



Examination of the Horsham District Local Plan 2030-2040

Matter 6a: Strategic Policy HA2: Land West of Ifield

1.1 Homes England (HE) supports the allocation of HA2. The Site is controlled by HE as a single public sector landowner and is the subject of a submitted hybrid planning application (DC/25/1312). Key infrastructure funding has been approved by His Majesty's Treasury (HMT), education provision is agreed in principle with the Department for Education (DfE) and WSCC. There are no known technical constraints prevent delivery. At least 2,500 dwellings are anticipated to be delivered by 2040.

i. Transport and movement:

a. the delivery and funding of the link road, safeguarding and areas of search

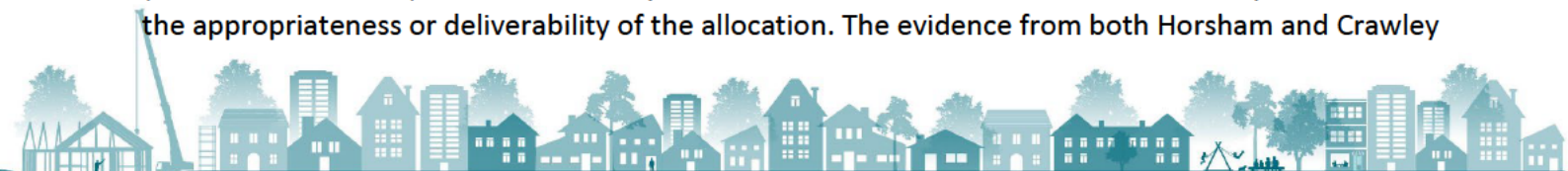
1.2 The evidence demonstrates that the transport infrastructure required to support Policy HA2 is deliverable to facilitate large scale housing delivery within the Plan period. Homes England will fund and deliver the Phase 1 infrastructure, comprising the Primary Road and Crawley Western Multi-Modal Corridor (CWMMC) through the site, together with associated bus, cycle, pedestrian, drainage and flood mitigation works. These works have HM Treasury-approved National Housing Delivery Fund (NHDF) funding and are not reliant upon third-party delivery or uncommitted funding sources.

1.3 The safeguarding and Area of Search (AoS) provisions in Policy HA2 provide a proportionate response to ensure the potential longer-term delivery of identified strategic transport priorities. Evidence confirms that land can be safeguarded for a future CWMMC extension to the south without prejudicing delivery of HA2, and the safeguarded alignment is compatible with Crawley Borough Council's northern section option testing.

1.4 Neither the Horsham Local Plan evidence base nor the evidence supporting application DC/25/1312 identifies a requirement for transport infrastructure beyond the proposed Phase 1 works to support the allocation during the Plan period. Any future CWMMC extension would relate to longer-term growth options being considered through the emerging Horsham Local Plan 2045. The AoS strikes a balance between protection and flexibility to enable this.

b. the impact on the road system including Crawley

1.5 The highway impacts of HA2 have been comprehensively assessed through the Horsham Transport Assessment (June 2026), which recognises increased traffic and pressure on some junctions in Crawley (Sections 6.5 and 7.6). However, the key issue for the Examination is whether these impacts undermine the appropriateness or deliverability of the allocation. The evidence from both Horsham and Crawley





strategic transport modelling concludes that, whilst some impacts are expected, they are either not severe in NPPF terms and/or can be appropriately mitigated through sustainable transport measures, targeted improvements and ongoing monitoring.

1.6 This conclusion is also consistent with Crawley Borough Council's Local Plan evidence base¹, which tested growth of up to 3,750 homes west of Crawley (Local Plan Scenario 3) and found that impacts could be accommodated through sustainable transport interventions and mitigation. The Transport Assessment² supporting application DC/25/1312 similarly identifies a package of measures to deliver modal shift and mitigate highway impacts, concluding that the development fully satisfies the relevant NPPF tests. Future impacts will be managed through a monitor & manage framework in consultation with HDC and WSCC, to ensure the required an appropriate level of modal shift is realised and mitigation for impacts within the wider highway network are delivered in a timely manner. This approach is enshrined in the NPPG and will be secured as part of a future s106 agreement.

c. sustainable transport and active travel measures and mitigation measures

1.7 The sustainable transport strategy is integral to HA2 and seeks to maximise travel by walking, cycling and public transport in accordance with Policies SP24 and HA2(8) and the West Sussex Transport Plan.

1.8 Evidence supporting the Local Plan and application DC/25/1312 demonstrates that the required modal shift will be achieved through delivery of walking and cycling improvements linked to the Crawley LCWIP, enhancements to Ifield Station, improved bus services and high-quality active travel connections.

1.9 Delivery will be supported through a Sustainable Transport Fund and Monitor and Manage framework agreed in principle with HDC and WSCC. The evidence demonstrates that the necessary measures are deliverable and appropriately funded.

ii. The delivery of facilities and their funding and phasing, including:

a. health, education

2.1 Homes England has secured Business Case approval and funding for the infrastructure and planning obligations consistent with requirements in HA2 and supporting IDP. It has engaged extensively with key service providers and is committed to delivering, or facilitating the delivery of, the necessary infrastructure through a future CIL Regulation 122-compliant s106 Agreement.

2.2 **Health** – building on its strong relationship with NHS Sussex and the ICB, through working collaboratively on the delivery of new healthcare facilities at Brookleigh in mid-Sussex, HE is actively engaged with the ICB to secure primary healthcare facilities on-site, as part of HA2. The exact requirements will be defined in a S106 agreement, following agreement that that the provision is CIL

¹ [Microsoft Word - Crawley Transport Study Project Report v7 0.docx](#) Para 6.8 and Section 9

² [Land West of Ifield](#) Transport Assessment Table 12.1





Reg 122 compliant. noting that acute healthcare services, including Crawley Hospital, are funded separately through NHS processes.

- 2.3 Leisure Centre** – HE has committed to provide a fully serviced leisure centre site within the Neighbourhood Centre, capable of accommodating a c.3,400sqm facility. The site will be offered to the Council at nil cost, alongside a construction contribution, with delivery secured through a marketing strategy. Soft Market Testing has taken place with HDC and leisure operators to identify optimum provision and provide certainty that any future form of provision will both meet local needs and also be commercially viable.
- 2.4 Primary School** – A serviced primary school site for up to 3FE, including capacity for early years and SEND provision, is secured within the masterplan and agreed with WSCC. The site has been identified through ongoing dialogue with WSCC and associated capital contributions will be secured through the s106 Agreement. WSCC has confirmed that one primary school is sufficient to meet the Development's needs.
- 2.5 Secondary School** – A secondary school site has been agreed with WSCC and the DfE, providing capacity to meet both development-generated demand and wider education needs in the Crawley area. The enlarged site will be funded and delivered through the Free Schools Programme and is supported by DfE, as per confirmation previously submitted to the Examination, for 6FE school and sixth-form provision, while under agreed Heads of Terms, Homes England will provide a serviced site as part of Phase 1 infrastructure delivery and fund additional 2FE expansion capacity and SEND as required. The school is intended to open ahead of first occupations, providing a high degree of certainty over education delivery and a significant benefit of the allocation given existing education pressures across Crawley and Northern West Sussex.
- 2.6 Early Years** – In addition to early years provision within the primary school, application DC/25/1312 proposes a further early years facility within the Neighbourhood Centre, agreed with WSCC. Delivery will be market-led, with the S106 Agreement securing appropriate marketing, funding and delivery mechanisms. If no commercial operator is secured, the site and associated funding could then be offered to WSCC to support provision.
- 2.7 Other community facilities and services** will be secured either through s106 or via CIL contribution.

b. Retail

- 2.8** In line with Policy HA2, retail provision has been informed by a Retail Impact Assessment, which demonstrates sufficient demand for the proposed provision and no significant adverse effect on nearby centres. Should a single foodstore operator not come forward, flexibility is retained within the DC/25/1312 HoTs for alternative town centre, commercial, community, residential or mixed-use development.





c. Employment

- 2.9 As set out in submissions on Matter 5a, West of Ifield's strategic location and strong sustainable transport links to major employment centres, including Gatwick and Manor Royal, will provide residents with access to a wide range of jobs from the outset. Homes England will also deliver on-site employment opportunities, including a 2.2ha employment area, SME and flexible workspace, an Innovation Centre, and additional Class E uses within the Neighbourhood Centre.
- 2.10 The proposed employment provision is supported by a robust Employment and Economic Development Strategy, Innovation Strategy Framework, Marketing Strategy Framework and Local Employment Framework. In addition to creating new jobs on-site, the development will also generate significant construction employment and strengthen the labour supply available to key economic centres, delivering substantial economic benefits. These wider economic benefits necessarily attract significant weight in support of the allocation.

iii. Impacts and mitigation:

a. the character and appearance of the area

- 3.1 There is a clear aspiration for HA2 to be landscape-led, retaining the vast majority of existing landscape features, including hedgerows, trees, boundary vegetation and watercourses. This long-established principle has informed development of the HE masterplan such that it can be demonstrated that at least 50% of the site can be retained as open space.
- 3.2 As with any edge of settlement scheme, there will be impacts on the landscape. HDC's Sustainability Appraisal concludes the overall impact is likely to have a strong positive effect on housing delivery; however, mitigation measures will be required to address the environmental impacts of development in this location including landscape impacts. Impacts have been assessed as part of application DC/25/1312; with detailed mitigation identified that demonstrates that retained landscape features, along with the maturing of the new landscape proposal would provide visual containment. Impact on the landscape both within the site and wider area can be expected to reduce over time, with any residual effects limited to receptors within and immediately adjacent the Site, which is proportionate and acceptable for an allocation of this scale.
- 3.3 Whilst some landscape effects are inevitable given the scale of the allocation; the evidence demonstrates that impacts can be appropriately mitigated and do not represent a constraint to the soundness, effectiveness or deliverability of HA2.

b. access to open space, including the closure of the golf course

- 3.4 Whilst the allocation will result in the loss of the golf club, the relevant question for the Examination is whether the overall package of sport, recreation and open space provision delivered through HA2





represents an appropriate and policy compliant replacement and whether the loss of the existing facilities (i.e. the loss of land and buildings) is decisively outweighed by the benefits of the allocation. The evidence demonstrates that it emphatically does.

- 3.5 The Site is currently a predominantly private greenfield site with limited public access. Whilst a small number of Public Rights of Way cross the Site, access to most of the land is restricted and does not have public access. In contrast, the landscape-led masterplan will deliver extensive publicly accessible green infrastructure, recreation space and sports facilities, providing a substantial increase in the quantity, accessibility and diversity of recreational opportunities available to both new and existing communities.
- 3.6 Consistent with HA2 requirements, DC/25/1312 will deliver approximately 72.5ha of natural and semi-natural greenspace, 26ha of parks and gardens, extensive walking and cycling routes, children's play facilities, allotments, sports pitches, a sports hub, pavilion facilities and other multifunctional recreation space. The scale of provision significantly exceeds that currently available to the public and creates a recreational resource of strategic importance for both Horsham District and Crawley. It will comprise a major recreational and leisure opportunity to current and future residents in the area.
- 3.7 HE doesn't allege that Ifield Golf Course is clearly surplus to golfing requirements. The evidence submitted to the Local Plan and subsequently updated in application DC/25/1312 (see **Appendix A**) demonstrates that the impact of any loss is capable of being appropriately mitigated and is decisively outweighed by the benefits of the proposed allocation (evidenced through the application). The detailed Sports and Recreation Strategy submitted for application DC/25/1312 (part B of the Golf Needs Assessment) demonstrates that the proposals will deliver substantial replacement and enhanced sports provision, alongside financial contributions towards wider sporting and recreational facilities. **See Appendix B** for a summary table setting out the open space mitigation proposed on site is appended, with a land use budget plan submitted for DC/25/1312 (dwg ref. P12061-00-001-GIL-0110, REV 04).
- 3.8 The assessment of this issue patently should not be limited to the loss of a single private sporting use. The overall implications of the allocation must be considered in the round as per the NPPF. The evidence demonstrates that HA2 will provide a significant net gain in publicly accessible recreation space and sporting opportunities, benefiting a substantially wider section of the community than the existing use. The proposals therefore deliver a much broader and far more inclusive recreational offer that supports health, wellbeing and active lifestyles.
- 3.9 Taken as a whole, the proposals will provide a clear and substantial enhancement in the quantity, accessibility and diversity of sport and recreation provision available across the catchment and satisfy the requirements of paragraph Paragraphs 99(b) and 99(c) of the NPPF (Sept 2023). The loss of the golf course does not undermine the soundness, effectiveness or deliverability of HA2. The benefits of the proposed new recreation area will be to a much wider part of the local populous.





c. wildlife and biodiversity

- 3.10 The Site contains ecological features ranging from negligible importance to nationally important assets, including ancient woodland and veteran trees. Policy HA2, alongside other strategic policies in the Plan, recognises the need to protect and give full considerations to these issues. Given the advanced stage of application DC/25/1312, ecological constraints are now well understood, and extensive engagement with Natural England and other stakeholders has informed mitigation measures, including the delivery of at least 10% Biodiversity Net Gain and wider ecological enhancements. There are no 'show stoppers' nor an objection from NE to the allocation.
- 3.11 The policy provides sufficient flexibility to secure appropriate mitigation for the site's ecological constraints. Following engagement with Natural England (NE), the masterplan has evolved to reduce development in the southern part of the Site and incorporate dark corridors and other mitigation measures. While this has reduced the developable area, the flexibility within the masterplan enables policy-compliant development without affecting deliverability.

d. the setting of heritage assets

- 3.12 The setting of the Scheduled Monument at Ifield Court, Grade I Listed Church of St Margaret and Ifield Conservation Area have been key considerations throughout the masterplanning process. The alignment of the CWMCM and associated mitigation has been developed to minimise heritage impacts and retain the area's open, parkland character. With the benefit of heritage impacts being considered and development of a Site wide Design Code as part of DC/25/1312, there is broad consensus with Historic England, that as a result of the Development, there would be no more than low end harm within the 'not substantial' harm category to heritage assets of significance, thereby demonstrating the ability to meet requirements of HA2 and other strategic policies in the Plan – consistent with the SA conclusions. There is no objection from Historic England to the allocation.

e. climate change mitigation, drainage, flood risk and utilities

- 3.13 **Climate change mitigation** – Climate change considerations have informed the preparation of the masterplan from the outset. HA2 provides a significant opportunity to support the Plan's climate objectives through the delivery of energy efficient homes, sustainable transport infrastructure, extensive green infrastructure and climate resilient design. HE commitments to achieving high quality, sustainable development is underpinned by its Strategic Plan (2025 – 2030)³ with clear KPI commitments in relation to climate change and adaptation.
- 3.14 **Flood Risk and Drainage** – while flood risk is a key consideration, this is limited to specific parts of the allocation and is reflected in both the allocation's housing capacity and requirements in HA2 for it to be considered at the application stage. Flood risk from both fluvial and surface water sources has been fully considered as part of the Local Plan SFRA, demonstrating that development can and should

³ [Homes England Strategic Plan 2025 to 2030](#)





be accommodated and further testing required at a future stage. The comprehensive Flood Risk Assessment and drainage strategy accompanying DC/25/1312, provides further confidence that higher risk development can be located outside of higher flood risk areas and surface water adequately managed in accordance with NPPF and NPPG guidance. Noting updated Environment Agency Flood Maps for Planning information were published in May 2026, this does not materially alter the findings of the August 2025 Flood Risk Assessment, and the proposed mitigation measures and conclusions remain valid. The proposals will neither give rise to a risk of onsite flooding nor an exacerbation of off-site flooding. There is no objection from the Environment Agency to the allocation or DC/25/1312.

3.15 Utilities - Throughout development of the masterplan and DC/25/1312, there has been ongoing and continuous engagement with relevant utility providers. A number of upgrades and new points of connection are required to support development. These are fully understood and a Utilities Strategy has been prepared to ensure adequate capacity as the scheme is built out over the Plan period. For upgrades required to be provided by the development, this funding has been secured as part of Ph1 Infrastructure works, for HE to secure or directly deliver the necessary upgrades. Where capacity is required from third party statutory providers, HE can utilise its wider experience from other sites and involvement in the New Homes Accelerator⁴ to ensure timely delivery. Specifically in relation to Thames Water and Southern Water, neither utility provider has identified that capacity cannot be provided or objects to the allocation or DC/25/1312. Discussions are ongoing regarding delivery mechanisms and timing, rather than whether capacity can be provided. Notwithstanding this, there is sufficient flexibility within the local plan trajectory to ensure it can be delivered at the appropriate time which would not impact the deliverability of the Plan.

iv. Delivery:

d. Masterplanning

4.1 HA2 benefits from a high degree of delivery certainty. Homes England controls the necessary land, has secured necessary funding and is progressing application DC/25/1312. As master developer it will directly deliver key infrastructure and manage build out through development agreements with housebuilders.

4.2 The masterplan underpins a funded delivery strategy focused on accelerating housing delivery while maintaining a strong emphasis on placemaking, design quality, stewardship and adherence to the Site Wide Design Code.

4.3 HA2 will make a significant contribution to the District's housing needs, with capacity for 3,000 homes, including at least 2,500 by 2040. It is also expected to deliver policy-compliant affordable housing across a range of tenures. The allocation therefore represents a key component of the housing

⁴ [New Homes Accelerator programme - GOV.UK](https://www.gov.uk/government/programmes/new-homes-accelerator)





trajectory and will make a substantial contribution to housing choice and affordable housing delivery across the District, which attracts substantial weight in support of the allocation.

b. Commencement and build out rates

4.4 HE's approvals enable it to lead delivery over the initial stages of the allocation, which may otherwise be affected by viability or market limitations. In a master-developer capacity, HE is committed to bringing forward development within the first 5 years of the Plan period and is at an advanced stage of securing the necessary planning permission and contractor appointments to enable this. While HE does not build houses, it is exceptionally experienced as a master development and actively works with housebuilder partners to de-risk and support delivery. Early SMT engagement has identified a strong appetite from a range of housebuilders to build out the early phases of the scheme. HE will use existing contractual arrangements to provide certainty on deliverability and ensure wider objectives and placemaking objectives are realised.

4.5 An updated programme, trajectory and phasing plan and are included at **Appendix D**, which builds on information provided to Icenl for the Housing Delivery Study in April 2026. HE's ability to accelerate delivery has been addressed in previous representations. Additional evidence of delivery rate at Brookleigh, Mid Sussex, are enclosed.

c. funding and phasing of infrastructure and mitigation measures

4.6 HMT funding has been secured to support delivery of a policy-compliant development in accordance with NPPG Paragraph: 002 Reference ID: 10-002-20251216. Funding assumptions have been informed by detailed cost planning, viability testing, risk analysis and market engagement, providing confidence that the allocation can be delivered over the Plan period. Other relevant funding and delivery mechanisms are set out above. Regular market engagement has demonstrated a strong interest in delivery of the development.

d. Potential delivery impediments

4.7 HE's statutory objectives require it to deliver new homes and meet wider sustainable and development objectives⁵. Within this context, it has proactively addressed potential barriers through preparation of the Local Plan evidence base and application DC/25/1312. The evidence demonstrates that land ownership, funding, infrastructure requirements and planning progress are sufficiently advanced to support delivery.

4.8 Matters raised through the Examination relate to normal implementation processes associated with major developments, including legal agreements, utility connections and planning approvals. They do not represent fundamental barriers to delivery and do not undermine the effectiveness or deliverability of HA2.

⁵ [Homes England Framework Document 2023.pdf](#)





Conclusion

- 5.1 Whilst the development of the Site will inevitably result in change, the evidence demonstrates that potential impacts have been appropriately assessed and can be avoided, mitigated or managed through the measures identified within the allocation, supporting evidence base and planning application process. Taking the evidence as a whole, HA2 can deliver a sustainable development supported by the necessary infrastructure, community facilities and mitigation measures. There is therefore no evidence before the Examination which indicates that HA2 is either undeliverable or incapable of being developed in a sustainable manner. To the contrary there is strong evidence that the proposals are deliverable and that there are no show stoppers which would preclude its delivery.
- 5.2 HE controls the Site, funding is secured for key enabling infrastructure, and planning is already progressing. There is therefore a high degree of confidence that HA2 will deliver housing and supporting infrastructure in accordance with the Local Plan trajectory and should remain a key component of the Plan strategy.

Appendices:

- A. HE response on England Golf (July 2026)
- B. Open space provision table
- C. High level programme with trajectory, updated phasing plan and Brookleigh delivery rates evidence





Appendix A - HE response on England Golf (July 2026)





Planning Application Ref: DC/25/1312

Land West of Ifield – Response to England Golf Consultation

July 2026

1. Introduction

- 1.1. England Golf maintains its objection to the proposed development at Land West of Ifield on the basis that the loss of Ifield Golf Club (IGC) would conflict with Paragraph 104 of the National Planning Policy Framework (NPPF). In summary, England Golf contends that the application fails to demonstrate that displaced demand can be accommodated within the existing provision, that the supply and demand are balanced within the agreed catchment, and that no adequate mitigation strategy has been identified.
- 1.2. Homes England does not agree with this position. It is considered that England Golf's objection does not fully reflect the updated Golf Needs Assessment (March 2026) or the wider body of supporting evidence submitted with the planning application. In particular, the objection places disproportionate weight on a narrow interpretation of capacity, displacement, gives limited regard to the comprehensive mitigation package and broader improvements to sport and recreational provision secured through the development proposals.
- 1.3. Furthermore, England Golf's response reflects its role as a governing and advocacy organisation for affiliated golf clubs. As such, it places a strong emphasis on the retention of existing facilities, with more limited consideration given to how participation growth, accessibility, and facility sustainability can be supported through a broader and more flexible approach to provision. This contrasts with England Golf's own strategic objectives, which promote a more inclusive, accessible and sustainable model of golf participation.
- 1.4. When the evidence base is considered in the round, it is clear that England Golf's objection overstates the scale of impact arising from the loss of IGC, relies on conservative and, in some cases, inflated assumptions regarding displaced demand, and does not properly account for the secured mitigation measures and wider benefits of the scheme.





2. Policy Compliance (NPPF Paragraph 104)

- 2.1. The assessment of this application against Paragraph 104 of the NPPF is central to the consideration of England Golf's objection.
- 2.2. As set out within the planning application it is not contended that IGC is surplus to requirements under Paragraph 104(a). Rather, the planning application seeks to demonstrate compliance with Paragraphs 104(b) and 104(c).
- 2.3. In this context, it is important to be clear as to the policy test. As is well established through case law and appeal decisions, Paragraph 104 does not require the applicant to demonstrate that all displaced users can be accommodated within existing provision, nor does it require like-for-like replacement of a golf facility in all circumstances. Instead, the policy allows for the loss of existing sports provision where either:
- replacement provision of equivalent or better quantity and quality is secured in a suitable location; or
 - the benefits of the development clearly outweigh the loss of the facility.
- 2.4. This reflects the need to consider proposals in the round, having regard to both mitigation and overall planning benefits.
- 2.5. England Golf's objection is therefore predicated on an incorrect application of policy. Its focus on whether all displaced demand can be accommodated, and whether a theoretical capacity surplus can be demonstrated, elevates a single evidential issue into a policy requirement that does not exist within the NPPF.
- 2.6. When assessed against the relevant policy framework, the proposal clearly satisfies the requirements of Paragraph 104(b) and 104(c):
- A robust and deliverable mitigation strategy is secured through the Section 106 Agreement, including targeted investment in golf facilities within the catchment and flexibility to respond to specific capacity and quality improvements; and





- The development delivers a substantial uplift in the quantity, accessibility and diversity of sport and recreational provision, including formal sports facilities, extensive publicly accessible green infrastructure, and significant new opportunities for participation; and
- The wider benefits of the scheme, including strategic housing delivery and supporting infrastructure, are significant material considerations which weigh decisively in favour of the development.

2.7. In this context, the loss of IGC must be assessed as part of the overall planning balance, rather than in isolation. When this is done, it is clear that the proposal not only mitigates the impact of the loss but delivers a materially improved and more accessible recreational offer across the catchment.

2.8. Accordingly, there is no conflict with Paragraph 104 of the NPPF, and England Golf's objection does not provide a sound basis to conclude otherwise.

3. Capacity within the Catchment

3.1. Turning to the issue of capacity, England Golf contends that the assessment does not robustly demonstrate the ability of the catchment to accommodate displaced demand and relies on insufficient indicators such as absence of waiting lists. However, as set out above, this approach reflects a misapplication of the test set out in Paragraph 104 of the NPPF. The policy does not require the applicant to demonstrate that all displaced demand can be fully accommodated within existing provision, nor to evidence a definitive surplus of capacity. Rather, the relevant consideration under Paragraphs 104(b) and 104(c) is whether the impact of the loss is acceptable when assessed in the round, having regard to the availability of alternative provision, the effectiveness of mitigation, and the wider sport and recreation benefits of the scheme. In this context, capacity evidence forms part of a broader assessment of supply and demand and should not be treated as a standalone or determinative test, as implied by England Golf.

3.2. In response to England Golf's position, the evidence base demonstrates that the assessment is not reliant on a single or limited indicator of capacity but draws on a range of quantitative and qualitative sources. This includes direct engagement with clubs, including Tilgate and Rookwood, as well as analysis of England Golf's own data where available. Taken together, this evidence indicates a clear trend of declining average membership levels across the catchment in recent years, alongside a stated willingness from clubs to accommodate additional members. This provides a robust basis to conclude that there is a reasonable prospect of available capacity within the 20-min catchment to absorb displaced demand, contrary to the position advanced by England Golf.





- 3.3. Further to this, engagement with clubs across the assessment area indicates that facilities are actively seeking to attract additional members and have not identified operational constraints that would prevent this. This real-world evidence is inconsistent with England Golf's assertion that clubs are operating at or near capacity. In addition, the catchment contains a diverse range of alternative provision, including municipal and proprietary courses offering varying price points, access arrangements and course formats. This diversity provides genuine flexibility and choice for displaced users, reinforcing the conclusion that the market can accommodate a redistribution of demand.
- 3.4. Whilst it is accepted that tee-sheet data is commercially sensitive and not publicly available, there is no substantive evidence provided by England Golf to demonstrate that the majority of facilities are operating at or near capacity, or that a significant number of displaced members could be accommodated within the assessment area or just outside of it.
- 3.5. In the absence of such evidence, there is a clear and robust basis to conclude that headroom exists within the network, and that supply and demand are broadly balanced.

4. Displaced Demand

- 4.1. In relation to displaced demand, England Golf adopts a worst-case assumption that all 590 members and associated users of IGC would require re-accommodation within the 20-minute catchment. England Golf's assessment of displaced demand is based on an inflated and forward-assumed membership figure. IGC has confirmed a current registered membership of approximately 555, with the 590 figure representing an assumed future position based on typical seasonal growth rather than the actual baseline at the point of assessment. This materially undermines the reliability of England Golf's capacity analysis.
- 4.2. Furthermore, even when applying England Golf's own assumptions, its evidence suggests that there is available capacity within the catchment of between 200 and 400 places. This indicates that a substantial proportion of existing members could be accommodated within the catchment, with any residual shortfall significantly lower than implied. When this is considered alongside the varied composition of membership, including flexible, social and infrequent users who do not generate regular playing demand, the level of effective displacement is reduced further. In practice, this demonstrates that the number of members unable to be accommodated within the catchment is likely to be limited, and materially below the headline figures relied upon by England Golf.





4.3. This headline figure also includes a range of membership categories, including social, flexible and infrequent users, and therefore does not equate to 555 (or England Golf's inflated figure of 590) active golfers generating regular playing demand. Accordingly, there is no requirement to re-accommodate the full headline membership total as active displaced demand.

4.4. The most recent membership data (May 2026) for Ifield Golf Club indicates a lower overall membership total than assumed and, importantly, a significantly smaller cohort of full, actively participating members. The composition of membership for 2025 and 2026 is shown in the charts below, which distinguish between membership categories and demonstrate that not all members generate regular playing demand.

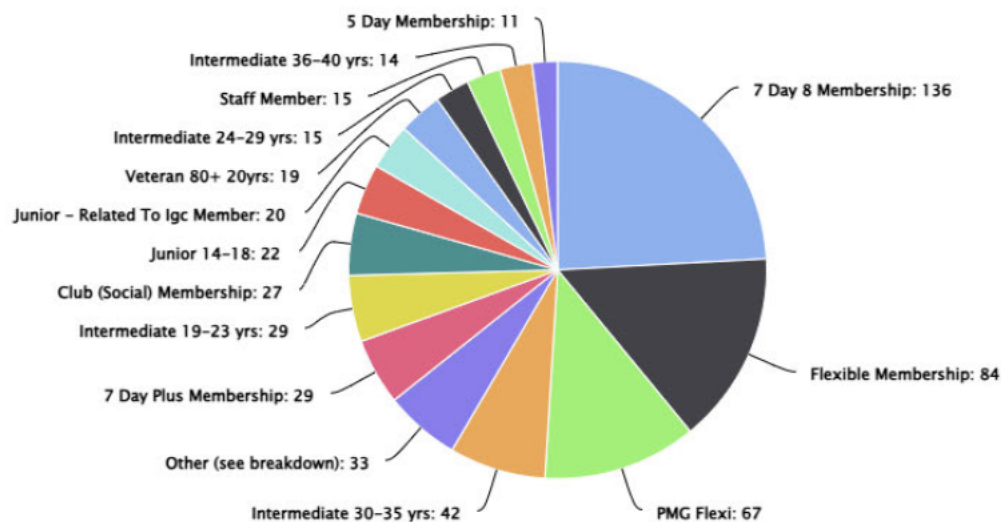


Figure 1 - 2025 Composition of Membership



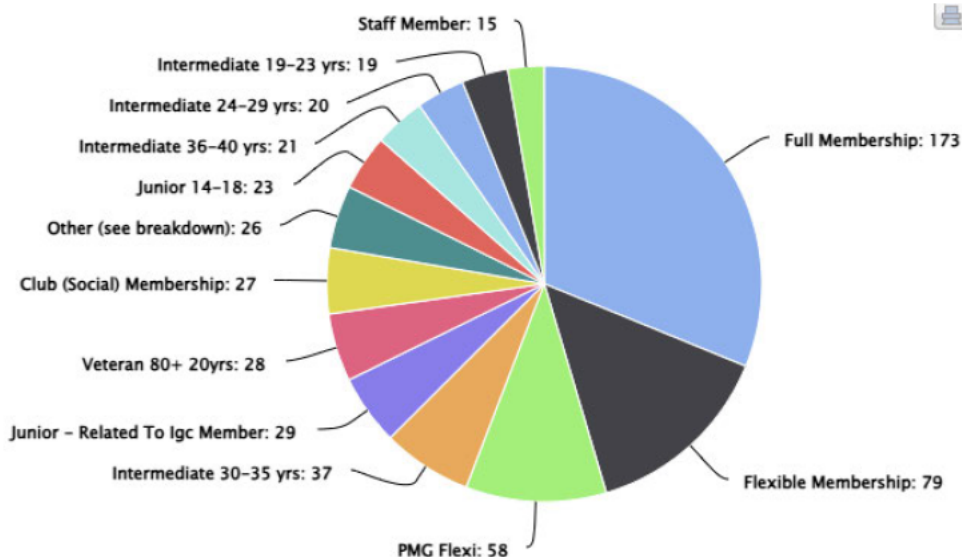


Figure 2 - 2026 Composition of Membership

- 4.5. Furthermore, it cannot be assumed that all members will continue participation following closure, nor that those who do will seek alternative provision within the defined 20-minute catchment. A proportion of members travel from outside (c.165 members) the core catchment as identified in the Golf Needs Assessment (March 2026), and a wider network of facilities exists beyond it which would reasonably accommodate some redistribution of demand. In addition, normal attrition rates and changes in participation behaviour are likely to further reduce the level of effective displacement.
- 4.6. When these factors are taken into account, the realistic level of displaced demand, or those that may not be able to be accommodated within the IGC catchment area is materially lower than the worst-case scenario advanced by England Golf and can reasonably be accommodated within existing provision across the catchment.
- 4.7. Accordingly, it is not necessary to assume that the full headline membership total equates to active displaced demand requiring re-accommodation. Rather, when the composition of membership, realistic patterns of redistribution, and identified capacity within the catchment are taken into account, the evidence indicates that the balance between supply and demand is, at most, marginal. This represents the appropriate baseline position against which the requirements of Paragraphs 104(b) and 104(c) of the NPPF should be assessed, rather than a binary test of whether all members can be directly accommodated within existing provision.





5. Accessibility

- 5.1. England Golf suggests that the consolidation of demand arising from the closure of IGC would lead to reduced pay-and-play access and increased pricing across remaining facilities. However, no substantive evidence is provided to support this assertion, and it is not borne out by the available evidence or operator engagement.
- 5.2. In practice, the catchment comprises a diverse range of facilities, including municipal, proprietary and member-based clubs operating across a broad spectrum of price points and access models. Engagement with operators does not indicate that facilities are operating at capacity or that there is a likelihood of uniform restrictions on access or increases in pricing as a consequence of the proposal. England Golf's position therefore relies on a hypothetical and unsubstantiated view of market behaviour, rather than evidence of actual constraints within the catchment.
- 5.3. Furthermore, the assertion that consolidation would necessarily reduce accessibility fails to take into account both the flexibility within the existing market and the mitigation package secured as part of the development. The proposals include targeted investment in golf provision within the catchment, which is capable of supporting improvements to capacity, quality and year-round usability. This has the potential to enhance the overall accessibility of golf provision, including opportunities for more flexible and inclusive participation.
- 5.4. More broadly, the assessment of accessibility should not be limited solely to the retention of a single golf facility. The scheme delivers a significant and measurable increase in publicly accessible sport and recreational provision, including formal sports facilities, a sports hub, extensive green infrastructure and over 11km of walking and cycling routes. When considered in the round, this represents a substantial enhancement in the accessibility, diversity and inclusivity of sport and recreation within the catchment.
- 5.5. Accordingly, there is no evidence to support England Golf's conclusion that accessibility would be reduced as a result of the proposal. On the contrary, when assessed holistically, the development delivers a materially improved and more accessible recreational offer, consistent with the objectives of Paragraph 104 of the NPPF.





6. Methodology and Catchment

- 6.1. In terms of methodology, England Golf criticises the planning application of the agreed 20-minute drive-time catchment and the inclusion of references to facilities beyond it. However, the assessment consistently applies the 20-minute drive-time catchment as the primary analytical framework, in line with the agreed methodology.
- 6.2. References to facilities beyond this area are clearly distinguished as contextual and are included to reflect real-world patterns of behaviour, rather than forming part of the core assessment of supply. This does not represent an inconsistency in approach, but rather a pragmatic recognition that catchments are not fixed or impermeable boundaries in practice. Evidence from the Golf Needs Assessment demonstrates that a proportion of IGC members already travel from outside the defined catchment, illustrating that golfers routinely access provision across a wider geography. The assessment therefore appropriately reflects actual user behaviour alongside the defined analytical framework.
- 6.3. England Golf's criticism also extends to the use of certain data sources, including Golfshake. However, this position represents a change in approach. England Golf has previously relied on such data within its own analysis, whereas in this instance it seeks to discount it without clear justification. As set out in the planning application, Golfshake data is used as a supplementary, contextual source and does not form a primary basis for conclusions on capacity or demand. Its inclusion provides an additional layer of user insight which, when considered alongside operator engagement and other evidence, strengthens rather than undermines the robustness of the assessment.

7. Regular Golfer Demand

- 7.1. With regard to the Regular Golfer Demand (RGD) model, England Golf concludes that a score above 100 indicates a deficit in provision and contradicts the assessment's findings.
- 7.2. Whilst the RGD index provides a benchmark endorsed by England Golf, it must be interpreted with caution and applied alongside local evidence. This is particularly relevant given that the model adopts broad assumptions regarding participation, including defining "regular" golfers at a relatively low threshold of activity, typically capturing individuals who may play as little as twice within a twelve-month period. As a result, the model is likely to overstate the level of regular demand placed on facilities and should not be relied upon in isolation as evidence of a meaningful shortfall in capacity.





7.3. A marginal increase above the equilibrium point does not, in itself, demonstrate a significant shortfall in capacity, particularly where qualitative evidence indicates availability within the market. The model does not account for behavioural factors, cross-boundary usage, or the diversity of provision. As such, the RGD outputs do not provide a robust basis to conclude that the impact of closure would be unacceptable.

8. Demand Trends and Future Demand

8.1. In relation to demand trends, England Golf relies on national data suggesting stabilisation or growth in participation.

8.2. However, local evidence, including data provided by England Golf itself, indicates declining membership levels across the catchment in recent years. The assessment appropriately gives weight to this local evidence. Whilst future population growth is acknowledged, any uplift in demand is likely to be modest and offset by normal attrition rates.

8.3. Importantly, existing provision, when considered alongside the identified headroom within the catchment and the flexibility of the market, is capable of accommodating reasonable future demand. As set out above, the current supply–demand position is, at most, marginal, with evidence of available capacity across a number of facilities and a demonstrated willingness from operators to accommodate additional members. This provides a baseline level of resilience within the network. In addition, the mitigation package secured through the development, including targeted investment in golf facilities, will support improvements to capacity, playability and year-round usability, thereby increasing the effective supply available to meet both existing and future needs.

8.4. Whilst population growth associated with the development is acknowledged, this must be viewed in the context of realistic participation rates, normal patterns of attrition, and the flexible redistribution of demand across a varied network of provision. When these factors are taken together, there is a robust basis to conclude that future demand can be accommodated without giving rise to a material shortfall in provision.





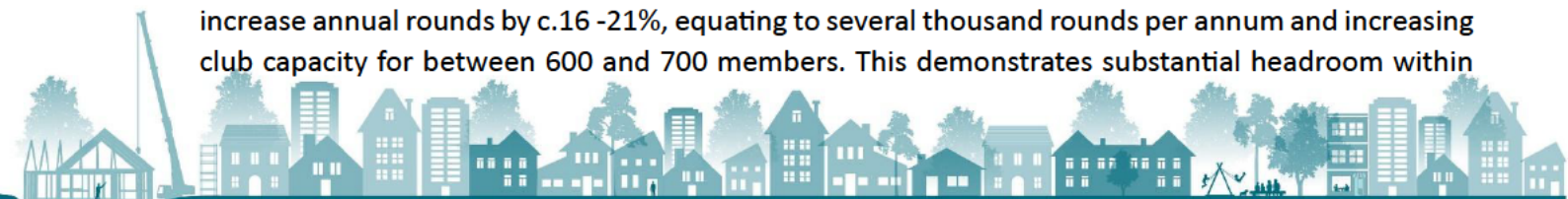
9. Mitigation

- 9.1. On the specific issue of golf, England Golf's assertion that no adequate mitigation is proposed is incorrect and not supported by the evidence. The planning application is underpinned by a Golf Needs Assessment, which provides a detailed, sport-specific analysis of supply and demand within the relevant catchment. This work identifies the anticipated impact of the development on golf participation and capacity, and sets out an appropriate and proportionate mitigation approach.
- 9.2. More broadly, the development is supported by a comprehensive and enforceable package of sport and recreation infrastructure, to be secured through a Section 106 Agreement. This forms the principal mechanism for delivering compliance with Paragraphs 104(b) and 104(c).
- 9.3. The Infrastructure Delivery Plan confirms that this mitigation has been developed through a robust assessment of population growth and resulting infrastructure needs. It ensures that both new and existing communities are adequately served through the provision and enhancement of sport and recreation facilities. This includes both golf-specific mitigation, in the form of financial contributions informed by the Golf Needs Assessment, and the provision of wider sport and recreation infrastructure.
- 9.4. The development is underpinned by a comprehensive and enforceable package of infrastructure proposed to be secured through a Section 106 Agreement, which provides the principal mechanism for delivering the sport and recreation strategy required to satisfy Paragraphs 104(b) and 104(c). The Infrastructure Delivery Plan confirms that mitigation has been developed through a robust assessment of population growth and resulting infrastructure requirements, ensuring that both new and existing communities are adequately served. This is supported by the Golf Needs Assessment, which provides a detailed sport specific assessment of supply and demand within the catchment and identifies an appropriate mitigation approach.
- 9.5. Earlier mitigation iterations identified site-specific mitigation options, including potential improvements at Tilgate Golf Centre, informed by the FMG technical work. Whilst these options demonstrated that there are opportunities within the catchment to enhance capacity and quality, they were necessarily high-level and subject to a number of unresolved constraints. In particular, the delivery of works at Tilgate would require a separate planning permission and is currently subject to uncertainty in respect of environmental considerations, including the absence of detailed arboricultural, ecological and ground condition survey information. At this stage, it cannot be concluded with certainty that the full extent of improvements previously identified could be delivered in practice.





- 9.6. In this context, the current submission adopts a more robust and deliverable approach to mitigation. In terms of on-site provision, the scheme delivers a substantial quantum of publicly accessible open space and green infrastructure which significantly exceeds policy requirements. The proposals include a minimum of 72.5 hectares of natural and semi-natural greenspace, compared to a requirement of approximately 16 hectares, and 26 hectares of parks and gardens, compared to a requirement of approximately 9 hectares.
- 9.7. This represents a significant overprovision against adopted standards and delivers a step change in accessible recreational provision within the catchment.
- 9.8. This is complemented by connective green infrastructure, multifunctional open space, allotments and provision for children and young people's play facilities, all delivered in accordance with defined standards and secured through parameter plans, conditions and obligations. These elements provide a wide-ranging and inclusive recreational offer that materially exceeds the scope of the existing single-use golf facility.
- 9.9. In addition, the scheme includes the delivery of formal sports infrastructure, including playing pitches, a sports hub with associated facilities, and provision for a new leisure centre designed to maximise community access. This includes the provision of supporting ancillary infrastructure, such as a pavilion with changing facilities, toilets and associated amenities necessary for the effective operation of outdoor sports provision. The Infrastructure Delivery Plan confirms that these measures are designed to meet both development-generated demand and existing deficiencies in provision within the wider area.
- 9.10. The proposals also include off-site financial contributions, to be secured via the Section 106 Agreement. This includes a golf facilities contribution (c.£1.4 million) directed towards capacity and qualitative improvements at existing courses within the catchment. It also includes contributions to other sports where enhancement of existing provision represents the most effective and sustainable form of mitigation, including rugby union and other club-based activities.
- 9.11. This allows for targeted and deliverable investment at appropriate facilities within the catchment to be made in consultation with relevant bodies so that benefits to golf can be maximised. The flexibility provided through the mitigation fund is a pragmatic response to delivering the needs and opportunities identified through the GNA and evidenced through the previously submitted FMG report, for example course improvements at Rookwood Golf Club, which has significant existing capacity, with approximately 85 season ticket holders, no waiting list, and future capacity to increase annual rounds by c.16 -21%, equating to several thousand rounds per annum and increasing club capacity for between 600 and 700 members. This demonstrates substantial headroom within





the existing network to accommodate displaced demand. However, should further engagement with bodies such as England Golf determine that alternative investment would better align with the long term needs and objectives for golf in the area, then the available funding can be targeted accordingly.

9.12. Crucially, all elements of this mitigation are secured, phased and deliverable, with clearly defined triggers linked to occupation and a mix of direct delivery and financial contributions. The Section 106 Agreement, informed by the Infrastructure Delivery Plan and Golf Needs Assessment, ensures that infrastructure is provided in a timely and coordinated manner alongside development, and that long-term management and stewardship arrangements are in place.

9.13. Taken together, the proposals do not merely offset the loss of IGC but deliver a substantial and measurable uplift in the quantity, accessibility and diversity of sport and recreation provision (including golf) across the catchment. In these circumstances, the requirements of Paragraphs 104(b) and 104(c) of the NPPF are satisfied.

10. Overall Planning Balance and Conclusion

10.1. The proposal must be assessed in the round, having regard to both the impact of the loss of IGC and the substantial benefits delivered by the development. The scheme provides a strategic mixed-use development including significant housing delivery, new formal sports provision, and extensive publicly accessible green infrastructure. This represents a step change in the quantity, accessibility and diversity of sport and recreational provision compared to the existing single-use golf facility, and these benefits would not arise in the absence of the development.

10.2. It is also material that IGC does not control the freehold of the site and has been served notice to vacate by the landowner. The continued operation of the facility is therefore not secured and is subject to constraints beyond the planning process. In this context, the proposal should not be viewed as the sole cause of the loss, but as providing a coordinated and deliverable strategy to manage an existing position whilst securing enhanced and more accessible sports and recreational provision in its place.

10.3. The evidence demonstrates that, whilst IGC is not surplus to requirements, the impact of its loss can be appropriately mitigated. The supply-demand position within the catchment is, at most, marginal, the level of effective displaced demand is materially lower than suggested by England Golf, and a robust and secured mitigation strategy is in place to support capacity and qualitative improvements across the network.





- 10.4. England Golf's objection is therefore not supported by the evidence and is founded on a misapplication of Paragraph 104 of the NPPF, placing undue weight on a narrow interpretation of capacity and full re-accommodation which does not reflect the policy test. It does not adequately account for the mitigation secured through the development or the wider benefits delivered.
- 10.5. For these reasons, it is considered that the position set out in the updated Golf Needs Assessment and supporting material remains robust. The requirements of Paragraph 104(b) and 104(c) of the NPPF are satisfied, and when assessed in the context of the wider planning balance, the loss of Ifield Golf Club is clearly and significantly outweighed by the substantial public benefits arising from the proposed development.
- 10.6. Accordingly, there is no sound planning basis on which to sustain an objection on sport or golf provision grounds.





Appendix B - Open space provision table





Appendix B – Open space provision

Facility type	Requirement for WOI development	Facilities over and above the baseline requirements for on-site provision
Sports Halls	2 court hall	4 – 6 court hall (therefore delivering 2 – 4 courts more than baseline requirements to address wider needs)
Swimming pools	0.33 pools to meet demand from new development - insufficient to require on site provision	Swimming pool – minimum 4no. 25metre lanes. Meets wider deficiencies in local area.
Studios	No clear quantitative guidance Studios required in line with population growth.	2 – 3 studios
Health and fitness	No clear quantitative requirement – infrastructure can meet additional demand. Development site is in area of deficiency in accessibility terms	Health and fitness studio circa (40 – 50 stations) – delivers above baseline requirements to address wider needs
Grass pitches	2 Adult Football, 3 Youth Football and 2 Mini Soccer pitches. New development generates demand for 1.94 cricket pitches	2 Adult (full size) Football, 2 Youth (seven-aside) Football and 2 Mini (five-aside) Football pitches. 1 cricket field with 7 wickets. Opportunities to provide rotate football and cricket pitch layouts, during winter/summer seasons.
3G AGP	0.38 AGP required by new development.	1no. 3G AGP and 1 MUGA – delivers above baseline requirements to address wider need.
Tennis	On site requirement for 2 courts generated by new development	3 tennis courts and 2 padel courts –addresses wider need
Sand based AGP for hockey	No on site requirement generated by development	Sand based AGP – within secondary school. Community use agreement to be explored with School Trust.

** In addition, a club house and pavilion building are proposed in the Groves sports hub and Meadows character area respectively.





Appendix C - High level programme, updated phasing plan and Brookleigh delivery rates evidence.





Appendix C - High level programme and phasing plan

Early enabling works, including ecological and archaeological mitigation, are programmed to commence following vacant possession of Ifield Golf Club in April 2027. Detailed design, technical approvals and early contractor involvement for Phase 1 infrastructure are already being progressed to accelerate delivery.

The masterplan's varied character areas and tenure mix, including private housing, affordable homes, Build to Rent, custom and self-build, senior living and care accommodation, will support multiple sales outlets and market segments. This diversified approach strengthens market absorption, improves resilience to changing market conditions and supports a high and sustained rate of housing delivery throughout the build-out period.

Construction will begin with the Phase 1A and 1B infrastructure works, including highways, utilities and drainage. Phase 1A is expected to take approximately 18 months to complete, enabling the delivery of a serviced site for the secondary school.

Procurement of residential development partners is programmed from mid-2027, with housing construction anticipated to commence in early 2031 following completion of the link road. This programme supports delivery of at least 2,500 homes by 2040, consistent with the Housing Delivery Study.

Character area	Phase	Quantum	Associated infrastructure / mitigation	Start on site	Completion
Early infrastructure	1A 1B 1C	0	Primary Road Link Road Utilities in. sub station Flood compensation Drainage Secondary School	2028/9	2030/31
Hillside and Woodlands	2A	698	Nature conservation area Ridgeway Park, sports pitches Allotments, play space Landscape buffers Natural & semi natural green space Strategic open space (country park)	2030/31	2036/37
Neighbourhood Centre	2B	751	Primary School Health Centre* Leisure Centre* Community centre Grove sports hub, pitches, club house	2032/33	2039/40



			Landscape buffers Natural & semi natural green space		
Meadows	3A	535 + 15 G&T	Gypsy & Traveller plots Meadows ped cycle link Landscape buffers Natural & semi natural green space	2034/35	2039/40
River Valley	3B	294	Employment land*	2037/38	2041/42
Meadows	4A	722	Allotments, play space Pavillion, playing pitches	2038/39	2042/43

*serviced land parcels will be available for these uses upon completion of Phase 1A/B



Homes England: Housing trajectory for West of Ifield (HA2) - September 2026

																	LP period ends	
		Homes per character area	Year 1	Year 2	Year 3	Year 4	Year 5	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10	Year 11	Year 12	Year 13	Year 14	Year 15
			2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40	2040/41	2041/42	2042/43
Enabling works		0																
Infrastructure	Phase 1A, 1B, 1C	0																
Hillside/Woodlands	2A	698				15	78	105	150	150	125	75						
Neighbourhood Centre	2B	751						80	100	100	100	125	125	80	41			
Meadows	3A	535								50	100	125	150	100	10			
River Valley	3B	294											25	25	64	80	100	
Meadows	4A	722												92	175	200	155	100
Total		3000				15	78	185	250	300	325	325	300	297	290	280	255	100
No. of outlets						1	2	3	5	6	7	7	6	6	6	5	5	2

698

751

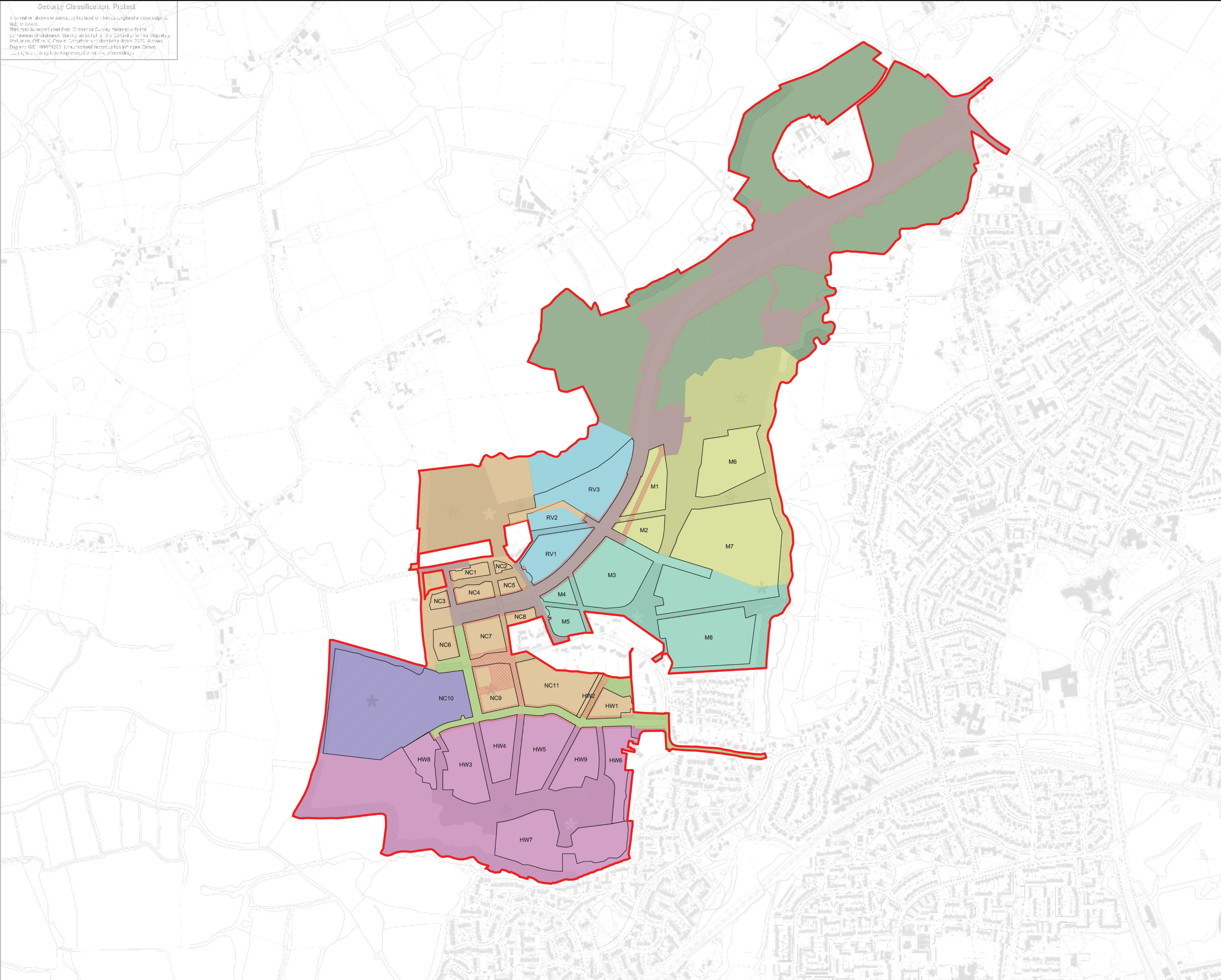
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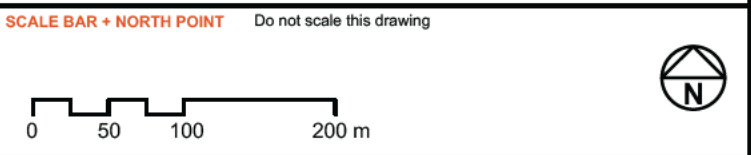
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3000 (2552 in LP period)

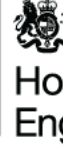
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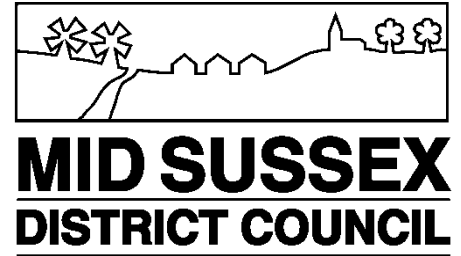
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- KEYS**
- Hybrid Planning Application Area
 - Area Applied for in Detail
 - Areas included within the detailed application but where RMAs will be submitted in the future. An overview of how the items of overlap are physically compatible is provided in the DAS
 - Parcels
 - Phase 1A
 - Phase 1B
 - Phase 1C
 - Phase 2A
 - Phase 2B
 - Phase 3A
 - Phase 3B
 - Phase 4A
 - River Valley Park

REV	DESCRIPTION	DRAWN	CHECKED	DATE
Safety, Health and Environment Information In addition to the hazards / risks normally associated with the types of work detailed on this drawing, note the following risks and information on:				
CONSTRUCTION				
DISMANTLING / DEMOLITION (FUTURE)				
For information relating to Use, Cleaning and Maintenance see the Health and Safety File. It is assumed that all works will be carried out by a competent contractor working, where appropriate, to an approved method statement.				
CLIENT		MASTERPLAN CONSULTANT		
 Homes England Homes England 50 Victoria Street Westminster London SW1H 0LE +44 (0) 300 1234 500		 Prior + Partners 70 Cowcross Street London EC1M 6EJ +44 (0)20 3951 0052		
DRAWING TITLE				
Land West of Ifield				
PROJECT TITLE				
Land West of Ifield				
DRAWN	CHECKED	APPROVED		
AA	CP			
DATE	SCALE	SIZE		
24/07/2026	1:5000	A1		
PURPOSE OF DRAWING		SUITABILITY		
DRAWING NUMBER				REV
				P01

Mid Sussex District Council



Mid Sussex District Council
Homes England

Statement of Common Ground

Delivery at Brookleigh, Burgess Hill

July 5th 2023

Purpose

The Statement sets out anticipated delivery rates at Brookleigh, Burgess Hill. The site was allocated in the Mid Sussex District Plan (2018) and will deliver 3,500 homes and associated infrastructure over a 15 year period.

This Statement provides an update to the one signed in June 2021, which was prepared to support the examination of the Site Allocations Development Plan Document.

In 2022 the marketing name for the Northern Arc was changed to 'Brookleigh'. This document therefore refers to the site as 'Brookleigh' rather than the Northern Arc, although it should be noted that some historic documents still contain reference to the Northern Arc.

Master Planning and Housing

The Northern Arc Masterplan (2018), which sets out the vision and strategic development principles for the site, Infrastructure Delivery Plan (IDP) and Phasing Strategy (2018) were approved at the Mid Sussex District Council on 24th September 2018 as a material consideration for all the planning applications in relation to Brookleigh.

Outline Planning consent for the 3,040 homes (30% affordable) was granted in October 2019 (DM/18/5114). Since then, work has progressed with the approval of Reserved Matters applications for homes, discharge of pre-commencement conditions and planning obligations, as well as applications for significant infrastructure including the Western Link Road (WLR) and Eastern Bridge and Link Road (EBLR) to support site delivery.

A plan showing the residential phases and sub-phases detailed below is attached in Appendix A.

Phase 1A, Oakhurst (formally known as Freeks Farm) was disposed by Homes England via a Building Lease to Countryside. Countryside has since been taken over by Vistry. Vistry will be delivering the remaining Phase 1A homes, associated infrastructure and open space. Vistry will operate under the original Building Lease. As part of the disposal contract, Countryside was tasked with meeting an ambitious programme to obtaining planning permission. The site, for 460 homes in addition to the 3040 homes referred to above, was subject to a separate Outline Planning Permission (DM/18/0509), which was approved in July 2019 and Reserved Matters were approved in December 2019 (DM/19/3945). Work commenced on the site preparation during 2020. Access to the site from Maple Drive (which required the relocation of a playground and the installation of a replacement playground and Multi Use Games Area), has been completed and the first housing completions took place during 2022 with first occupations in November 2022. To date, there have been 50 completions with 50 occupations.

Phase 1B, also at the eastern end of the site has been purchased by Bellway under a Building Lease which was entered into in March 2023. Reserved Matters permission for this site was granted in May 2022 (DM/21/3870) for 249 new homes. Work commenced on this parcel in March 2023.

Homes England have acquired Woodfield House, a parcel of land outside, but adjacent to the Brookleigh District Plan Site Allocation/outline planning application boundary. Bellway will be delivering 30 homes on this site as part of Phase 1B. Outline Planning Permission was granted for 30 homes on this site in 2020 and has since expired. Pre-application discussions have taken place on an amended scheme and a full planning application is anticipated July 2023.

Procurement has taken place on phase 1C, which includes the Eastern Neighbourhood Centre and approximately 270 homes, including 60 extra care homes. A Developer Partner has been selected and Homes England is currently in the process of contracting. The Developer Partner is currently in pre-application discussions with MSDC. A planning application is anticipated in late Summer/early Autumn 2023.

Homes England is in the process of procuring developer partners for the western end of the site which will include the Western Neighbourhood Centre (Phase 1Da) and employment centre (Phase 1E). A Developer Partner has been chosen to develop the first western parcel (Phase 1Da), which includes the neighbourhood centre and approximately 255 homes. Pre-application discussions are at an advanced stage and a Reserved Matters application is anticipated in Autumn 2023.

Phase 1Db, also on the western side, has been out to market for a further 34 homes. However, there was limited interest due to the Homes England procurement process which is complex for SMEs. Homes England is currently reviewing its procurement process to make it more effective for

SMEs. Phase 1Db will be re-marketed once the new process has been put in place which is likely in Autumn 2023.

Infrastructure

The key pieces of infrastructure required to unlock the development of this allocation are the new roads that will link the site to the existing highway network. Homes England has entered into construction contracts to deliver two key pieces of infrastructure – EBLR and the WLR. The EBLR is anticipated to complete December 2023 and the WLR Phase 1 is anticipated to complete September 2023. This infrastructure opens up opportunities to enable further serviced parcels to be disposed of via Building Leases at both the Western and Eastern ends.

Pre-application discussions are at an advanced stage for the next pieces of road infrastructure including:

- Between the A2300 and the western Bridge over the river Adur
- From the western bridge over the river Adur to Isaacs Lane (Northern Arc avenue Central Section)
- A2300 and Jane Murray Way improvements

Reserved Matters applications are anticipated for all these pieces of infrastructure in Autumn 2023 and these phases will unlock access to serviced parcels later in the programme.

The upgrade of the A2300 (link road to the A23) is also a critical piece of infrastructure required to support the development. Work was completed in 2022. The cost of this was c £27.6 million and has been funded by the Local Growth Fund and S106 contributions including from Homes England as a requirement of the Section 106 Agreement on the Outline Planning Permission. The Homes England contribution was £2,882,000. The Business Case for funding of this major project was conditional on the Brookleigh development proceeding and the homes coming forward in line with the District Plan trajectory.

In terms of infrastructure requirement to support the delivery of the first residential phase of the site, there is a planning condition on the Freeks Farm (Oakhurst) Outline Planning Permission that prevents no more than 199 homes from being occupied until the bridge over the River Adur and the road link between the bridge and Isaacs Lane is completed.¹ This infrastructure is due to complete in November 2023, in advance of 199 dwellings being completed and will therefore not prejudice delivery rates.

The development also required investment in the Goddard's Green Wastewater Treatment works to reduce the odour contours arising from the site, to enable the development potential of the allocation to be maximised. A £15.24m funding package has been secured for this work, which consists of £4m Local Growth Funding, £6.54m from the Housing Infrastructure Fund and £4.70m from Southern Water. These works are due for completion by the end of 2023.

The first primary school to be delivered at Brookleigh in the eastern end is due to open in September 2026. Homes England is funding and directly delivering this school and have completed a full site feasibility study. Homes England is currently in the process of procuring a lead consultant to design, and procure a contractor to deliver the school, this process is anticipated to be complete in Autumn 2023.

Homes England is working closely with MSDC and West Sussex County Council (WSCC) to deliver the secondary school in the eastern end. Reserved Matters permission for the secondary

¹ This condition was amended from 130 dwellings to 199 dwellings in the Section 73 Application to the Freeks Farm Outline Planning Permission (DM/22/1655)

school was secured in December 2022 (DM/22/2553). WSCC have appointed a contractor to deliver the secondary school with construction on the secondary school to start in Summer 2023 and be completed by February 2025 for a September 2025 opening.

Pre-application discussions are underway for the Centre for Outdoor Sports which includes sports pitch infrastructure and a Local Equipment Area for Play, along with the first element of Green Circle in the western part of the site. The Green Circle is a key piece of off road pedestrian, cycling and equestrian infrastructure. A Reserved Matters Application is anticipated in Autumn 2023 with construction anticipated to commence in January 2024.

The Phase 1E employment area in the western end has been out to market and Homes England are in the process of evaluating the submissions. Pre-application discussions are anticipated to commence on this parcel this Summer.

Delivery Rates

The District Plan trajectory indicated that the full 3,500 homes would be delivered by March 2036.

A Development Phasing and Specification Plan was approved via an application to discharge an obligation in the legal agreement (DM/21/0787) which provided an accelerated delivery trajectory from that identified in the District Plan.

An updated Delivery Trajectory has been provided dated December 2022, updating those set out in the Development Phasing and Specification Plan. The current housing trajectory confirms that the 3,500 homes would be delivered in the District Plan period. This indicates that delivery rates have slipped in relation to those agreed as part of the Development Phasing and Specification Plan. The reason for the slippage is as follows:

- On site delays for Phase 1A including Covid-19, labour, supply chain issues and the delays in completion of the EBLR and underground of UKPN cables which run through the EBLR, Phase 1A, Phase 1B and secondary school site.
- Trajectory for later phases is based on general assumptions arising from earlier parcels that:
 - there is typically a 12 month period between the Agreement for Lease and Start on Site, and another 12 month period between Start on Site and first housing completions;
 - each phase is assumed to complete 6 homes a month, which is more realistic than the 10 or 11 previously assumed in the earlier version;
 - Wherever possible the overall delivery rate per financial year across the whole scheme shouldn't exceed much more than 300 homes, to avoid risk of 'flooding the market'.

There is a peak in 2027/2028, at which point there will be 5-6 outlets/developer partners on site including Phase 1A, Phase 1B, Phase 1C and Phase 1D as well as early Phase 2 parcels. The use of multiple delivery outlets and simultaneous development from the western and eastern sides of the site is one of the ways Homes England will be ensuring accelerated delivery.

To ensure timely consideration of the planning applications and supporting documentation a Planning Performance Agreement (PPA) for the masterplan and preparation of the outline planning applications was entered into. A second PPA has been agreed for the next stage of the work, including comprehensive pre-application discussion processes for each sub-phase. The agreement sets out clear timelines for the achievement of key milestones. In addition, MSDC has appointed a member of staff whose sole responsibility is dealing with Brookleigh planning matters.

Notwithstanding this slippage, Homes England has been able to accelerate progress on the site overall by reducing lead in times to start on site and through a range of mechanisms to ensure once on site development is delivered at pace.

In February 2020, Lichfields Insight – Start to Finish (second edition)² identified that the average lead in time for the delivery of large sites of 500+ homes following the grant of consent was 36 months (3 years). This document states that this figure rises to 96 months (8.4 years) from validation of the first planning application to completion of the first homes for sites of 2,000+ homes.

At Brookleigh, Homes England has reduced overall lead in times from acquisition (March 2018) to Freeks Farm housing starts (March 2020) to only 24 months (2 years) – significantly less than seen elsewhere – and this demonstrates the ability of Homes England to reduce the lead in time for major sites.

Homes England has entered into a Building Lease with Bellway to deliver 249 homes at Phase 1B (parcels east of Isaacs Lane). As part of Bellway's contract, a Reserved Matters application was required to be submitted within 100 days from the start of the contract. This clause will be replicated in the contracts relating to future phases. A comprehensive pre-application meeting programme has been set via a PPA to ensure Reserved Matters applications are submitted within the timeframes.

Homes England has recently published a new Strategic Plan 2023-28³. As set out in the new Strategic Plan, Homes England's mission is to drive regeneration and housing delivery to create high-quality homes and thriving places. This will support greater social justice, the levelling up of communities across England and the creation of places people are proud to call home. A key focus for Homes England is the quality of what is being delivered, including championing environmental sustainability, design and beauty in homes and places that we support to create distinctive places and spaces that are designed for people to use and thrive. Homes England also recognise that mixed-use regeneration to deliver housing alongside employment, retail and leisure space helps to create vibrant and successful places.

There is a range of mechanisms available to Homes England to accelerate housing quality, sustainability and delivery. Specifically, in relation to strategic sites such as Brookleigh and in its capacity as master developer. Homes England is able to use its expertise and test innovative delivery models and financing options that will support the accelerated delivery of large settlements.

Homes England believe that these measures create the conditions necessary to accelerate housing delivery on large sites such as Brookleigh. This aligns broadly to a number of the findings of the Letwin Review⁴ which recommended more diversity of the type and tenure of new homes, to accelerate market absorption and the build out rate of large sites. By adopting the following mechanisms to accelerate delivery on large sites, Homes England can ensure that housing delivery is greater than can be delivered by the market alone and therefore meet local housing needs.

- **Diversification** – Homes England is providing support for smaller builders and new entrants to create a more diverse, resilient and competitive market. Diversification is also being encouraged by providing access to land and short-term development finance through

² <https://lichfields.uk/content/insights/start-to-finish>

³ <https://www.gov.uk/government/publications/homes-england-strategic-plan-2023-to-2028>

⁴ Letwin 2018. Independent Review of Build Out, Final Report. Rt Hon Sir Oliver Letwin MP, October 2018 -

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/752124/Letwin_review_web_version.pdf

the Home Building Fund. This can be seen at Brookleigh with Bellway contracted to delivery at one of the sub-phases via a SME.

- **Modern Methods of Construction (MMC)** – Homes England is accelerating the delivery of homes without eroding value by incorporating MMC to drive innovation, quality and productivity in the industry. Covering a range of offsite and modular building techniques, MMC have the potential to be significantly more productive than traditional building methods; allowing homes to be built more quickly, addressing labour and skills shortages and improving the quality, consistency and energy efficiency of newly built homes. As part of Homes England's new Strategic Plan, we are seeking to improve construction productivity and encourage the uptake of MMC in housing delivery, a series of Homes England's own sites will deliver ambitious levels of MMC which are higher than the market norm. As part of the procurement process, developers are scored on their ability to deliver homes through MMC and phases 1A, 1B, 1C and 1Da all include MMC. Each procurement for a developer partner includes a minimum score for MMC and is a pass/fail criteria.
- **Simplifying Procurement** – Homes England delivery framework (Delivery Partner Panel 3 (DPP3)) was replaced in 2022 with the Delivery Partner DPS which is more efficient and enables developers to join it at any time, throughout its ten-year life span. The application process is quicker than the previous DPP3 Framework which creates efficiencies for Homes England and for all developers. Homes England is confident that this flexible approach will help diversify the housing market and work with a wider range of housebuilders large and small. The DPS provides Homes England with a procurement compliant approach to land disposals so that Homes England can control the speed and quality of housebuilding through Building Leases and deliver government objectives of higher quality urban and building design, increased delivery speed through use of MMC and higher sustainability standards.
- **Increasing the Pace of Delivery** – through DPS Framework, Homes England is able to use their Building Lease arrangements to ensure their developer partners deliver at predetermined contractual pace levels over and above what would be expected through the market alone. Current contract data from Homes England sites shows that sites procured through the former DPPS3 and DPS are contracted to deliver between 115% - 150% of the market rate and this is expected to be continued through the DPS Framework. A direct example of how Homes England are increasing the pace of delivery at Brookleigh, is that the two contracted housebuilders have minimum acceleration clauses in their Building Leases to ensure they build at a required rate. The construction pace for Countryside / Vistry at Freeks Farm is a minimum 8 homes per month and for Bellway at Phase 1B it is 6 homes per month. Homes England undertakes monthly monitoring through compliance inspectors to ensure the housebuilders meet these targets. This will be the case for all phases which are being delivered by developer partners with each phase minimum number of homes being determined by site specific circumstances and the method of delivery i.e. MMC is expected to deliver at an increased pace.

In the five years since Homes England acquired the site and by end of 2023, two pieces of key highways infrastructure (EBLR and WLR) will be completed. 35% (1,234 homes) of the whole allocation (including Freeks Farm) will be under contract with delivery partners.

Statement of Common Ground

Site address	Land North and North-west of Burgess Hill (Brookleigh)
District Plan allocation	DP9 – up to 3,500 homes

Planning Status

For the purposes of this statement the site is split into the Brookleigh (Northern Arc) (3,040 homes) and Freeks Farm (460 homes) giving 3,500 homes in total.

Frees Farm

Planning application Reference		Date of Permission
DM/18/0509	Outline planning permission for 460 homes	24.07.2019
DM/19/3845	Reserved matters for 460 homes	19.12.2019

Brookleigh

Planning application Reference		Date of Permission
DM/18/5115	Outline Permission for 3,040 homes	04.10.2019
DM/19/3313	Full planning permission Bridge and Eastern Link Road	17.01.2020
DM/20/0254	Reserved matters for Western Link Road	10.07.2020
DM/21/3870	Reserved matters for Phase 1B (249 homes and associated development)	24.05.2022
DM/22/2553	Reserved matters for Secondary School	19.12.2022

I, Graham Hyslop, Project Director, Homes England can confirm that the information set out in the table below are an accurate reflection of the anticipate delivery rates on this site.

Freeks Farm, Burgess Hill - 460 homes		
Financial Year (1st April – 31st March)	Actual Completions	Projected number of Completions
2022/23	50	0
2023/24		92
2024/25		96
2025/26		96
2026/27		96
2027/28		30
Total	50	410

Brookleigh – 3,040 homes (2,310 homes within plan period)	
Financial Year (1st April – 31st March)	Projected Number of completions
2023/24	50
2024/25	168
2025/26	245
2026/27	238
2027/28	300
2028/29	278
2029/30	268
2030/31	291
2031/32	281
2032/33	322
2033/34	263
2034/35	234
2035/36	102
Total	3040

Signed: Graham Hyslop Project Director Homes England	
Date:	5 July 2023

Signed: Sally Blomfield AD for Planning and Sustainable Economy Mid Sussex District Council	
Date:	5 July 2023

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