



Homes
England

Ifield Golf Club

Homes England Position Statement

November 2023



Introduction

- 1.1** Located within the administrative boundary of Horsham District Council (HDC) and adjacent to Crawley Borough Council (CBC), the proposed West of Ifield allocation includes land owned by Homes England south of Rusper Road. Part of this is currently run as an 18 hole golf facility and is leased to Ifield Golf Club on an unsecured, short-term lease arrangement that expires on 30 April 2026, with a 12 month break clause implementable on 30 April of any preceding year.
- 1.2** Homes England has advanced an initial masterplan for a scheme made up of circa 3,000 homes, associated employment and supporting infrastructure; including new sport, health and well-being facilities. The masterplan has been developed in consultation with Horsham, Crawley and West Sussex authorities through pre-application discussions and in consultation with the local community, statutory and non-statutory stakeholders through a series of formal consultation events and engagement between 2020 and 2022.
- 1.3** To date, Horsham District Council (HDC) has published evidence¹ demonstrating that there is a good level of golf provision within the district *“well provided for in relation to golf supply”*, with it *“having considerably more facilities than both national and regional rates as well as a good variety of provision”*, and a number of other strategic sports requirements that need to be met over the forthcoming Plan period.
- 1.4** In accordance with Paragraph 99 of the NPPF, the Ifield Golf facility (IGF) should not be built on unless it can be shown that one or more of the stated exception criteria apply (paragraphs 99 (a), (b), (c)).
- 1.5** Homes England has benefitted from ongoing engagement with Sport England, England Golf and Ifield Golf Club throughout the preparation of the masterplan to help establish a baseline for future golf need and demand, to understand the impact of any loss and consider a suitable approach to potential mitigation if required that is both pragmatic and delivers the best outcome for golf overall.
- 1.6** Building on the assessment work undertaken by HDC and engagement with the relevant sport bodies to date, this interim position statement has been submitted in advance of the publication of the Regulation 19 to demonstrate how the loss of the IGF is acceptable in planning policy terms because the intention is for the requirements of paragraph 99 of the

¹ Knight Kavanagh Page (KKP) *Golf Supply and Demand Assessment February 2021 (updated December 2022)*.

NPPF to be met.

- 1.7** While it is the intention of Homes England to submit a full site specific NPPF Para 99 assessment in support of any draft allocation (i.e. in response to a Regulation 19 public consultation) and / or subsequent planning application covering the site, positive engagement is ongoing with Sport England and England Golf (see attached letter from Sport England in Annex 1) with the assessment to be concluded in due course.

National Planning Policy Framework Para 99

- 1.8** National Planning Policy Framework (NPPF) Paragraph 99 states that:

'Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- *an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or*
- *the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or*
- *the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.'*

- 1.9** It is very important to note that it is not an absolute requirement that all three limbs of paragraph 99 are met. The word 'or' is inserted at the end of each limb and it therefore follows that it is acceptable for a single limb to be satisfied or a combination of them.

Para 99 (a) – Consideration of Golfing Needs

- 1.10** In line with the recommendations of the KKP study undertaken on behalf of HDC, an assessment of supply and demand has been considered on a more relevant catchment basis, specific to the IGF. The catchment shown in Annex 2 includes clubs within a 20 minute catchment including, Ifield, Copthorne, Cottesmore, Tilgate, Cuckfield, Le Club Effingham Park, Horsham Golf and Leisure, Mannings Heath, Rookwood.
- 1.11** While the 20 minute catchment is the primary assessment area, there is also significant golf provision within 15km (c.30-minute catchment), which can also cater for both Horsham and Crawley based demand (Annex 3). This comprises 17 standard courses (with 279 holes), 2 par 3 courses (18 holes) and 8 Golf Driving Ranges (GDRs) with 134 bays.

1.12 In considering future golfing needs, the Sport England 'Assessing Needs and Opportunities Guide' (ANOG) methodology is being used in line with best practice. The ANOG approach emphasises the need to consider strategic issues, needs assessment work therefore needs to consider the strategic context, what are the trends in golf, golf participation profile across the area, and the supply and demand of golf facilities in terms of *quantity, quality, accessibility and availability*.

1.13 Taking each of the ANOG criteria in relation to the IGF catchment, it can be demonstrated that:

Quantity

- the Ifield catchment has a range and variety of golf facilities. These cater widely for golfers who seek regular membership of golf clubs, casual access to clubs on payment of green fees, and those who prefer to access municipal courses on a pay and play basis providing a wide basis of choice for those on their golfer journey.
- the Horsham part of the catchment is well catered for in terms of traditional private members' clubs, or proprietary commercial facilities, which operate mainly for the benefit of their members Golf provision (18 hole courses), while provision outside of the Horsham area is more balanced.
- there is significant opportunity for more affordable casual play on a *pay and play* basis, without the need to join a club - which is better aligned with current and future golfer demand in the catchment.
- there is a more limited range of ancillary golf course facilities, including only one par 3 courses within the primary assessment area, and only three Golf Driving Ranges in the whole area, none of which are free standing.
- there is a more limited supply of development facilities across the catchment area to introduce newer golfers to the beginning of the golfing journey.

Quality

- most of the standard courses within the assessment area are 18 holes and varied typology. The IGF is therefore not necessarily unique and provides a similar golfing offer to a number of other facilities within the catchment area.
- all courses within the catchment have their individual characteristics and challenges

which will affect the perspective of quality for individual members / players.

- quality of golf provision in the most part is subjective, limiting the opportunity to compare between courses with personal preference and individual circumstances are likely to determine choice / willingness of individual members to play at particular clubs.

Accessibility

- accessibility by car in the whole Horsham and Crawley area is good with nearly all of the population able to access a golf facility within a 20-minute drive, and the majority within 10 minutes.
- those living in the catchment have a choice of more than one course or facility, and overall accessibility would not be impaired if IGF were to close.
- while a number of Ifield Golf Club Members are located within the 20min catchment, a significant proportion travel from outside of the assessment area and therefore existing members could consider other facilities outside of the primary assessment area, where these are located closer to their homes or on the basis of personal preference.
- membership subscriptions in the area are generally high and regular golfing is expensive to access. When considering range of disposal income across the catchment areas, membership golf is likely to be unachievable to many living within the catchment area with a preference towards flexible memberships or casual play.
- while high green fees at some courses could be a barrier to some, the cost of casual golf in the area caters for a range of different types of golfer on a varied range of courses across the catchment area.

Availability

- there are vacancies at the majority of local clubs with most actively seeking to attract new members indicating spare capacity is likely to exist within the catchment.

1.14 In considering the role of IGF within the catchment and whether future demand could be met, it can be demonstrated that while it is a well-established membership club, the IGF does not differentiate from much of the traditional golfing offer elsewhere in the catchment and the

focus of the club remains on growing membership and commercial considerations, as opposed to offering opportunities for newer golfers looking to take their first steps into the game.

- 1.15** Therefore, while there are no definitive conclusions at this point, any assessment of the golf supply area can be expected to show that there is unlikely to be a clear and overriding case to retain Ifield as a private members' club to meet current demand for golf and that there is a reasonable prospect that future golf demand can be met even with the loss of IGF, through a number of alternative golfing facilities that currently exist both within the catchment and wider area.

Para 99 (b) – replacement of equivalent or better provision

- 1.16** When considering the initial outcomes of the ANOG assessment and in the context of underlying demand for future golf provision, it can be demonstrated that if relinquished, any replacement of Ifield Golf facility on a *'like for like'* basis (i.e. a 18-hole members course) is unlikely to be justified.
- 1.17** It is also evident that with disposable income levels relatively low within a significant part of the catchment area, the high green fees at some courses (including IGF) could be a barrier and therefore importance of any mitigation should be placed on cheaper more accessible provision, with a focus on facilities that will better meet the future needs including more affordable pay and play and additional ancillary facilities (such as driving range and other casual golfing offers).
- 1.18** There are two municipal courses within the primary assessment area (Rookwood and / or Tilgate) that have the potential to mitigate for the loss of the IGF. Both courses are of good quality and provide a cheaper more accessible offer but require investment and have the potential to further diversify their golfing offer in the longer term. Given both courses are in public ownership, a suitable delivery mechanism can be secured to enable the necessary improvements that could be facilitated through the redevelopment of the IGF.
- 1.19** By widening the facility mix, providing opportunities for newer golfers looking to take up the game and starting on the golfer journey into potential club membership, offsite mitigation therefore presents an opportunity to better align the future golfing offer with future needs and deliver better outcomes for the sport as a whole.

Paragraph 99 (c) - Alternative Sports and Recreation Provision

1.20 Through the preparation of the West of Ifield masterplan, a number of new sport and recreational facilities have been identified that meet future demand from the development as well as respond to existing evidence of sporting and recreation need within the wider area. These can be secured as part of any emerging policy and secured through future s106 agreements.

1.21 As shown in the illustrative masterplan the IGF site (and therefore directly replacing the existing golf facility), can accommodate a significant increase in the amount of publicly accessible sport and recreational provision which can be expected to include:

- up to 9.7ha of new publicly accessible parks and 2ha of amenity greenspace
- up to 7 no. new infant, junior and youth play facilities
- up to 0.3ha of new allotments
- up to 4 no. new tennis court / multisport facilities
- a new 1200sqm leisure facility
- flexible recreation facilities, walking and cycling routes in-line with Active Design principles
- the delivery of a new secondary school and playing pitches with the ability to secure access as part of a future Community Use Agreement.

1.22 The release of the IGF will also directly unlock the wider masterplan area which would bring forward further provision of sport and recreation provision, that would not otherwise be realised. Based on the emerging proposals, this can be expected to include:

- up to 9.2ha of publicly accessible parks and 5.7ha of amenity greenspace;
- up to 5 no. infant and junior play facilities;
- a new sports hub comprising 3G and grass pitches;

- flexible recreation facilities, walking and cycling routes in-line with Active Design principles;
 - up to 1.2ha of new allotments; and
 - up to 4 no. new tennis court / multisport facilities.
- 1.23** While providing in part for new residents, a number of the facilities are capable of addressing strategic sporting needs and all will be accessible to both existing and future residents². Significant potential therefore exists to deliver key strategic sport and leisure provision as part of any allocation, secured through future s106 agreements.
- 1.24** An overarching *Sports Strategy for the West of Ifield* development is being prepared that will evidence both the current and projected future needs and set out how the proposed masterplan will meet these needs as well as comply with any emerging Local Plan policies. The Sports Strategy will drive a positive planning approach to the site, and linked with the principles of Active Design embedded across the scheme, will create a sustainable new neighbourhood, improving health, well-being and recreation more widely.
- 1.25** Given the range of alternative sports facilities and for these to directly address sporting needs set out in local needs assessments, the onsite re-provision can reasonably be expected to outweigh the limited / private use of the site currently for golfing and therefore the benefits of the alternative sports and recreational provision are very likely to outweigh the loss of the golf facility.

Summary – NPPF Paragraph 99 Requirements

- 1.26** Paragraph 99 of the NPPF provides a framework for HDC to consider, at the appropriate point in time, the options and the next steps in bringing forward the site which would include the IGF as part of the Local Plan process.
- 1.27** In accordance with paragraph 31 of the NPPF, the preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and taking into account relevant market signals. The preparation of a needs assessment is not a 'one off'

² For example, the Football Foundation consider that a 3G pitch typically caters for an average of 1,200 participants per week, from all sections of the community.

task but instead the evidence base should be reviewed continually up until the plan is found to be sound in order to ensure it is up to date and takes into account changes at IGF and further afield.

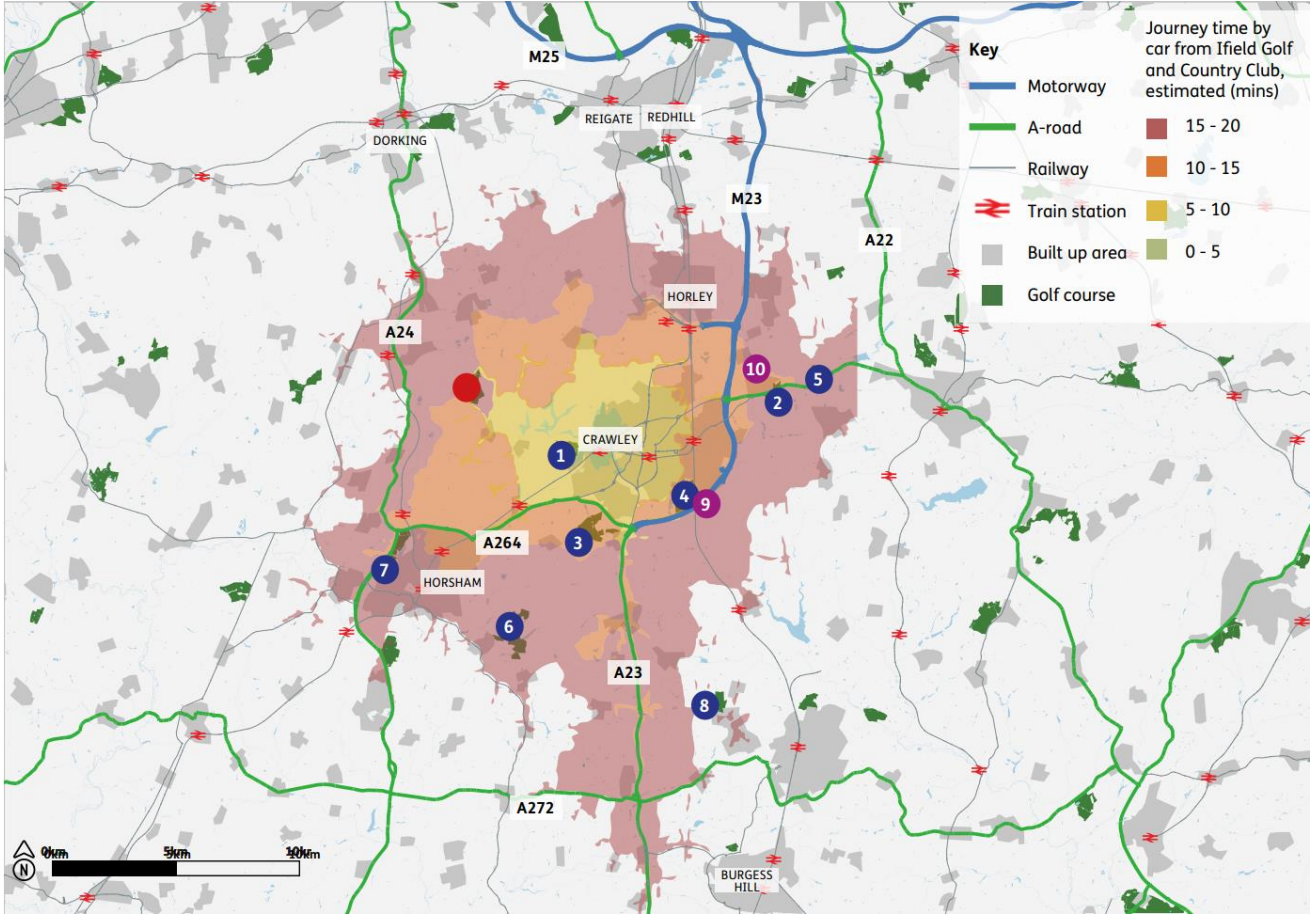
1.28 While a detailed Para 99 assessment will be submitted in support of any draft allocation (if included in the Regulation 19 consultation) and or future application in due course, there is already a reasonable prospect at this stage that all three limbs of the Para 99 tests will be satisfied. This means that any allocation at the West of Ifield that includes the existing IGF can be considered justified, effective and consistent with national policy as set out in Para 35 of the NPPF in as much as:

- **Deeming the course surplus to requirements** – at this stage, there is no overriding case to retain the current facility with alternative supply within the immediate catchment and wider area capable of meeting the demand for traditional golf provision that is currently provided by the IGF, with sufficient capacity elsewhere that would better meet future golfing demands across the entire golfer journey.
- **Securing off-site mitigation to better meet golfing needs of the area** – there is no strong rationale for re-providing the Ifield Golf facility on a 'like for like' basis to meet future golf demand within the catchment area. Offsite contributions could be secured to deliver improvements to alternative golf provision at existing facilities within the IGF catchment that would be better aligned with future demand and more accessible to a wider proportion of the population.
- **Direct delivery of alternative sports and recreational provision** – a significant package of investment in alternative sports and recreational facilities can be delivered through the redevelopment of the IGF, both within the existing site and wider masterplan area, the benefits of which are likely to clearly outweigh the loss of the golf course.

1.29 Each of the approaches outlined above, either in isolation or combination would meet the required policy tests and therefore enable consideration of the site as part of the Local Plan process.

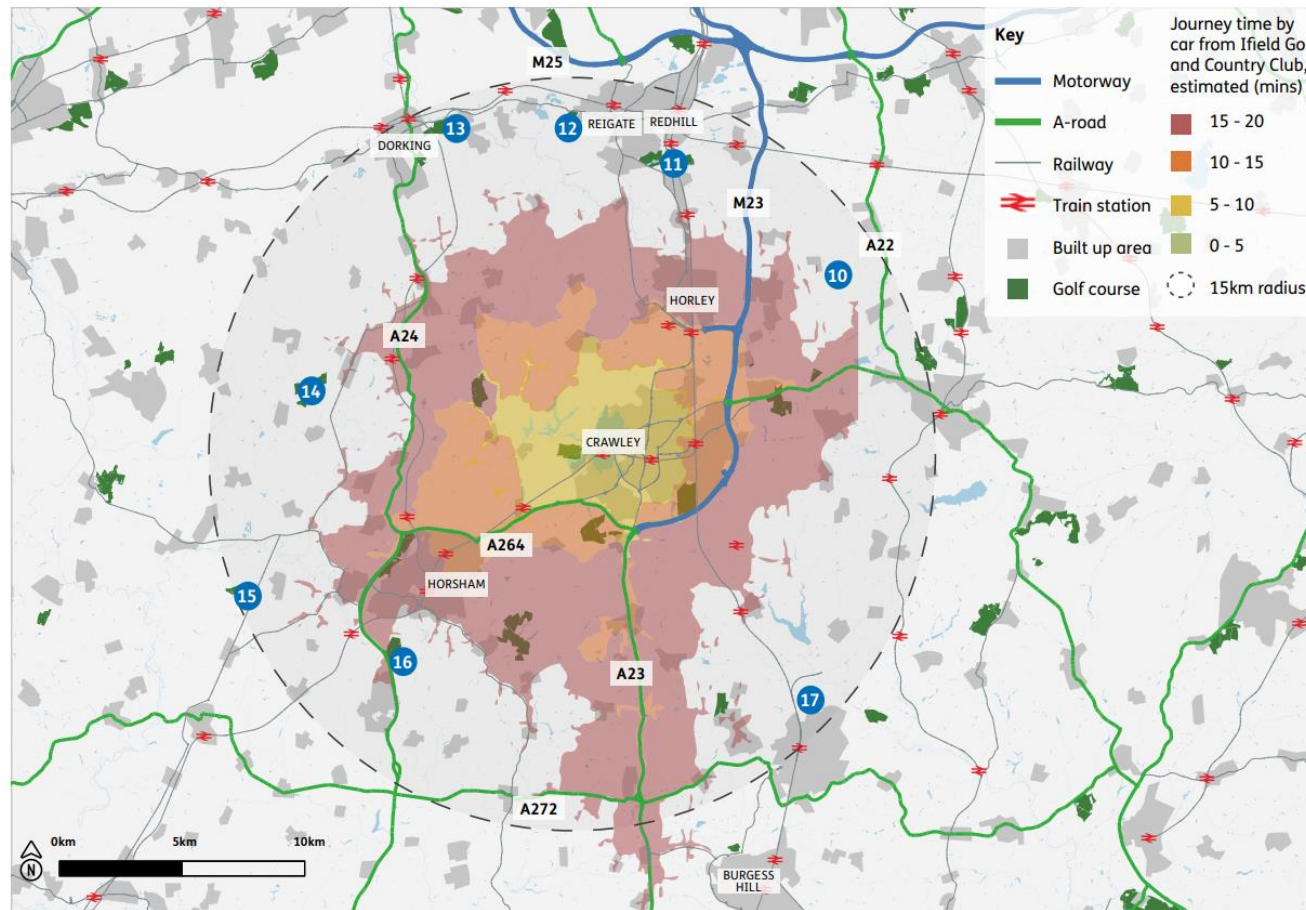
Annex 1: Letter from Sport England (November 2023)

Annex 2: Golf Courses in the Primary Impact Area (20min drive time catchment) of Ifield Golf Facility



Ref	Name	England Golf Affiliated	Holes	Distance from IGC by road (km)	Management	Local Authority	Ward	Built
20 minute journey catchment (vehicle) from Ifield Golf Course								
1	Ifield Golf and County Club	Y	18	N/A	Sports Club	Horsham DC	Colgate & Rusper	1927
2	Copthorne Golf Club	Y	18	10.1	Sports Club	Mid Sussex DC	Copthorne & Worth	1892
3	Cottesmore Golf & Country Club	Y	18 & 9	8.4	Commercial	Horsham DC	Colgate & Rusper	1974
4	Tilgate Forest Golf Centre	Y	18	6.1	Local Authority	Crawley BC	Furnace Green	1992
5	Le Club Effingham Park	Y	9	11.6	Commercial	Tandridge DC	Felbridge	1979
6	Mannings Heath Golf Club	Y	18 & 9	14.9	Commercial	Horsham DC	Nuthurst & Lower Beeding	1905
7	Rookwood Golf Course	N	18	13.3	Local Authority	Horsham DC	Trafalgar	1997
8	Cuckfield Golf Centre	Y	9	16.8	Commercial	Mid Sussex DC	Cuckfield	2001
Other facilities								
9	Tilgate Forest Footgolf		9	6.1	Local Authority	Crawley BC	Furnace Green	1992
10	Gatwick Footgolf		18	10.1	Commercial	Tandridge DC	Burstow, Horne and Outwood	1990
Recently closed								
	Rusper Golf Club	Y	18	7.4	Commercial	Mole Valley DC	Capel, Leigh and Newdigate	1992

Annex 3: Golf Courses in the Secondary Impact Area (15km radius) of Ifield Golf Facility



Ref	Name	England Golf Affiliated	Holes	Distance from IGC by road (km)	Management	Local Authority	Ward	Built
15 km distance catchment from Ifield Golf Course but outside primary 20 minute journey catchment (vehicle)								
10	Horne Park Golf Course	Y	9	16.7	Commercial	Tandridge DC	Burstow, Horne and Outwood	1995
11	Golf Made Simple (formerly Redhill Golf Centre)	N	9	16.1	Health Authority	Reigate & Banstead BC	Earlswood & Whitebushes	1992
12	Reigate Heath Golf Club	Y	9	17.7	Local Authority	Reigate & Banstead BC	Reigate	1895
13	Betchworth Park Golf Club	N	18	23.6	Sports Club	Mole Valley DC	Brockham, Betchworth and Buckland	1911
14	Gatton Manor Golf Club	Y	18	17.4	Commercial	Mole Valley DC	Okewood	1969
15	Slinfold Golf & Country Club	Y	18	21.2	Commercial	Horsham DC	Itchingfield, Slinfold & Warnham	1992
16	Horsham Golf	Y	18 & 9	18.6	Commercial	Horsham DC	Southwater North	1993
17	Haywards Heath Golf Club	Y	18	22.3	Commercial	Mid Sussex DC	High Weald	1922

