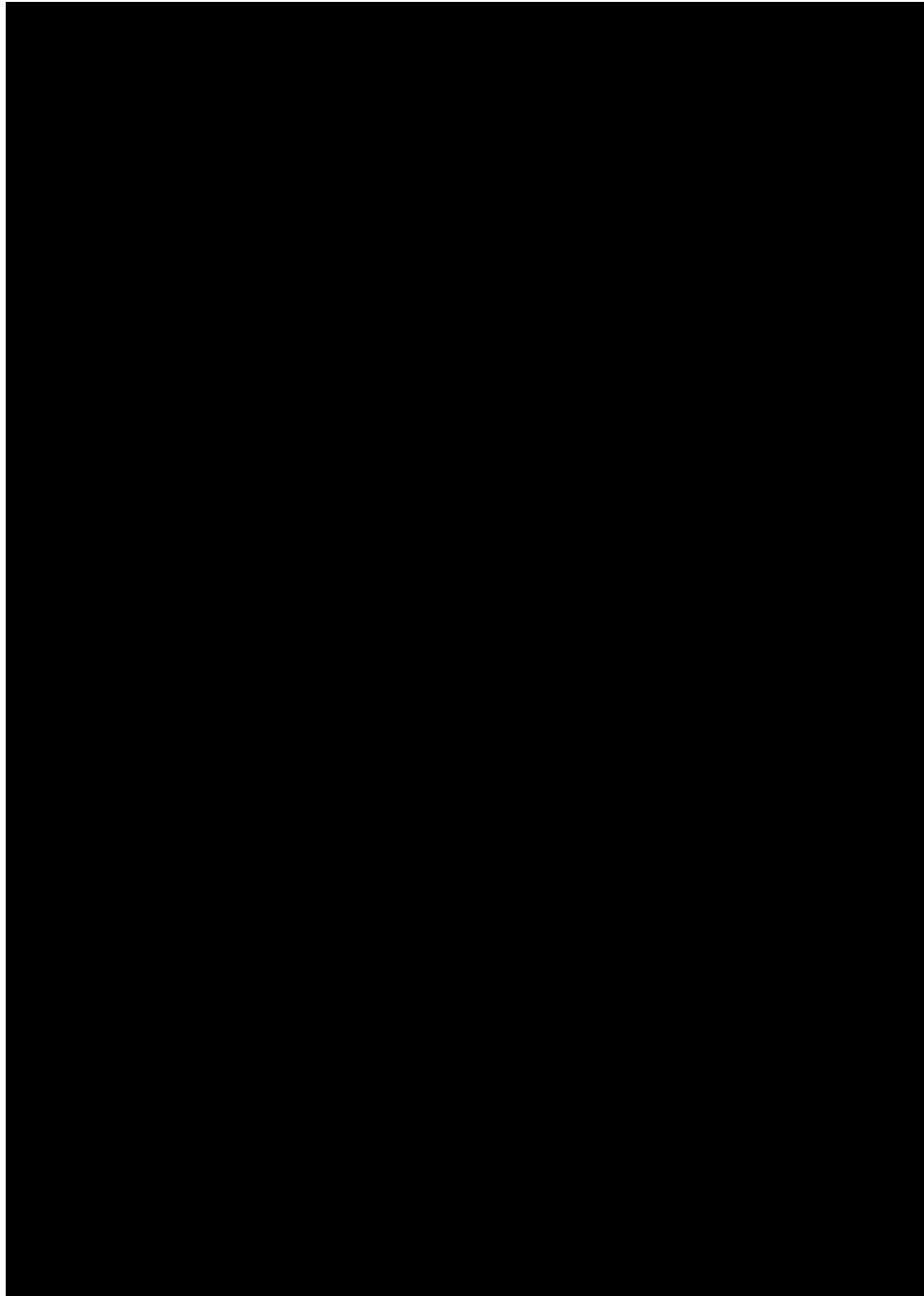
Yours faithfully



Mark Smith BA MRICS MBA

Assessing needs and opportunities guide for indoor and outdoor sports facilities

**How to undertake and apply needs assessments for
sports facilities**



Assessing needs and opportunities guide for indoor and outdoor sports facilities

How to undertake and apply needs assessments for sports facilities

Contents

Page 1	Introduction
Page 13	Stage A: Prepare and tailor your assessment
Page 28	Stage B: Gather information on supply and demand
Page 55	Stage C: Assessment – bringing the information together
Page 71	Applying the assessment

Appendices

Appendix 1 Sport England planning tools, data and guidance

Appendix 2 Information from national governing bodies of sport

Development of the guide

This guide has benefited from feedback received during the scoping stage in 2013 and the consultation on the draft guide during from December 2103 to February 2014.

The scoping and consultation involved engagement and contributions from a range of organisations including, , Government and national agencies, national governing bodies of sport, county sports partnerships along with development planning and leisure consultancies.

Sport England would like to thank all those who contributed to the development of the guide. Sport England was assisted in drafting the guide by NAA and AMEC, with input from KKP and Kit Campbell Associates.

July 2014

Assessment

STAGE A

Prepare and tailor the approach

Establish a clear understanding of the purpose, scope and scale of the assessment.

Preparation Purpose & objectives • Proportionate approach • Sports scope • Geographical scope • Strategic context • Project management

STAGE B

Gather information on supply and demand

Establish a clear picture of the supply of facilities within your area. Establish a clear understanding of what the current and future demand for facilities are.

Supply Quantity • Quality • Accessibility • Availability

Demand Local population profile • Sports participation national • Sports participation local • Unmet, latent, dispersed & future demand • Local activity priorities • Sports specific priorities

STAGE C

Assessment - bringing the information together

Using the data from Stage B to build a picture of the level of provision, looking at four key elements. Developing key findings and facility implications around the framework of protect, enhance, provide.

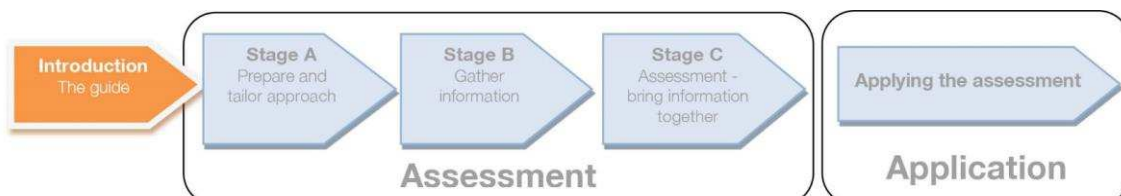
Building a picture Quantity • Quality • Accessibility • Availability

Application

Application of an assessment

Using the outcome of the assessment to deliver key priorities in different settings.

Settings Sports facility strategy • Planning policy • Infrastructure planning • Development management • Funding bids



Appendix B

Mark Smith

From: foi@highwaysengland.co.uk
Sent: 14 August 2023 16:03
To: Mark Smith
Subject: [FOI/6009] The Lower Thames Crossing and Southern Valley Golf Course
Attachments: Response - Independent golf needs assessment (1).pdf

Categories: [Consultancy/Gravesend Golf Centre]



Dear Mark Anthony Smith

The Lower Thames Crossing and Southern Valley Golf Course

Thank you for your information request dated 17/07/2023 regarding The Lower Thames Crossing and Southern Valley Golf Course. We have dealt with your request under the provisions of the Freedom of Information Act 2000.

You asked -

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

I am acting on behalf of Swing Rite Golf Ltd who operate Gravesend Golf Centre. Its full postal address is Gravesend Golf Centre, Thong Lane, Gravesend, Kent, DA12 4LG.

My contact details and address are as per this letterhead.

Our request relates to the now permanently closed Southern Valley Golf Course which lies adjacent to Gravesend Golf Centre. Its full address was Southern Valley Golf Course, Thong Lane, Gravesend, Kent DA12 4LT.

As part of the research for working up the development proposals for the LTC it is probable that National Highways commissioned an independent golf needs assessment to determine whether Southern Valley Golf Course was 'surplus to requirements' under paragraph 5.174 of the National Policy Statement for National Networks.

We request that you provide the following information to me by email to mark@smithleisure.com:

- Confirmation as to whether or not National Highways did commission an independent golf needs assessment relating to its proposed closure of Southern Valley Golf Course.

- If it did commission such an assessment (or assessments), to provide a copy/copies along with any important supporting correspondence National Highways has relating to its proposed mitigation for the loss of Southern Valley Golf Course.

Thank you in advance for your cooperation and we look forward to receiving a reply to this Freedom of Information request in due course.

I can confirm that we hold the information you have requested.

Information provided

Confirmation as to whether or not National Highways did commission an independent golf needs assessment relating to its proposed closure of Southern Valley Golf Course

The Lower Thames Crossing did commission an independent golf needs assessment.

If it did commission such an assessment (or assessments), to provide a copy/copies

Please find attached a copy of the Lower Thames Crossing independent golf needs assessment. This report was commissioned during the development of the Lower Thames Crossing proposals, to consider (in the context of the proposed acquisition and closure of Southern Valley Golf Course) whether there was surplus provision of golfing facilities in the area relative to demand, in accordance with paragraph 5.166 of the National Policy Statement for National Networks (DfT, 2014). It is an independent report, and the conclusions reflect the views of KPP and are not necessarily the views of National Highways.

Share any important supporting correspondence National Highways has relating to its proposed mitigation for the loss of Southern Valley Golf Course.

The Lower Thames Crossing will be able to provide you with any important supporting correspondence on this matter within the next 20 working days, which is a deadline of the 12 September 2023. This is to ensure that these can be assessed correctly before they are shared. We apologise for any inconvenience this delay causes.

If you are not satisfied with our response you may ask for an internal review within 40 working days of receiving the response, by replying to this email. You can learn more about the internal review process at https://nationalhighways.co.uk/media/a14hbrhu/foi_eir_complaints_process.pdf.

If you are not content with the outcome of the internal review, you have the right to apply directly to the Information Commissioner for a decision. The Information Commissioner can be contacted at <https://ico.org.uk/make-a-complaint/> or via the address below -

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Please remember to quote reference number **FOI/6009** in any future communications about this response.

Kind regards

Lower Thames Crossing – Executive Programme Director

You can make new FOI requests and review published responses by visiting <https://foiform.nationalhighways.co.uk/>

Independent golf needs assessment

This report was commissioned during the development of the Lower Thames Crossing proposals, to consider (in the context of the proposed acquisition and closure of Southern Valley Golf Course) whether there was surplus provision of golfing facilities in the area relative to demand, in accordance with paragraph 5.166 of the National Policy Statement for National Networks (DfT, 2014). It is an independent report, and the conclusions reflect the views of KPP and are not necessarily the views of National Highways.

The review identified that the Southern Valley Golf Course was not surplus to requirements (in the context of golfing demand / supply), and as a consequence National Highways have not presented a case that the Southern Valley Golf Course is surplus to requirements within the Development Consent Order application for the A122 Lower Thames Crossing that is currently being Examined. It should be noted that since the report was finalised, the facility has been closed and voluntarily acquired by National Highways; the report is therefore not considered to reflect the current situation or the policy position in connection with the proposed use and acquisition of site.

Appendix D of the Planning Statement submitted as part of the DCO application represents National Highways' position on these matters.

More information on the A122 Lower Thames Crossing proposals can be found here: <https://infrastructure.planninginspectorate.gov.uk/projects/south-east/lower-thames-crossing/>



ASSESSING NEEDS & OPPORTUNITIES FOR GOLF COURSES AFFECTED BY THE LOWER THAMES CROSSING

AUGUST 2019

QUALITY, INTEGRITY, PROFESSIONALISM

Knight, Kavanagh & Page Ltd

Company No: 9145032 (England)

MANAGEMENT CONSULTANTS

Registered Office: 1 -2 Frecheville Court, off Knowsley Street, Bury BL9 0UF

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ARCADIS: GOLF NEEDS ASSESSMENT FOR COURSES AFFECTED BY THE LOWER THAMES CROSSING

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ARCADIS: GOLF NEEDS ASSESSMENT FOR COURSES AFFECTED BY THE LOWER THAMES CROSSING

PART 1: INTRODUCTION

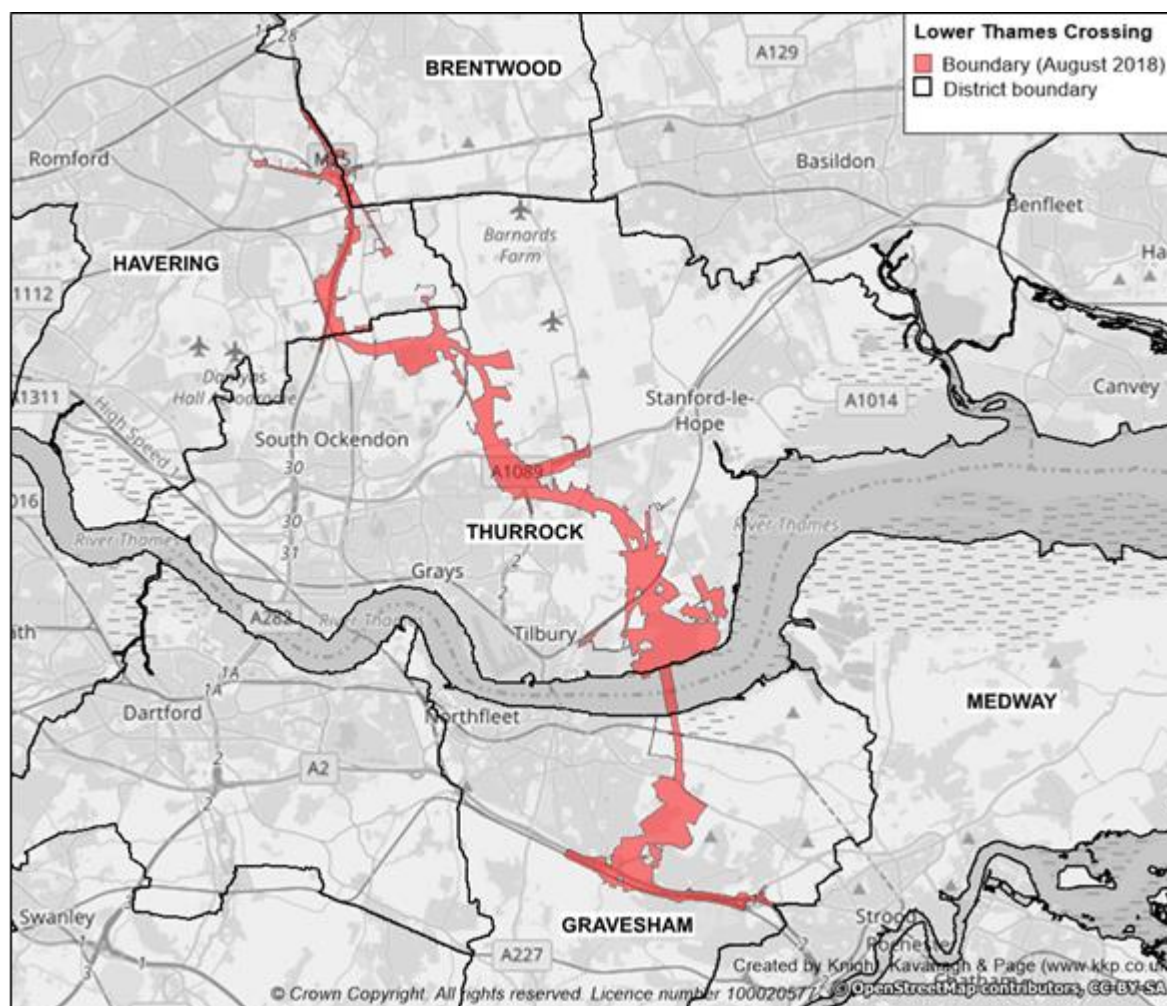
1. This is the Knight, Kavanagh and Page Ltd (KKP) report setting out the needs assessment of golf, with particular regard to golf clubs which are affected by the proposed Lower Thames Crossing. KKP is aware that Southern Valley is to be directly impacted by the LTC; with a number of others indirectly affected. These include:
 - ◀ Rochester and Cobham Park Golf Club (Gravesham)
 - ◀ Orsett Golf Club (Thurrock)
 - ◀ Cranham Golf Course (Havering)
 - ◀ Top Meadow Golf Club (Brentwood).
2. This report is a detailed assessment of current provision of golf facilities, identifying need (demand) and gaps (deficiencies in provision) affecting all of the above courses/clubs, but with specific regard to Southern Valley Golf Course which is directly affected by the proposed route.
3. This report addresses the needs assessment elements via a combination of desk top review of existing golf facilities, consideration of levels of demand (using a range of tools), an audit of the supply of golf courses and taking account of stakeholder views and aspirations via consultation. We have also taken account of the views of, and have liaised with Sport England, England Golf (the national governing body (NGB) for the sport) and key local golf clubs in the area. The list of consultees during February and March 2019 included:
 - ◀ Steven Peet; Regional Development Manager, England Golf
 - ◀ Michael Sim, Southern Valley Golf Club
 - ◀ Iain Lancaster; Club Support Manager, England Golf
 - ◀ Adrian Hickmott; Leisure & Resilience Manager, Gravesham Council
 - ◀ Steve Armstrong; Mid Kent Golf Club
 - ◀ Danny Stock; Top Meadow Golf Club
 - ◀ The Secretary; Kent Golf Union
 - ◀ Membership Secretary; Rochester and Cobham Golf Club
 - ◀ Rob Swain; CEO, Gravesham Community Leisure Ltd
 - ◀ Richard Herring; Orsett Golf Club
 - ◀ Geoff Westlake; Volunteer, Deangate Ridge Golf Club
4. The key deliverables for this report include:
 - ◀ Assessment of the need for golf facilities to meet the requirements of current and future demand in the area based on evidence of existing facilities, usage and membership which makes reference to appropriate policies and guidelines.
 - ◀ A desk top audit of existing golf facilities including type of facility, usage, management, ownership etc.
 - ◀ Stakeholder consultation where appropriate.
 - ◀ Consideration of the potential closure of Southern Valley Golf Course and associated facilities.

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PART 2: BACKGROUND AND CONTEXT

5. The Government announced the preferred route for the Lower Thames Crossing (LTC) in April 2017. The aim is to create a new link road between the A2 and the M25 and reduce the burden on the Dartford Crossing. It is expected that the LTC will carry 4.5 million heavy goods vehicles in its first year. Subject to statutory processes construction could start in 2021, with the new road opening to traffic in 2026.
6. The planned route will run from the M25 near North Ockendon, cross the A13 at Orsett before crossing under the Thames east of Tilbury and Gravesend. A new link road will then take traffic to the A2 near Shorne, close to where the route becomes the M2. This is identified in Figure 2.1 below.

Figure 2.1: Lower Thames Crossing preferred route alignment and development boundary

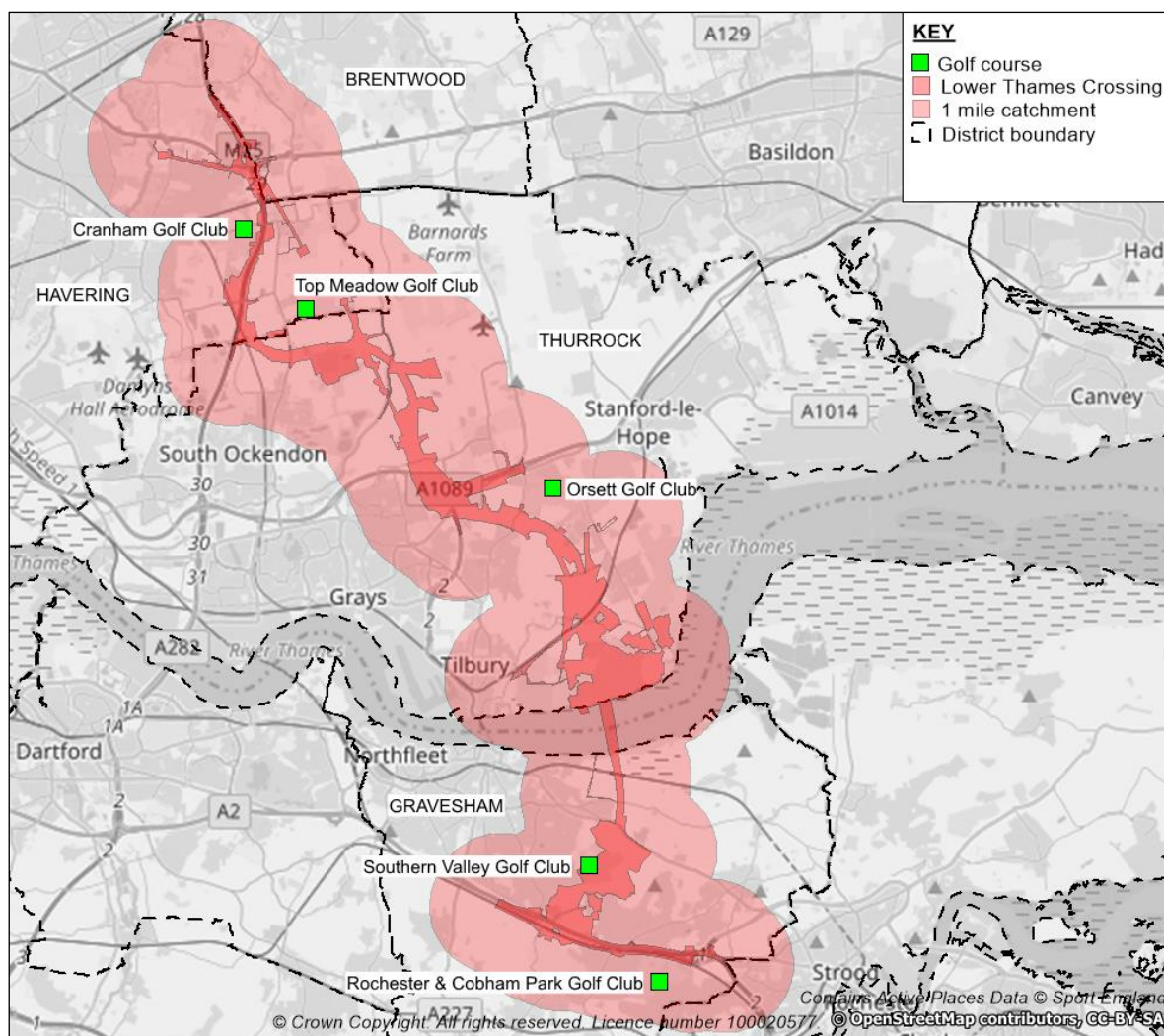


Scope of the project

7. Figure 2.2 overleaf, identifies the golf courses affected by the LTC both north and south of the River Thames. Southern Valley Golf Course (SVGC) is the most affected course with LTC cutting directly through it. Consultation with SVGC proprietor indicates that the crossing will affect 14 holes and that much of the remaining land will be required for storage and containers for contractors. This report assesses the impact of LTC on each of the five courses identified individually and builds on the Open Space Sport and Recreation (OSSR) findings report.

ARCADIS: GOLF NEEDS ASSESSMENT FOR COURSES AFFECTED BY THE LOWER THAMES CROSSING

Figure 2.2: Five golf courses affected by the LTC



8. The initial findings with respect to each golf course affected by the LTC are detailed below.

Table 2.1: OSSR initial findings of the impact of LTC on golf courses (2019)

Name of course	Actions required to determine the final impact on the site
Cranham Golf Club	Nearby enabling works are for a major trunk road. These will take approximately 2 years. Work will be undertaken outside the golf course and it is not envisaged that this will impact on the ability to play golf. Mitigation unlikely to be required, however, if required appropriate measures to limit noise and visual impact to golf area should be provided during the course of enabling works
Orsett Golf Club	Potential works to Gas Main above ground structure. Could take in excess of 2 years due to complexity of the works and lack of outages. Provision of service road. Potential mitigation includes appropriate measures to limit the indirect impacts to golf may need to be considered. Solutions to consider include provision of appropriate vegetation (e.g. trees, shrubs etc) along the boundary to reduce the impact relating to visual, noise and pollution. This may also help to manage any potential impact issues of drainage. Erection of netting to shield the tee-off and road may also be beneficial subject to how close the service road will be to the tee.

ARCADIS: GOLF NEEDS ASSESSMENT FOR COURSES AFFECTED BY THE LOWER THAMES CROSSING

Name of course	Actions required to determine the final impact on the site
Rochester & Cobham Golf Club	No direct impact to site. There may however need to be some works along Park Pale to access valves, inspection chambers, joints etc. access should only be for no longer than 1 month. Mitigation unlikely to be required.
Southern Valley Golf Club	Carriageway runs through site. Potential mitigation will include replacement provision to equivalent or better quantity and quality Golf assessment needs to investigate requirements.
Top Meadow Golf Club	Impact to golf course will be during the re-stringing of the overhead electricity cables and earthing works to provide suitable tension to cables once diverted. This will take 1 year with access being required. Potential mitigation includes appropriate measures of protection to protect golfers during these time periods

Given the above, the primary focus of this study is the Southern Valley Golf Club which will be disturbed the most by the LTC route.

National Planning Policy Framework

9. The purpose of this study is to provide Highways England with an independent open space, sport and recreation needs assessment, focussed on golf and a catchment area defined by the LTC route alignment. It is vital for the study to be carried out independently in order for the assessment of provision and impact of the LTC to be robustly and confidently undertaken. This ensures the findings and recommendations are unbiased.
10. The importance attached to the provision of open space, sport and recreation is recognised within National Policy Statement for National Networks (Paragraph 5.174) which states:

The Secretary of State should not grant consent for development on existing open space, sports and recreational buildings and land, including playing fields, unless an assessment has been undertaken either by the local authority or independently, which has shown the open space or the buildings and land to be surplus to requirements, or the Secretary of State determines that the benefits of the project (including need) outweigh the potential loss of such facilities, taking into account any positive proposals made by the applicant to provide new, improved or compensatory land or facilities”.
11. Paragraph 5.166 of the National Policy Statement for National Networks states that:

Existing open space, sports and recreational buildings and land should not be developed unless the land is surplus to requirements or the loss would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location. Applicants considering proposals which would involve developing such land should have regard to any local authority’s assessment of need for such types of land and buildings.
12. Meeting the needs of local communities through the provision of accessible, high quality facilities which provide opportunities to participate in sport is therefore a critical part of good planning. The efficient and effective delivery of sports facilities depends on understanding the nature of current provision and assessing what will be required in the future by taking account of demographic and sports participation changes and trends. The NPPF makes this clear in paragraph 96.
13. The NPPF also states that planning policies should be based on robust, up-to-date assessments of need for open space, sports and recreation facilities and opportunities for new provision. Specific needs and quantitative and qualitative deficiencies and surpluses in

ARCADIS: GOLF NEEDS ASSESSMENT FOR COURSES AFFECTED BY THE LOWER THAMES CROSSING

local areas should also be identified and used to inform what provision is required in an area.

14. As a pre-requisite, Paragraph 97 of the NPPF states existing open space, sports and recreation sites, including playing fields, should not be built on unless:
 - ◀ An assessment has been undertaken, which has clearly shown the site to be surplus to requirements.
 - ◀ 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.
 - ◀ The development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.

Golf facility definitions

15. This study takes account of the different type of golf facilities recognised by Sport England.

Table 2:2 Sport England definitions of golf facilities

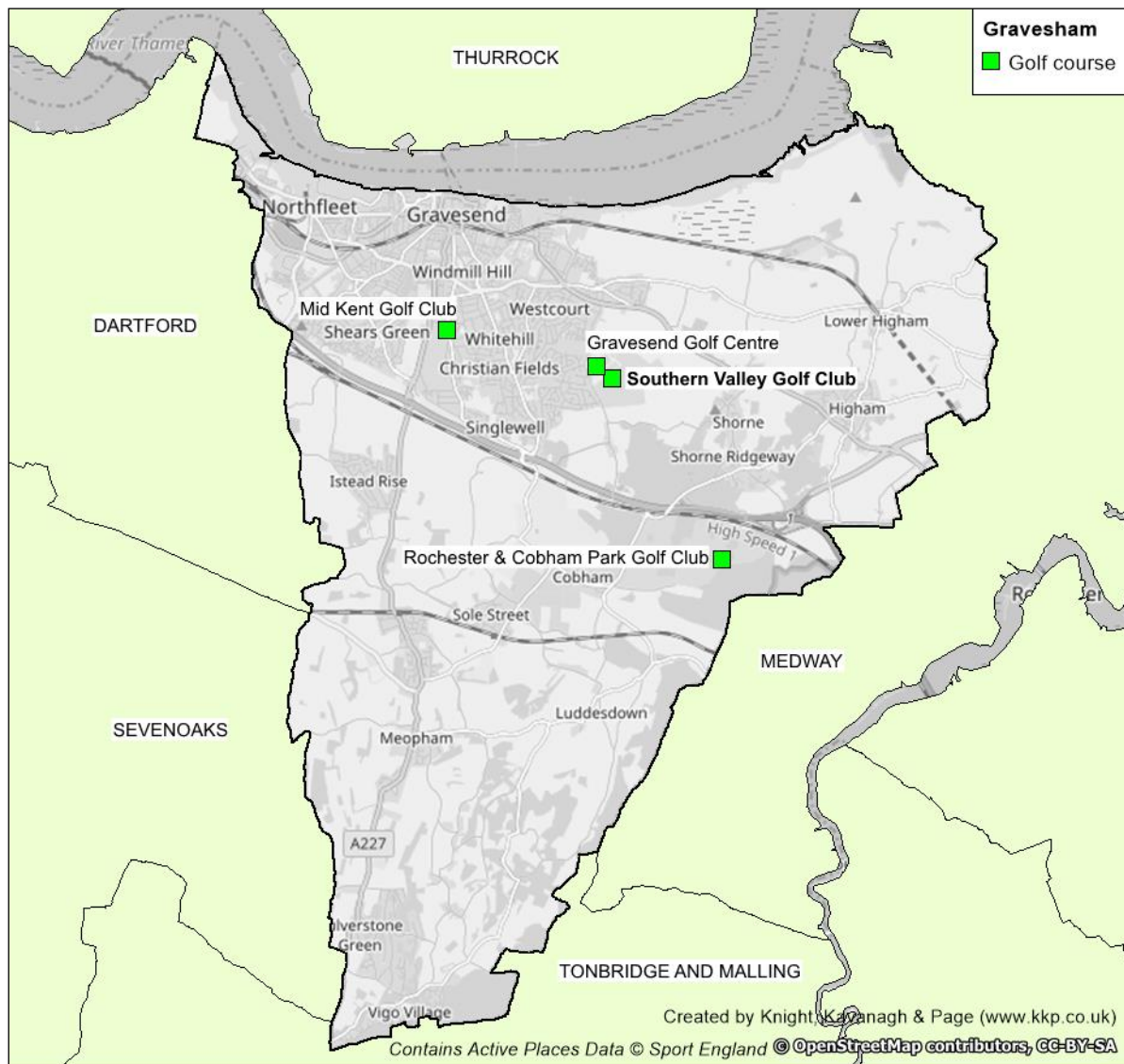
Facility type	Description
Standard	A standard par course, with a minimum of 9 holes.
Par 3	Shorter length of holes than the standard course, where no hole is over Par 3.
Driving Range	Includes covered and uncovered driving bays. Range must have a minimum of 10 driving bays. Ranges based on hire of balls by the bucket, and user does not retrieve balls. Does not include practise areas within golf courses.

Southern Valley Golf Course local context

16. Located in Gravesham Borough Council, the construction of SVGC began in January 1998 on 138 acres situated in Shorne, south east of Gravesend in Kent. The site was originally Gravesend Airport, which was actively in use during the 2nd World War and overlooks the Thames Estuary. The course has been designed and built in sympathy with a traditional Links Course. It features large greens and tees and undulating fairways. The subsoil is predominantly chalk which provides excellent drainage conditions. The tees and greens have been built to modern specifications and this ensures no temporary tees at any time of the year.
17. There are three other golf facilities in Gravesham BC which include Gravesend Golf Academy, Mid Kent Golf Club and Rochester and Cobham Golf Club. Figure 2.3 below identifies the location of SVGC in relation to other golf facilities in Gravesham BC. It is noted that Rochester and Cobham GC is located on the south side of the A2 and the high speed rail line (HS1), which renders its accessibility more difficult to people living north of the railway line.

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Figure 2.3: Golf facilities in Gravesham



Consultation

18. KKP has consulted England Golf, Sport England and local golf clubs. This process has been used to determine golf requirements for the area and whether the potential loss of SVGC is likely to affect demand for the sport.

Study area

19. The catchment area (drive time) covers 20 minutes' drive times from SVGC (as is common practice and advised by Sport England). Catchment areas for different types of sports provision provide a tool for identifying areas currently not served by existing sports facilities. It is recognised that catchment areas vary from person to person, day to day, hour to hour. This problem has been overcome by accepting the concept of 'effective catchment', defined as the distance travelled by around 75-80% of users (and is a model used by Sport England). This concept is also accepted and used by England Golf.

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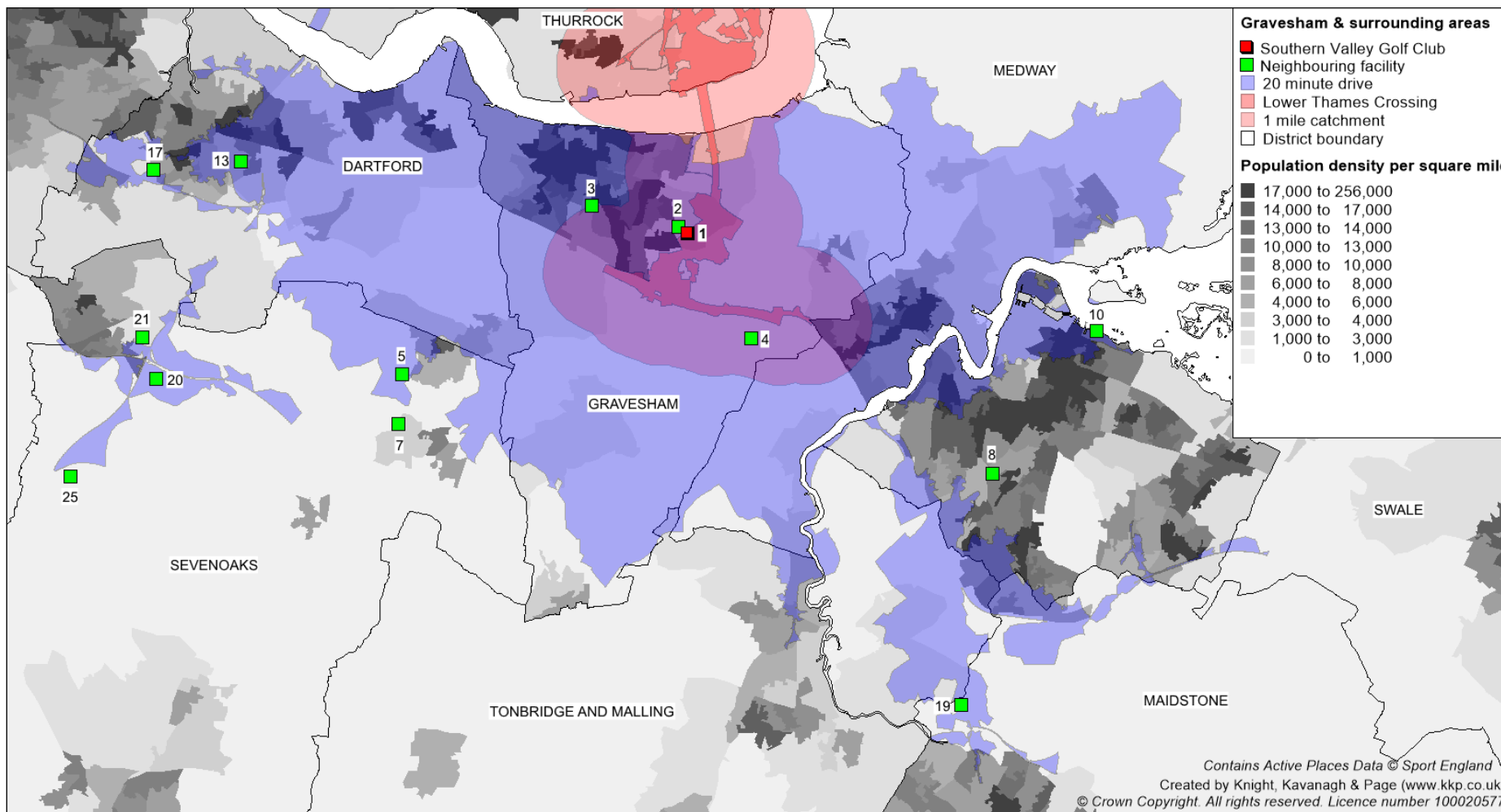
Table 2.3: Facility catchment areas

Facility type	Identified catchment area by urban/rural
Sport halls	20 minutes' walk/ 20 minutes' drive
Swimming pools	20 minutes' walk/ 20 minutes' drive
Golf courses	20 minutes' walk/ 20 minutes' drive

20. Figure 2.4, overleaf, identifies all golf facilities within 20 minutes' drive time of SVGC and some which are just outside of the catchment area. This demonstrates the general distribution of golf in the area.

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Figure 2.4: Location of SVGC and facilities within 20 minutes' drive time



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Table 2.4: Golf facilities within 20 minutes' drive time of SVGC

Map ID	Site	Standard course(s)	Par 3	Driving Range	Total holes
1	Southern Valley Golf Club	18			18
2	Gravesend Golf Centre		9	30	9
3	Mid Kent Golf Club	18		12	18
4	Rochester & Cobham Park Golf Club	18			18
5	Corinthian Golf Club	9			9
7	Redlibbets Golf Club* (just outside the catchment area)	18			18
8	Snodhurst Bottom Club* (just outside the catchment area)	18			18
10	Strand Leisure Pool & Park		9		9
13	Princes Park Community Stadium		9		9
17	Dartford Golf Club* (just outside the catchment area)	18			18
18	Wrotham Heath Golf Club* (just outside the catchment area)	18	9		27
20	Pedham Place Golf Centre	18	9	40	27
21	Olympic Golf Driving Range* (just outside the catchment area)			17	
25	Lullingstone Park Golf Course* (just outside the catchment area)	27		12	36

*facilities just outside of the 20 minute drive time

21. In summary, there are three 18-hole courses, one 9-hole course, a par 3 academy course and 82 driving range bays within 20 minutes' drive time of Southern Valley Golf Course. There are a further four 18 hole, a 27 hole and two par 3 courses within 30 minutes' drive of SVGC. Whilst the industry standard is to reference facilities within 20 minutes' drive time of a facility it is acknowledged that members living within this radial catchment may also live within a 20 minutes' drive time of other facilities. Consequently, they are referenced to give an overall picture of the wider area.

Local context

22. *Population* - (Data source: 2017 Mid-Year Estimate, ONS) The total population of Gravesham BC is 106,121 (2017 Mid-Year Estimate) with a slightly higher number of females (53,783) to males (52,338). There is a slightly lower proportion of people in the 50+ age group in Gravesham (35.8%) when compared to the south east region (38.3%). These groups are likely to have higher disposable income and still be physically active. The largest proportion (82.8%) of the local population classified their ethnicity as White; which is slightly lower than the comparative England rate of 85.4%. The next largest population group (by self-classification) is Asian, at 10.4% which is higher than the national equivalent (7.8%).
23. *Deprivation* (Data source: 2015 indices of deprivation, DCLG). Relative to other parts of the country Gravesham experiences similar levels of deprivation; around 1 in 3 of the Borough's population (30.5%) falls within the areas covered by the country's three most deprived cohorts compared to a national average of c.30%. Whilst 22.7% live in the three least deprived groupings in the country, this compares to a 'norm' of c.30%. With regard to health, 14.5% of the Gravesham population falls within the areas covered by the three most

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deprived cohorts, this compares to a national average of c.30%. Conversely, 46.4% live in the three least deprived groupings compared to a 'norm' of c.30%.

24. *Health data* (Data sources: ONS births and deaths, NCMP1 and NOO2). In keeping with patterns seen alongside similar levels of health deprivation, life expectancy in Gravesham is similar to the national figure; the male rate is currently 79.7 compared to 79.6 for England, and the female rate is exactly the same at 83.2 years.
25. *Weight and obesity* - Obesity is widely recognised to be associated with health problems such as type 2 diabetes, cardiovascular disease and cancer. At a national level, the resulting NHS costs attributable to overweight and obesity are projected to reach £9.7 billion by 2050, with wider costs to society estimated to reach £49.9 billion per year. These factors combine to make the prevention of obesity a major public health challenge. Adult rates for people who are overweight or obese in Gravesham are above the national and regional averages. Child rates, however, are below national and above regional rates.
26. The British Heart Foundation (BHF) Promotion Research Group has reviewed the costs of avoidable ill health that it considers these to be attributable to physical inactivity. Initially produced for the Department of Health (DoH) report *Be Active Be Healthy* (2009) the data has subsequently been reworked for Sport England.
27. Illnesses, that the BHF research relates to, include cancers such as bowel cancer, breast cancer, type 2 diabetes, coronary heart disease and cerebrovascular disease (e.g. stroke). Gravesham is within one Clinical Commissioning Group (CCG): NHS Dartford, Gravesham and Swanley CCG (Sevenoaks, Dartford and Gravesham). Gravesham's population covers 41.5% of NHS Dartford, Gravesham and Swanley CCG. The annual cost to the NHS of physical inactivity for the CCG that Gravesham falls within is estimated at £1,991,162

Active Lives Survey

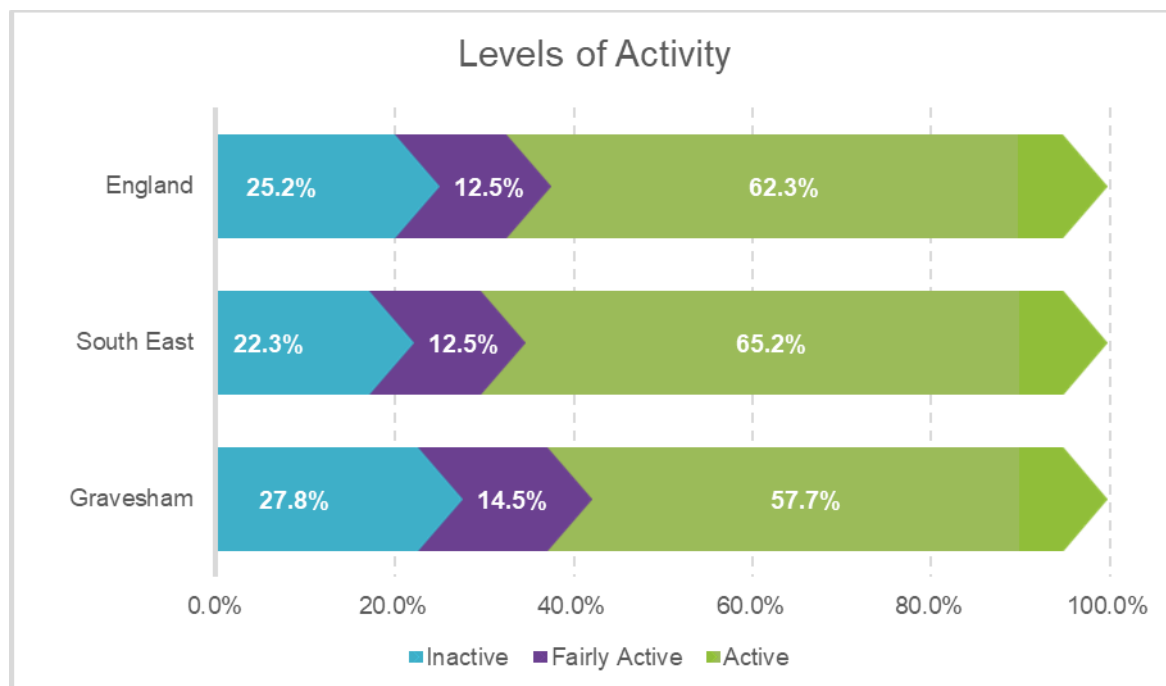
28. Sport England recently produced its Active Lives Survey (ALS) May 2017/18, based on 16+year olds taking part in walking, cycling, fitness, dance and other sporting activity. As identified in Figure 2.5, a higher percentage of the Gravesham population is inactive compared to England and the south east and a lower percentage is considered to be active.

¹ National Child Measurement Program

² National Obesity Observatory

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Figure 2. 5: Levels of Activity



The most popular sports

29. A further aspect of the ALS is that it makes it possible to identify the top sports within Gravesham. As with many other areas, walking (leisure), athletics and cycling are among the most popular activities and are known to cut across age groups and gender; in Gravesham over a third adults go walking (leisure), on average, at least once a month. The next most popular activity is athletics which 14.7% of adults do on a relatively regular basis.

Table 2.5: Most popular sports in Gravesham (Source: SE Active Lives Survey Nov 16/17)

Sport	Gravesham		South East		England	
Walking (Leisure)	32,300	38.2%	3,318,500	45.4%	18,722,600	41.8%
Athletics	12,400	14.7%	1,278,300	17.5%	7,266,300	16.2%
Cycling	11,800	13.9%	1,378,800	18.9%	7,498,900	16.8%
Structured Prg Class	11,600	13.7%	1,361,200	18.6%	7,938,000	17.7%
Fitness	10,500	12.4%	955,700	13.1%	5,727,600	12.8%
Swimming	7,200	8.5%	848,700	11.6%	4,651,100	10.4%
Badminton	3,400	4.0%	166,400	2.3%	892,600	2.0%
Golf	1,700	2.1%	198,800	2.7%	921,000	2.1%
Table Tennis	800	1.0%	84,200	1.2%	443,600	1.0%
Squash	800	0.9%	72,600	1.0%	351,000	0.8%
Gymnastics	700	0.8%	58,900	0.8%	321,200	0.7%
Rugby Union	500	0.6%	41,700	0.6%	246,200	0.6%

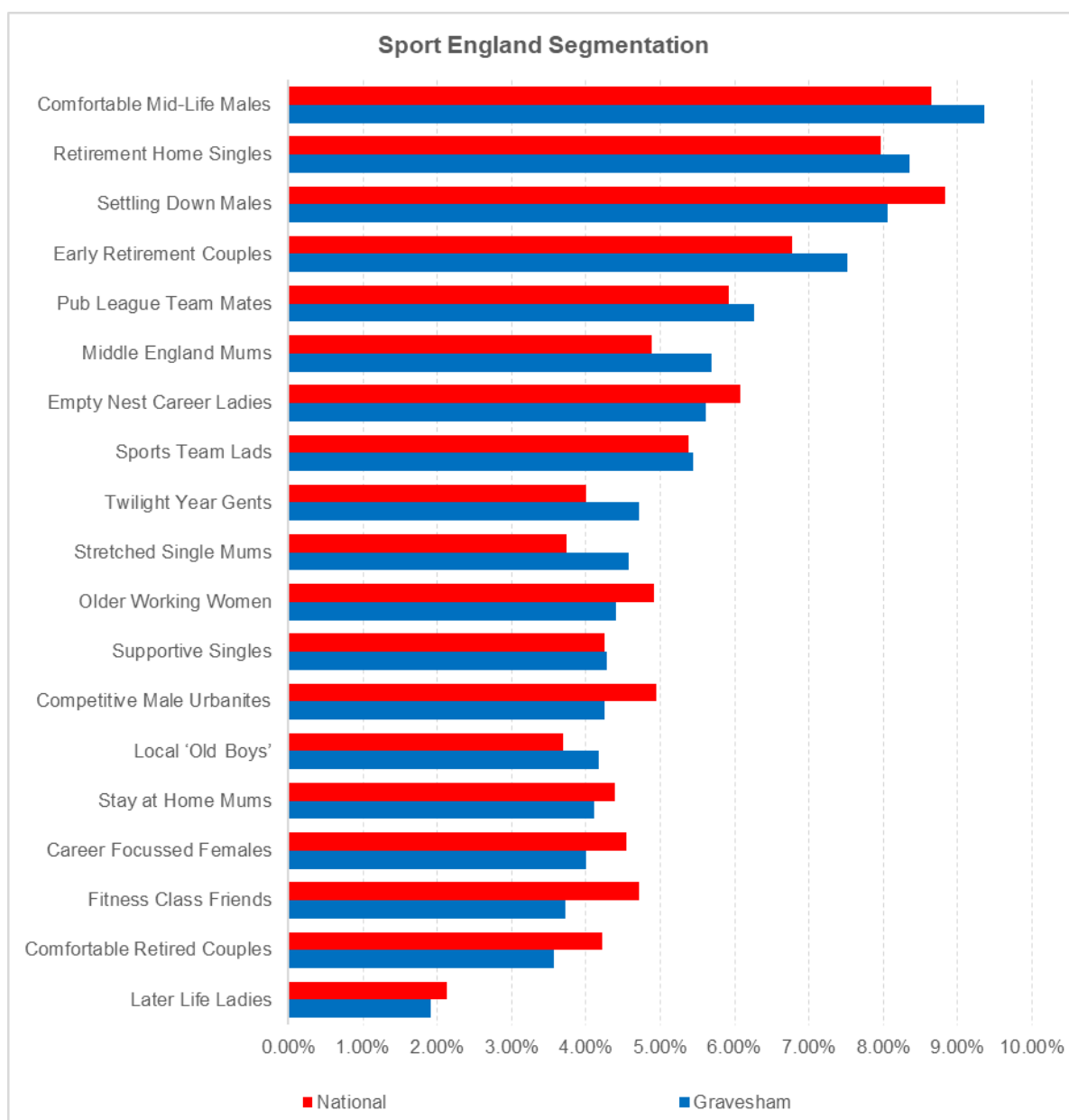
Golf is identified as the eighth most popular sport/activity in Gravesham with 2.1% of the population indicating that they take part at least once per month. This is commensurate with national figures but lower than the average in the south east (2.7%).

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Sporting segmentation (Data source: Market segmentation, Sport England)

- 30. Sport England has classified the adult population via a series of 19 market segments which provide an insight into the sporting behaviour of individuals throughout the country. The profiles cover a wide range of characteristics, from gender and age to the sports that people take part in, other interests, the newspapers that they read etc.
- 31. Knowing which segments are most dominant in the local population is important as it can help direct provision and programming. Segmentation also enables partners to make tailored interventions, communicate effectively with target market(s) and better understand participation in the context of life stage and lifecycles.

Figure 2.6: SE segmentation – Gravesham compared to England



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32. The segmentation profile for Gravesham indicates 'Comfortable Mid-Life Males' to be the largest segment of the adult population at 9.36% (7,089) compared to a national average of 8.65%. This is closely followed by 'Retirement Home Singles' and 'Settling Down Males'. At the other end of the spectrum, there are fewest 'Later Life Ladies' with only 1.91% (similar in percentage to the national average), 'Comfortable Couples' (3.57%) and 'Fitness Class Friends'.
33. Table 2.7 Dominant Sport England profiles for Gravesham

Comfortable Mid Life Males	Mid-life professional, sporty males with older children and more time for themselves aged 46-55 years old
Retirement Home Singles	Retired singles or widowers, predominantly female, living in sheltered accommodation aged 66+
Settling Down Males	Sporty male professionals, buying a house and settling down with partner aged 26-35 years old

Mosaic (Data source: 2018 Mosaic analysis, Experian)

34. Mosaic 2016 is a similar consumer segmentation product and classifies all 25.2 million UK households into 15 groups, 66 household types and 238 segments. This data can be used to paint a picture of UK consumers in terms of their social-demographics, lifestyles, culture and behaviour. Table 2.6 shows the top five mosaic classifications in Gravesham compared to the country as a whole. The dominance of these five segments can be seen inasmuch as they represent over half (56.7%) of the population compared to a national equivalent rate of over a third (37.7%).

Table 2.6: Mosaic – main population segments in Gravesham

Mosaic group description	Gravesham		National %
	#	%	
1 - Family Basics	14,788	14.0%	9.8%
2 - Aspiring Homemakers	13,022	12.3%	4.3%
3 - Senior Security	12,041	11.4%	3.4%
4 - Suburban Stability	10,834	10.2%	12.6%
5- Urban Cohesion	9,315	8.8%	7.6%

35. The largest segment profiled for Gravesham is the Family Basics group, making up 14.0% of the adult population in the area, which is higher than the national rate (4.5%). Characteristics of the top three most dominant profiles are found in Table 2. 8.

Table 2.8: Dominant Mosaic profiles in Gravesham

Family Basics		Families with children who have limited budgets and can struggle to make ends meet. Their homes are low cost and are often found in areas with fewer employment options.
Aspiring Homemakers		Younger households who have, often, only recently set up home. They usually own their homes in private suburbs, which they have chosen to fit their budget.

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Senior Security		Elderly singles and couples who are still living independently in comfortable homes that they own. Property equity gives them a reassuring level of financial security. This group includes people who have remained in family homes after their children have left, and those who have chosen to downsize to live among others of similar ages and lifestyles.
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Population projections

36. The most recent ONS projections (MYE 2017) indicate a rise of 17.0% in Gravesham's population (+18,062) over the 25 years from 2016 to 2041. Over this extended timeframe fluctuations are seen in rise and fall at different points across the majority of age groups. Several key points for Gravesham are outlined below:
- ◀ One of the most notable points is the progressive rise in the number of 0-15 year olds, rising by +1,645 (+7.4%) over the first half of the projection (to 2028). This will place pressure on differing types of sporting, educational and cultural provision (facility and services) by age, gender and sub-groups of the cohort.
 - ◀ In contrast, there is predicted to be decline in the number of 25-34 year olds, -9.7% in the first period (-1,364) followed by growth back to +3.6% (+507) in the second period.
 - ◀ There is a continuous increase in the numbers of persons aged 65+ and a need to consider varying sports offers for this age group. This represents an increase of +21.2% (+3,856) in the first period continuing to rise to +50.3% (+9,157) between 2016 and 2041. While the age group represented 17.2% of Gravesham's population in 2016 it is projected to be 22.0% of the total by 2041.

Summary

37. Residents in Gravesham have higher than average levels of inactivity in sport and a lower propensity to take part in sport and physical activity in comparison with national and regional figures. Levels of deprivation are equivalent with the national picture. Gravesham has above average health and social indicators when compared to national figures. ONS figures indicate a projected rise in the population of 17.0% from 2016-204. In particular, there will be a rise in the number of people aged 65+ years from 17.2% in 2016 to 22.0% by 2041.
38. Sport England data suggests that the three highest market segments of the population are Comfortable Midlife Males who are identified as professional sporty males, Retired Singles or widowers (predominantly female) and Settling Down Males; the first and third of these segments, may have the time and/or desire to play golf. Furthermore, the Mosaic data suggests that Family Basics, Aspiring Home Makers and Senior Security are the key profiles in its assessment. Aspiring Homemakers and Senior Security are the segment types most likely to be interested in golf than, say, Family Basics.
39. Walking for leisure, athletics and cycling are the most popular physical activities in Gravesham. Golf is the eighth most popular sport and figures are commensurate with national participation figures. The loss of any golf facility in Gravesham is likely to lead to a reduction in the number of people taking part in golf, which has the potential to impact negatively on the levels of physical activity in the area, thereby contributing to the already lower than average levels of activity in the Borough.

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PART 3: NEEDS ASSESSMENT

3.1: Introduction

40. England Golf is the national governing body (NGB) for golf and is charged with its governance and driving increases in participation in the sport (amongst other things).

3.2 Supply

National provision and trends

41. There are an estimated 3,000 golf courses in Britain, covering about 1,500 km², at least 0.5% of the land area. Approximately 90 courses in England are designated as Sites of Special Scientific Interest (SSSI's) because apart from the intensively managed trees and greens they have other habitats with high wildlife value. Many other golf courses exist within designated Heritage Coast sites, Areas of Outstanding Natural Beauty, or listed Historic Parklands.
42. Sport England's Active Places identifies over 1,900 courses in England with 68 courses identified in Kent. Of these 27 have a golf driving range (GDR) or practice ground. There are a further three stand-alone Golf Driving Ranges (GDR's).
43. Over the last decade the golfing landscape has changed considerably. Club membership has steadily declined and only recently shown signs of stabilising, while the number of independent golfers (people who play regularly who do not belong to a specific club) and leisure golfers (people who play infrequently and also do not belong to a specific club) has continued to grow. Golf as a sport has also diversified in this time and there are numerous opportunities to play, outside the traditional 18-hole format, including adventure golf, entertainment ranges, virtual golf and competitive socialising experiences. Some affiliated golf clubs have responded to the evolving market with flexible memberships, academies, fun golf formats and by improving the off-course experience.
44. As identified in Figure 2.4 above, this assessment, takes account of golf facilities within 20 minutes' drive time of SVGC as well as those located immediately outside this distance, in order to give a balanced view of golf provision in the area

Table 3.1: Golf facilities within 20 minutes' drive of SVGC (and those just outside)*

Map ID	Site name	Facility and ownership type
1	Southern Valley Golf Club	18-hole course; proprietary owned course with a consistent membership of c.200.
2	Gravesend Golf Centre	30 bay driving range and a par 3, 9-hole golf course. Ideal for beginners and families in particular.
3	Mid Kent Golf Club	An 18-hole members club which allows some pay and play (societies and with members). An established mature course. Its website suggests that it is a challenge for all standards of golf.
4	Rochester & Cobham Park Golf Club	This 18-hole course is set in a spacious parkland setting with greens constructed to USGA guidelines, suggesting high quality. Designed in 1997, this is a member's club which allows some pay and play.
5	Corinthian Golf Club	A 9-hole golf course with varied tees for 18 challenging holes, set in a peaceful and unspoilt location. The greens were

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Map ID	Site name	Facility and ownership type
		renovated, graded and reshaped during 2014, along with a total overhaul of the rest of the course.
7*	Redlibbets Golf Club* (just outside the 20 mins drive time)	The Redlibbets Golf Club opened in 1997 and offers an 18 hole course laid out in 150 acres of parkland. There is also a full indoor fitting and simulator studio on site.
8*	Snodhurst Bottom* (just outside the 20 mins drive time)	This challenging 18-hole pitch and putt course run by Greenspace Services. The course is open from 1 April to 11 October.
10	Strand Leisure Pool & Park	9-hole golf course closed in 2018 . This will be replaced by a parkour, picnic and play area. The 18-hole crazy golf course is based at the café on site and will open again in Easter.
13	Princes Park Community Stadium	A 9-hole, par 3 course open to members and non-members, suited to golfers of all standards.
17*	Dartford Golf Club*	Set upon park and heathland, it is a comparatively small par 69, 18-hole course, measuring only 5914 yards.
18	Wrotham Heath Golf Club*	Relatively short in comparison to other courses, it is still challenging with many of the tees in the woods and playing to tight undulating fairways.
20	Pedham Place Golf Centre	This is considered an inland links-style golf course, offering both an 18-hole Championship and a 9-hole Par 3 course,
25	Lullingstone Park Golf Course*	Lullingstone Park Golf Club is a public parkland golf course with an 18-hole Championship Golf Course as well as a 9-hole, par 3 course.

*Located just outside the 20 mins drive time of Southern Valley Golf Course.

Standard hole golf hole courses

45. Table 3.1 identifies three 18 standard hole golf courses (Mid Kent, Rochester and Cobham and Pedham Place Golf Centre) within 20 minutes' drive time of SVGC. In addition, Corinthian Golf Club is a nine hole course (with 18 tees) and as such adds nine holes to the supply of standard golf holes within 20 minutes' drive time of SVC. There are a further five 18 standard hole courses located just outside the 20 minutes' drive time of SVGC (Redlibbets, Snodburst Bottom, Dartford, Wrotham Heath and Lullingstone golf courses). Pedham Place Golf Centre is a full 20 minutes' drive time being located over 12 miles away and it is necessary to travel via the busy A2 and M25 in order to access the facility.
46. In KKP's opinion it is highly likely that displaced golfers would look to play at either Mid Kent Golf Club or Rochester and Cobham (assuming that they could afford the fees, which are identified in Paragraph 64) as they are the closest facilities. In addition, Corinthians is difficult to access and only offers 9 holes, whilst the travelling distance to Pedham Place Golf Club via the A2 and M25 is likely to deter many golfers from accessing it. Capacity at courses is discussed further in paragraphs 87 and 89.

Par 3 golf courses

47. There are three par 3 golf courses within 20 minutes' drive time of SVGC (i.e. Gravesend Golf Centre, Princes Park Stadium and Pedham Place Golf Centre). As identified in Paragraph 16, Par 3 golf courses have shorter length holes than a standard course, and no hole is over a Par 3 distance or difficulty. They offer a different golfing experience to a standard hole course and whilst golfers may use these facilities for practice, they cannot be considered as an alternative to a standard hole facility.

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Driving ranges

48. Driving ranges are considered as an additional golf facility and are not considered a substitute for a standard golf course nor a par 3 course. Within 20 minutes' drive time of SVGC there are 82 golf driving bays located on three sites as follows:
- ◀ Gravesend Golf Centre has 30 bays within its driving range.
 - ◀ Pedham Place Golf Centre has 40 bays.
 - ◀ Mid Kent Golf Club has 12 bays.

Supply of golf holes set against population

49. In order to ascertain the level of supply of golf facilities within 20 minutes' drive time of SVGC, the supply of holes was analysed and set against national and regional averages to help gauge 'standards in terms of number of standard holes per population. This section considers standard golf courses and the number of golf driving bays per head of population.
50. Table 3.2 indicates 0.59 holes per thousand population in England, with the regional average being higher at 0.77 per thousand. (This is similar to the county of Kent which has 0.78 holes per thousand). Gravesham is comparable with the national average at 0.59 holes per thousand but lower than Kent and the south east.
51. Developed to aid local authorities in comparative and benchmarking exercises, 'nearest neighbours' (as determined by the Chartered Institute of Public Financing and Accountancy - CIPFA 2016) provide a wide range of socio-economic indicators upon which specific family group (local authorities with similar indicators) is calculated. The 'nearest neighbours for Gravesham (as determined by CIPFA 2016) are Redditch, Broxbourne, Kettering, Pendle and Wellingborough local authorities.
52. When comparing Gravesham to its five nearest neighbours (as determined by CIPFA) it has the second lowest number of holes per capita, just above Wellingborough which has the least (0.23). When SVGC is closed, Gravesham remains in this position but with only 0.28 standard golf holes per thousand.

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Table 3.2: Standard golf course holes³ in Gravesham in comparison to 'nearest neighbours' using 20 minutes' drive

Area	Total standard golf holes	Population MYE 2017	Holes per 1,000 pop.
Gravesham	63	106,121	0.59
Kent	1,215	1,554,636	0.78
South East	6,972	9,080,825	0.77
CIPFA nearest neighbours*			
Redditch	54	85,204	0.63
Broxbourne	36	96,762	0.37
Kettering	45	100,252	0.45
Pendle	45	90,696	0.50
Wellingborough	18	78,914	0.23
Within 20 minutes' drive of SVGC	90	260,822	0.35
<i>As above but excluding SVGC</i>	<i>72</i>	<i>260,822</i>	<i>0.28</i>
Best in South East (South Bucks)	216	69,785	3.10
England	31,571	55,619,430	0.57

53. When considering the number of holes within 20 minutes' drive time of SVGC, there is an estimated 0.35 holes per thousand population, which is significantly lower than the Gravesham, Kent and national averages. When Southern Valley closes due to the construction of LTC, the average number of holes per thousand population falls to 0.28. This does not compare favourably with national (0.59) and county averages (0.77) indicating that supply of standard golf hole facilities, which is already low will be even worse.

Table 3.3: Driving ranges⁴ in Gravesham and other local authorities within 20 minutes' drive

Area	Total driving range bays	Population MYE 2017	Bays per 1,000 pop.
Gravesham	42	106,121	0.40
Kent	699	1,554,636	0.45
South East	2,910	9,080,825	0.32
CIPFA nearest neighbours			
Redditch	36	85,204	0.42
Broxbourne	36	96,762	0.37
Kettering	24	100,252	0.24
Pendle	0	90,696	0.00
Wellingborough	0	78,914	0.00
Within 20 minutes' drive of SVGC	82	260,822	0.31
Best in South East (South Bucks)	108	69,785	1.55
England	11,781	55,619,430	0.21

³ All populations based on MYE 2015 estimates (ONS).
Golf facilities data from Active Places Power, 10/03/2019

⁴ All populations based on MYE 2015 estimates (ONS).
Golf facilities data from Active Places Power, 10/03/2017

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54. Looking at wider golf facilities, we have identified the number of bays in driving ranges to assess standards across the area. Table 3.3 indicates that the national average of driving range bays is 0.21 per thousand population. It identifies that there are currently 0.40 bays per thousand population in Gravesham and 0.31 bays per thousand within 20 minutes' drive time of SGVC. These are both above the national (0.21) average, which suggests that by supply alone, there are sufficient driving bays in the area (both within Gravesham and the wider 20 minutes' drive time area).

Summary of supply

55. There are

- ◀ Three 18 hole standard golf courses and one nine hole standard golf course within 20 minutes' drive time of SVGC. One of these courses, Pedham Place Golf Course requires travel via the A2 and M25 so may not be considered a direct alternative to the current membership at SVGC.
- ◀ Other facilities in the catchment area range from high end, expensive courses to those which offer pay and play opportunity, suggesting a wide choice of facilities and standards.
- ◀ Within a 20 minutes' drive time of SVGC, there is relative provision (compared to national and regional provision) of:
 - ◀ Fewer 18 holes per thousand population both including SVGC and excluding it, compared to national and regional figures.
 - ◀ More driving range bays per thousand population than nationally. This will not be affected by the closure of SVGC.

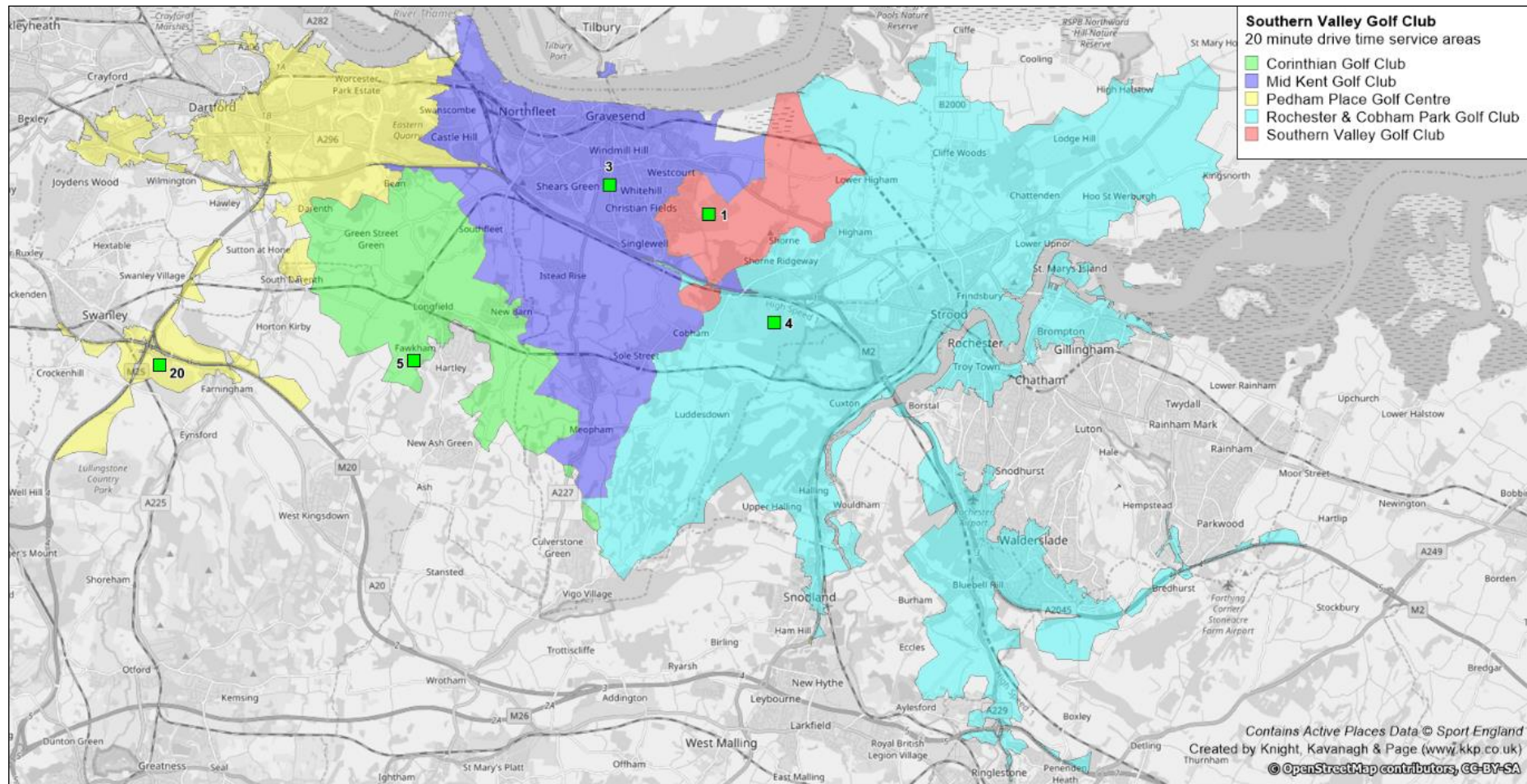
Accessibility

56. Figure 3.2 indicates the most likely golf course people will travel to, currently, based on distance only. It is understood, however, that many golfers choose a golf course for a whole range of reasons including quality, availability, cost, socials, where friends/family play etc. In addition, there are an increasing number of golfers who choose not to become members of a golf club but are frequent users of different facilities (nomadic golfers). It is not uncommon for these golfers to travel up to one hour or more to utilise good quality facilities at a price they deem to be acceptable for one off use. This behaviour is not normal for regular membership use.

57. Figure 3.2 and Table 3.4 identify the modelling probability of a consumer visiting a given golf course by function of the distance to that site, the site's attractiveness, and the distance and attractiveness of competing sites (it models where people are likely to travel from to attend a specific golf course). It takes account of the courses identified within 20 minutes' drive time of SVGC.

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Figure 3.2: Closest Centre catchments – with Southern Valley Golf Course



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Table 3.4: Closest Centre catchments populations with and without SVGC

Map ID	Site	*MYE 2017 with SVGC	*MYE 2017 excluding SVGC
1	Southern Valley Golf Club	7,162	
3	Mid Kent Golf Club	86,110	92,889
4	Rochester & Cobham GC	104,960	107,216
5	Corinthian Golf Club	7,259	7,259
20	Pedham Place Golf Centre	43,625	43,625

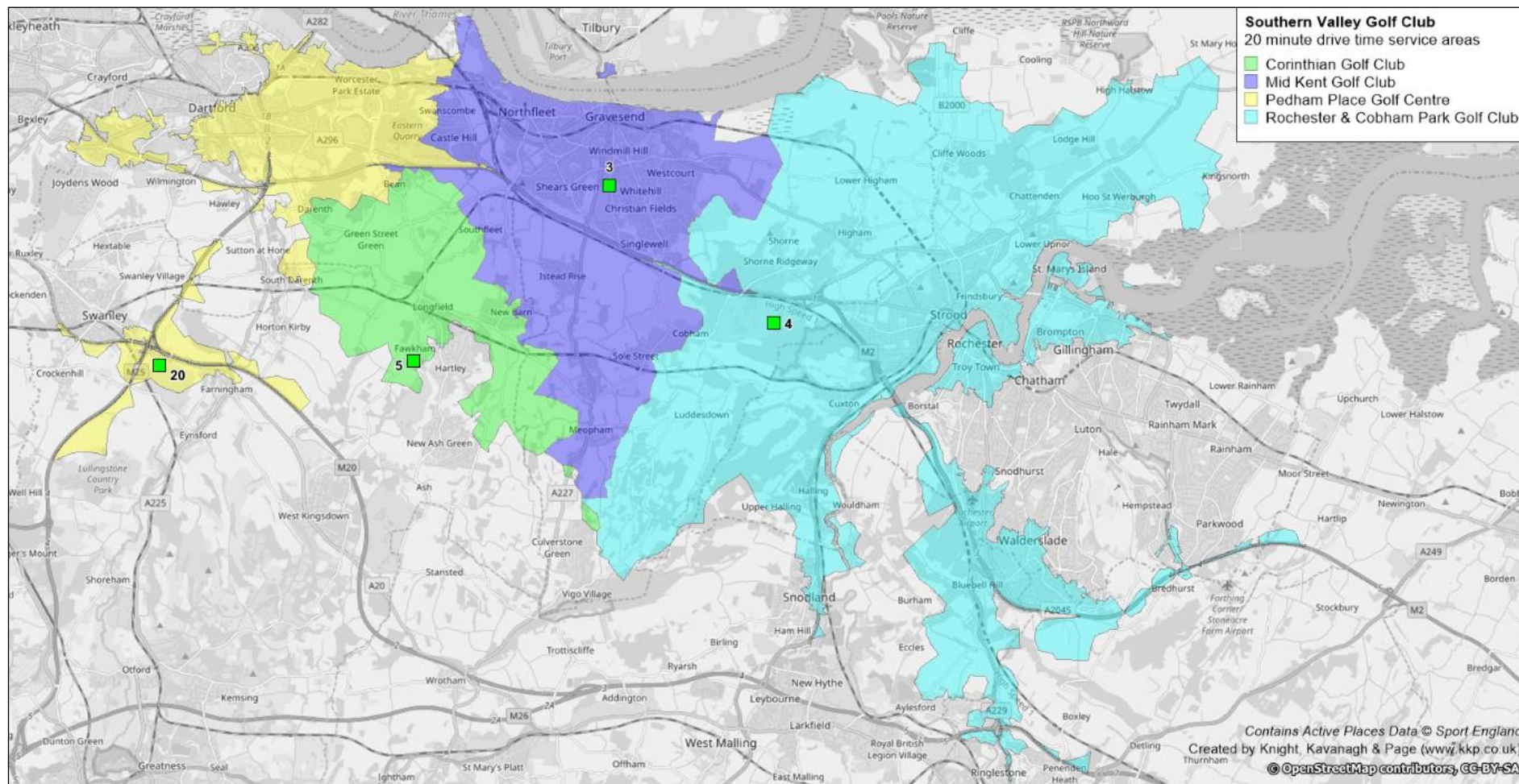
*MYE – mid-year estimates

Note* these figures are estimated

58. Table 3.4 identifies that SVGC is only likely to attract its membership from 7,162 people, all other things being equal. The closure of SVGC will see that potential membership travel to either Mid Kent or Rochester and Cobham golf courses, due to their proximity. (No other assumptions are made, for example availability of membership, current membership at other facilities, or attractiveness of other golf courses mapped).

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Figure 3.3: Closest course catchments – without Southern Valley Golf Course



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59. These findings are commensurate with KKP's assumptions that Corinthian and Pedham Place golf clubs are unlikely to be recipients of additional membership when SVGC closes as identified in Paragraph 46.

Quality of provision

60. There are no official national or county golf course rankings in the country. Generally, the better the quality, the higher the joining/membership and green fees are likely to be. Some courses gain status through hosting county, national and international golf events and some tend to feature in ranking articles put together by golf magazines.

SVGK is a proprietary (privately owned) club with 18 holes and club house, built in 1998. Compared to many other courses it has not fully matured yet, although bunkers, tees and greens are well maintained. Golf England describes SVGK as, ostensibly a pay and play golf course, although it does have c.200 members. Membership has remained similar over the past few years. It is a well drained course which, combined with the milder temperature experienced in the south east of England, ensures that the facility remains open throughout the year, without the need for temporary greens. Consequently, pay and play use, via individuals and golf societies, is also strong throughout the winter months.

Accessibility: pricing

61. A key issue for the wider golf population is whether golf courses are available for the general population at a price which is accessible to the majority of residents. Better quality courses tend to have higher quality and more extensive ancillary practice, catering and changing provision. Further to this, 18 hole provision generally carries a higher status than 9 hole provision.
62. The general downturn in numbers of golfers joining clubs has resulted in a wide variety of packages and deals being made available to the general public. The situation is further complicated as the pricing strategies offered by clubs become more flexible.
63. This trend has increased the opportunities for nomadic golfers and our experience suggests that the increase in flexible packages and cheap green fees is leading to a reduction in the actual number of club members, leading to:
- ◀ A reduction in regular income levels for many golf clubs.
 - ◀ Clubs are open to market fluctuations.
 - ◀ Seasonal fluctuations in income generation
 - ◀ The impact of the weather is greater as more reliance is placed on nomadic golfers rather than club members.
64. The situation is more acute at lower grade than higher grade clubs where high quality enables the club to maintain a premium price.

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Table 3.5: Pricing structures at local golf clubs

Golf Club	Joining fee	Full membership (£)	Green fee per round (£)	
		Men/women	Weekday	Weekend
Gravesend Golf Centre	N/A	N/A	£7.00	£7.00
Southern Valley Golf Course	N/A	£1,060.00	£22.50	£30.00
Mid Kent Golf Club	£750	£1,155.00	£40.00	£40.00
Rochester & Cobham Park Golf Club*	£1,000	£1,795.00	£40.00	£70.00
Corinthian Golf Club ^[1]	N/A	£552.00	£18.00	£18.00
Redlibbets Golf Club	N/A	£1,495.00	£30.00	£40.00
Snodhurst Bottom	N/A	N/A	£6.50	£6.50
Princes Park Community Stadium (The Paul Page Golf Academy)	N/A	£300.00	£9.00	£9.00
Dartford Golf Club	£750.00 ^[2]	£1,242.00	£35.00	£45.00
Wrotham Heath Golf Club	N/A	£1,428.00	£50.00	^[3]
Pedham Place Golf Centre	N/A	£1,050.00	£26.50	£34.00
Lullingstone Park Golf Course	N/A	£732.00	£22.50	£30.00

65. SVGC is at the cheaper end of the golf experience in comparison with its immediate 18-hole competitors. The two nearest facilities both require joining fees (Mid Kent Golf Club; £750 and Rochester and Cobham; £1,000). They also are more expensive on an annual basis with Mid Kent GC charging £1,155.00 (an additional c.£150.00) and Rochester and Cobham GC charging £1,795.00 (over £700.00 more expensive). There is also a requirement for new members to be interviewed and play nine holes with a Board Director before membership is offered at Rochester and Cobham GC.
66. Pedham Place Golf Centre, which as identified above is on the cusp of 20 minutes' drive time of SVGC has a very similar pricing point to that of SVGC. Corinthian Golf Club also has a similar pricing point with annual membership at £1,100 for the 9 hole course.
67. Visitors to private members clubs are normally expected to have a registered handicap certificate (a certificate issued by The Council of National Golf Unions - CONGU) indicating a level of play and competence enabling competition at all levels, dress appropriately and be familiar with the rules and etiquette of the game. This requirement is not always rigorously enforced as clubs compete with each other and have a tendency to chase income.

Transport links

68. Many golf clubs, by the nature of their geography, are located in areas where the use of a car or public transport is required (it is worth noting that the vast majority of people using golf courses do not use public transport). This can act as a discriminatory factor for non-car owners and young people who can only get to the course with a lift from a friend, for example. SVGC is located in close proximity to housing in general and to the whole of

^[1] Membership prices are for 6 months.

^[2] Paid over 3 years, or £500 in full.

^[3] Pay & Play only available Monday – Thursday.

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Gravesend itself. By the nature of the equipment required to play golf most golf players are car drivers and access courses accordingly. Groups of visitors may travel together by coach.

69. That being said SVGC feels far more accessible than both Corinthians and Rochester and Cobham golf clubs (due to the proximity of housing and the short distance to the town centre of Gravesend). Corinthians and Rochester and Cobham are both located on single track country lanes to the south of the A2. For some, driving over the busy A2 can be an additional transport barrier, due to the additional traffic experienced.

Summary of supply of golf courses

- ◀ SVGC is located in Shorne, south of Gravesham. It has open access with much of its membership being pay and play, although, membership stands at C, 200.
- ◀ The facility is in good condition; is open year-round and provides a challenging 18 hole experience.
- ◀ There are five golf facilities within 20 minutes' drive time of SVGC. Four of which offer standard hole golf holes (3 x 18 hole and 1 x9-hole course). They are membership clubs all of which offer limited pay and play opportunities.
- ◀ Par 3 courses and driving ranges are excluded from the golf supply because they offer a different golfing experience and appeal, in the main, to different market segments.
- ◀ Even though there has been a general down turn in participation in golf over the past 10 years, both Mid Kent and Rochester and Cobham golf clubs still require a joining fee as well as having an annual membership higher than SVGC.
- ◀ Pedham Place Golf Centre, Swanley and Corinthian Golf Club have a similar pricing structure as SVGC. Corinthians is a 9 hole course and access to Pedham Place is via the A2 and M25 and on the cusp of 20 minutes' drive time from SVGC.
- ◀ The number of golf bays at driving ranges will not alter with the closure of SVGC, so there will remain 0.31 bays per thousand population compared with the national average of 0.21 bays per thousand population within 20 minutes' drive time of SVGC.
- ◀ When SVGC closes due to the LTC development, there will be a reduction in the number of standard holes per thousand population from 0.35 to 0.28. Both of these are significantly below the regional (0.77) and national (0.57) averages.
- ◀ Model mapping as identified in Paragraph 58 and Table 3.3 indicates that, when SVGC closes the majority of users will try and access Mid Kent and Rochester and Cobham golf clubs, all other things being equal.

3.3 Demand

70. Demand for golf nationally, and in particular membership of a golf club, has fallen significantly over the past decade. This fall has witnessed a rise in 'Nomads', i.e. golfers who like to play golf but are not interested in affiliating to the national governing body (NGB), obtaining an official handicap or joining a golf club, preferring instead to play a variety of courses, mostly in good weather with friends and family, taking advantage of offers and discounts to play off-peak. This is amplified by Sport England's Active People Survey (APS) data for Kent which indicates a reduction from 4.36% to 3.44% of the population playing golf from 2005/6 to 2015/16 which in real terms is a reduction of c.22%. In 2016, however, golf was still identified as the fifth most popular sport within the County.

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Table 3.6: Active People Survey in Kent

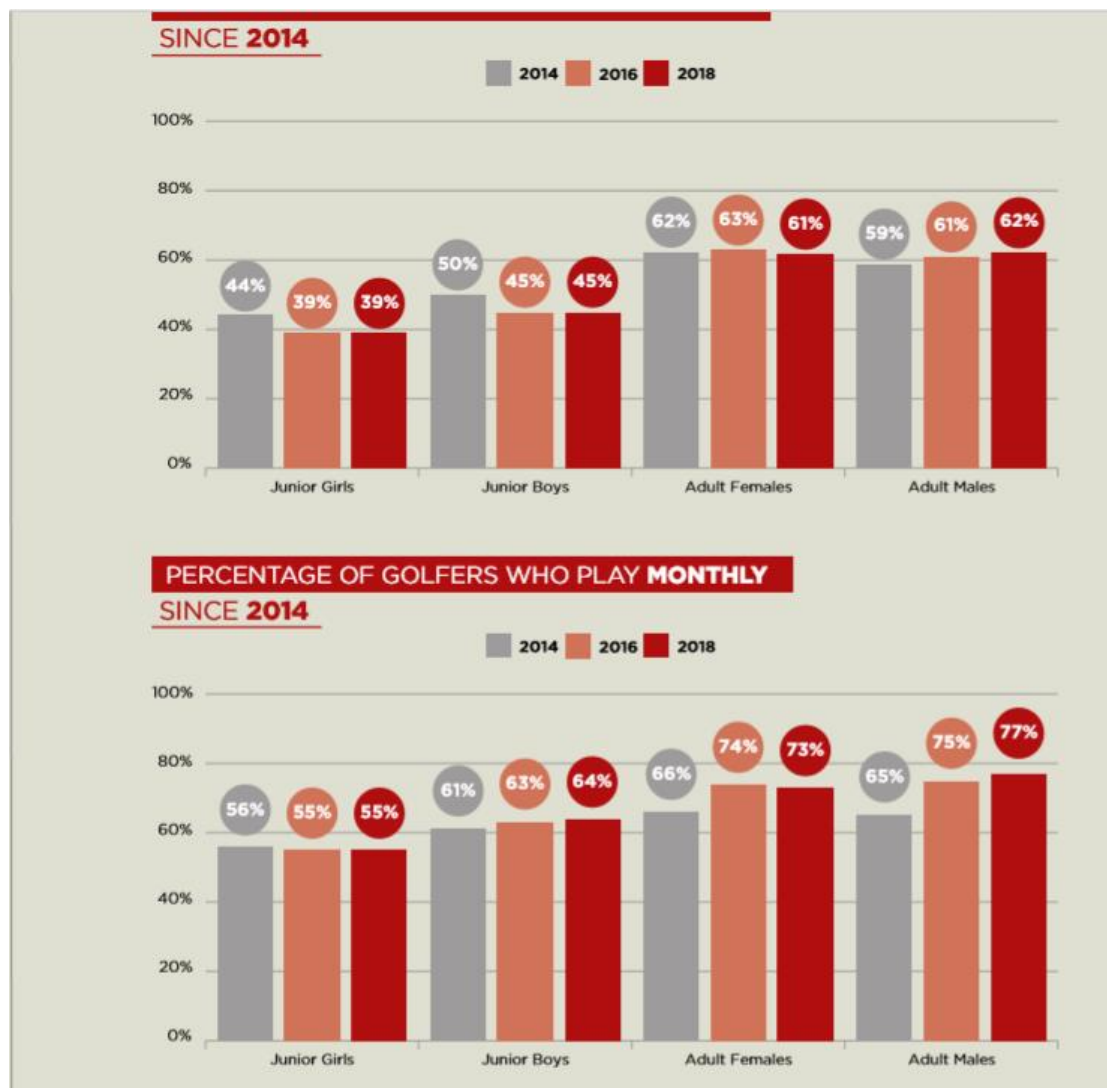
Activity	APS1	APS2	APS3	APS4	APS5	APS6	APS7	APS8	APS9	APS 10
Swimming	13.9%	14.10%	13.60%	13.40%	12.10%	11.80%	11.00%	10.40%	9.58%	8.38%
Cycling	9.02%	9.80%	9.98%	10.20%	10.10%	8.57%	9.76%	9.66%	9.72%	8.33%
Athletics	3.87%	5.17%	5.06%	5.55%	5.21%	6.33%	6.08%	6.21%	6.83%	7.32%
Football	6.45%	6.99%	5.97%	5.04%	5.86%	5.28%	5.16%	4.91%	5.01%	4.14%
Golf	4.36%	4.86%	4.67%	3.86%	3.63%	3.69%	3.74%	3.17%	3.71%	3.44%
Badminton	2.43%	2.39%	2.12%	1.93%	2.14%	1.73%	1.80%	2.00%	1.42%	1.68%
Tennis	1.91%	2.75%	2.35%	1.94%	2.13%	1.75%	2.09%	1.38%	1.78%	1.27%
Equestrian	1.16%	1.33%	1.29%	1.11%	1.29%	0.97%	1.44%	0.96%	0.94%	0.81%
Bowls	1.40%	1.86%	1.56%	1.05%	0.95%	0.84%	1.30%	1.01%	0.66%	0.80%

APS1- 2005/6 – APS10 2015/16: Source: Sport England APS 10

71. England Golf's bi-annual Golf Club Questionnaire (2016) suggests the average number of members per golf club has remained largely the same at 460 in 2016, compared to 466 in 2014. In 2016, 30% of clubs saw an increase in membership, with these members, on average, playing more frequently. Not as many golfers are playing weekly, reflecting a combination of lifestyle pressures, but more golfers are playing at least monthly. While membership numbers have largely stayed the same, the number aged 65+ has increased by 13%. This may be a reflection of the good health of golfers, enabling them to play and stay members for longer as well as an increase in this age group cohort, due to the ageing population.
72. England Golf's bi-annual Golf Club Questionnaire (2018) identifies that the number of adult males and females playing weekly has remained fairly steady since 2014; but has fallen for both junior boys and junior girls as identified in Figure 3.4. The numbers of people reportedly playing monthly has increased between 2014 and 2018 for adult males, adult females and junior boys, whilst remaining very static for junior girls. This tends to suggest that the supply and demand for golf is very complicated requiring the need for a bespoke local approach to attracting new members.

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Figure 3.4: Comparison of weekly and monthly players 2014 to 2018



73. England Golf published the 'Raising Our Game' strategy in 2014, which clearly defined the organisation's strategic direction for the 2014-2017 window. This document highlighted the need for a strategy to enhance market understanding of the size and shape of the golfing market and to map this alongside the golfing facilities catering for that demand. A market segmentation specific to golf was devised. Research identified that 24% of adults in England are potential players. This is made up of 9% current players, 8% lapsed players and 7% latent players, amounting to c.9.6 million people in total. It also provided England Golf with nine defined profiles and clearly identified behaviours, motivations and barriers within each one.
74. England Golf then worked with LCMB, facility consultancy, to utilise the segmentation work to develop a facility strategy and create some practical tools to overlay supply with demand. When looking at a club, local authority or region, England Golf's mapping report is able to identify the total number of golfers within a 20 minutes' catchment. This number will include current, lapsed and latent golfers, which suggests this makes up 24% of the population.

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75. The LCMB findings (2019) are that within Gravesham there is significant demand for golf, much greater than the average for the south east region. The demand cuts across all nine golfing profiles, both club based and independent (i.e. those who have not joined a club). Membership profiles can be found in Appendix 1. Membership numbers are mixed compared with the national average, but worth noting that each club will have a different financial model in terms of income generation from membership vs green fees etc.
76. The level of golf provision within the catchment area is made up of traditional 18 hole courses with only one driving range open to the public, with a 9 hole course attached. Providing/developing entry level facilities that offer more informal playing opportunities would be key, as without them the playing opportunities in Gravesham will continue to be limited to traditional 18 hole golf. Based on LCMB's initial analysis, clubs are not proactively targeting new audiences through coaching programmes or a wider range of membership/playing options.
77. Table 3.9 provides the most recent affiliated membership numbers from Golf England (March 2019).

Table 3.9: Golf club affiliations in key local clubs (information supplied by Golf England)

Club Name	2016 Numbers	2017 Numbers	2018 Numbers
Southern Valley Golf Club	180	167	200
Gravesend Golf Centre	Not affiliated		
Mid Kent Golf Club	800	592	650
Rochester & Cobham Park Golf Club	600 (2007)	473	500
Corinthian Golf Club	75	53	81
Redlibbets Golf Club		230	
Snodhurst Bottom	Not affiliated		
Princes Park Community Stadium	Not affiliated		
Dartford Golf Club	508	526	533

78. Both Mid Kent (650) and Rochester and Cobham (500) golf clubs have membership which is above the national average identified in England Golf's Bi-annual Survey 2014 (see paragraph 71).

Consultation

79. *Golf England Regional Development Manager (RDM):* Consultation with the RDM for the south east indicates that SVGC has c.200 members, the vast majority of whom are male. SVGC offers the only genuine pay and play opportunity in Gravesham. This allows for both entry level golf and for the more experienced and discerning golfer. The RDM identified the importance of SVGC to the local and wider golfing community, especially given that the facility is open all year round, with no need to play on winter greens. This is due to the temperate climate and chalky base.
80. The RDM also pointed out the lower annual fees and lack of a joining fee for golfers at SVGC, which is significantly lower than, for example, Mid Kent and Rochester and Cobham golf clubs which both require a joining fee and have higher annual fees. SVGC is a popular local amenity. SVGC is priced to attract local golfers who want to golf within a specific budget. They are unlikely to be able to afford the higher cost of neighbouring courses. The

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RDM is keen to see mitigation of some golf provision following the potential loss of the course to the LTC.

81. *Southern Valley Golf Course Managing Director*: Consultation with the MD confirmed that the facility is a proprietary club, built in 1998. The course feels like an inland links course due to ground conditions, although it is undulating and overlooks the Thames. Most of the members (c.200) live locally and use the facility all year round. There is limited female usage and no junior section within the club. Management is keen to keep the business as active as possible, despite the proposed future developments (which has the potential to drive away current members). It reportedly had c.34,000 rounds of golf during the 2018 season (which included a very wet winter and particularly parched arid summer).
82. The MD suggests that the feel of the Club is totally different to its nearest rivals, to the extent that he does not believe that many members will look to try and join either Mid Kent Golf Club nor Rochester and Cobham Golf Club, once LTC is underway. As with many clubs its finances are supported by the use of the clubhouse for weddings and events. Again, these tend to be more accessible than many other rival establishments in the area.

Gravesend Golf Centre

83. Gravesend Golf Centre is located within one mile of SVGC. It currently offers a 30 bay driving range and par 3 golf course. Gravesham Borough Council, as the land owner, is currently in discussion with the tenant on a re-formation of the golf facilities so that the driving range and par 3 pitch and putt facility can be amalgamated in to one controllable area with subsequent improvements to the overall offer. This will require the existing football pitches on site to be reconfigured to allow this to happen. The Council indicates that it is happy, in principle, to support this redevelopment, subject to the availability of overall playing pitches being maintained and planning permission (if required) being acquired.

It is anticipated that the facility will include;

- ◀ A new multi-shot driving range with, deflective netting, split fairways, five raised target greens, bunkers and enclosure landforms;
 - ◀ New Par 3 academy course reconfigured and remodelled for greater security, aesthetic appeal, interest, strategy and challenge; and,
 - ◀ New 9 hole footgolf course, enabling the golf centre to cater for a new emerging market in leisure facilities.
84. The ambition of the current lease holder is for these facilities to act as a development tool for those wishing to take up the game (from the young to old), for people to improve/practice certain aspects of their game, and/or activities to take part in as a family including new connected activities such as footgolf. The proposed changes to this facility complement the existing full size 18 hole courses within the Borough and surrounding area and should not be seen as a replacement, but more of an improvement to the overall portfolio of provision within the area. Quite clearly, this is a very different facility to SVGC, looking to attract different market segments than those currently playing at Southern Valley.

Mid Kent golf club

85. An established and traditional members club (formed in 1909), consultation identified that the club is at capacity for 7-day male memberships. With 75 women members there is still capacity to grow this to c.90. The Club has been proactive in trying to recruit women and junior members within the last few years. There are a limited number of 5-day memberships available. Described as an all year round golf club, there are no winter greens. It is located

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on the outskirts of Gravesend and is surrounded by fencing so it physically has no room to expand. The Club identified plans to replace or renovate the ageing clubhouse. This will not lead to increased golf participation but should add to the golfing experience.

86. Consultation indicates that a handful of members have already moved from SVGC (due to the uncertain future of this course) but that it is unlikely that many more will follow given the difference in pricing points, traditions and capacity within Mid Kent Golf Club. The Manager suggested that there will be a need for an entry level 18 hole golf course in the area, following the closure of SVGC and the closure of Deangate Ridge, Medway in 2018. It is considered important that the public has the opportunity to, at least, have a go at golf before they can commit to joining a club with the expense and commitment that that entails.

Rochester and Cobham Golf Club

87. This traditional championship golf course is at the top end of the pricing point for the area with a joining fee of £1,000 and an annual membership fee of £1,750. There is still a requirement to be interviewed and play 9 holes with a Director of the Board in order to be accepted as a member. It has over 600 members, which has remained steady for the past few years, with a strong ladies section of c. 70 members.
88. Consultation with staff at the course indicates that Rochester and Cobham Golf Club will not be able to take additional members should any members from SVGC wish to join. They also thought that it was highly unlikely that many members would wish to join given the price difference between the two clubs.

Deangate Ridge Golf Club

89. This was an 18 hole golf course established in 1972. It is positioned on the Hoo, near the town of Rochester approximately 15 minutes (9 miles) drive from SVGC. The course has a par of 71 (SSS 71) and is spread across 6,300 yards. Owned by Medway Council, it catered for a range of memberships from casual to experienced golfers as a municipal course. It closed in April 2018 on financial grounds (i.e. it was considered to be financially unsustainable) following a recommendation by officers to Medway Council.
90. Consultation with ex playing members suggests that the Council wished to use the land for housing development in the area but that this has been seriously scaled back due to part of the area being designated a site of special scientific interest (SSSI). KKP has been unable to ascertain whether any market testing was undertaken by Medway Council to determine if the facility could be managed profitably if another organisation was to operate it.
91. Consultation suggests that the golf course had a membership of c250 members but was also open to pay and play (being a municipal course). The majority of members have dispersed to other courses including Gillingham, Cobtree Manor, Mid Kent, Sittingbourne and SVGC with others ceasing to play.

Gravesham Community Leisure Limited (GCLL)

92. GCLL is the key leisure facility operator in Gravesham, having operated leisure facilities on behalf of Gravesham Council since 1999. Consultation with the CEO indicates a desire to move into golf management. GCLL is aware of the LTC development and the impact this will have on SVGC. The CEO has been keen to explore the re-opening of Deangate Ridge golf course (regardless of the LTC developments), but suggests that significant investment will be required, particularly to the clubhouse and to improve drainage on certain holes on the course. He also indicated specific ideas on how to convert Gravesend Golf Academy into a

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9 hole standard golf course (with potentially 18 tee boxes) as well as developing an academy and including re-configured bays within the driving range. He is keen for further consultation.

Summary of consultation of local golf clubs in the area

93. The existing facilities offer a wide range of golf experience in the area, ranging from driving ranges, footgolf, pitch and putt, to established and traditional 18 hole golf courses.
94. SVGC is a successful business venture which supplements its golf income with wedding and events (not uncommon for most golf clubs). Consultation indicates that the business has taken over 20 years to grow and that the development of LTC will destroy it. It is highly likely that the current management will not consider being involved in developing a new business based on a new course, should the outcome of the Golf Needs Assessment suggest this as a way forward.
95. Deangate Ridge Golf Club was a municipal course based in Medway, closed in April 2018 with the Council citing its financial unsustainability. The course is part of a wider sports complex which includes an indoor bowls centre, athletics track, health and fitness facility, grass football pitches and outdoor tennis courts. It is located 15 minutes (9-miles) drive time from SVGC.
96. Consultation with Mid Kent and Rochester and Cobham golf courses suggest that they are operating successfully; they both have very limited capacity to increase membership as they both have waiting lists for 7 day adult membership. Both have a limited number of women and junior memberships available. The price point (i.e. the cost of membership with joining fee) of these two clubs is significantly higher than SVGC.
97. Consultation with GCLL, Gravesham's leisure operator, indicates a desire to become involved in the management of golf facilities in the area.
98. The loss of the 18 holes at SVGC will have a major negative impact upon golf participation within the area with the loss of c.34,000 rounds of golf per annum (2018). This comes on top of the loss of the closure of Deangate Ridge Golf Course in April 2018. Given the difference in the cost of memberships (and the interview requirement at Rochester and Cobham Golf Club), different market segments catered for and lack of 7 day memberships available at both clubs, it is highly likely that there will be minimal movement from SVGC to other golf clubs in the area, following its closure.
99. Further, the projected growth of the population in Gravesham (17.0% by 2041) will also see an increase in the over 65 age group to 22% of the population. It is, therefore, expected that this is likely to lead to a small increase in demand for golf.

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Summary of golf demand

- ◀ Demand for golf has been falling, in general, over the past 10 years, although England Golf suggests that this is now stabilising and, in some instances, turning the corner.
- ◀ Kent has a higher than average participation rate in golf in comparison to the rest of the country.
- ◀ SVGC has the lowest number of members compared with other 18-hole facilities within 20 minutes' drive time. It does, however, have a significant pay and play opportunity with a combined number of rounds in 2018 of 34,000.
- ◀ Members tend to be male aged 40-75 and are locally based. There are a few female members and no junior section.
- ◀ Rochester and Cobham and Mid Kent golf clubs (the clubs located closest to SVGC) indicate that they are full for male 7-day memberships and do not have capacity to grow should displaced members from SVGC wish to move facility. There are some 5-day, women and junior memberships available.
- ◀ The price points of Mid Kent and Rochester and Cobham golf clubs are higher than SVGC; both have joining fees as well as more expensive membership costs, so it is very unlikely that there will be significant movement across to other courses in the area.
- ◀ Demand at Mid Kent and Rochester and Cobham golf courses remains high with both being able to charge a joining fee, which again restricts use of golfers to those that can afford higher fees.
- ◀ Corinthians and Padham Place golf clubs have a much similar price point to SVGC. Corinthinans is a 9 hole course (and not easily accessible) and Padham Place Golf Club requires 20 minutes' drive time via both the A2 and M25.
- ◀ Demand for golf in the area is lower than the Kent average but is commensurate with the national average, despite there being fewer relative holes than the national average per thousand population.
- ◀ The proposed developments at Gravesend Golf Centre are aimed at a family market and in getting people into the sport rather than being a similar golf facility to SVGC. This facility is highly unlikely to attract membership from SVGC when it closes.
- ◀ GCLL has indicated a desire to get into golf management should the opportunity arise (which could include SVGC).

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3.4: Supply and demand analysis

100. Golf is identified as the eighth most popular sport in Gravesham with 2.1% of the population indicating that they take part at least once per month. This is commensurate with national figures but lower than the south east average (2.7%). Residents in Gravesham have higher than average levels of inactivity in sport and a lower propensity to take part in sport and physical activity, in competitive sport and compete (compared to regional and national figures). The closure of a functioning facility is likely to have a negative impact on participation.
101. SVGC is a successful proprietary course which has positioned itself as a pay and play 18 hole course. A club does operate from the facility which has c.200 members. It has the feel of a links course, is open all year round and appears to be a very important local amenity. It mainly attracts males aged from 40-75 years of age. In 2017/18, there were a reported 34,000 rounds of golf played at the facility, despite the wet winter and very dry summer.
102. Three types of golf facility are identified including driving ranges, par 3 pitch and putt courses and golf courses with standard holes. Neither the number of bays nor the par 3 pitch and putt facilities will be affected by the closure of SVGC. (It is worth noting that these facilities are not directly comparable to standard hole facilities as they offer a different golfing experience). The same cannot be said for the number of standard holes. There is a current low level of provision of standard golf holes within the surrounding area. Within 20 minutes' drive time of SVGC there is 0.35 holes per thousand population which will reduce to 0.28 holes per thousand population when SVGC closes. This is considerably lower than the 0.57 for England and 0.77 for the South East of England.
103. There are four courses within 20 minutes' drive time of SVGC. Membership numbers at the two most local facilities (Mid Kent and Rochester and Cobham) are above the national average and both have indicated that they are at capacity for adult male membership, operate waiting lists and are significantly more expensive than SVGC. Corinthians is a 9 hole (standard holes) is 17 minutes' drive away and is located in a very rural setting, which is not easily accessible. Padham Place golf course has an 18 standard hole and par 3 9-hole facility; this is located a full 20 minutes' drive time from SVGC via the A2 and M25; this does not make it easily accessible for the majority of users at SVGC, especially on a regular basis.
104. There are a further five 18 standard hole courses located just outside the 20 minutes' drive time of SVGC (Redlibbets, Snodburst Bottom, Dartford, Wrotham Heath and Lullingstone golf courses). In addition, Deangate Ridge Golf Course (municipal course of 18 standard holes) which is c. 9 miles and 15 minutes' drive from SVGC was closed in April 2018. It had c. 250 members which have been dispersed to other courses including SVGC, Gillingham, Cobtree Manor, Mid Kent and Sittingbourne. It is highly likely that a number of golfers also stopped playing but exact numbers are unknown.
105. In KKP's opinion and given the evidence identified above, the closure of SVGC is likely to have a detrimental effect on golf participation in the area given that:
 - ◆ SVGC offers c.34,000 rounds of golf per annum; it is highly unlikely that the courses closest to them will be able to accommodate such demand (all other things being equal).
 - ◆ The two closest courses, Mid Kent Golf Club and Rochester and Cobham Golf Club have indicated that they have limited memberships available, especially for 7-day members. There are a limited number of 5-day memberships available and a desire to attract more women and juniors.

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- ◀ Mid Kent and Rochester Golf Clubs also have joining fees and more expensive annual fees than SVGC. This is likely to deter a high percentage of SVGC members and nomadic golfers from wanting (or being able to afford) to become members or play at these courses.
- ◀ The two other standard hole courses identified within 20 minutes' drive time are unlikely to attract significant numbers of golfers from SVGC as one is a 9-hole course (and difficult to access) and Pedham Place Golf course is on the cusp of the 20 minutes' drive time and relies on both the A2 and M25 being clear of traffic.
- ◀ Consequently, it cannot be stated that SVGC is considered surplus to requirements when taking account of the NPPF Planning Test. There is clear justification to replace SVGC with a full size (18 hole) course in the local/Gravesend area. This will also require appropriate ancillary facilities in order to ensure it is financially viable (given that SVGC, along with most other golf clubs, relies on secondary spend via events and weddings to supplement its income).

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PART 4: POTENTIAL SOLUTIONS/OPTIONS

106. Given that golf courses can take many years to develop, there appear to be three main options to mitigate the loss of SVGC, all of which will require further investigation and negotiation with relevant stakeholders. It is also worth noting that management at Southern Valley Golf Course has indicated its reluctance to manage an alternative golf course development; this may lead to the any golf developments being made more challenging and should be considered early on in the process of any golf mitigation moving forward.
107. England Golf and Sport England will need to be consulted on the proposed options to ensure that they agree that the preferred option mitigates the potential loss of SVGC.

Option 1: work with the (independent) operators of the Gravesend Golf Academy to develop a 9 -standard hole course on the existing academy course in the short term (whilst work on LTC is underway); with a view to extending the course to 18 holes when LTC is fully developed.

Option 2: Work with Medway Council to bring the 18 hole facility at Deangate Ridge, Medway back into operation.

Option 3: Identify a new site and develop an 18 hole golf course with clubhouse to mitigate the loss of SVGC.

108. KKP's initial and high level explanation of each of the options is detailed below:

Option 1- Development of an interim 9-hole course at Gravesend Golf Academy and then increase to an 18 hole.

- ◀ The site is located next to Southern Valley Golf Course, so is ideally placed for mitigation.
- ◀ It is an established golf facility offering driving range and an academy par 3 golf course (pitch and putt).
- ◀ The land belongs to Gravesham Borough Council but there is 17 years left on an existing lease to a private operator, Duncan Lambert. There is no guarantee that the current operator would be interested in this process.
- ◀ Duncan Lambert is currently prepared to invest in the facility and it is in the process of working with the Council to alter the golfing offer and has been developing ideas in consultation with Gravesend Borough Council (March 2019).
- ◀ The current operator of SVGC has indicated that there is no desire to continue to manage/start another golf facility in the future.
- ◀ The proposal to extend, develop and upgrade the current par 3 academy course to a 9 hole standard golf facility as opposed to the current par 3 facility is likely to require additional land due to current site constraints. The north of the facility is farmland so there may be an opportunity to acquire this land and alter its use to leisure use.
- ◀ Preparations for the changes could begin prior to the LTC development which will allow golfers to transfer without any loss of facility in the short term.
- ◀ If developed into a full 9 hole standard golf facility, it could cater for the c.200 members currently playing at SVGC. It is unlikely that this facility will be able to accommodate or even attract the levels of pay and play being offered at SVGC.
- ◀ Ground conditions will need to be examined to ensure that this is a feasible option.
- ◀ There may be an opportunity to use some of the spoil from the tunnel to develop the landscaping of the course; assuming that drainage will not be an issue.
- ◀ Ownership and management of the land and facilities will need to be agreed in advance with Gravesham Borough Council and any other affected land owner.

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- ◀ Once LTC is developed, there may be an opportunity to reclaim some of the land within the development boundary (northwest of the road) to expand the interim 9 hole course into an 18 hole course. This may also require additional land to the south east of the LTC and a bridge to connect the holes (again inside the boundary of the LTC development).
- ◀ Consultation with SVGC, Gravesend Golf Academy, Gravesham Borough Council will be required in the first instance to discuss the viability of such an option.

This option will allow some golfers to continue to play in the short term. It is unlikely that all 34,000 rounds will be accommodated and that some nomadic golfers may need to find alternative activity, especially in the short term. The location is excellent given its proximity to SVGC. Consideration of ownership and management will need to be resolved.

Option 2- Work with Medway Council to re-open Deangate Ridge Golf Course

- ◀ The site is located 9 miles (15 minutes' drive time) to the east of SVGC. It closed in April 2018. It is unknown how many SVGC members are located within 20 minutes' drive of this facility.
- ◀ Medway Council has not yet engaged in consultation despite several attempts to do so.
- ◀ This is an established 18 hole golf course which closed due to its financial viability. As a municipal course, this facility was an entry level course which also had a club membership (very similar in some respects to SVGC).
- ◀ There will be a requirement for significant investment to bring it back to a good quality (especially greens and tees). This investment is likely to be significantly less than trying to locate land and develop a course from scratch.
- ◀ Appropriate investment and improved quality of facilities is likely to lead to a significant number of those who have transferred to other clubs returning.
- ◀ Given the financial reasons cited for closure of this facility, management and ownership need to be considered and agreed prior to this option progressing.
- ◀ Consultation with Medway Council is key to identifying whether this is a potential option and one which needs further consideration.

The location of the course is not necessarily strong, given that it is located nine miles away from SVGC. It has until very recently functioned as an 18-hole golf course, so has many features/requirements in place e.g. drainage, club house etc. The attitude of Medway Council to this solution will be key to its success. This may complicate matters as re-provision is within another local authority. If viable, this is likely to be the most cost effective of the three options. Consideration of ownership and management will need to be resolved.

Option 3- Identify a new site and develop an 18 hole golf course with clubhouse to mitigate the loss of SVGC.

- ◀ Investigate what land is available for the development of a new facility.
- ◀ It is highly likely that this will not be completed prior to the closure of SVGC which will result in, at the very least displacement of golfers, and at worst loss of golfers to the sport.
- ◀ This is likely to be the most expensive option going forward.
- ◀ Consideration of ownership and management will still need to be resolved.
- ◀ It is highly likely that, finding a piece of land large enough to accommodate a new 18 hole golf course with ancillary facilities, will require land in the Green Belt, which will present particular challenges around any built development.

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Potentially, the most expensive solution as it will entail the development of a new 18 hole course and clubhouse. The availability of land to create such a facility is unknown and may require a compulsory purchase to achieve this. Consideration of ownership and management will need to be resolved.

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APPENDICES

Appendix 1: Golf England golfing segments

Table A.1 below indicates the findings of the Lower Thames Crossing, Open Space, Sport and Recreation Report, May 2019 undertaken by KKP on the impact of LTC on other golf courses in the area. KKP consulted with each of the clubs to determine the potential impact of the LTC on their land and ability to play golf. The following table qualifies the current position.

Table A.1: Summary of the impact LTC has on local golf courses with precis of consultation

Name of course	Actions required to determine the final impact on the site
Cranham Golf Club	Nearby enabling works are for a major trunk road. These will take approximately 2 years. Work will be undertaken outside the golf course and it is not envisaged that this will impact on the ability to play golf. Despite several attempts, Cranham Golf Club has not responded to requests for consultation*. There is still a need to clarify the extent of the potential impact in relation to golf with the golf club.
Orsett Golf Club	Potential works to Gas Main above ground structure. Could take in excess of 2 years due to complexity of the works and lack of outages. Provision of service road. Potential mitigation includes appropriate measures to limit the indirect impacts to golf may need to be considered. Solutions to consider include provision of appropriate vegetation (e.g. trees, shrubs etc) along the boundary to reduce the impact relating to visual, noise and pollution. This may also help to manage any potential impact issues of drainage. Erection of netting to shield the tee-off and road may also be beneficial subject to how close the service road will be to the tee. Consultation with the Club indicates that it is aware of the LTC development and does not consider that it will impact negatively on the golf course itself. It understands that it may lose up to 60m ² of its playing surface. Orsett Golf Club is an all year round facility, with a membership of approximately 700. The Club considers that it is at capacity and has been for a couple of years.
Rochester & Cobham Golf Club	No direct impact to site. There may however need to be some works along Park Pale to access valves, inspection chambers, joints etc. access should only be for no longer than 1 month. Mitigation unlikely to be required. Consultation with the Club suggests that the LTC development will not affect the club at all with regard to quality of the course or levels or membership. The Club has indicated that it is aware that some changes may be needed to a service road but as most of the development work is on the other side of the railway line, this will not adversely affect the Club.
Top Meadow Golf Club	Impact to golf course will be during the re-stringing of the overhead electricity cables and earthing works to provide suitable tension to cables once diverted. This will take 1 year with access being required. Potential mitigation includes appropriate measures of protection to protect golfers during these time periods Consultation with the Club suggests that it does not believe that it will be affected negatively by the LTC development. The Club is described as an entry level club with a membership of c.450. There has been a slight decline in membership over the past few years but this has not been significant and the club continues to be financially viable.

*consultation with the owner has not occurred despite repeated attempts (having been told to phone back at specific times, he has remained unavailable)

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Appendix 2: Golf England golfing segments

The demand for golf within the borough and the region by profile is as follows;

Profile Name	Average number of people per club/facility/local authority (within 20 minute drive time*)	
	Local Authority	Region
	Gravesham	South East
1: Relaxed Members	11060	6149
2: Older Traditionalists	9146	5662
3: Younger Traditionalists	11050	5836
4: Younger Fanatics	9512	6193
5: Younger Actives	10485	5960
6: Late Enthusiasts	9463	5943
7: Occasional Time Pressed	10717	5941
8: Social Couples	9997	5781
9: Casual Fun	9160	6494

*The figures represent the number of people within each profile, within a 20 minute drive time of each club/facility. It is averaged to ensure no double counting and is therefore at its most accurate at club/facility level.

In addition, the following shows demand for each club and facility within Gravesham

Profile Name	Average Number of People per Affiliated Facility (within 20 minute drive time*)			
	Affiliated Club	Affiliated Club	Affiliated Club	Non-Affiliated Driving Range
	Southern Valley Golf Club	Rochester and Cobham Golf Club	Mid Kent Golf Club	Gravesham Golf Centre
1: Relaxed Members	7393	17272	12182	7393
2: Older Traditionalists	6025	14355	10178	6025
3: Younger Traditionalists	7517	17051	12117	7517
4: Younger Fanatics	6257	14963	10590	6257
5: Younger Actives	7001	16364	11571	7001
6: Late Enthusiasts	6216	14893	10529	6216
7: Occasional Time Pressed	7216	16640	11795	7216
8: Social Couples	6601	15709	11078	6601
9: Casual Fun	5908	14563	10261	5908

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Segments	Characteristics
Relaxed Members	<ul style="list-style-type: none"> ◀ 67% male, 33% female ◀ Average age of 45 ◀ 86% are current players and 90% are club members ◀ Play 18 holes, 9 holes and driving ranges all year round ◀ Bad weather discourages 70% of this segment
Older Traditionalists	<ul style="list-style-type: none"> ◀ 90% male, 10% female ◀ Average age of 59 ◀ Almost all of the segment are current players & members ◀ 95% prefer to play 18 holes, 66% practice on a driving range on a monthly basis ◀ 91% have a regular commitment to play and nearly all play in the winter
Younger Traditionalists	<ul style="list-style-type: none"> ◀ 79% male, 21% female ◀ Average age of 35 ◀ 97% are members ◀ Play 18 holes, 9 holes and driving ranges regularly all year round ◀ 80% have a regular commitment to play but about half can be discouraged by bad weather
Younger Fanatics	<ul style="list-style-type: none"> ◀ 74% male, 26% female ◀ Average age of 31 ◀ 79% are current players and 90% are members ◀ Play all formats of golf frequently all year round ◀ 90% have a regular commitment to play but poor weather is a barrier
Younger Actives	<ul style="list-style-type: none"> ◀ 74% male, 26% female ◀ Average age of 38 ◀ Only a third are current players and 1% are club members ◀ Like to play all formats of golf ◀ 20% play monthly during the summer, few play in the winter
Late Enthusiasts	<ul style="list-style-type: none"> ◀ 84% male, 16% female ◀ Average age of 51 ◀ Only a quarter are current players and 1% are club members ◀ Play infrequently in the summer and only 38% play in the winter ◀ 28% have a regular commitment to play ◀ Mainly interested in par 3 courses or other short courses
Occasional Time Pressed	<ul style="list-style-type: none"> ◀ 84% male, 16% female ◀ Average age of 43 ◀ Only a quarter are current players, none are club members ◀ Play infrequently in the summer and only 29% play in the winter ◀ 25% have a regular commitment to play ◀ Enjoy all formats of golf
Social Couples	<ul style="list-style-type: none"> ◀ 53% male, 47% female ◀ Average age of 47 ◀ 36% are current players and 1% are members ◀ Only a quarter play in the winter ◀ Play for 2 hours or less and so prefer pitch and putt or driving ranges
Casual Fun	<ul style="list-style-type: none"> ◀ 70% male, 30% female ◀ Average age of 42 ◀ 25% are current players and none are members ◀ Only 16% would play in winter

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	<ul style="list-style-type: none">◀ Play infrequently and rarely play a full round◀ Prefer informal formats of football such as crazy golf
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Golf

GOLF'S

David Walsh hears
how clubs are facing
unprecedented growth
after lifting of lockdown



UNSTOPPABLE

RISE

Exactly one year ago, a story in *The Scotsman* began with the following: "Another month, another golf club closure in the sport's cradle. Add Mount Ellen in Lanarkshire to other relatively recent shutdowns of Eastwood in Renfrewshire, Brunston Castle in Ayrshire and Carrick Knowe in the Lothians. Camperdown is closing too."

It wasn't just Scotland. Two months later, the UK trade publication, *The Golf Business*, reported that "at least nine clubs" had closed down in the previous few weeks. Not enough people wanted to play golf and then on March 23, the government announced that, as with every other sport, golf clubs had to shut down. It was the last thing the game needed.

Clubs remained closed for more than seven weeks. Then, on a cool but mostly sunny mid-May morning, golf restarted. Covid-19 guidelines meant a maximum of two players in the same group and only those who pre-booked their rounds could play. In this new

golf world, no one knew quite what to expect – but more closures seemed probable.

"I've played golf for a long time, at all levels, and I've never seen anything like what's happened since lockdown ended," says Ricky Willison, the former Walker Cup player who is now director of Ealing Golf Club in west London. "The numbers playing, the inquiries about membership, the number of club fittings ...

"We've taken in over 100 new members at Ealing since April. People from all walks of life, not just people from the traditional demographic but from families wanting to do things together. Neil Jordan, my colleague at Ealing, is booked up for lessons until August 30. That's every half hour from 8am to 12.30pm five days a week. I have been flat out pretty much every day since we've come out of lockdown."

Ealing's influx of new members is one example of a countrywide phenomenon. "Since May 13, there have been 20,000 new members across England," Jeremy Tomlinson, the chief executive at England Golf,

'We've taken in over 100 new members. And not just people from the traditional demographic'

says. "According to SMS [Sports Marketing Surveys] figures, the number of rounds played in June and July was up 60 per cent on 2019 and is trending towards the same increase for August."

A number of factors have contributed to the game's resurgence. During the early weeks of renewal, the weather was good and having been imprisoned in their homes for the previous seven weeks, people realised how much they enjoyed their game. Being forced to book in advance and play in two-balls eliminated two of the amateur game's greatest bugbears: the 4½-hour round and time wasted hanging around a congested 1st tee.

When restrictions were eased and groups of four were allowed to play together, many clubs preferred to stay with a maximum of three to ensure the pace of play did not regress. It also became clear that members enjoyed shorter rounds and the certainty of knowing when a round would start.

With a significantly increased demand for playing time from their own members, clubs were no longer in a position to accommodate non-members wishing to pay and play. As a consequence, many non-affiliated golfers had to join a club to be sure of getting a game.

Other factors contributed to the rising demand. Colin Mayes, the chief executive of Burhill Golf and Leisure, says: "We have ten clubs and most of them have two courses, some have

three, our Hoebridge Golf Centre in Surrey is probably the busiest golf club in the country, it has 45 holes of golf. Burhill would be classed as an upmarket, traditional golf club. A lot of our members at Burhill work in the city and because they're not travelling into the office, they've got two hours of their life back.

"By being more efficient working at home, they've suddenly got four hours available. Instead of playing once a week, as they did previously, they're now playing two or three times a week."

This isn't a London-only factor. Alasdair Good, the head professional at Gullane Golf Club in East Lothian, says: "People in Gullane travelled into Edinburgh and they didn't get home in the evening until about half six. They then had their tea at seven o'clock and had no opportunity to get



The spike in interest is comparable to that during Woods's coming

on the course. Now they're at home, working till five o'clock, switching the computer off and they're on the tee for quarter past five. We've seen a huge resurgence in evening golf."

Burhill also has many courses that restrict member numbers to maximise revenue. As member clubs are no longer able to accommodate independents wanting to pay a green fee, Mayes has seen revenues from his pay-and-play courses soar.

"There has been probably a 30 to 40 per cent increase," he says. "The numbers for July just arrived on my desk. In July, this is all of our main course rounds at Hoebridge, we had a 31 per cent increase against the previous year. And here is another interesting stat: the short-course rounds,

which is the beginner course, are double what they were last year. We did 32,000 short-course rounds in July compared with 16,000 the previous year."

Less tangible, but perhaps no less important, is the feelgood factor around golf clubs, with increased participation underpinning a more vibrant spirit and greater support for club competitions. As if, after the lockdown, those who played realised how fortunate they were to play a game that could be enjoyed in relative safety during this global pandemic.

Tennis is another sport that allows natural social distancing and it too has enjoyed significantly increased participation since clubs and public courts were reopened. There has been a 372 per cent increase in court bookings from reopening in May to the end of July, compared with last year's figures. According to the Lawn Tennis Association, there were 26,829 bookings on June 14.

Many of those involved in golf believe the present enthusiasm for the game may be unprecedented in modern times. "People certainly seem to be enjoying it more," Richard Latham, general manager at Woodhall Spa, says. "I haven't anything to back that up, but from watching what is going on, that seems to be the case."

Good recalls the heightened interest in golf during the early years of Tiger Woods's coming and still believes that what we've seen over the past three months outstrips that. "I would say we've never had such a demand for golf, for people getting into the game," he says. "Golf now has an incredible opportunity."

There is no certainty that the game will make the most of this new opportunity. "There is absolutely the possibility that we will not learn from the mistakes of the past and they will continue to do the same old things again," Good says. "We have to realise that golf has to change, it has to adapt to meet the demands of families and younger people with a different outlook to older members. We have to listen to the younger golfers and make sure we meet their expectation."

"Nobody wants to go out in shorts and long socks any more. Hopefully those days are gone."



The market-leading golf club management solution

English golf clubs have seen 20,000 new members since May

By Alistair Dunsmuir
August 19, 2020 10:39

The CEO of England Golf has revealed that English golf clubs have collectively seen 20,000 new members join them in the three months since most venues reopened.

This almost certainly represents the biggest membership growth over a three-month period in history.

Speaking to **The Sunday Times**, Jeremy Tomlinson said: "Since May 13, there have been 20,000 new members across England. **The number of rounds played in June and July was up 60 percent on 2019 and is trending towards the same increase for August.**"



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Jeremy Tomlinson

"I've played golf for a long time, at all levels, and I've never seen anything like what's happened since lockdown ended," said Ricky Willison, the former Walker Cup player who is now director of Ealing Golf Club in west London.

"The numbers playing, the inquiries about membership, the number of club fittings.

"We've taken in over 100 new members at Ealing since April. People from all walks of life, not just people from the traditional demographic but from families wanting to do things together. Neil Jordan, my colleague at Ealing, is booked up for lessons until August 30. That's every half hour from 8am to 12.30pm five days a week. I have been flat out pretty much every day since we've come out of lockdown."

Moray Golf Club in Scotland is another to report a membership boom. **It has attracted the 320 new members and counting.** The club is also seeing the course become extremely popular with nearly double the number of people playing on it this August compared with a year earlier.

Derek Ramsay, PGA professional, said: "When the country went into lockdown, we predicted that we would be out of money by July. However, things are even better now than usual, and it's been amazing to see such a significant improvement in memberships – especially with young people."

The 'Golf Boom' Continues

August 19th, 2020

Preliminary figures released today by **Sports Marketing Surveys** are in line with those presented yesterday by Sports & Leisure Research Group at the PGA of America's 'Virtual Summit'. There is a huge appetite for golf as a relatively safe activity during the pandemic and widespread working from home has provided an increase in available leisure time.


As Richard Payne from SMS says, "The challenge for the industry is to keep up the good work and convert new players to the game to make golf part of the 'new normal'. To do that it is imperative that golf courses engage with new audiences."

Please review our selection of golf business stories from around the world. Keep safe, healthy and well-informed.

Geoff Russell, Publisher <https://golfbusinessnews.com>

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SMS reports July rounds up by 40% on 2019 figures

Management Topics 12:18 pm, August 19, 2020

Preliminary figures issued by Sports Marketing Surveys for July suggest that the post-lockdown boom in rounds played in Great Britain is continuing apace, with an average growth of over 40% compared to July 2019.



The UK has seen the biggest golf spike in the world



By Alistair Dunsmuir
September 1, 2020 06:59

New data analysing golf activity around the world has found growth everywhere in recent weeks – with the UK leading the way.

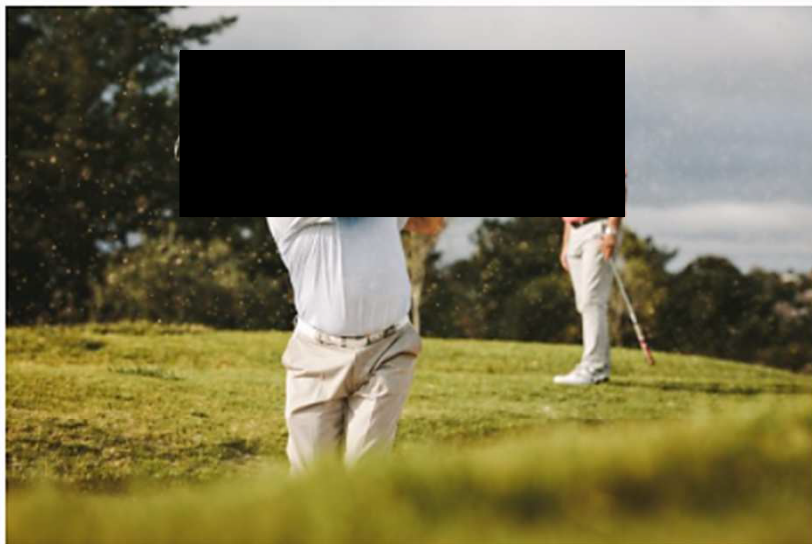
Shot Scope, a company that manufactures GPS and shot tracking technology used in watches that golfers wear, analysed the activities of 50,000 golfers around the world this July, and compared this with data it had for July 2017, 2018 and 2019.

It found that golf rounds in the UK were up by just under 40 percent (39.7%) compared with pre coronavirus levels, the biggest growth in the world.



The USA saw an increase of 34.9 percent of rounds played and Canada 12.7 percent.

The average for Europe was 27.9 percent, and the rest of the world at 7.5 percent.



“On the heels of the Covid-19 lockdowns and closed courses around the world, golfers everywhere jumped at the opportunity to play in 2020, and among our more than 50,000 golfers, July rounds skyrocketed,” said David Hunter, CEO, Shot Scope.

“With the UK and US markets recording nearly 40 and 35 percent growth respectively, and as golf is the perfect outdoor social distancing activity, it is clear that the game is thriving right now.”

The company also found that the average user of its software played 5.2 rounds in 2018 – but this rises to 6.2 for 2020.



By Alistair Dunsmuir
September 1, 2020 06:59

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Golf participation up 2.3 million in UK and Ireland - and must be seized upon, says R&A

26 May 2021 | [Golf](#)

Around 25% of women playing golf had tried it for the first time in 2020.

Golf in the UK and Ireland has been told by the R&A to "seize" its chance to build on a surge in participation.

An extra 2.3 million adults played in the UK and Ireland in 2020 despite disruption from the Covid-19 pandemic.

The numbers playing on a nine or 18-hole course in the UK increased by 2.1 million players to 5.2 million - the highest figure recorded this century.

In Ireland, participation also grew markedly, with an increase of 219,000 on-course players to 540,000.

Phil Anderton, chief development officer at the R&A, said: "We have seen a real surge in the number of golfers in Great Britain and Ireland.

"This is reflected by the high demand for tee times and clubs reporting a strong interest in membership last year.

"It is vital that golf seizes the opportunity to maintain this heightened interest by offering new and returning golfers compelling reasons to stay within the sport and enjoy it with friends and family."

Research led by the R&A, together with England Golf, Golf Ireland, Scottish Golf and Wales Golf, has highlighted the numbers participating on course and in alternative forms of the sport such as pitch and putt or at driving ranges.

In the UK, the average age of golfers fell by five years to 41. Some 25% of female golfers were new to the sport and tried it for the first time during the Covid-19 pandemic.

Golf rounds played by club members are up on 2020

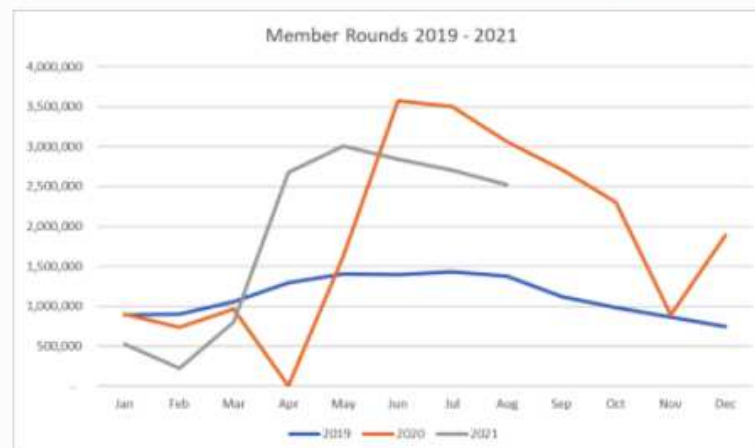
By Alistair Dunsmuir
October 18, 2021 07:56

New data by software company BRS finds that there were even more rounds of golf in the UK played by members of clubs in total for the year to the end of summer 2021 than there were at that stage in 2020, although there has been a recent slowdown.

The same company reported recently that visitor numbers pointed to a predicted pandemic boom slowdown from early summer 2021, and while there has been a similar trend with membership numbers, they appear to be in an even healthier place.

The software, used by more than 705,000 golf club members, **finds that 15.3 million rounds of golf were processed in the year to the end of August.** This equates to 5.6 million more rounds of golf compared with 2019 (a 45 percent increase) at the end of August, and even 938,000 additional rounds compared with the end of August 2020, the year that saw the summer of unprecedented growth.

However, as with visitor numbers, there has been an expected membership rounds slowdown during this summer when compared with last summer.



"At the beginning of the year golf in the UK was closed, everywhere except Scotland, for pretty much the entirety of the first quarter," reports a spokeswoman for BRS.

"When courses did reopen, we saw the expected initial spike in April and May.

"As the summer progressed and the UK and Ireland began to reopen in other sectors, the number of member bookings has been dropping month on month June to August. June saw a 21 percent drop year-on-year in member rounds, July was 23 percent down and August saw an 18 percent dip.

"This represents two million fewer member rounds played over these three months. External factors certainly came into play this summer. A spell of poor weather, the Euros and England's progression to the final, restaurants and bars reopening, live sport welcoming back spectators, and people starting to return to the office in a flexible format, all contributed and golf had to compete once again for its share of people's time.

"It should be noted that the numbers we are seeing in 2021 are still miles ahead of the pre-pandemic levels of 2019, but there has been a shift in recent months."

By Alistair Dunsmuir
October 18, 2021 07:56

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GOLF BUSINESS

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Golf rounds in 2021 are up by 46% compared with 2019



By Alistair Dunsmuir
November 22, 2021 16:49

New data shows the number of rounds of golf played in the UK in the third quarter of 2021 are significantly up compared with 2019 and only slightly down on 2020.

The figures from July, August and September 2021 are the first time a three month period can be compared with a three-month period a year earlier in which there were no lockdowns, since the pandemic began.

They show the number of rounds played rose 46 percent compared to the same period in 2019 and fell only seven percent on 2020's numbers.

The figures for this year also include a spell of poor weather, the climax of Euro 2020, restaurants and bars reopening, live sport welcoming back spectators and people starting to return to the office in a flexible format.

The figures also suggest the number of rounds played in September 2021 was about the same as in September 2020.

The south, which recorded a particularly extraordinary performance in 2020, experienced the greatest drop in 2021.

The SMS Rounds Played Monitor concludes that "Q3 2020 was a time of unprecedented appetite for golf. It was a record performance in the 20 year history of the Rounds Played Monitor. That 2021 is outpacing 2019 while hanging within touching distance of 2020 gives grounds for optimism. Even as other leisure activities reopen and golfers have more alternative ways to spend their leisure time and money, golf remains top of many people's lists."



SMS director Richard Payne added: "It isn't surprising at all that we have seen a decline against 2020, which was an anomaly in lots of ways. What was always going to be the key this year was the proportion of those new players and new rounds golf managed to retain. In absolute terms, the comparison with 2019 is much more meaningful, so it's brilliant to see substantial medium term growth. The relatively low drop compared to 2020 is great news, suggesting that those who played more last year appreciated the benefits of the game, in terms of physical, mental and social wellbeing. The results also mean that year to date growth remains up, 16.7 percent higher than 2020 – although closures through Q2 had an impact. At the end of last year, we expected to see a further boost in 2021 as an overall year and we are delighted to see that playing out so far."

Phil Anderton, chief development officer at The R&A, said: "It is encouraging to see that more rounds are being played in Great Britain now compared to the same period two years ago and this reflects a rising demand to play the sport when it can be enjoyed outdoors by golfers, who are experiencing the many health benefits it can provide. The opportunity is there for clubs and facilities to retain this heightened interest in playing the sport by ensuring that they provide a product that golfers can continue to enjoy with family and friends."



By Alistair Dunsmuir
November 22, 2021 16:49

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Golf Enjoying Record Global Growth, Reports The R&A And SMS

11.07am 14th December 2021 - [Growing the Game](#)



New research figures revealed by The R&A and Sports Marketing Surveys show golf has enjoyed a significant increase in popularity worldwide, with over 5.5 million people taking up the sport over the last five years.

The number of total golfers globally has increased from 61 million to 66.6 million in a five-year growth period, surpassing the previous high mark of 61.6 million set in 2012. The measure includes club members and non-member independent golfers playing nine or 18 holes and users of driving ranges in markets where course availability is limited.

The new figure reflects a positive trend in golf in which participation levels are now rising worldwide after a period of decline. This was recently highlighted in the 2021 European Golf Participation Report, which highlighted that over 10.6 million golfers now enjoy playing full-length courses on the continent – a healthy increase from the 7.9 million last monitored in 2016.

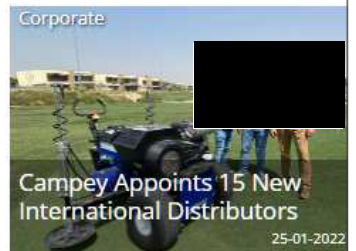
Phil Anderton, Chief Development Officer at The R&A, said: "Golf is enjoying a real boom in popularity at the moment and we are seeing substantial increases in participation in many parts of the world, particularly in the last two years when the sport could be played safely outdoors during the Covid-19 pandemic.

"The new figures are very encouraging but we need to work

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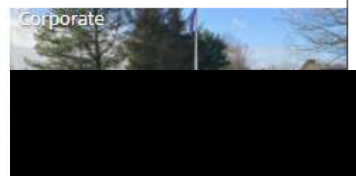
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Latest Golf Industry News



Corporate
Campey Appoints 15 New International Distributors
25-01-2022

The new dealers have been appointed across the Middle East and Pan-Asia as part of the Company's new rationalised international dealer network which will provide customers with Campey's renowned service wherever they are in the world



Corporate
Oh, Yes He Is!
25-01-2022

The Golf Course Manager, Extreme Athlete and Recent Pantomime Star, Andrew Smith, has been revealed as BIGGA Vice President 2022



Media

“The new figures are very encouraging but we need to work together as a sport to make the most of this opportunity by retaining those people who have returned to golf or tried it for the first time. We can achieve this by offering a variety of attractive and flexible options that encourage golfers to play more regularly and enjoy its many health and wellbeing benefits with family and friends.”

SMS collected participation data reported by national federations in different regions around the world, using nationally representative studies and expert estimates to calculate the global number of total golfers.

Regions experiencing the largest rises include Asia (20.9 million to 23.3 million); Europe (7.9 million to 10.6 million – driven largely by Great Britain and Ireland 3.6 million to 5.7 million); and North America (29.9 million to 30.6 million).

The research figures indicate the growth trend began before Covid-19 and then accelerated during the pandemic as the popularity of golf grew due to golfers being able to socially distance in a safe outdoor setting and stay active to boost their physical and mental health.

In Great Britain, the number of adults playing a nine or 18-hole course began to gradually increase before the onset of Covid-19, rising from 2.5 million in 2017 to 2.8 million in 2018, then to 3 million in 2019, before surging to 5.2 million in 2020.

Following the easing of lockdown restrictions, The R&A sought to carry out additional research into this rise in demand and how different types of golfers were engaging with the sport.

The Post Covid Opportunity Research, along with findings from Bayfirth Research, details experiences of golfers during the pandemic, motivations for playing and long-term plans for the future. Among new golfers, 98% of those interviewed identified they are enjoying playing golf and 95% see themselves playing golf for many years to come.

The research also outlined recommendations clubs can take to retain new players, including feeling welcome and valued; a friendly culture and relaxed atmosphere; participation options based on ability and experience; good customer service; having an efficient booking system; the quality and maintenance of the course; and, importantly, playing in an encouraging environment.

The R&A also launched a Covid-19 Support Fund to help golf deal with the impact of the pandemic, with the £7 million funding package largely aimed at national federations and other affiliated bodies in Great Britain and Ireland.

Further support for national federations is set to come in 2022. The R&A is creating a series of new assets to help market and promote the sport so that more people are encouraged to take up golf and existing golfers are retained.

Golf participation strong in first half of 2023

Golf's leading provider of tee time management booking technology, BRS Golf, and the world's biggest tee time marketplace, GolfNow, have reported a strong first half of 2023 for both member play and visitor play in the UK and Ireland, with more rounds played so far this year than in the whole of 2019.

Together BRS Golf and GolfNow provide tee time booking solutions to 1,500 golf clubs across England, Ireland, Northern Ireland, Scotland and Wales, making the tech giant one of the largest and most trusted sources of participation data for golf in the British Isles.

Member participation remains strong

1 January - 30 June 2023, BRS Golf processed 13.6 million member rounds. A 13% increase vs the same period in 2022.

Comparing rounds booked in 2023 with pre-pandemic levels in 2019, an extra 6.7M were played in 2023. To put the total rounds into context, there have been more rounds played in the first half of this year than the whole of 2019.

Member rounds by country

- England: 6.6 million rounds
- Ireland: 2.9 million rounds
- Scotland: 2.3 million rounds
- Northern Ireland: 1 million rounds
- Wales: 723,000 rounds.

Overall membership numbers see small decline but still buoyant

In 2022 we thought the cost of living crisis might precipitate a decline in membership, however in 2023 we have seen only a small drop (less than 1%) in registered members. Overall membership numbers are healthy as golfers continue to renew.

The following numbers are based on those clubs who were live and transacting in December 2022, and do not include any new clubs signed up to BRS Golf over Q1 and Q2 2023. Based on this sample set of clubs, the total registered members number has dropped by 4,000 over the course of January - June 2023.

- 41 percent of these lost members have been in Ireland and Northern Ireland
- 17 percent in Scotland
- 42 percent in England
- Wales remains flat.

In Ireland and Northern Ireland there were 15 clubs who lost 100+ members and 25 who have lost more than 50 but less than 100. While in Scotland, nine clubs saw a decrease of more than 100 members and 14 clubs more than 50, but less than 100 members. And in England, 25 clubs saw their member numbers decline by 100+ and 24 clubs by more than 50 but less than 100 members. Taking a closer look at England, the drop in registered members has been felt mostly in the South and the Midlands, with the North of England seeing a small increase in total registered members.

Appendix D

Initial Concept Design for Relocating Gravesend Golf Centre

