

Ifield Golf Club

Rusper Road, Crawley
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Report for Save West of Ifield

regarding

**Horsham District Council's Local Plan 2023-2040
and the Regulation 19 Stage Representation**

prepared by

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23 February 2024

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EXECUTIVE SUMMARY

This report relates to Ifield Golf Club ('Ifield') and is a representation regarding the 'Regulation 19' stage of Horsham District Council's Local Plan 2023-2040. I am instructed by 'Save West of Ifield' to prepare my report.

I am a chartered surveyor and have specialised solely in UK golf property and business matters for the last 33 years. From time to time, I provide expert evidence on golf property and business matters in court and tribunal hearings as well as at planning inquiries. My report on Ifield represents my true professional opinion.

Homes England is proposing to build around 3,000 homes with supporting infrastructure in the West of Ifield area. This will mean the permanent loss of the 18-hole golf course at Ifield.

I have been instructed by Save West of Ifield to consider whether, in my professional opinion, Homes England's proposals are compliant with the government's national planning policy relating to '*Open Space and Recreation*'. The relevant policies are paragraphs 98 and 99 of the National Planning Policy Framework ('Para 98' and 'Para 99' of the 'NPPF' – September 2023 version).

Closely connected to Paras 98 and 99 are two guides from Sport England called '*Assessing Needs and Opportunities Guide*' (ANOG) and '*Planning for Sport Guidance*'. They provide the 'best practice' framework for evaluating compliance or non-compliance with the various planning policy tests under Paras 98 and 99 of the NPPF.

If Homes England's development proposals contravene the government's national planning policies for '*Open Space and Recreation*', it then follows that Horsham District Council's ('HDC') emerging draft Local Plan is 'unsound' in respect of this specific element of national policy.

Under Para 98 of the NPPF, HDC's emerging Local Plan needs to be based on 'robust' and 'up-to-date' assessments of sporting provision and future need. For golf courses in England under threat of closure, the primary assessment area for a 'robust' and 'up-to-date' assessment is a 20-minute drivetime by car.

No such assessment exists in the public domain for Ifield, so it logically follows that the current position is clear: HDC's emerging Local Plan proposing the permanent closure of Ifield Golf Club must be 'unsound' in relation to this requirement.

If Homes England is to build on Ifield Golf Club, it must satisfy one of three key tests under Para 99 of the NPPF to be compliant with the government's national planning policy relating to 'Open Space and Recreation'.

I am to consider only the first two tests: 99(a) and 99(b), as they fall within my area of professional expertise.

Effectively under test 99(a), it is for Homes England to prove that Ifield Golf Club is 'clearly ... surplus to requirements'.

Sport England's ANOG framework is built around four overarching measures to assess whether an existing sporting facility is 'clearly ... surplus to requirements'. They are: 'quantity', 'quality', 'accessibility' and 'availability'.

It is my strong view that Ifield Golf Club is clearly needed in respect of all four of these overarching measures. It therefore follows that it will not be possible for Homes England to demonstrate that Ifield Golf Club is 'clearly ... surplus to requirements' under the Para 99(a) test of the NPPF.

If Homes England cannot pass test 99(a), and it transpires that it cannot pass test 99(c) of the NPPF in respect of its plans to permanently close the 18-hole golf course at Ifield, then it can close Ifield if it satisfies test 99(b).

Effectively under test 99(b), Homes England must replace Ifield by building another new 18-hole course with clubhouse and associated facilities to an equivalent or better standard nearby. To my knowledge, it is not proposing to do this, so it will not meet the requirements of test 99(b) either.

From this, it logically follows that if Homes England cannot pass test 99(c) then it will be in contravention of the government's national policy test 99 of the NPPF, and again, HDC's emerging Local Plan will be 'unsound' in this respect.

My report provides my detailed reasoning as to why I have reached the conclusions I have.

A handwritten signature in black ink, appearing to read 'Mark Smith', is positioned above the typed name.

Mark Smith BA MRICS MBA

23 February 2024

1. INTRODUCTION

- 1.1 I am instructed by 'Save West of Ifield' ('SWOI').
- 1.2 I have been asked to provide my independent professional opinion on golf need aspects relating to Ifield Golf Club ('Ifield').
- 1.3 Ifield is a 'not for profit' membership based 18-hole golf club. Members pay yearly subscriptions to play there. Visitors wishing to play there can do so by paying green fees on a 'per round' basis. It is therefore open to the general public as a sporting venue.
- 1.4 Ifield is approaching its centenary year. It was founded in 1927.

My professional experience

- 1.5 I have been a member of the Royal Institution of Chartered Surveyors ('RICS') since 1991 and I am a RICS Registered Valuer.
- 1.6 For the last 33 years I have specialised solely in the UK golf sector. I provide advice to a wide range of clients on golf related property and business matters. My clients include golf venue operators, freehold investors, local authorities, banks, surveying firms needing specialist golf advice, lawyers, and accountants.
- 1.7 My firm is called 'Smith Leisure' and I attach in Appendix MAS 1 some background information on myself and my firm.
- 1.8 *Planning inquiry work:* I have given golf related evidence at the following planning inquiries in the capacity of a professional expert witness:
 - Ingol Golf Course in Preston, Lancashire (two separate inquiries) – an existing 18-hole commercial golf course aimed at the mid to lower end of the market (on behalf of the local planning authority).
 - Cherry Lodge Golf Club in Kent – an existing 18-hole 'mid-market' private members' golf club founded in 1969 (on behalf of the appellant).
 - The Dye London (now renamed 'The Legacy Club') in north-west London – a proposed 18-hole commercial course of 'international standing' (on behalf of the appellant).
 - The proposed Hertford Golf Club in Hertfordshire – an 18-hole 'open to all' commercial golf course (on behalf of the appellant).
 - Widnes Golf Club in Widnes, Cheshire – an existing 100 year old 18-hole private members' club (on behalf of the local planning authority).
- 1.9 In addition, I have provided advice to clients at the planning application stage, and I have also given expert evidence at planning hearings.

1.10 Other work examples: These include the following:

- Swinton Park Golf Club in Manchester. In July 2020 I was appointed by the Mayor of Salford City Council to provide an independent report on whether the club was financially viable as a golf course. The club had been closed by the then owners with a view to redeveloping the site for large-scale residential. I acted in a role similar to that of a third party 'independent expert' in a property dispute. I took evidence from the parties in dispute and then formed my own professional opinion.
- The Belfry in Birmingham. In 2021 I was appointed by Goldman Sachs to advise on the performance and potential of the golf operation, as part of the investment bank's due diligence process in connection with a £100 million plus private equity purchase. This golf hotel is famous for holding the Ryder Cup for a record four times and is the home of The Professional Golfers' Association ('PGA').
- Avisford Park Hotel in West Sussex. In 2022 I was appointed by Highways England to advise on the viability issues relating to the proposed A27 Arundel Bypass Scheme taking a large part of the 18-hole golf course at this hotel.
- The Dundas Castle Estate near Edinburgh. In 2006 I gave expert evidence on golf viability and worth on behalf of Edinburgh City Council in the Lands Tribunal for Scotland. This related to a proposed 5-star golf course of 'international standing' at this estate.
- East Aberdeenshire Golf Course. In 2015 I was appointed by the Chief Valuer Scotland, on behalf of Transport Scotland, to provide independent expert evidence on the viability and worth of this venue in compulsory purchase proceedings.

Differing roles: expert witness and surveyor-advocate

1.11 As a member of RICS, I am aware of the differing roles between a chartered surveyor acting as an expert witness and that of a surveyor-advocate. The difference normally relates to giving evidence in court, tribunal and planning inquiry proceedings.

1.12 The evidence given in the capacity of a surveyor expert witness must adhere to the following:

- It must be, and must be seen to be, the surveyor's independent and unbiased professional view, and fall within the surveyor's experience, expertise and knowledge.
- It must be impartial and uninfluenced by those instructing or paying the surveyor.

1.13 In addition, the surveyor must state the main facts and assumptions that the evidence is based on and must not omit material facts that might be relevant to the surveyor's conclusions.

1.14 In contrast to the above, a surveyor-advocate's role is to advance a positive case for the benefit of the instructing client. The case made may then not represent the surveyor's true professional opinion.

1.15 Whilst my report regarding Ifield does not include a full statement of truth or declaration, (because we are not at the planning examination stage in front of a planning inspector), I can confirm that in preparing this report I have assumed the obligations of an expert witness rather than an advocate-surveyor. It is, therefore, my true professional opinion.

1.16 In due course, if I am required to give evidence to a planning inspector, then at that time, I will include a full statement of truth and declaration in the normal way.

My knowledge of Ifield

1.17 One of my roles in the golf industry is as a valuer for business rates purposes. Virtually all golf clubs are given a rateable value by the Valuation Office Agency (an Executive Agency of HMRC).

1.18 I represent around 200 golf clubs in England to ensure that their rateable value assessment is fair and reasonable. I have represented Ifield Golf Club in negotiations with the Valuation Office Agency regarding its rateable value.

1.19 It is through this work that I have a good working knowledge of Ifield Golf Club – both from the perspective of its physical property and its business trading performance.

General colour coding within this report

1.20 For ease of reference, I have used the following general background shadings for text boxes which contain extracts and quotes:

- Light pink – for the national planning policies relating to ‘*Open Space and Recreation*’ (paragraphs 98 and 99 of the September 2023 National Planning Policy Framework (**‘the NPPF’**)).
- Light yellow – for principles and guidance set out by Sport England in its two documents: ‘*Assessing needs and opportunities guide for indoor and outdoor sports facilities*’ (**‘ANOG’**) and its ‘*Planning for Sport Guidance*’.
- Light green – for ‘*The Golf Supply and Demand Assessment*’. This is dated December 2022 and was prepared by Knight, Kavanagh & Page (**‘the KKP Golf Assessment’**) for Horsham District Council.
- Light blue – for the ‘*Ifield Golf Club – Homes England Position Statement*’. This is dated November 2023 and was prepared by Homes England (**‘the HE Position Statement’**).
- Light grey or no colouring – for other general information sources or quotes.

2. POLICIES AND GUIDANCE

The Key National Planning Policy Tests Relating to Golf Provision

- 2.1 Horsham District Council's (**'HDC'**) emerging Local Plan includes an allocation for development by Homes England. The latter has prepared an initial masterplan (**'the Initial Masterplan'**) which comprises a development of around 3,000 homes along with associated infrastructure. The Initial Masterplan also includes some new sport, health and wellbeing facilities.
- 2.2 Homes England's development proposals, if they go ahead, will mean the permanent loss of the 18-hole golf course at Ifield.
- 2.3 A key question is whether the permanent loss of the 18-hole golf course at Ifield is fully compliant with national planning policy guidance. If it is not, then this puts into question the soundness of HDC's emerging Local Plan regarding its support for Homes England's Initial Masterplan.

Open Space and Recreation - Paras 98 and 99 of the September 2023 NPPF

- 2.4 For Homes England's Initial Masterplan to be compliant with national planning policy guidance on the specific topic of *'Open space and recreation'*, one must consider paragraphs 98 and 99 of the *'National Planning Policy Framework'* (September 2023 version), as issued by the Department for Levelling Up, Housing and Communities. The national policy wording on this is as follows:

Open space and recreation

98. Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities, and can deliver wider benefits for nature and support efforts to address climate change. Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate.

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

(a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or

(b) 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

(c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.

- 2.5 It is essential to reflect carefully on the standard of proof set by paragraph 98 (**'Para 98'**) and paragraph 99 (**'Para 99'**). What evidence is needed to prove any assertion that HDC's emerging Local Plan is compliant with these two paragraphs in respect of Homes England's Initial Masterplan?
- 2.6 It follows that HDC and Homes England must establish and publish facts to prove and support their case for compliance with the Government's stated national planning policies – paras 98 and 99 of the NPPF.

Para 98 of the NPPF

- 2.7 Looking specifically at Para 98, and relating it to the 18-hole golf course at Ifield, the NPPF's wording can be broken down regarding the facts required to support the case for the golf course's permanent closure:

"Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities, and can deliver wider benefits for nature and support efforts to address climate change...."

- The golf course at Ifield is a large open space which has been used for sport and recreation for nearly 100 years. Building large scale housing on the land inevitably means a large loss of open space. Have HDC and Homes England proved that this is acceptable in terms of the above national policy guidance?

"Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate."

- Does HDC have a robust and up-to-date assessment regarding the need for open space, sport and recreational facilities which supports the permanent loss of the 18-hole course at Ifield?

Para 99 of the NPPF

- 2.8 Looking specifically at Para 99, and relating it to the 18-hole golf course at Ifield, the NPPF's wording can be broken down regarding the facts required to support the case for the golf course's permanent closure:

"Existing open space, sports and recreational buildings and land ... should not be built on unless:

a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements"

- The first key question is whether an appropriate assessment exists which proves the above. In particular, the bar is set very high – the assessment must clearly show the 18-hole course at Ifield to be surplus to requirements. The test is therefore 'beyond reasonable doubt that it is surplus to requirements' rather than 'on the balance of probabilities it is surplus to requirements'.

"or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location"

- The second key question is whether HDC and/or Homes England are proposing to replace the existing 18-hole golf course with its clubhouse and associated facilities in an alternative suitable location if the course at Ifield is proven not to be 'clearly ... surplus to requirements'? Again, the bar is set very high. Mitigation under this test means a full replacement course, not a 'watered down' version of mitigation for golf loss.

“or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.”

- The third key question is if tests a) and b) have not been met, nor are they going to be met, is whether the Homes England Initial Masterplan provides for alternative sports and recreational provision at Ifield which clearly outweigh the loss of the existing 18-hole course? Again, the bar is set very high – the benefits need to clearly outweigh the loss.

2.9 Given my professional background, I will comment solely on HDC’s and Homes England’s plans for permanently closing the 18-hole golf course at Ifield, as they relate to national planning policy – Paras 98 and 99 of the NPPF.

2.10 Regarding Para 99, I will only consider tests a) and b) as they fall within my area of professional expertise. I will not consider test c).

Sport England's 'Assessing Needs and Opportunity Guide'

2.11 Sport England was established by Royal Charter in 1996. It is an arm's length body of government responsible for growing and developing grassroots sport and getting more people active across England.

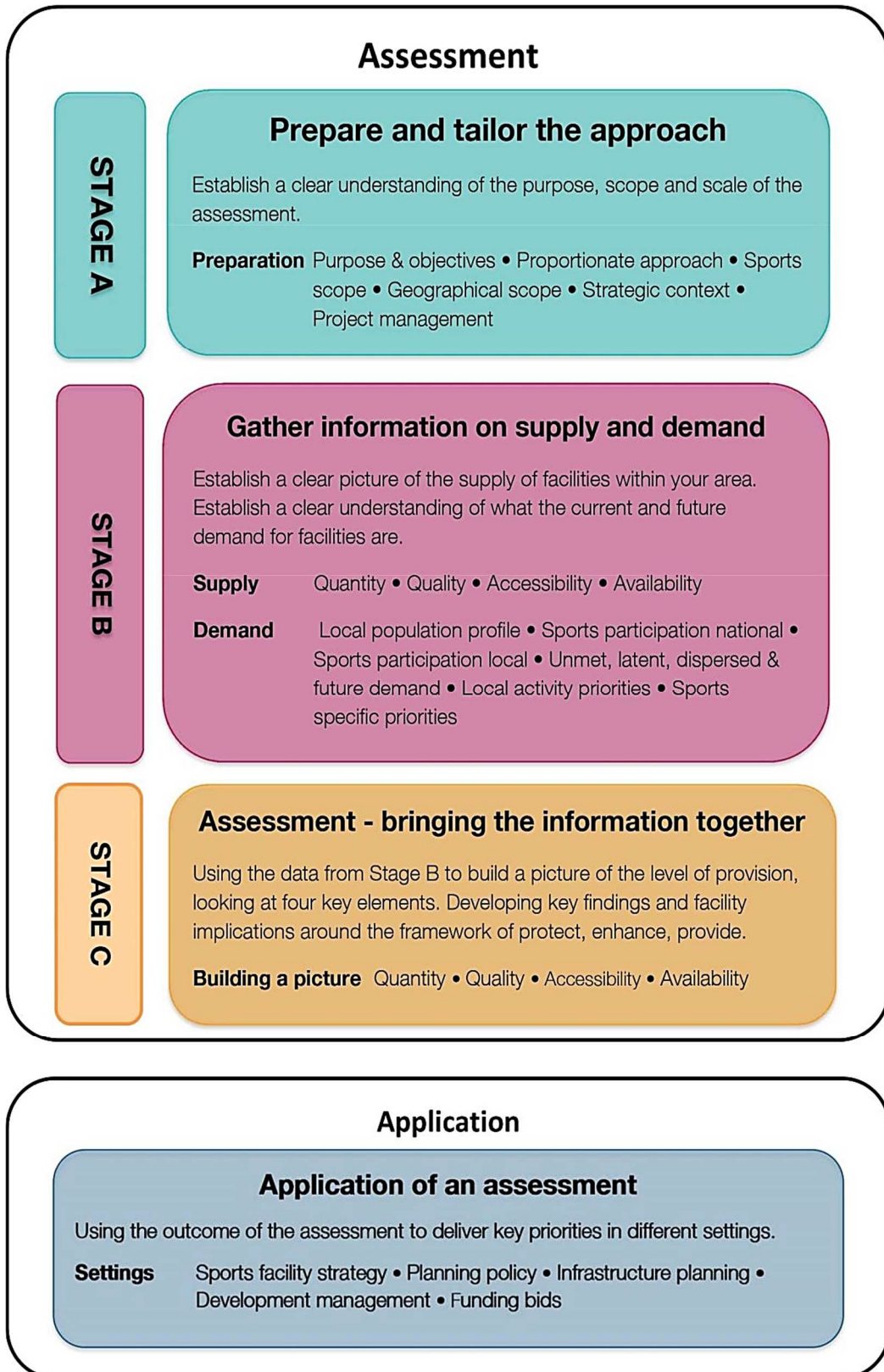
2.12 It is a statutory consultee when it comes to the provision of sport in Local Plans and planning applications made which affect sporting provision.

2.13 It also provides guidance on planning for sport and sporting need.

2.14 In 2014 Sport England published its *'Assessing needs and opportunities guide for indoor and outdoor sports facilities'* (**'ANOG'**). It explains how to undertake and apply needs assessments for sports facilities.

2.15 Thus, for the national planning policy tests on whether the loss of the 18-hole golf course at Ifield is acceptable in terms of the NPPF's Paras 98 and 99, any golf needs assessment should be compliant with the framework set out in Sport England's ANOG.

2.16 On page 1 of ANOG (its pdf page 3) is a useful visual overview of the approach needed to carry out the assessment. It is as follows:



- 2.17 In terms of the proposed loss of the 18-hole golf course at Ifield, Sport England's ANOG framework is about building a picture on whether its loss is acceptable in terms of four overarching measures:
- Quantity
 - Quality
 - Accessibility
 - Availability
- 2.18 I attach in Appendix MAS 2 extracts from Sport England's ANOG explaining how to assess these four variables.
- 2.19 To successfully pass the high standard of proof set by test a) in Para 99 of the NPPF – that Ifield is 'clearly ... surplus to requirements' in golf needs terms – Homes England needs to clearly prove this in a published sports needs assessment which is open to public scrutiny.
- 2.20 The assessment must address the four overarching measures of quantity, quality, accessibility and availability using correct and relevant facts. It then needs to reach a reasonable, logical conclusion on whether the 18-hole course at Ifield is, indeed, 'clearly ... surplus to requirements' in sports need terms.

Sport England's 'Planning for Sport Guidance'

- 2.21 In June 2019 Sport England published its '*Planning for Sport Guidance*'. Below is Sport England's headline statement about the guide's purposes which appears on its pdf page 2:

PLANNING FOR SPORT GUIDANCE

The purpose of this guidance, and the twelve planning-for-sport principles it presents, is to help the planning system provide formal and informal opportunities for all to take part in sport and be physically active.

It is hoped that it will be of assistance to all involved in, or looking to engage, with the planning system in England. This includes local authority officers and councillors, planning inspectors, developers and consultants through to parish/town councils, neighbourhood forums, public health leads, sports clubs/organisations, community groups and individuals.

The guidance and the twelve planning-for-sport principles it contains will also help to guide and support Sport England's engagement with the planning system.

- 2.22 The wording over the page then appears on pdf page 4 of the guide:

PLANNING FOR SPORT: PROVIDING ACTIVE ENVIRONMENTS

The **many benefits of sport and physical activity**, including to people's physical and mental health, are widely recognised.

Our built and natural **environments are key** to helping people change their behaviours to **lead more active and healthier lifestyles**.

The **planning system plays a vital role** in shaping our environments.

To help provide environments that protect, enhance and provide both formal and informal opportunities for all to take part in sport and be physically active, the planning system should **embrace 12 planning-for-sport principles**.

2.23 I attach in Appendix MAS 3 a summary of Sport England's '12 Planning-for-Sport Principles' which it refers to in the above statement. This appears on pdf page 5 of the guide.

2.24 Of particular relevance to the 18-hole golf course at Ifield are Sport England's following three Planning-for-Sport Principles (**'SE Principles'**):

- SE Principle 2: '*Undertake, maintain and apply robust and up-to-date assessments of need and strategies for sport and physical activity provision, and base policies, decisions and guidance upon them.*'
- SE Principle 4: '*Protect and promote existing sport and physical activity provision and ensure new development does not prejudice its use.*'
- SE Principle 10: '*Provide sport and physical activity provision which is fit for purpose and well designed.*'

2.25 I also attach in Appendix MAS 3 some statements from the guide which confirm important policy matters relating to sports provision and the protection given to existing sporting facilities.

2.26 Of particular note is Sport England's unequivocal statement below regarding the then para 97 of the 2019 NPPF, which became Para 99 of the September 2023 NPPF:

"The Government is clear that existing sport and recreational provision should be protected unless one of three specific circumstances are met. This protection is afforded to all provision irrespective of whether it is in public, private or educational ownership and regardless of the nature and level of use. It also relates to ancillary facilities including clubhouses, changing rooms and parking facilities".

3. THE EVIDENCE BASE

Evidence from Horsham District Council and Homes England

- 3.1 The relevant published evidence base relating to the proposed loss of the 18-hole golf course at Ifield from HDC and Homes England in relation to Paras 98 and 99 of the NPPF appears to be as follows:

From Horsham District Council:

- *'The Golf Supply and Demand Assessment'*. This is dated December 2022 and was prepared by Knight, Kavanagh & Page for HDC (**'the KKP Golf Assessment'**).

From Homes England:

- *'Ifield Golf Club – Homes England Position Statement'*. This is dated November 2023 and was prepared by Homes England (**'the HE Position Statement'**).

- 3.2 I now consider the above evidence in relation to Paras 98 and 99 of the NPPF and Sport England's *'Assessing needs and opportunities guide'* (**'ANOG'**) and its *'Planning-for-Sport Principles'* (**'SE Principles'**) in its 2019 *'Planning for Sport Guidance'*.

- 3.3 Before I do this, it is important to clearly define the primary assessment area for analysis.

The 20-minute drivetime by car – the primary assessment area

- 3.4 For nearly all 18-hole golf courses in England, it is accepted that the primary assessment area for analysis for town and country planning purposes is a 20-minute drivetime by car.

- 3.5 The above has applied in all the planning cases I have dealt with in my professional career.

- 3.6 I am also aware that England Golf, the national governing body for amateur golf in England, uses this as the primary assessment area for planning related cases.

- 3.7 I believe that Sport England also recommends using a 20-minute drivetime by car for golf analysis.

- 3.8 The reason for using the 20-minute drivetime by car as the primary assessment area is that it is widely accepted that for most 18-hole golf courses, most of its regular users will live within a 20-minute drivetime from it.

- 3.9 It is my view that the correct primary assessment area for the 18-hole course at Ifield is its 20-minute drivetime by car.

3.10 Indeed, Homes England agrees that the 20-minute drivetime is the primary assessment area for Ifield. The comments below appear in paragraphs 1.10 and 1.11 of the HE Position Statement:

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*.

The Para 98 NPPF test

3.11 This is as follows:

Open space and recreation

98. Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities, and can deliver wider benefits for nature and support efforts to address climate change. Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate.

- 3.12 Firstly, it is important to consider the *'health and well-being of communities'* aspect in Para 98.
- 3.13 The health and mental well-being aspects of golf are perhaps, not as widely understood and appreciated by those who do not play the game.
- 3.14 To give an idea of the health benefits associated with golf, I attach in Appendix MAS 4 extracts from the *'Golf & Health 2016-2020'* report commissioned by The R&A (one of the game's global governing bodies):
- 3.15 The two key tests arising from Para 98 of the NPPF, as they relate to the 18-hole course at Ifield, are as follows:
1. Are both the KKP Golf Assessment and the HE Position Statement *'robust'*?
 2. Are both the KKP Golf Assessment and the HE Position Statement *'up-to-date'*?
- 3.16 Taking each and starting with the *'up-to-date'* test:
- The 'up-to-date' test:*
- 3.17 A major factor in the UK golf market is the very significant boost in golfer participation caused by Covid. The first national lockdown started in March 2020.
- 3.18 The research firm, Sporting Insights, is widely regarded in the UK golf sector as the leading independent analyst for golf participation. I attach in Appendix MAS 5 a recent article from Sporting Insights referring to the boost in golf participation post-Covid along with other articles.
- 3.19 The KKP Golf Assessment is dated December 2022 and specifically refers to the boost in golf demand caused by Covid. The HE Position Statement is more recent, being dated November 2023.
- 3.20 I believe that both assessments are *'up-to-date'* from a timeline perspective, although the HE Position Statement has two golf venues on its list in Annex 2 shown as 'open' when, in fact, they are closed. These are Le Club Effingham Park - a short golf course which closed in March 2020 and never reopened for normal golf use, and the footgolf course at Tilgate Forest Golf Centre which has now been closed for about two years.
- The 'robust' test:*
- 3.21 Turning to the *'robust'* test, this falls into two elements:
- the relevant professional experience of the firm who prepared the assessment; and
 - whether the assessment relates specifically to the primary assessment area for Ifield (its own 20-minute drivetime).
- 3.22 Regarding the KKP Golf Assessment, Knight, Kavanagh & Page Ltd was founded in 1990 and is one of the UK's leading consultancy firms which prepares sports needs assessments for town and country planning purposes. It prepares many assessments which are specific to golf courses in England.
- 3.23 I believe that the KKP Golf Assessment can generally be considered *'robust'* in terms of i) the firm's specific professional expertise relating to golf venues in England; and ii) on commenting on golf provision within HDC's administrative boundary.

3.24 The KKP Golf Assessment, however, relates to golf provision within HDC's administrative boundary. This is distinctly different from a bespoke and specific 20-minute assessment area for the 18-hole golf course at Ifield.

3.25 I include below five extracts from the KKP Golf Assessment which, when read collectively, correctly acknowledges this very important distinction:

1.1 Horsham District Council commissioned Knight Kavanagh & Page Ltd (KKP) to undertake a standalone supply and demand assessment for golf. This was completed in February 2021, but now needs to be updated to account for changes in the Council's development strategy and to recognise the impact of the Covid-19 pandemic. This report therefore provides this.

Scope

1.12 The study area for the assessment is the Horsham District boundary area, with all golf facilities within the District included. The sites covered are therefore as follows:

- ◀ Horsham Golf & Fitness Club
- ◀ Ifield Golf & Country Club
- ◀ Mannings Heath Golf Club
- ◀ Rookwood Golf Course
- ◀ Slinfold Park Golf & Country Club
- ◀ West Sussex Golf Club
- ◀ Horton Golf Club
- ◀ Cottesmore Golf & Country Club

1.13 In addition, whilst the focus of the project is on the above sites, consideration has also been given to supply and demand in close proximity to the Horsham District border from neighbouring authorities due to the location of some venues and the propensity of golfers to travel cross-boundary to access preferred facilities. This has been achieved via use of a 20-minute drive time catchment area, which is recommended as best practice by both Sport England and England Golf when undertaking such studies.

2.6 There are eight golf venues within Horsham District that conform to the above definitions, as identified in Figure 2.1 and Table 2.2 below. All provide at least one standard hole course (both Cottesmore Golf & Country Club and Mannings Heath Golf Club have two), whilst two also host accompanying par 3 courses and driving range bays (Horsham Golf & Fitness Club and Slinfold Park Golf & Country Club).

Figure 2.1: Location of golf facilities in Horsham District

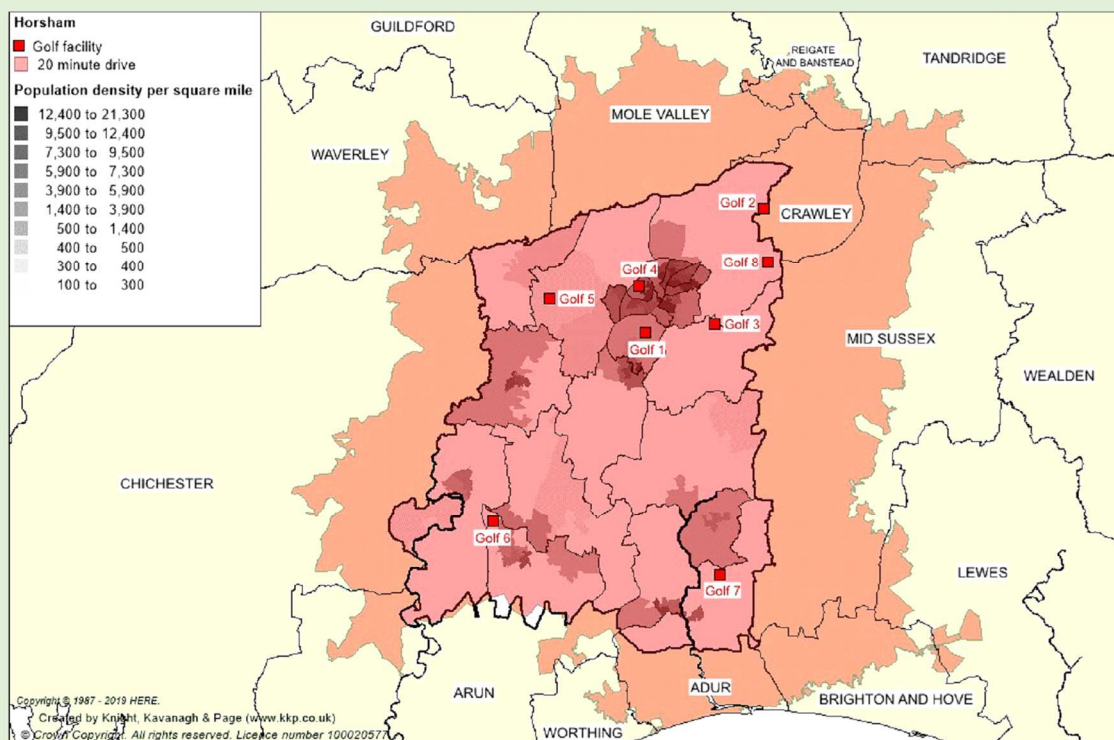


Table 2.2: Summary of golf facilities within Horsham District

Site ID	Site name	Holes		Driving range bays
		Standard	Par 3	
Golf 1	Horsham Golf & Fitness Club	18	9	16
Golf 2	Ifield Golf & Country Club	18	-	-
Golf 3	Mannings Heath Golf Club	27	-	15
Golf 4	Rookwood Golf Course	18	-	-
Golf 5	Slinfold Park Golf & Country Club	18	9	14
Golf 6	West Sussex Golf Club	18	-	-
Golf 7	Horton Golf Club	9	-	-
Golf 8	Cottesmore Golf & Country Club	27	-	-
Total		153	18	45

2.145 If the existing development proposals and the potential loss of golf provision are to be pursued, separate needs assessment studies will be required to fully determine requirements, with the focus specifically on the site/s in question and a bespoke, site-specific catchment area. Provision and demand from within neighbouring authorities can be more thoroughly considered as part of this. Any assessment should follow Sport England's ANOG and, for a proposal to go ahead, will need to evidence that the provision is surplus to requirements or set out a mitigation proposal that replaces the supply to an equivalent or better quantity and quality in a suitable location. **This is also as per the NPPF.**

- 3.26 Of particular relevance from the above KKP Golf Assessments extracts is the location of Ifield (Golf 2) in relation to HDC's administrative boundary – which is outlined in bold with various shades of red within it (but not the orange shading). Ifield sits right on the edge of HDC's administrative boundary. Indeed, the 'Welcome to Crawley' sign is around 400 yards away from the club.
- 3.27 To provide a 'robust' assessment on whether Ifield is 'clearly ... surplus to requirements' as per test a) of Para 99 of the NPPF, a specific 20 minute drivetime assessment is required using Ifield's postcode (RH11 0LN).
- 3.28 From the above extract it is apparent that the 20-minute drivetime boundary for Ifield will include parts of the following council areas: Horsham, Crawley, Mole Valley and Mid Sussex.
- 3.29 Turning to whether Homes England has published a 'robust' assessment for the loss of Ifield under the Para 98 NPPF test, the answer is clearly 'no'. This is because it has only published the HE Position Statement which acknowledges that it has yet to publish its specific golf needs assessment relating to Ifield.
- 3.30 I attach on the next two pages two extracts from the HE Position Statement which confirms this:

- 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 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.

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.

3.31 I wish to respectfully make the point that Homes England has had years to publish a specific '*robust*' golf needs assessment for Ifield – but it has not published one for proper public scrutiny.

3.32 It is clear from para 1.28 of the Homes England Position Statement that it believes '*there is already a reasonable prospect at this stage that all three limbs of the Para 99 test] will be satisfied*'.

3.33 Homes England is the government's housing and regeneration agency. I attach below an extract from its website:

What we do

As the government's housing and regeneration agency we believe that affordable, quality homes in well-designed places are key to improving people's lives.

Together with our partners, we're accelerating the pace of house building and regeneration across the country, as we seek to deliver homes and places people are proud to live in – for generations to come.

Homes England is an executive non-departmental public body, sponsored by the [Department for Levelling Up, Housing and Communities](#).

[Read more about what we do](#)

Follow us
The following links open in a new tab

- [Follow on Homes England on Twitter \(opens in new tab\)](#)
- [Follow on Homes England on LinkedIn \(opens in new tab\)](#)

3.34 The above Homes England website extract talks about '*affordable, quality homes in well-designed places*'.

3.35 However, affordable, quality homes cannot be '*well-designed*' if they are proven to be on a golf course protected by the government's own national '*Open Space and Recreation*' planning policies via Paras 98 and 99 of the NPPF.

3.36 It is clear and unequivocal from the government's Paras 98 and 99 of the NPPF that an up to date assessment is required regarding Homes England's plans to close the 18-hole course at Ifield – including references to quantitative or qualitative deficits or surpluses.

3.37 It is only then that required sporting provision can be properly assessed. HDC's emerging Local Plan should then seek to accommodate sporting provision relating to the 18-hole golf course at Ifield in accordance with the '*robust*' assessment for it.

3.38 I respectfully assert that at this point in time, HDC's emerging Local Plan cannot be considered '*sound*' in respect of Homes England's proposals for Ifield without Homes England publishing its '*up-to-date*' and '*robust*' assessment regarding the 18-hole course at Ifield.

3.39 I believe that this assessment should have been made available for inspection at or before this current Regulation 19 stage of the emerging Local Plan so that it could be open to examination and proper public scrutiny.

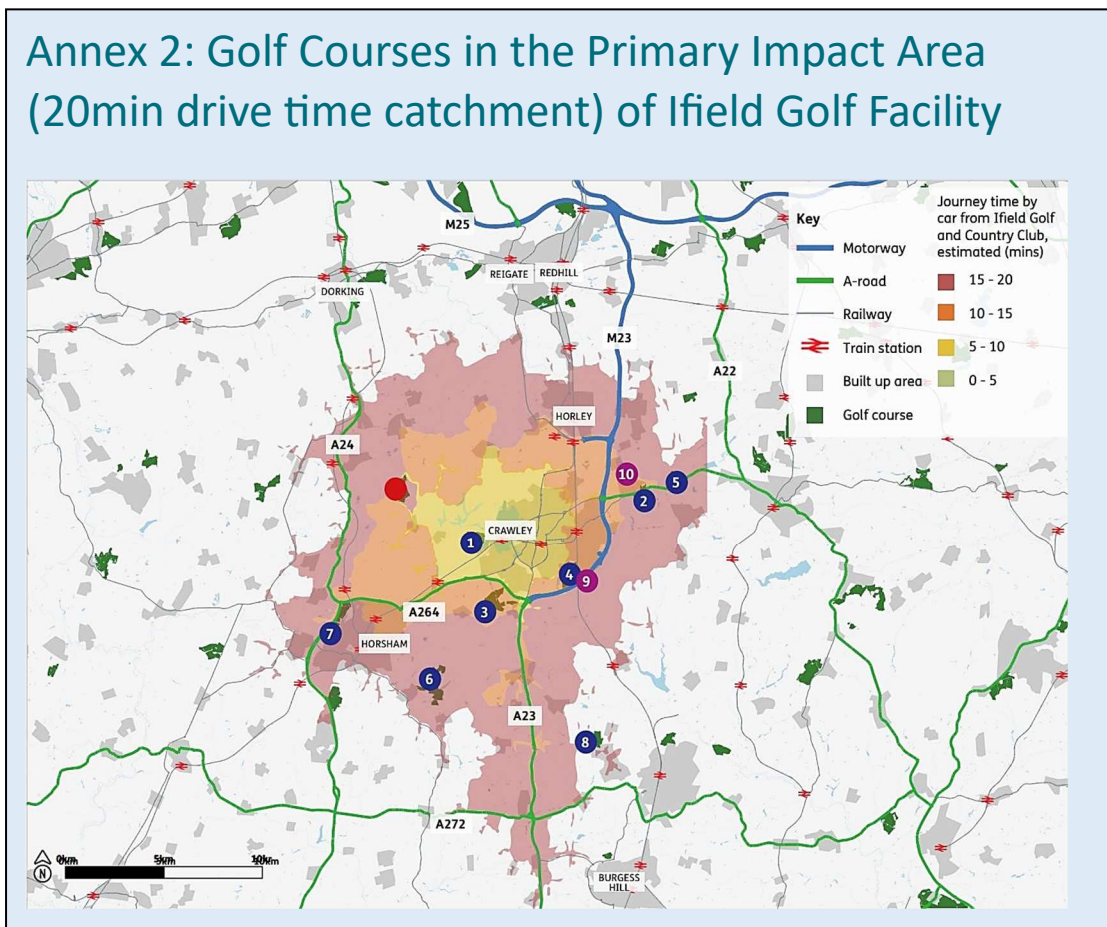
3.40 It seems unreasonable in public transparency terms not to have published such an assessment.

3.41 Indeed, if it was going to be relatively easy to demonstrate that the 18-hole course at Ifield is '*clearly ... surplus to requirements*' in relation to test a) of Para 99 of the NPPF, then I believe it is probable that Homes England would have published its assessment rather than delay with the interim 'HE Position Statement'.

- 3.42 I believe that there is a reasonable possibility that Homes England may, for strategic or tactical reasons, be deliberately delaying the publication of its bespoke golf needs assessment for Ifield to minimise proper examination and public scrutiny of its assessment.
- 3.43 If this were to be the case, then in the context of public transparency, this is poor form.
- 3.44 If it is not the case, then it ought to publish its golf needs assessment without delay, so it is then open to public scrutiny.
- 3.45 Furthermore, there has been no public statement from England Golf, the game’s national governing body, on whether it supports the closure of an affiliated 18-hole club. Its position on the matter should be in the public domain for proper transparency and scrutiny.

Sport England’s ANOG ‘quantity’ test

- 3.46 This is the first of the four overarching measures: quantity, quality, accessibility and availability.
- 3.47 Homes England provides data on the quantity of golf provision within the primary 20-minute assessment area for Ifield in Annex 2 of its Position Statement:



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

3.48 I am confident that the data has come from Sport England's Active Places Power tool. This is an interactive online facility where one can run sport provision reports using Sport England's very extensive database.

3.49 Indeed, when I ran a search for Ifield for the golf provision within its 20-minute drivetime, I got the same list of venues. I attach my data from Sport England's Active Places Power tool in Appendix MAS 6.

Make-up of the golf provision within the primary assessment area:

3.50 Expanding on the HE Position Statement table, below is my summary description of the eight venues referred to as 'standard courses' – 18 or 9-hole full length courses (as opposed to short courses, par 3 courses, footgolf courses or driving ranges).

Ref	Name	Built	Holes	Course length	Type
1	Ifield Golf Club	1927	18	6,319 yards	Sports club
2	Copthorne Golf Club	1892	18	6,651 yards	Sports club
3	Cottesmore Hotel, Spa & Golf Club	1974	18 & 9	6,444 & 2,240 yards	Commercial
4	Tilgate Forest Golf Centre	1983	18	6,283 yards	Local authority
5	Le Club Effingham Park	1979	9	0	Closed 2020
6	Mannings Heath Golf Club	1905	18 & 9	6,683 & 3,082 yards	Commercial
7	Rookwood Golf Course	1997	18	6,200 yards	Commercial
8	Cuckfield Golf Centre	2001	9	2,946 yards	Commercial

3.51 'Le Club Effingham Park' (No.5 on the Annex 2 list) forms part of the Copthorne Effingham Gatwick Hotel. It was a short course and closed for play in March 2020 due to the Covid national lockdowns. It has not

reopened since for golf use. It is reasonable to exclude this from the analysis. Tilgate Forest Footgolf (No. 9 on the Annex 2 list) closed around two years ago and has not reopened.

- 3.52 The 9-hole course at Cottesmore is very short, at just 2,240 yards (equivalent 18-hole length 4,480 yards). There is an argument to say that it should not be given full weight as a 'standard course', given how short it is. I will, however, treat it as a full standard 9-hole course (length typically 2,850 yards to 3,250 yards) in my analysis.
- 3.53 Excluding, Le Club Effingham Park, there is therefore the equivalent of 7.5 18-hole courses. This equates to 135 holes.
- 3.54 Sport England's Active Places Power tool confirms that Ifield's total resident population within the primary 20-minute drivetime assessment area is 243,057 (see Appendix MAS 6).
- 3.55 Sport England's Active Places Power tool confirms that Ifield's total resident population within its 10-minute drivetime area is 87,701 (also see Appendix MAS 6).
- 3.56 An important fact to note here is that Ifield is the only course within Sport England's 0 - 10 minute drivetime. If it were to close, there would be no courses within Sport England's 0 - 10 minute drivetime – which would be unusual in England, particularly given the venue's proximity to a sizeable town (Crawley).
- 3.57 To form a view on whether the local quantity of golf courses in a set location is 'about right', 'excessive' or 'lacking', one has to benchmark the number of courses within the given catchment area against the population of that catchment area. This is ratio analysis.
- 3.58 For many years prior to Sport England's ANOG, the UK golf industry used a general 'rule of thumb' guide of one 18-hole course per 20,000 to 25,000 resident people representing equilibrium. This is where, all other factors being equal, a provision ratio at this level indicates that the supply of golf courses is reasonably in balance with local golfer demand which comes from the total resident population.
- 3.59 For practical purposes, to assess the likely financial viability of 18-hole golf courses, I still use the 1: 20,000/25,000 yardstick as a reliable guide in my work today. I have used it for 30 years.
- 3.60 It is my practical experience that (with all other factors being equal):
1. If the local ratio is say 1: 15,000, this indicates more than ample golf course supply compared to the number of local golf users. The resulting competitive market will most likely make it harder for local golf courses to trade satisfactorily in a financially sustainable way.
 2. If the local ratio is say 1: 30,000, then the opposite is true from 1. above. There is low local golf course supply in relation to the number of local users. The resulting less competitive market will most likely make it easier for local golf courses to trade well in a financially sustainable way.
 3. The mid-point ratio, at 1: 20,000/25,000, is a situation where the supply of golf courses compared to the number of local golfers is likely to be broadly in balance – neither golf course oversupply nor undersupply.
- 3.61 The 1:20,000/25,000 ratio came out of reports from golf's various governing bodies, research organisations, and from operators in the marketplace running golf courses during the late 1980s and the 1990s.

3.62 In a 2011 planning inquiry that I was involved with regarding Ingol Golf Course ¹ in Preston, the planning inspector referred to this ratio in his reasoning in his appeal decision. I attach his specific words below:

324. The golf industry standard for the provision of courses is one course to 20- 25,000 head of population. The catchment area contains some 356,000 people, and within this number is a better than average representation of socio-economic groups that are found to play golf. Taking Ingol golf course into account the ratio of course to population in the catchment area is 1:33,900. Excluding Ingol the ratio is 1:37,500. Thus on a quantitative basis using the objective industry standard there is a significant undersupply of 18 hole golf courses. Overall, even taking into account that the current economic situation could suppress demand, it is evident that there is a need for the golf course.

3.63 In recent years, most golf needs assessments show the golf course supply to local population ratio in terms of holes per 1,000 people. For context, the 1/20,000 ratio can be rewritten as 0.90 holes per 1,000 people and the 1/25,000 ratio can be rewritten as 0.72 holes per 1,000 people.

3.64 Given the above, I have analysed the supply/demand balance for Ifield and the surrounding areas in the table below:

Catchment area	Total holes	Catchment population	Ratio: holes per 1,000 people	Equivalent: one 18-hole course per people
From my analysis - Ifield's 18-hole course stays:				
Ifield's primary 20-minute drivetime	135	243,057	0.56	32,408
Ifield's 10-minute drivetime	18	87,701	0.21	87,701
From my analysis - Ifield's 18-hole course closes:				
Ifield's primary 20-minute drivetime	117	243,057	0.48	37,393
Ifield's 10-minute drivetime	0	87,701	0.00	Nil provision
From KKP Golf Assessment:				
(tables 2.2 & 2.7, pages 7 & 14)				
Horsham District Council	153	146,800	1.04	17,271
Arun District Council	72	164,800	0.44	41,200
From KKP Golf Assessment:				
(table 2.7, page 15)				
Brighton & Hove	63	277,200	0.23	79,200
Chichester	126	124,100	1.02	17,729
Crawley	18	118,500	0.15	118,500
Guildford	180	143,600	1.25	14,360
Lewes	81	99,900	0.81	22,200
Mid Sussex	126	152,600	0.83	21,800
Mole Valley	105	87,400	1.20	14,983
Reigate & Banstead	117	150,900	0.78	23,215
Tandridge	225	87,900	2.56	7,032
Waverley	144	128,200	1.12	16,025
Worthing	54	111,400	0.48	37,133
South East	6,597	9,278,100	0.71	25,315
England	30,448	56,489,800	0.54	33,395

¹ Planning Inspectorate Ref: APP/N2345/A/11/2145837

3.65 There are some very significant factual insights that can be drawn from the above data. They are as follows:

1. Ifield's primary assessment area – the 20-minute drivetime – unequivocally shows a shortage of golf course provision: 1:32,408 versus the 1:20,000/25,000 yardstick.
2. The above shortage of golf course provision compounds further if Ifield's 18-hole course were to close: 1:37,393 versus the 1:20,000/25,000 yardstick. Furthermore, there is then no golf provision at all within Ifield's 10-minute drivetime.
3. As an aside to 2. above, this ratio will get worse if Ifield closes to make way for say 3,000 homes. If the average occupancy rate in these homes was 2, then this equates to an extra 6,000 residents within the 10-minute drivetime. This then makes nil golf provision for 93,701 residents (87,701 + 6,000).
4. Horsham District Council, from a strict administrative boundary calculation, has marginally more than ample existing golf course provision. I will refer to this later.
5. Ifield is situated very close to the administrative boundary of Crawley. It is very clear that Crawley, from a strict administrative boundary calculation, has an acute lack of courses: 1:118,500 versus the 1:20,000/25,000 yardstick. Ifield, because it is situated within 400 yards of HDC's boundary, is strategically very important in serving the golfing needs of the neighbouring area for Crawley Borough Council.
6. Of the other nearby surrounding districts and boroughs, there is a mixed picture regarding their golf course supply/population demand ratios.
7. The ratio for the whole of South East England sits around the equilibrium position (1:25,315) and the whole of England shows a ratio of 1:33,395. One would generally expect a higher level of golf provision in South East England compared to say the north of England or within areas of deprivation. It is usually not financially viable to build and operate golf courses in remote rural locations or those which suffer from pronounced deprivation issues.
8. The same conclusions above obviously stand if one uses the holes per 1,000 population figures instead of the 1:20,000/25,000 benchmark.

3.66 Turning to the existing golf provision within Horsham District Council's administrative boundary, although it is relatively well provided for in terms of existing golf courses, the KKP Golf Assessment was clear in stating that it would be difficult to justify any existing golf course closures in golf need terms. See the following three extracts over the page:

Summary

- 2.46 Golf facility levels in Horsham District are evidently high when compared to national and regional rates and will remain that way even if existing development proposals come to fruition, which should be seen as a positive. However, this does not necessarily equate to an oversupply of provision and the above findings should not be used in isolation to justify any future loss. **The calculations are intended for use as a guide and are part of the suite of tools used to inform this supply and demand assessment.**
- 2.47 In reality, using 'standards' to gauge provision can be somewhat inaccurate as rates can continually reduce as and when developments take place and golf provision is lost, which then in turn reduces the level of provision required for an authority to be above average levels. As an example of this, there are currently 484 fewer standard holes identified nationally and 222 fewer identified regionally when compared to previous findings (in 2021), despite demand levels seemingly rising over this timespan. This has created more pressure on remaining golf supply yet calculating averages with no further analysis would suggest less need for facilities.
- 2.48 In addition, the approach does not take account of local nuances and the propensity of a population base to participate in golf. Furthermore, due to the nature of the sport, local authorities with high supply levels are more likely to have provision that meets demand from neighbouring authorities with low supply levels, especially where facilities are situated close to the border. In Horsham District, this is the case particularly at Ifield Golf & Country Club, which reports accommodating considerable demand from Crawley due to its location (see imported demand). Horsham has one of the higher rates of provision in the South East region, whereas Crawley has one of the lowest rates (although nationally there are authorities without any golf facilities, including Adur), which is likely to be a consequence of it being an urban centre (with Horsham District much more rural).

Exported/imported demand

- 2.108 Cross-boundary demand for golf is common nationally due to the nature of the sport. As referenced previously, golfers do not necessarily recognise local authority borders, and many will choose a facility for a whole range of reasons other than where it is located, with factors including quality, availability, cost and where friends/family play.
- 2.109 Imported demand is especially pronounced at some venues in Horsham District due to their location in relation to neighbouring authorities and a comparative lack of provision within those authorities, especially to the north. In particular, high levels are reported by Ifield Golf & Country Club due to its close proximity to Crawley. In total, only 68 of its 515 current members (13%) live definitively within Horsham District, with a further 146 members living close to the Crawley boundary (the Club could not calculate how many of these are within Horsham District and how many are within Crawley). The remaining members all live conclusively outside of Horsham District, including 44 that even reside outside of neighbouring authorities.

3.1: Conclusion

3.2 To conclude the supply and demand assessment, it is considered that:

- Horsham District is currently 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, although most sites are expensive to access.
- Supply is currently deemed to be sufficient to meet demand; however, it is also clear that each facility is meeting a need due to current membership and usage levels.
- Potential future demand provides further evidence that each existing facility is required.
- It is unlikely that any loss of provision could be supported without appropriate mitigation being secured due to capacity pressures that would be created, despite the development aspirations that are in place.
- If existing development proposals and/or the potential loss of any golf provision are to be pursued, separate site-specific needs assessment studies are needed to fully determine requirements, with a full and specific focus on the site/s in question and concentration on a more closely defined and more relevant catchment area (a 20-minute drive time from the site/s).
- For a proposal to go ahead, any needs assessment will need to evidence that the provision is surplus to requirements or set out a mitigation proposal that replaces the supply to an equivalent or better quantity and quality in a suitable location, as per the NPPF's requirements.

3.67 In conclusion, from the above evidence it is not possible to show that the 18-hole course at Ifield is 'clearly ... surplus to requirements' when benchmarked against Sport England's ANOG 'quantity measure.

3.68 It is interesting to note the fact that Ifield's quantitative supply ratios in the primary 20-minute assessment area, if it remains open (1:32,408) or closed (1:37,393), are very similar to those for Ingol Golf Course in Preston, where the planning inspector clearly concluded that there was not golf course oversupply, and the course was needed (see para 3.62 earlier).

Sport England's ANOG 'quality' test

- 3.69 This is the second of the four overarching measures: quantity, quality, accessibility and availability.
- 3.70 Homes England makes the following comments about the quality of Ifield in its Position Statement:

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.

- 3.71 I disagree with the assertions above. The tone appears to be that because 'quality' is subjective, it matters less as test. To the contrary, to most discerning golfers, the quality of the golf course they choose, and pay to play on, is absolutely critical.
- 3.72 Whilst it can be difficult to measure the quality of some things in life, nearly everyone instinctively knows it or feels 'quality' when they experience it. Golfers 'just know' when they experience playing a 'quality course', even if the specific aspects of quality may not be measured in a neat, analytical matrix of variables.

Ifield's historic pedigree

- 3.73 The R&A is a leading body within the world of golf and engages and supports activities to ensure it is a thriving sport for all on a global scale. 'R&A' is short for The Royal and Ancient Golf Club of St Andrews which was founded over 250 years ago. The R&A is based at St Andrews, in Scotland, and is known in the world of golf as 'the home of golf'.

3.74 Below is an extract from The R&A's website about 'The Open':

The Open is golf's original Championship. Played since 1860 on iconic links golf courses, it is the sport's most international major championship with qualifying events on every continent.

For one week each year, the pursuit of the famous Claret Jug trophy is the focus of the sporting world, followed globally by millions of fans. Brian Harmon is the defending champion after his historic success in The 151st Open at Royal Liverpool in 2023.

3.75 There are only 10 venues on the current Open Championship roster. One of them is Royal Birkdale Golf Club which is situated near Southport in Merseyside.

3.76 Below is an extract from Wikipedia about the history of the 18-hole course at Royal Birkdale which refers to two golf course architects, Frederick G Hawtree and J H Taylor.

Three generations of the Hawtree family of golf course architects have worked on the course.^[4] Frederick G. Hawtree and champion golfer [J.H. Taylor](#) are the two people most responsible for the current routing,^[4] following the valleys between the very large dunes which dominate the property. The arrangement makes for excellent spectator conditions during major events. Frederick W. Hawtree, the son of Frederick G, performed some modifications in the 1960s and in 1993 [Martin Hawtree](#), son of Frederick W., improved and modernised the layout further, with all 18 of the club's greens being completely rebuilt, to improve turf and drainage following the 1991 Open Championship.^[6] Only relatively minor tweaking, such as the addition of a few new bunkers and back tees, has been deemed necessary in advance of the last two Open Championships.^[6] The course was ranked as the 18th best in the world outside the [United States](#), in the 2007 rankings by [Golf Digest](#) magazine.^[7]

During the 1960s, the club hosted the [Ryder Cup](#) twice, in [1965](#) and in [1969](#). The United States won in 1965 by the score of 19½–12½, but in 1969 the competition ended in a 16–16 tie when [Jack Nicklaus](#) generously conceded a short putt to [Tony Jacklin](#) to halve their match, which later became known as "The Concession." As [defending champions](#) in a tie, the U.S. retained the trophy; they kept it for another sixteen years, until [1985](#).

3.77 J H Taylor won The Open Championship (widely regarded as the most prestigious championship in the world of golf) five times. Below is a further extract from Wikipedia about him:

John Henry "J.H." Taylor (19 March 1871 – 10 February 1963) was an English professional golfer and one of the pioneers of the modern game of golf. Taylor is considered to be one of the best golfers of all time. He was a significant golf course architect. Taylor helped to found the [British PGA](#), the world's first, and became respected for his administrative work. He also wrote two notable golf books.

3.78 It follows from the above that Hawtree and Taylor were highly revered golf course architects in their day, and they still are in the world of golf today.

3.79 As an analogy, having a golf course designed by Frederick G Hawtree and J H Taylor instead of an average architect is like owning a bespoke 'made to measure' suit from Savile Row rather than owning an 'off the peg' one from Marks & Spencer.

John Henry Taylor



Taylor in 1908

- 3.80 It is fair to say that Hawtree and Taylor really were master craftsmen in the world of golf course architecture. Their work was the embodiment of 'quality'.
- 3.81 The 18-hole course at Ifield was designed by Frederick G Hawtree and the five time Open Champion, J H Taylor.
- 3.82 The course at Ifield was founded in 1927 and so is close to reaching its centenary year. It is my understanding that, apart from bunker alterations at Ifield, virtually all of its original design remains intact to this day. To have so few changes over the years is very rare and is testament to the original craftsmanship of Hawtree and Taylor. Their design has admirably 'stood the test of time'.
- 3.83 I contacted Dr Martin Hawtree, the internationally renowned golf architect, to ask him about his recollection of Ifield because his grandfather was Frederick G Hawtree.
- 3.84 I attach over the page an extract which appeared in Golf Monthly (Britain's oldest and most well-known golf magazine) saying that the '*Hawtree name is iconic in golf design*'. I also attach in Appendix MAS 7 a statement from Dr Hawtree specifically about Ifield for the purpose of this Regulation 19 stage consultation.
- 3.85 Dr Hawtree is now in his 70s. Given his life's knowledge on what constitutes a 'good quality' golf course, what he says holds real weight as evidence.
- 3.86 It is important to consider his statement in full in Appendix MAS 7. I have, however, extracted the following passages to give a flavour of Dr Hawtree's views on Ifield's heritage and quality:

"I have known about Ifield Golf Course for most of my life."

"The golf course has lost a good many of my grandfather's bunkers, as most courses of Ifield's generation have; and some of my grandfather's style in the shaping of those bunkers that remain has been lost, being a little too maintenance intensive for the modern age. But the green and green surround formations are still clear to see fitting in to a layout that I recognise as my grandfather's. My recognitions would be immaterial if it were not for the golfing interest and pleasure which formations and layouts such as this one have provided for thousands of golfers through the years. FGH was a master of deriving the greatest variety of direction, length, and sequence within the limitations of the smallest of sites. The layout has a compactness about it yet the last nine holes seem to stride effortlessly round the boundaries. The layout combines frequent changes of direction against all compass and wind directions, with east-west being the predominant layout on account of the main dimensions of the site. Only four pairs of holes follow consecutively the same direction. The rest twist and turn through the site with subtlety and smoothness. There is a favourite FGH theme of meeting points at 1 and 16 and at 5 and 7 where two greens come close together out of sequence."

"The disappearance of Ifield would be a sad loss to the Hawtree-Taylor canon. It is vintage 1920s golf and probably the most venerable of the dozen or so golf courses in the area. It would surely be a refreshing green lung in an extended Crawley with its extensive woodland on site. New Towns such as the garden city at Letchworth, Harlow, Livingstone, Milton Keynes, have their golf courses close by and were foreseen by their respective town planners. The planners of Crawley New Town had one ready-made on their doorstep."

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What Courses Has Martin Hawtree Designed?

The Hawtree name is iconic in golf designed we take a look at Martin's best work here.

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BY SAM TREMLETT
PUBLISHED OCTOBER 29, 2019

The Hawtree name is iconic in golf designed we take a look at Martin's best work here.

What Courses Has Martin Hawtree Designed?

Martin Hawtree is the third generation designer as part of a company started by his grandfather, Frederick George Hawtree. His son Frederick William Hawtree continued the work during World War II and then Martin took over in 1973 after getting a degree and Masters from the University of East Anglia and then a doctorate at the University of Liverpool.

- 3.87 Of particular note from the above is Dr Hawtree's observation: "It is vintage 1920s golf and probably the most venerable of the dozen or so golf courses in the area. It would surely be a refreshing green lung in an extended Crawley with its extensive woodland on site".
- 3.88 It is important to emphasise the phrase 'venerable' as it relates to Ifield. The Cambridge Dictionary defines 'venerable' as follows: 'deserving respect because of age, high position ... or historical importance'.
- 3.89 In the UK, buildings of special architectural and historic interest can be granted Listed status for protection in the town and country planning system. Whilst golf courses do not qualify for Listed status, if they were, then I think it would be reasonable to conclude that Ifield is worthy of special protection and would qualify for the equivalent of Grade II listed status given to buildings.
- 3.90 I attach in Appendix MAS 8 extracts from the 75th anniversary booklet authored by Craig Gascoigne in 2002 called 'Forging Links (The Story of Ifield Golf and Country Club)'. I have highlighted elements with red lines.
- 3.91 Over the years, Ifield has been associated with producing many fine golfers. It is well-known within golfing communities that the best golf clubs usually produce the most outstanding golfers. They also attract other outstanding golfers to join them for the quality of course they offer and the high level of competition within those clubs.
- 3.92 I am aware that Ifield has a proven history in recent decades of producing a conveyor belt of exceptional golfing talent. There are many PGA golf professionals now employed at many other Sussex golf clubs, some who have competed at the highest level and in The Open Championship, who all honed their talents as young golfers at Ifield. And not just professionals, but also amateur golfers who have represented their country are included within the Ifield membership over the years. Few clubs locally could claim the same quantity of quality golfers through the ages.
- 3.93 Page 9 of the booklet shows a picture of Shaun Webster, a junior member at Ifield, being presented with 'The World Boys Champion' trophy by Doug Sanders in 1994. The latter famously (and dramatically) lost The Open Championship at St Andrews in a playoff with Jack Nicklaus in 1970.
- 3.94 Page 14 of the booklet shows a picture of Bernard Gallacher OBE holding the Ryder Cup in 1995 after Europe's close win against the USA.
- 3.95 Bernard Gallacher started his professional career at Ifield.
- 3.96 I attach in Appendix MAS 9 an extract from Wikipedia outlining Bernard Gallacher's career as a 'top level' professional golfer.
- 3.97 Over the page is the strapline from the website for the next Ryder Club in 2025 which illustrates its high standing in the world of top global sporting events. To be a Ryder Cup captain on three occasions is no mean feat. He also played in the Ryder Cup eight times.





AN EVENT LIKE NO OTHER

The Ryder Cup has become one of the world's greatest sporting events. Every two years, 24 of the best players from Europe and the United States go head-to-head in match play competition. Drama, tension, incredible golf, camaraderie and sportsmanship are served in equal measure, captivating an audience of millions around the world. It's an event that transcends sport, yet remains true to the spirit of its founder, Samuel Ryder.

- 3.98 It is reasonable to say that when it comes to evaluating a golf course which Bernard Gallacher has played a great many times, he is extremely well qualified to provide a correct and reliable assessment of its 'quality'. And he played the 18-hole course at Ifield a lot when he was based at the club.
- 3.99 I attach over the page a statement from Bernard Gallacher where he comments on the quality of Ifield (also attached in Appendix MAS 9).

For the attention of Mark Smith of Smith Leisure

The Proposed Closure of the 18-Hole Course at Ifield

I was very sorry to hear from you about the proposed closure of Ifield to make way for a large scale housing scheme.

It is such a great shame because for a membership based and affordable 'club course', its 18 holes really are excellent quality. I hope the course can be saved.

Ifield has a special connection for me in the development of my golfing career. It is no exaggeration to say I would not have had the success I have been fortunate to have without the support of Ifield Golf Club.

Aged 19, I moved down from Scotland to live in the village of Smallfield, which is a few miles north east of Crawley. My then manager lived in the area.

Back in those days, to play in professional golf tournaments you had to be affiliated to a golf club.

To improve further as a golfer, it was important for me to attach to a golf club which had a quality course, maintained in good condition, and with an adjoining practice ground.

Ifield's mature 18-hole course, having been designed by renowned golf course architect, Frederick G Hawtree, who also designed Royal Birkdale (the Open Championship venue), is an excellent test for both amateurs and professionals. Thus, when the members of Ifield Golf Club invited me to affiliate with the club and represent it in professional tournaments, I was delighted.

Although Ifield's 18-hole course could not be considered Championship in the strict sense of the word, it is without doubt ideal for club golfers wanting to play an interesting and challenging 18-hole 'club' course.

I stayed affiliated with Ifield Golf Club during 1969 and 1970. I spent many long hours at the club working on improving my game. This paid off. Representing Ifield, I finished as top earner on the European Tour in 1969 and so was awarded the Harry Vardon Trophy. I also played in the Ryder Cup match at Royal Birkdale, which was drawn. At the time, I was the youngest player to represent Great Britain in the Ryder Cup – a record since beaten by Nick Faldo and others.

If it was not for the fact that I was offered the job as an assistant professional at the famous Wentworth Club, I would have stayed longer at Ifield.

Since the boom in golf demand caused by Covid, I believe we have a shortage of courses in many towns and cities in this country. Of course, I recognise the need for more homes, but it would be so much better to use brownfield land for this purpose rather than build over much loved, good quality 100 year old golf courses.

I understand that you are submitting a written statement on behalf of 'Save West of Ifield' in connection with the 'Regulation 19' stage of the draft Local Plan process.

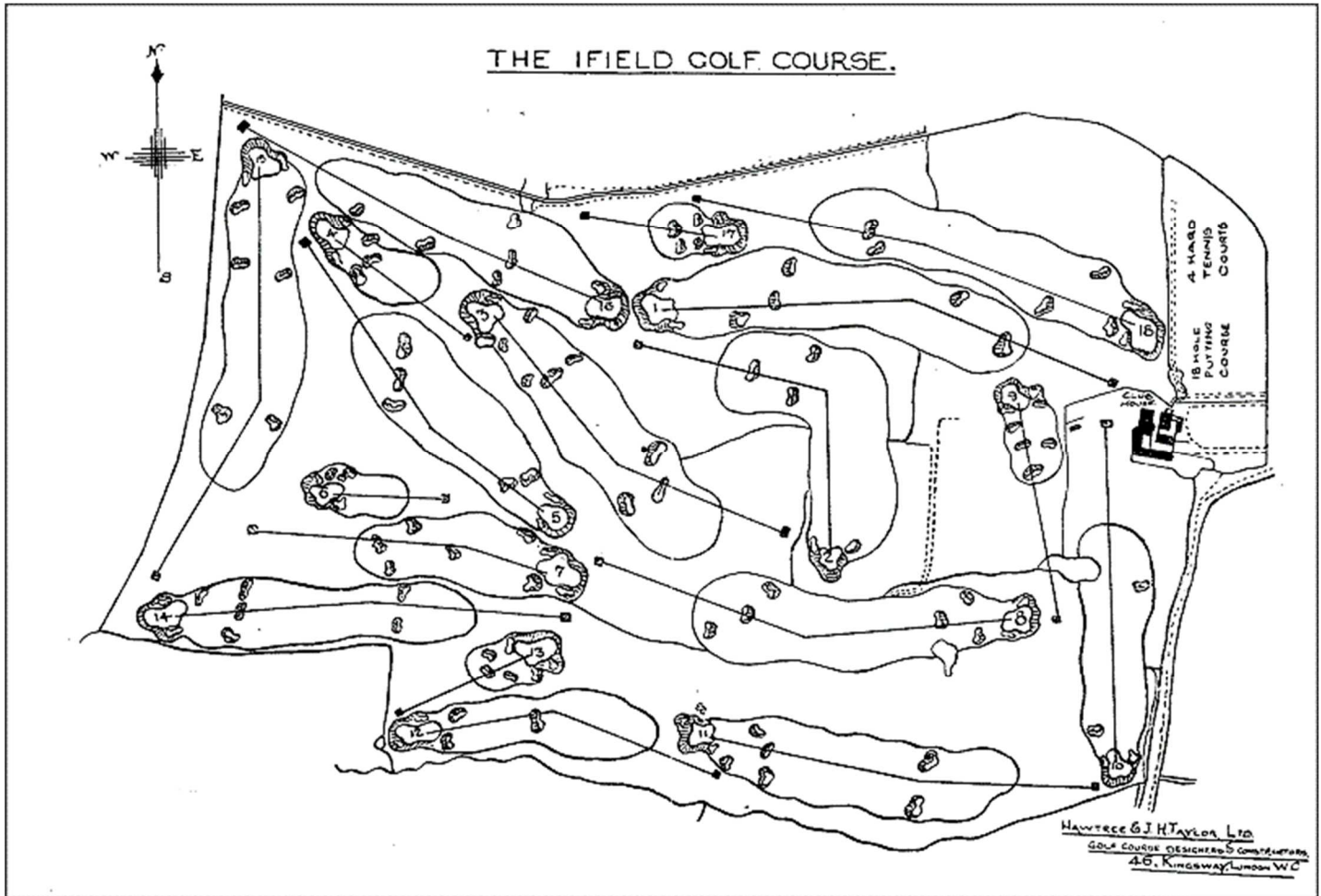
I am happy for you to include my statement in your submission. I can also confirm that what I have said above represents my true views on the quality of the 18-hole course at Ifield Golf Club and the need to preserve golf courses in this country rather than close them.

Bernard Gallacher

Bernard Gallacher OBE

Date 3. 2. 24

3.100 A further benefit of Ifield’s design is that it has two loops of 9 holes both starting and finishing close to the clubhouse, as shown on the original routing plan below. This means that golfers can readily play just 9 holes if they wish. Many of the early golf designs did not incorporate this feature.



3.101 Only last year, Ifield hosted the Sussex Men’s Amateur Championship, having done so on previous occasions. The KKP Golf Assessment refers to this below.

- 2.73 Mannings Heath Golf Club and Ifield Golf & Country Club are also considered to be top tier facilities. Both, in addition to West Sussex Golf Club, have previously hosted the Sussex Amateur County Championship (as organised by the Sussex County Golf Union) and Ifield Golf & Country Club will again be holding the competition in 2023. Only the best quality facilities are considered appropriate for such events.
- 2.74 With specific reference to Ifield Golf & Country Club, despite its status, it reports that it can suffer from drainage issues in the winter due to the clay-based soil upon which it is built. This is a common problem across Sussex. As a result, it often chooses to close the site when others stay open to protect the course from excessive damage and to ensure that high quality is sustained. This means that its members will not have golf course access during this time (unless they have additional memberships or choose to access an alternative site via pay and play), despite still paying their fees, although this is completely normal and industry standard.

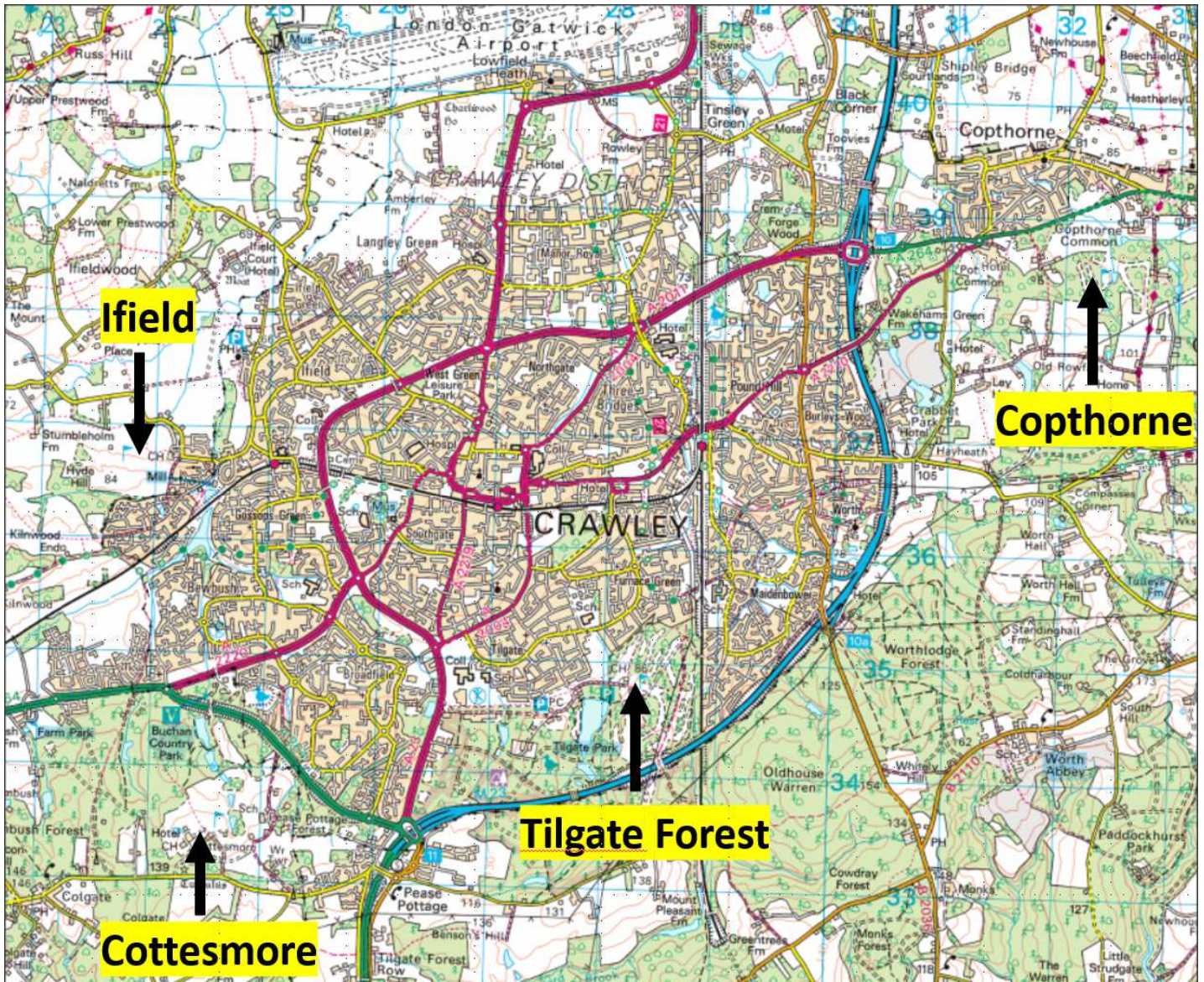
- 3.102 It is a long standing tradition in golf that only good quality courses are chosen by England's county golf unions to hold their most prestigious county amateur championships. I therefore agree with KKP's comment that: *"Only the best quality facilities are considered appropriate for such events"*.
- 3.103 I also acknowledge the comments that KKP make about winter drainage at Ifield. This is very common in the UK golf industry regarding inland courses. It is rarely a major issue because most golf is played during the summer months and golfers play considerably less during the wet winter months. Limited winter play on clay-based inland courses is an accepted part of playing the game.
- 3.104 In addition to the high quality 18-hole course, the clubhouse facilities are also good at Ifield, as acknowledged by the KKP Golf Assessment in its para 2.77:

2.77 Ancillary facilities are also for the most part good across Horsham District, with most sites offering all-encompassing clubhouses and several, as noted, also supplying other amenities such as gyms and hotels. The clubhouse at West Sussex Golf Club was refurbished and extended recently, whilst the clubhouse at Ifield Golf & Country Club was refurbished in 2017. Both are considered to be of particularly good quality.

- 3.105 The clubhouse at Ifield is used by local residents for parties, wakes, quiz nights plus carvery lunches every month. There is also a snooker room.
- 3.106 As well as being popular with its club members, Ifield is also popular with visitors. Typically each year, over 5,000 rounds of golf are played by non-members paying visitor green fees, and over 40 societies hold their annual golf days at Ifield, including Horsham District Council. There are also numerous charity days raising funds for the likes of Macmillan Cancer, the RNLI and Dementia UK.
- 3.107 This level of activity would not be possible if the course and the clubhouse at Ifield were not good quality and not well suited to local market needs.
- 3.108 In conclusion, given the heritage of Ifield's 18-hole course and the respected opinions of Dr Martin Hawtree and Bernard Gallacher OBE, and the considerable level of current usage of the facilities at Ifield, I believe it is not plausible to reasonably conclude that the 18-hole golf course at Ifield is *'clearly ... surplus to requirements'* under Sport England's ANOG *'quality'* test.

Sport England's ANOG 'accessibility' test

- 3.109 This is the third of the four overarching measures: quantity, quality, accessibility and availability.
- 3.110 It is for Homes England to publish its golf needs assessment in full for Ifield and to comment on the accessibility measure. I can, however, make some general factual observations which provide important insights on the 'accessibility' test.
- 3.111 Below is an Ordnance Survey map of Crawley.



- 3.112 Ifield Golf Club lies on the western boundary of the town, Cottesmore Hotel Golf & Country Club lies on the south western boundary, Tilgate Forest Golf Centre lies on the south to south eastern boundary, and Copthorne Golf Club lies to the north east, a little way out from Crawley. Gatwick Airport lies to the north.

3.113 From a simple 'stand back and look' commonsense perspective, Ifield is strategically well located for a good quality 18-hole course. It is right on the town's boundary and naturally serves most of the residents living on the western side of Crawley.

3.114 Indeed, the following comment from the KKP Golf Assessment supports this:

2.130 Ifield Golf & Country Club (48,731 people) has the highest number of people considered most likely to travel to it (based on travel distance only) when compared to the other facilities followed by Rookwood Golf Course (38,721 people). For Ifield Golf & Country Club, it actually has a minimal catchment within Horsham District, with the majority of its area covering Crawley.

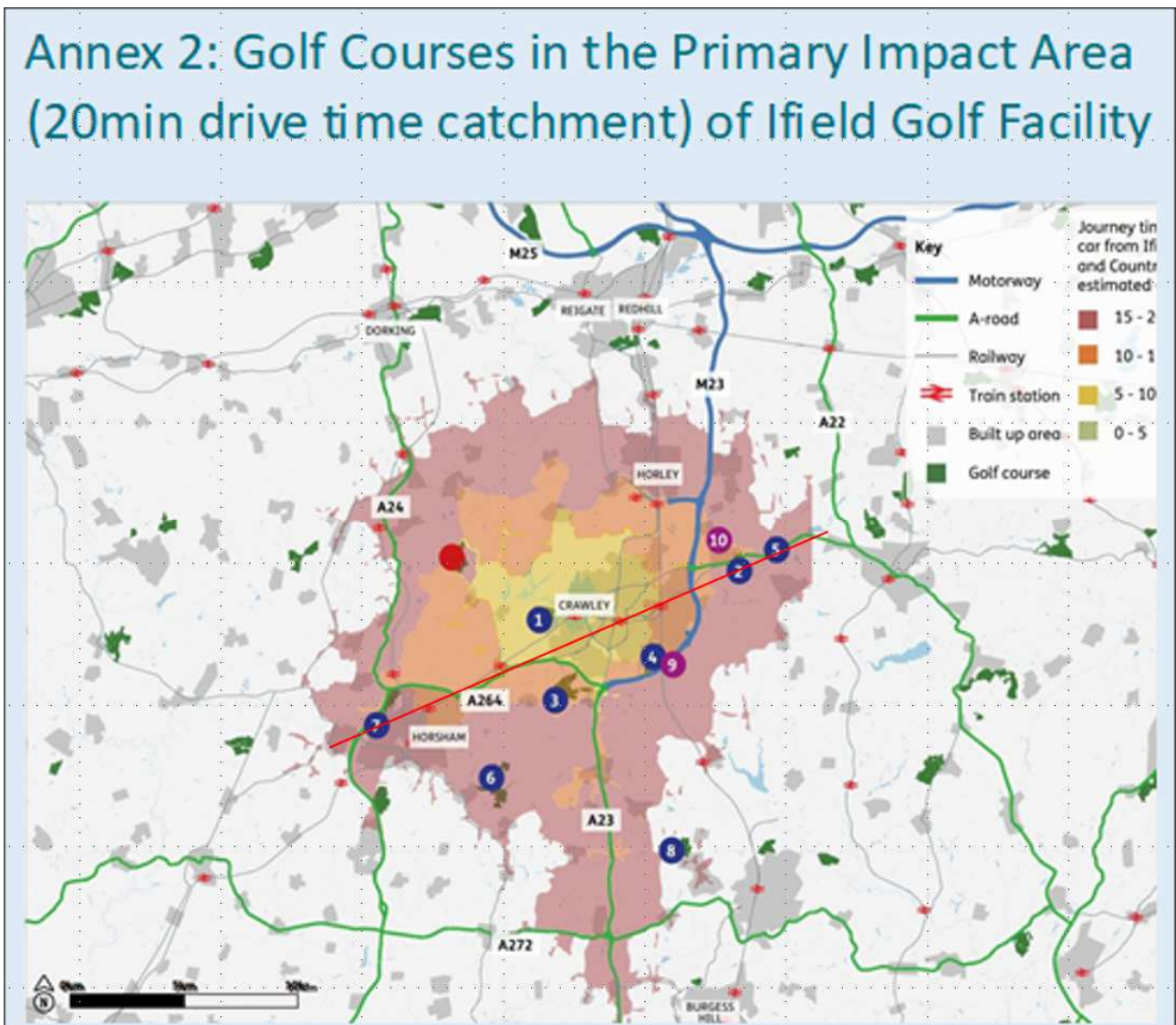
3.115 Ifield is a 'not for profit' membership based golf club where visiting golfers are also welcome to play. In contrast, Cottesmore Hotel Golf & Country Club is a 'for profit' based golf hotel; and Tilgate Forest Golf Centre is a municipal venue with an 18-hole course and a 32 bay floodlit driving range fitted with Toptracer (digital range ball tracing software).

3.116 A large proportion of regular golfers prefer to play their golf at a very well established 'not for profit' membership based club, as opposed to playing at a newer commercial venue (particularly golf hotels) or a local authority venue.

3.117 Copthorne Golf Club, the only other 'not for profit' membership based club close to the town of Crawley, lies some distance to the north east. Furthermore, Copthorne Golf Club is more expensive to play and is either at full capacity or close to full capacity.

3.118 Thus, the most accessible option for a golfer in the west and north west of Crawley to join a very well established 'not for profit' membership based club is Ifield. For this reason, and amongst others, it is needed from an accessibility perspective.

3.119 Some interesting insights become clear by drawing a red line through Rookwood Golf Course in Horsham (No. 7) and Copthorne Golf Club (No. 2) on the Annex 2 map in the HE Position Statement:



3.120 The facts which emerge from drawing this red line are as follows:

1. The red dot with no number is the closed 18-hole Ruser Golf Club. The two other dots – Nos. 9 and 10 are not proper golf courses – they are small footgolf courses, so are irrelevant to the analysis (and indeed the footgolf course at Tilgate Forest (No. 9) closed two years ago and has not reopened).
2. A very significant proportion of the built up environment relating to Crawley (an important source of potential golfers) lies to the north of the red line.
3. Most of the remaining venues (four in total) fall to the south of the line (No. 3 – Cottesmore; No. 4 – Tilgate Forest; No. 6 – Mannings Heath; and No. 8 – Cuckfield). Note: No. 5 – Le Club Effingham Park closed before Covid and is not open for normal golf use.

4. However, the only venue with a full length standard course which lies to the north of the line is Ifield (No. 1). If Ifield were to close, because of Homes England's proposals, then there would be a large gap in accessibility of golf provision north of the line relating to the 20-minute primary assessment area.

3.121 Given the above, it is my strong view that Ifield is clearly needed in relation to the ANOG 'accessibility' test. It then follows that it is not possible to demonstrate that Ifield is 'clearly ... surplus to requirements' in respect of the 'accessibility' test.

Sport England's ANOG 'availability' test

3.122 This is the fourth of the four overarching measures: quantity, quality, accessibility and availability.

3.123 The HE Position Statement makes the following comments on 'availability' for Ifield:

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.

3.124 Whilst I agree that some vacancies may exist at some clubs, this does not mean that there is sufficient availability to meet the ANOG test. One must consider the types of golf clubs in the primary assessment area, their respective market positions, their quality, their pricing, any further barriers to entry, and their likely current spare capacity to take any displaced golfers from Ifield because of its permanent closure.

3.125 It is for Homes England to prove in its golf needs assessment that the level of spare capacity for golf in the primary 20-minute assessment area is so large that under this test, Ifield would then be 'clearly ... surplus to requirements' in this respect. Having a few vacancies at clubs is not enough to pass the test.

3.126 Based on my in-depth knowledge of the UK golf market and the trends within it, it is my view that it will be very hard, if not impossible, for Homes England to demonstrate the above.

3.127 It is useful to consider my earlier summary of the eight courses within the primary 20-minute drivetime assessment area (see earlier para 3.50) along with the earlier Ordnance Survey map for Crawley on page 35 plus two tables over the page from the KKP Golf Assessment relating to pricing for golf and local membership numbers:

Table 2.14: Pricing structures at golf facilities within Horsham District

Site ID	Course name	Joining fee	Full annual membership	Green fee (per round) ¹⁵	
				Weekday	Weekend
Golf 1	Horsham Golf & Fitness Club	-	£1,200.00	£30.00	£45.00
Golf 2	Ifield Golf & Country Club	-	£1,376.75	£35.00	£35.00
Golf 3	Mannings Heath Golf Club	£350.00	£1,815.00	£70.00	£80.00
Golf 4	Rookwood Golf Course	-	£1,248.00	£29.00	£31.00
Golf 5	Slinfold Park Golf & Country Club	£10.00	£1,512.00	£37.00	£37.00
Golf 6	West Sussex Golf Club	£4,000.00	£2,500.00	£125.00	£140.00
Golf 7	Horton Golf Club	£50.00	£155.00	N/A	N/A
Golf 8	Cottesmore Golf & Country Club	-	£768.00	£45.00	£35.00

Table 2.16: Membership breakdown within Horsham District

Site ID	Site name	No. of members (%)		
		Senior male	Senior female	Junior
Golf 1	Horsham Golf & Fitness Club	271 (72%)	95 (25.5%)	9 (2.5%)
Golf 2	Ifield Golf & Country Club	423 (82%)	76 (15%)	16 (3%)
Golf 3	Mannings Heath Golf Club	594 (85%)	50 (7%)	56 (8%)
Golf 4	Rookwood Golf Course	Unknown	Unknown	Unknown
Golf 5	Slinfold Park Golf & Country Club	Unknown	Unknown	Unknown
Golf 6	West Sussex Golf Club	385 (71.3%)	115 (21.3%)	40 (7.4%)
Golf 7	Horton Golf Club	140 (79%)	28 (16%)	9 (5%)
Golf 8	Cottesmore Golf & Country Club	350 (58%)	100 (17%)	150 (25%)

3.128 From the data above, and my own practical knowledge of the workings of the UK golf market, I make the following general observations:

1. The prices quoted in the above KKP Golf Assessment tables are as at December 2022. Copthorne's website shows that its 2023/24 full membership rate is £1,638 and the joining fee for both 5 and 7 day membership is £750. The other clubs will most likely have increased fees too (I believe that the joining fee at Mannings Heath is now around £750. Ifield's current 2023/24 subscription is still £1,377 with no joining fee).
2. Ifield, Copthorne and Mannings Heath are the three old golf courses in the area – around 100+ years old. Strong heritage is a key benefit for them in attracting golfer demand.
3. Ifield and Copthorne are the only two 'sports clubs' in the primary 20-minute drivetime assessment area. By their nature, they are 'not for profit'. Any surplus funds they make each year are used to reinvest back into their facilities. They are run by their members for the benefit of the local community and visiting golfers. Many keen golfers enjoy the 'sports club' ethos.
4. Cottesmore and Mannings Heath are commercial venues. Whilst, of course, customer care is extremely important to them, ultimately, they are run to make a profit for their owners. Both Cottesmore and Mannings Heath have other uses on site, such as hotel and spa facilities (Cottesmore) or overnight accommodation, vineyard and wine tours (Mannings Heath). Their business focus is therefore not solely on golf. They are likely to push daily visitor green fee business hard (due to the commercial return) and they may restrict golf club membership numbers accordingly. Thus, relatively low quoted membership numbers is not necessarily an indication of high spare course capacity because visitor green fee players will use up this capacity. Cottesmore's quoted membership subscription, at £768, is for off-peak golf only. Golfers pay extra for morning weekend golf (the prime playing times).
5. Ifield is strategically very well positioned in the local marketplace: it is adjacent to a large population centre (Crawley), its course quality is high (Dr Hawtree quote: – it is "*probably the most venerable of the dozen or so golf courses in the area*"), yet its pricing is mid-market and good value compared to Copthorne and Mannings Heath. This is powerful market positioning in the local golf marketplace.
6. Both Tilgate Forest and Rookwood are local authority owned, although they are run by specialist golf operators. By their nature, they are there to provide relatively lower cost golf and they fill an important need in the local market, in addition to Ifield and the other clubs.
7. Cuckfield, with its 9-hole course is a smaller, low-key commercial operation, which also serves a need in the local market. However, given its physical location (to the far south west of the catchment area), its scale and quality, it is not a natural home for displaced golfers from Ifield, if the latter were to close.
8. Quoted membership numbers need to be treated with considerable care when assessing potential spare golf capacity. Primarily membership based clubs will have proportionately more members because that is their business model. However, many commercial golf courses deliberately encourage proportionately more casual visitor green fee play to cater for roaming and 'nomad' golfers not seeking membership. They therefore deliberately reduce membership numbers to compensate to allow more casual play. Low membership numbers quoted at these courses therefore do not automatically mean large spare golf capacity. Both business models are very important and valid in the UK golf marketplace.
9. The KKP Golf Assessment shows Ifield as having a total of 515 members as at December 2022. This is despite the prospect of permanent closure hanging over it for a number of years due to

Homes England's plans. If the threat of permanent closure was removed, I am confident that the membership numbers would increase substantially given the strong golfer demand in the UK today.

3.129 A key question is this: if Ifield were to permanently close, where would its displaced members (515 as at December 2022 plus visiting golfers) go to play their golf?

3.130 Some of the comments in the KKP Golf Assessment provide useful insights in answering the question. See the two extracts below:

2.101 Similarly, Ifield Golf & Country Club states that its demand increased following Covid-19 before the rise came to a halt. Anecdotally, it also reports that potential growth is now being impacted upon by the development aspirations at the venue, identifying that this puts off potential users as long-term access is not guaranteed. The Club says that this has also led to some existing members leaving although to relatively minimal levels.

Pay and play

2.102 Whilst it is acknowledged that pay and play usage has generally increased across England in recent years, usage figures for the sites within Horsham District are generally not known as it is not something that is tracked by England Golf. Furthermore, most operators are unwilling to disclose details as part of this study due to commercial sensitivity.

2.103 An exception to the above is provided via Ifield Golf & Country Club, which has supplied its green fee income figures to evidence a recent and considerable growth in its pay and play demand. Between the 2006/2007 and 2015/2016 playing seasons¹, it averaged income of £26,500 per year in green fees, before this increased to an average of £41,000 across 2016/2017 and 2017/2018 and to an average of £62,159 across 2018/2019 and 2019/2020. It then brought in £142,617 in 2020/2021 and £98,448 in 2021/2022, which whilst representing a reduction compared to the previous year is still above prior levels.

2.104 The Club states that its initial growth post 2016 can be attributed to not previously encouraging or allowing many visitors, whilst its more recent growth can be put down to several factors. Primarily, a significant increase in demand was experienced following the lifting of Covid-19 restrictions; however, it is thought that good quality and affordable (nonincreasing) pricing is also attributable. Moreover, the Club believes that more users now want to access the course on a pay and play basis rather than via a membership due to the uncertainty around the sites long-term future.

Unmet demand

- 2.115 Unmet demand is existing demand that is not getting access to facilities. This is most commonly reflected in golf via site waiting lists, although it is likely that people on a waiting list are still playing elsewhere due to the quantity of facilities in the area and the nature of the sport. This could be via membership of another club or pay and play access.
- 2.116 In Horsham District, West Sussex Golf Club has a long waiting list, with 45 people currently on this. It reports reviewing the list every six months to determine whether additional members can be accepted, but notes that it has grown in recent years, particularly following the Covid-19 pandemic. There is clear unmet demand for access to this particular site.
- 2.117 In addition, Cottesmore Golf & Country Club also reports that it has a waiting list in place due to currently being at capacity. This, however, is a waiting list for membership to the whole site, rather than just for access to the golf provision.
- 2.118 No other operators report having a waiting list in place, meaning that they are in a position to accept new members. Horton Golf Club, for example, reports having capacity for 190 members, 17 more than it currently accommodates, whilst Mannings Heath Golf Club reports having capacity for 800 members. This is 100 more than its current level.

3.131 From the above, the following picture emerges regarding local golf availability if Ifield's 18-hole course were to permanently close:

1. Despite the threat of closure in recent years, Ifield is still a busy and thriving course (515 members as at December 2022 plus high visitor green fee usage). Over 500 member golfers will need to find somewhere else to play. The high volume of visitor golfers will also have to be absorbed in the local marketplace by the other courses.
2. The displaced members could try its nearest club, Cottesmore for membership. However, according to the KKP Golf Assessment, Cottesmore is at full capacity with a waiting list (KKP para 2.117 above).
3. The displaced members at Ifield could try Tilgate Forest, the municipal course. This, however, cannot compete with the quality of Ifield. Tilgate Forest has been operational for over 40 years, but my understanding is that it has not pulled many members away from Ifield for good reason. Ifield is a considerably better proposition than Tilgate Forest for most regular golfers.
4. The displaced members at Ifield could try Copthorne, the other established 'not for profit' sports club in the primary 20-minute drivetime assessment area. However, I believe it is highly probable that Copthorne is either at full capacity with a waiting list for new members or it is very close to full. Clubs charging substantial one-off joining fees (£750 for Copthorne) is usually a 'tell-tale' sign that they are either full or very close to full. The significantly higher membership fee at Copthorne is also likely to be a barrier for some displaced Ifield members.
5. The displaced members at Ifield could try Mannings Heath, but as at December 2022, it could only accommodate 100 or so members (KKP para 2.118 above). The number is probably less now. Furthermore, Mannings Heath has a very substantial barrier to entry – that of price. It is the most expensive club in the primary catchment area, which may be a barrier to many displaced Ifield members.
6. The displaced members could try Rookwood in Horsham, but this is far from practical. The venue is not on the edge of Crawley and is close to 20-minute boundary from Ifield. It is therefore not as local to Crawley residents than Ifield. Its course is also lower quality than Ifield.

3.132 Given the above situation, as the stock of venues currently exist within the primary 20-minute drivetime assessment area, it is going to be very hard for Homes England to plausibly demonstrate that Ifield is *'clearly ... surplus to requirements'* under Sport England's ANOG *'availability'* test.

Mitigation - the Para 99 (b) NPPF test

3.133 Para 99 of the September 2023 NPPF says the following:

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

(a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or

(b) 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

(c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.

3.134 The test under Para 99(b) for Ifield can be distilled to the following specific words for Ifield:

'Existing open space, sports and recreational buildings and land ... should not be built on unless ... 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'.

3.135 The government's national planning policy wording, as it relates to Ifield, is very clear and unambiguous: if it is to be built on by Homes England then it must build a replacement good quality 18-hole course with associated clubhouse and ancillary facilities in a reasonably nearby location.

3.136 Anything less than the above clearly fails the test in the context of Para 99(b).

3.137 The KKP Golf Assessment carried out for Horsham District Council clearly recognises the importance and implications of the above Para 99(b) test. I attach over the page what it says (2.144 underlined for emphasis by KKP):

2.3: Supply and demand analysis

- 2.143 Horsham District is currently well provided for in relation to golf provision, with it having considerably more facilities than both national and regional rates. Furthermore, a variety of provision is offered with standard hole courses, Par 3 courses and driving range bays supplied and with some venues focusing on membership schemes (i.e., West Sussex Golf Club, Ifield Golf & Country Club, Horton Golf Club, Mannings Heath Golf Club and Cottestmore Golf & Country Club), and others on pay and play usage (i.e., Rookwood Golf Course and Slinfold Park Golf & Country Club). This means that it is likely that most current and potential users can be catered for and that supply is generally sufficient to meet demand, although it should be noted that most sites are relatively expensive to access and that there are no municipal courses.
- 2.144 Notwithstanding the above, it is also clear that each facility is meeting a need due to overall high demand as well as current membership and usage levels at most sites, and when factoring in potential future growth, **meaning that there is not an oversupply of provision. Due to this, despite the current development aspirations in place, it is unlikely that any loss of provision could be supported without appropriate mitigation being secured, unless it can be evidenced that a proposal can help meet a gap in the golfing market. As things stand, existing usage levels could not be absorbed by the remaining sites without significant capacity pressures being created, meaning that replacement to an equivalent or better quantity and quality in a suitable location will be required where any loss is occurred. This is as per the NPPF.**
- 2.145 If the existing development proposals and the potential loss of golf provision are to be pursued, separate needs assessment studies will be required to fully determine requirements, with the focus specifically on the site/s in question and a bespoke, site-specific catchment area. Provision and demand from within neighbouring authorities can be more thoroughly considered as part of this. Any assessment should follow Sport England's ANOG and, for a proposal to go ahead, will need to evidence that the provision is surplus to requirements or set out a mitigation proposal that replaces the supply to an equivalent or better quantity and quality in a suitable location. **This is also as per the NPPF.**
- 2.146 More generally, there is likely to be more of a need for specific facilities to be retained depending on what type of demand and market is being catered for and whether or not similar provision exists elsewhere within the locality. Certain sites have a more distinctive appeal when compared to others, such as West Sussex Golf Club due to its premium offer, or Horton Golf Club due to its lower price point, potentially making it more difficult for demand to relocate to access an equivalent offer. This can be based on numerous factors, such as quality, cost, travel distance and difficulty.

3.138 The HE Position Statement says the following about the Par 99(b) test:

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.

3.139 I very strongly disagree with the statement made in the HE Position Statement on this point.

3.140 It appears to me as attempted 'watered down' mitigation.

3.141 If Homes England wishes to rely on test (b) of Para 99 because it cannot clearly demonstrate that Ifield is 'clearly ... surplus to requirements' under test (a), then it must provide another new 18-hole course in a suitable location or rely on satisfying test (c). The government's national planning policy test 99(b) is unequivocal in its wording on this.

3.142 I note the statement made in the first paragraph of the HE Position Statement which says:

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.

3.143 Homes England owns the freehold reversionary interest in Ifield. It has the power break the lease with the Ifield club members to permanently close the golf club down if it so wishes.

3.144 This has relevance in terms of practical delivery – Homes England can obtain vacant possession at short notice.

3.145 However, the deliverability aspect – the prospect of obtaining vacant possession at short notice – is not relevant to the 99(b) mitigation test. It would be entirely inappropriate if Homes England were using its power of permanent course closure of Ifield as a lever to attempt to persuade Sport England and/or England Golf that 'watered down' mitigation, such as investing in making improvements to either Tilgate Forest and/or Rookwood golf courses, (two existing local authority owned courses) is an acceptable alternative to building a new replacement 18-hole course for Ifield.

3.146 Investing in existing golf courses is not acceptable mitigation given the circumstances surrounding Ifield. There is considerable golfer demand and a need for Ifield, so to rely on test 99(b) Homes England must build a new replacement 18-hole course, otherwise there is an obvious loss in quantity.

3.147 Furthermore, I am aware that Sport England's planning policy requirements are that if an outdoor sports facility is to be replaced elsewhere under the Para 99(b) test, then it needs to be built prior to closing the old facility to allow a seamless relocation from the old site to the new one. It takes years to build a new, good quality 18-hole golf club.

3.148 Homes England is proposing around 3,000 new homes in its Initial Masterplan. If consented, the net development value from around 3,000 homes is very high indeed. Out of this very high net development value, Homes England should readily be able to afford to provide a new replacement 18-hole course for Ifield.

3.149 More generally, test 99(b) is carefully worded by the government for good reason – to protect open space, sport and recreation provision. The fact of ownership (or say an option to buy) by a housing developer of any golf club in England, which then gives the developer the power to close that club down at short notice, must not be used as a 'bargaining chip' by the developer in its negotiations with Sport England and England Golf for getting their support for 'watered down' golf mitigation.

3.150 It is worth repeating Sport England’s unequivocal statement below regarding the then para 97 of the 2019 NPPF, which became Para 99 of the September 2023 NPPF:

“The Government is clear that existing sport and recreational provision should be protected unless one of three specific circumstances are met. This protection is afforded to all provision irrespective of whether it is in public, private or educational ownership and regardless of the nature and level of use. It also relates to ancillary facilities including clubhouses, changing rooms and parking facilities”.

3.151 Sport England, as a statutory consultee, has a duty to hold firm on the Para 99(b) test and demand full mitigation – a replacement course in a suitable location. Otherwise, it is breaching its duty under its own Sport England Principle 4 which is to: ‘*Protect and promote existing sport and physical activity provision and ensure new development does not prejudice its use.*’

3.152 Likewise, as the national governing body for amateur golf in England, England Golf has a firm obligation to properly defend and uphold the Para 99(b) test for the benefit of its members who, by way of affiliation fees, fund its existence.

3.153 At this point in time there has been no public statement from England Golf on whether it believes that Ifield, having been designed by Frederick G Hawtree and J H Taylor and approaching its centenary year, and being located on the edge of a large town where demand for golf is healthy is clearly ... surplus to requirements’.

3.154 If England Golf believes that Ifield is not clearly surplus to requirements, then it must demand a new replacement 18-hole course of at least like-for-like quality in a nearby location in accordance with Para 99(b) of the NPPF.

HDC’s emerging Local Plan and other proposed development on golf courses

3.155 I am aware that, in recent years, various ‘standard’ golf courses have permanently closed in the locality. These include the following:

- Rusper Golf Course closing entirely
- Cottesmore reducing from 36 holes to 27 holes in 2012
- Mannings Heath reducing from 36 holes to 27 holes in 2018
- Le Club Effingham Park closing in 2020
- Redhill & Reigate GC closing in 2019.

3.156 Appropriate change from time to time to fairly reflect realistic golf needs is healthy. Whilst some closures might naturally rebalance the market in appropriate cases, one needs to guard against the inappropriate erosion of local golf supply. Otherwise, a point gets reached where reducing further golf supply means insufficient remaining courses to service the reasonable needs of existing and predicted future golf demand.

3.157 I strongly believe that this point has been reached in respect of Ifield. It needs to stay as an 18-hole golf club or be properly and fully relocated with a new build facility.

3.158 I am, however, aware from reading the KKP Golf Assessment that Ifield is not the only golf course within the district where third parties are promoting alternative use development in the emerging Local Plan. See over the page:

Future provision

- 2.26 Three golf sites in Horsham District are being promoted for development and have been put forward to the Strategic Planning team at Horsham District Council for consideration as potential development allocations in the emerging Local Plan. This could result in the allocation of the provision at Ifield Golf & Country Club in the Council's emerging Local Plan, as well as the loss of some provision at both Cottesmore Golf & Country Club and Horsham Golf & Fitness Club.
- 2.27 In order to minimise confusion, taking into account the Council officer's recommendations in the July 2021 Cabinet report, it should be noted that it is unlikely that Horsham District Council will propose the loss (in whole or part) of either Cottesmore Golf & Country Club or Horsham Golf & Fitness for development. However, it is more likely that Ifield Golf & Country Club will be supported if the West of Ifield strategic site, promoted by Homes England, progresses to allocation in the Local Plan. This was recommended by officers in the Cabinet report.

- 3.159 Clearly, from the above statement, HDC's planning officers were preferring the loss of Ifield in its entirety for housing, as opposed to the part loss of either Horsham Golf & Fitness or Cottesmore Golf & Country Club. Whilst I have not studied the full development plans for Horsham Golf & Fitness, my understanding is that it was promoting up to 800 homes on site.
- 3.160 It is, of course, for third party promoters to put forward golf land for housing as they see fit. However, as a general observation, from a golf needs perspective in primary 20-minute drivetime for Ifield, if part of the existing golf course supply really had to go for housing, losing full length golf holes at Horsham Golf & Fitness and/or 9 holes at Cottesmore Golf & Country Club makes much better strategic sense in golf provision terms than losing the 18-hole course at Ifield – which is described by Dr Hawtree as *"probably the most venerable of the dozen or so golf courses in the area"*.
- 3.161 Looking at the golf needs assessment for the proposed 'Horsham Golf and Fitness Village' dated April 2023 and prepared by Consult QRD, I note the plans to convert the existing golf configuration into a 9-hole par 3 course, an extended floodlit driving range, a 6-hole academy course and 36 holes of adventure golf. In my opinion, if this happened, it would cater very well for 'open to all' golf in the primary catchment area at a lower golfing price point.
- 3.162 Horsham Golf & Fitness, as a commercial 18-hole venue with its floodlit driving range, would work very well if it were upgraded to a high quality commercial 'golf centre' on a much more compact site, thus releasing a substantial amount of land for potential new housing.
- 3.163 Turning to the 9-hole course at Cottesmore Golf & Country Club, it is very short (equivalent 18-hole length of 4,480 yards) and this probably makes it less viable to maintain and operate. If it were lost for housing, the impact on golf provision in the area would be very modest because Cottesmore would still retain use of its full length 18-hole course.
- 3.164 If it is deemed that the emerging Local Plan is unsound in respect of Homes England's proposals for Ifield, HDC therefore does have good alternative golf options to consider: developing on the golf courses at either Horsham Golf & Fitness and/or Cottesmore Golf & Country Club in part for housing.

Compared to other closed golf courses Ifield's proposed closure appears somewhat unique

- 3.165 The website 'Golf's Missing Links – The Internet's Most Comprehensive Guide to the Golf Courses of Yesteryear' (www.golfsmissinglinks.co.uk) contains a comprehensive historical record of lost golf courses through the ages.

- 3.166 In my experience, closed golf clubs in England in more recent times can usually be categorised within three distinct groups:
1. Those which failed commercially because they were unable to trade any longer due to overwhelming external commercial pressures. This is usually from golf course oversupply and/or severe competition with others, and/or a poor trading location (for example, being in an area with a very low catchment population or situated in an area of widespread deprivation). Furthermore, those which ultimately failed could mostly be deemed to be of generally lower quality. They then failed to generate enough income from members and visitors or attract any other form of commercial financial support to survive. These are common factual historical reasons for golf club closures in the UK.
 2. Those whose golf owner operators were commercial 'for profit' organisations who then actively pursued high value alternative use development (primarily housing), for large financial gain, at the expense of the loss of the golf course for its members and the wider golfing community. This has become an increasingly familiar modern situation as the need for housing becomes higher profile. Indeed, it exists today within the small group of golf courses within Horsham District Council's administrative boundary with both Cottessmore Hotel, Golf & Country Club and Horsham Golf & Fitness Club actively pursuing such development opportunities.
 3. Old 'not for profit' golf clubs who decided to sell their land for housing and relocate their 'not for profit' club nearby. In recent years, these have included the following: Royal Norwich Golf Club (founded in 1893), Reading Golf Club (founded in 1910) and Basingstoke Golf Club (founded in 1907). I am also aware that Bognor Regis Golf Club (founded in 1892) has plans to do this.
- 3.167 By contrast, Ifield is in the somewhat unique position where a financially sound 'not for profit' golf club with a 'venerable' golf course of undisputed quality and nearly 100 years old (founded in 1927), which has no desire to close, is being forced to close by the site's owners, Homes England with no plans to build a new relocated course for the 'not for profit' golf club.

4. MY CONCLUSIONS

- 4.1 Horsham District Council, in its *'Frequently Asked Questions and Guidance for making representations'* at the Regulation 19 state included the following statement regarding its latest draft Local Plan:

Is it 'sound'? (i.e., does it meet the tests of soundness?)

Local Plans must be prepared in accordance with the National Planning Policy Framework. The National Policy Planning Framework (NPPF) states that a Plan is 'sound' if it meets the following tests:

- **Positively prepared** - providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- **Justified** - an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- **Effective** - deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- **Consistent with National Policy** - enabling the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework and other statements of national planning policy, where relevant. If you do not consider the plan has been prepared in accordance with these requirements, you will need to identify which of these criteria have not been met and why.

- 4.2 In particular, to be 'sound', the Local Plan needs to be *'consistent with national policy'* – and that means compliances with Paras 98 and 99 of the September 2023 NPPF. Its specific wording is as follows:

Open space and recreation

98. Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities, and can deliver wider benefits for nature and support efforts to address climate change. Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate.

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

(a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or

(b) 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

(c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.

- 4.3 The key question for me to answer in respect of Homes England's development proposals for Ifield, from a golf perspective is this: can Homes England pass either of the two tests in respect of Para 99 (a) and (b) of the September 2023 NPPF?

- 4.4 If Homes England cannot pass these two tests, and additionally, it cannot pass the third test in Para 99 (c) of the NPPF, then its development proposals for Ifield fail the government’s national planning guidance in relation to ‘Open space and Recreation’.
- 4.5 If this were to be the case, it then logically follows that HDC’s emerging Local Plan is ‘*unsound*’ in respect of Homes England’s proposals for Ifield and Para 99 of the NPPF.
- 4.6 It is important to note that Homes England must only pass one of the three tests (a), (b) or (c) for compliance with Para 99 of the NPPF.
- 4.7 However, it is equally important to note that partial compliance with all three tests (a), (b) and (c), or some of the tests, does not cumulatively ‘on balance’ mean compliance with Para 99 of the NPPF. Partial compliance on each test ultimately means total failure of compliance with the Para 99 test.
- 4.8 My professional conclusions, as they relate to my specific expertise – that of golf – on the tests of Paras 98 and 99 (a) and (b) of the NPPF are as follows:
1. There is currently no published ‘*up to date*’ and/or ‘*robust*’ assessment relating to the specific golf needs for Ifield’s primary assessment area – its 20-minute drivetime by car. Para 98 is therefore contravened and is not satisfied.
 2. In my view, even if an ‘*up to date*’ assessment is published by Homes England, it would not be ‘*robust*’ if it were to suggest that the 18-hole course at Ifield is ‘clearly ... surplus to requirements’ in accordance with the test in Para 99(a).
 3. I reach the conclusion in 2. above on the grounds of the four overarching Sport England ANOG measures: quantity, quality, accessibility and availability. In my opinion, it is not reasonably plausible to claim that Ifield is ‘clearly ... surplus to requirements’ when properly evaluated against these four measures.
 4. It appears very unlikely that Homes England is contemplating building a new good quality 18-hole course to replace Ifield. Thus, if it cannot pass test (a) nor test (c) then this stance would mean Homes England fails on test (b).
 5. Sport England, as the national governing body for sport in England, published its ‘*12 Planning-For-Sport Principles*’ in 2019. Principle 2 is to ‘*Undertake, maintain and apply robust and up-to-date assessments of need and strategies for sport and physical activity provision, and base policies, decisions and guidance upon them.*’; and Principle 4 is to ‘*Protect and promote existing sport and physical activity provision and ensure new development does not prejudice its use.*’ Under Principle 4, Sport England has a duty to apply the requirements of Para 99(b) correctly – and not accept ‘watered down’ mitigation as a compromise solution to Para 99(b) for the permanent loss of the 18-hole course at Ifield. This means building a new replacement 18-hole course for Ifield.
 6. Likewise, as the national governing body for amateur golf in England, England Golf has a firm obligation to properly defend and uphold the Para 99(b) test for the benefit of its members who, by way of affiliation fees, fund its existence.

4.9 Thus, unless Homes England can satisfy the test under Para 99(c) of the NPPF, HDC's emerging Local Plan is clearly unsound in relation to Homes England's development proposals when tested against the government's own national planning policy for the protection of Open Space and Recreation under Paras 98 and 99 of the September 2023 NPPF.

A handwritten signature in black ink, appearing to read 'M Smith', written in a cursive style.

Mark Smith BA MRICS MBA

23 February 2024