

**Save West of Ifield (SWOI) Reg 19 - Policy HA2 – Ifield Golf Course  
and Club  
NPPF Paragraph 99(c)**

There will no doubt have been plenty of submissions opposing the HDC Local Plan in a wide variety of ways. There will also be golf-centric expert analysis of NPPF Paragraph 99 (a) and (b). However, paragraph 99 (c) will probably have received less analysis and focus. I wish to set out below some observations about the considerable problems which lie ahead for any party wishing to successfully overcome the requirements of the test of 99 (c), in relation to the destruction of Ifield Golf Course and Club for development as part of the HA2 allocation in the HDC draft local plan.

Firstly, let's consider what the specific requirement of NPPF 99 is.

So, NPPF 99 says: *'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*

*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."*

Paragraph 99 (c ) can be considered in two parts, part 1, being: *the development is for alternative sports and recreational provision*

The HA2 allocation is not FOR alternative sports and recreation provision. The HDC Local Plan, page 159 (box) sets out the key elements of the proposed development, making it clear that it is first and foremost a ' comprehensive new neighbourhood to deliver the necessary infrastructure, services and facilities to meet the longer-term development of approximately 3,000 homes, of which it is anticipated at least 1,600 will be delivered in the period to 2040.' So primarily it is a housing development. Any sports and recreational facilities are ancillary. No housing – no sports and recreational facilities.

This should mean the test under 99 (c) fails at the first hurdle, and Ifield Golf Course can only be built on if the tests under NPPF Paragraph 99 a & b are met. This is discussed in a separate report.

However, to consider paragraph 99 (c) part 2 - *the benefits of which clearly outweigh the loss of the current or former use."* .

Before moving on to comment on 99 (c) part 2 in more detail, a few observations may be helpful. The intention being to place some of the future considerations which will need to be undertaken by an Inspector, into some broader perspective.

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It has been clear since Homes England (H.E.) first acquired the land in late 2020, the golf course on which Ifield Golf Club (IGC) has existed since 1927, that there was a clear presumption that proving any, or all three elements of para 99 would be quite simple. Maybe even that it was a foregone conclusion? This, despite H.E. having no discernible, proven track record of owning, closing and developing otherwise viable, indeed successful golf courses.

It is exceedingly rare in fact for a successful golf club to close, or be closed, unless the owners were purely after financial gain from development. Otherwise, it is normally only failing, or failed golf clubs that close down. The presumption we face is that the overall benefits the H.E. proposed plan would comfortably outweigh the needs of the local golfing community and justify the closure of an otherwise thriving golf club. One agonisingly in touching distance of celebrating its Centenary Year in 2027. Unprecedented in fact. Can you imagine this happening up the road at Walton Heath or Wentworth? No, you could not.

Furthermore, that despite ample opportunity and a very long lead-time to this 2024 submission period, H.E. have still failed, perhaps felt it unnecessary, to provide a detailed Needs Assessment. We understand this will follow later to accompany a Planning Application, but how much more time do they need? Perhaps they just want to assess the public response in advance. To fail to publish a robust Needs Assessment to support their confidence in succeeding, remains a mystery and leads one to conclude either a degree of over-confidence, or they just want to avoid releasing their conclusions. One suspects that, despite their rhetoric, it betrays a lack of confidence in their stated position. Whatever the truth behind their decision, it does not lend to any reasonable sense of public transparency in proving their case. It should be considered entirely unacceptable.

Instead, the public is left with just their Position Statement, supported by one very vague letter of implied support from Sport England (S.E.). It is more than surprising that they have supplied nothing at all, from England Golf (E.G.) to accompany their proposals and instead have relied upon S.E. alone.

S.E. are the statutory consultee concerning provision of sport in Local Plans and whenever planning applications affect sporting provision. They provide guidance on planning for sporting need but are not specialists in golf. They invariably delegate the detailed assessments to the governing body of whatever sport is affected. In the case of IGC that would obviously be England Golf. S.E. would probably adopt the same approach whether this situation involved Netball, Hockey, or Swimming, and defer to that sports' governing authority.

So why the ominous silence from E.G. and a complete lack of opinion? As a result the local community of golfers eagerly await the input from E.G. which, eventually, should prove far more important than that of S.E. Although it should not be forgotten that one of S.E.'s key principles is to *'Protect and promote existing sport and physical activity provision and ensure new development does not prejudice its use.'*

E.G. is the governing body for amateur golf in England. As their stated aim they are *"dedicated to growing the game of golf."* They have a clear responsibility towards its golfing community of affiliated members of approximately 720,000. These are the golfers who represent the lifeblood of the almost 1800 E.G. affiliated golf clubs. It is surprising that the anticipated support for IGC from E.G. has failed to appear. Failed to be shared with the public despite the knowledge that they have long been involved

in discussions with H.E. as evidenced by the published 2<sup>nd</sup> November 2023 letter from Jo Edwards S.E. Planning Manager.

Nevertheless, we cannot comment or analyse, guess, or pre-empt that which remains withheld from public scrutiny, so we must restrict ourselves to simply commenting on that which is so far in the public domain, sketchy though that is.

Para (c) observes that...

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

Words are so very important in legal matters, each one intended to have specific meaning, so it should be incumbent on any Needs Assessment to prove beyond doubt that any development *“clearly outweighs the loss...”*

To use the same word, this clearly presents an immediate problem, a clear red-flag for H.E. Indeed, just how does anybody prove that the replacement of one form of sport, or recreation, *“outweighs the loss”* of another? How does one prove that clearly if replacing football with cricket, or hockey with rugby, that the *“benefits clearly outweigh the loss”*? Or in this case, Golf?

The loss of a golf course arguably matters little to anybody who does not enjoy the game themselves - and why would it? Why would any non-Golfer care about the value of a golf course to its members, visitors, and its community? In many ways non-golfers often consider golf to be a very odd pastime, taking hours to play and often (incorrectly) associated with a certain demographic cohort. The days of garish knitwear and check trousers lazily seen as some comedic golfing uniform has largely disappeared, but nevertheless golf is rarely taken seriously by non-golfers. But to golfers, it is often referred to as an addiction. Like no other, golf truly is a game for life.

And yet golf is one of the most popular, largest participation sports in England, behind only the most obvious. But beyond that, it is arguably one of, if not the most popular sporting pastime for the older generation. What other active participation sport do adults of mature years partake in? One that gives so many health benefits of exercise, camaraderie and within a club a profound sense of community. The very first and only sport which returned to action during COVID when others remained banned for long periods. It was enjoyed in the pandemic year in unprecedented numbers and it was obvious why. It was safe and valuable to all.

Bowls certainly is popular amongst the older generation, but to nowhere near the same degree of participation. Yet Bowls does not appear to be included in H.E.'s *“alternative sports and recreational provision.”*

There are many studies, too many to list, which exhort the proven benefits of golf, both from a physical and mental well-being perspective, its undeniable. Major surveys undertaken by Golf's most respected governing body the Royal & Ancient Golf Club (R&A) and the benefits also recognised by the Government itself in the All-Party Parliamentary Group for Golf. And many more. The benefits to physical and mental well-being of golf are irrefutable.

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So, what Sports and Recreational provision do H.E. propose within their Development Plan? And can it be clearly shown that the benefits of these CLEARLY outweigh the loss of the golf course? The H.E position statement states:

**Extract from HE Position Statement:**

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

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

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

- up to 9.2ha of publicly accessible parks and 5.7ha of amenity greenspace;
- up to 5 no. infant and junior play facilities;
- a new sports hub comprising 3G and grass pitches;
- flexible recreation facilities, walking and cycling routes in-line with Active Design principles;
- up to 1.2ha of new allotments; and
- up to 4 no. new tennis court / multisport facilities.

Do the benefits of these clearly outweigh the loss of the golf course?

Sports pitches both artificial and grass. Marvellous for active younger people to participate in all manner of sports. Not golf though.

Multi-sports facilities. Whilst unspecified presumably 5-a-side football, basketball, and other highly active sports? Who knows without more details. Are any of the “multi-sports” likely to appeal to the over 50 age group? The Over 60’s? Or even over 70’s or 80’s ALL of whom are catered for by playing golf at IGC very regularly. Nobody knows.

A few tennis courts. Yes, a small English participation sport, tennis is most popular in the June/July weeks surrounding Wimbledon, but not really a year-round sport. And sadly, not for many older people conscious of jeopardising their knee and hip replacements.

Green open space. This can be found in many places already in the local area and public footpaths.

Allotments. How many are proposed? And once these are taken these are surely for the use of one person, or just one family alone? Allotments are not typically seen as a shared facility open to all to share. And a recreational replacement for golf? Seriously?

New infant, junior and youth play facilities. Clearly could not be seen as a benefit to the golfing community.

Is there anything else I have missed that forms part of the HDC Local Plan?

Without the benefit of further detail thus far made available, it seems nothing short of ludicrous to suggest that anything yet publicised as part of the H.E. proposals will “...clearly outweigh the loss...” and certainly not to the benefit of the older generation who currently enjoy the irreplaceable benefits of playing regular golf.

Indeed there are very few facts, if any, available to support the H.E. Position statement on para (c) which concludes, “*a significant package of investment in alternative sports and recreational facilities can be delivered through the redevelopment of the IGC, both within the existing site and wider masterplan area, the benefits of which are likely to clearly outweigh the loss of the golf course.*”

How revealing that a “*significant package of investment*” is only “likely to clearly outweigh the loss...” The inclusion of the word “likely” is so revealing in that it clearly casts doubt over the veracity of their case. Their arguably lazy conclusion is no more than subjective that it passes the test of para 99(c) and does not even bear the name of any author. Indeed, it begs the question whether the author is even qualified to write the position statement or reach that subjective conclusion. That too seems entirely unacceptable for public scrutiny.

The average age of the membership at IGC is 60 or above. At many golf clubs it is higher and across the country the irrefutable fact is that the average age of golfers is increasing almost every year in line with the ageing population. The National Census does not lie...

Just as evidence of the numbers, locally, right across all affiliated golf clubs in Sussex shows 10,765 members are below the age of 56. While an astonishing 17,964 affiliated members are 56 years and over. Even more astonishing is that 11,501 of those are aged 66 and above.

Proof, if it was ever needed, that golf provides physical health and exercise benefits to the older generation beyond any other sporting activity. And those numbers are only for club members, so you can add in many, many more casual golfers who choose to play only occasionally. Most likely in the summer months and who choose not to commit to joining a golf club. It is most unlikely that the benefits offered by other sports facilities as proposed by H.E. can possibly clearly outweigh the loss of such a valuable golf facility as IGC. To decide otherwise, in the complete absence of any supporting evidence, flies in the face of reality.

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When it comes to the HDC Plan being scrutinised by a Government Inspector they will surely fail to find any substance or evidence to support what is no more than a subjective H.E. claim. After all, they have no data, just an unsubstantiated, anonymous



opinion to support their view. This could be politely considered a somewhat lacklustre attempt to prove their case. Indeed, the public deserve more effort to be put into an argument proposing the unprecedented loss of such an historic local landmark as IGC.

This probably brings us back to the genesis of this entire scheme which presupposed the sacrificing of IGC for the development of a predominantly housing development and two schools intended for the HDC District. That in itself must be considered somewhat ironic with the Crawley Borough Council boundary only about 400 yards away.

Since day one, there has been a presumption, whether borne out of overconfidence or, perhaps simply arrogance, that sacrificing one golf club was a price worth paying. It may even have been borne out of ignorance, having previously studied historic Needs Assessments which suggested in years gone by that HDC was well catered for with golf courses. That may have been true in the past, but none of those historic assessments included the 112,000 population of Crawley which now must be factored into the equation.

They may have taken into account closures of some courses in recent times, but back then they would not have known about the genuine aspirations of both Cottesmore and Horsham Golf to realise the development potential of their land. Even if they did, they may be relying on the fact that neither of those would get planning permission. That may well be the case but nobody should take for granted that the owners of either, or both of those courses will continue to operate as golf courses, into the future, and may either choose to close, or be unable to continue. Just as both Rusper Golf Club and Redhill & Reigate and Effingham Park have all closed for good in only the last 4 years. All now lost to the local golf community.

Once closed, a golf course is lost forever, never to re-open. The golfing boom of the 1980's and 90's saw hundreds of new, mostly average golf courses built. That boom ceased years ago and caused some over-supply. Since then many have failed and continue to do so. One thing is for sure, no new courses are being built now, the cost is astronomical. The absolute handful that have been built in recent times have been privately funded, high profile exclusive private clubs and not available to any but the super-rich. Once gone, the field will never be replaced.

To lose such a historic golf course and club, on a subjective opinion of the relative merits of a couple of football pitches, smaller multi-sports facilities, a handful of tennis courts and some allotments, simply beggars' belief. I have no doubt that once the possibility of closure becomes a distinct threat, this will gain national exposure across the golfing world and members at other golf clubs will have genuine cause for concern. The field today. Sunningdale tomorrow? I believe H.E. will quite rightly have their work cut out to prove this clearly, under NPPF Para 99 (c). The golfing world will be watching.

As previously mentioned, non-golfers may not care, whether they be Council Planners or H.E. developers. But the independent Inspector surely will and regardless of H.E. or HDC motives, the fact of the matter is there are tests to be met. Government guidelines to be followed and an Inspector ultimately charged with finding that either (a) or (b) or (c) have been clearly achieved. That, I respectfully suggest, is clearly going to be an extremely hard test to pass.

Cathy Durrant On behalf of S.W.O.I.