

From:

Sent:

To:

Cc:

Subject:

15 September 2025 12:18

Planning

info@sportengland.org

Objection to Application Reference: DC/25/1312

Categories:

Comments Received

To: Jason Hawkes & F.A.O Jo Edwards
Horsham District Council, Planning Department
Albery House, Springfield Road, Horsham, West Sussex RH12 2GB

Objection to Planning Application DC/25/1312 West of Ifield

I object to planning application DC/25/1312 West of Ifield for the following planning reasons:

1. Loss of Ifield Golf Course, Non-Compliance with NPPF Paragraph 99, and Sport England’s Role

The **closure of Ifield Golf Course** would represent a **devastating and irreversible loss** of sporting and recreational provision in an area that is already **severely underprovided**.

In recent years, our region has suffered the **closure or reduction of multiple golf courses**:

- **Closed:** West Chiltington, Rusper, Redhill & Reigate, Effingham Park, Horsham Golf and Fitness (approved for closure).
- **Reduced:** Mannings Heath and Cottessmore (both cut down in number of holes).
- **Pending:** Gatton Manor has applied for change of use.

In total, **117 golf holes have already been lost** across our area. This development would worsen that deficit dramatically.

The **National Planning Policy Framework (NPPF) Paragraph 99** states:

*“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.”*

Homes England has failed to meet either requirement:

- **Ifield Golf Course is not surplus to requirements.** Demand for golf is rising nationally and locally, while supply is collapsing due to closures.
- **Mitigation proposals are wholly inadequate.** Investment in **Tilgate, Rookwood, and Goffs Park** does not come close to replacing what will be lost:
 - *Tilgate* is in **poor condition**, with **widespread public access causing antisocial behaviour and danger** to the public.
 - *Rookwood Golf Course* is **similarly affected by public access issues** and is often used more by dog walkers than golfers, undermining its suitability as a serious sporting facility.
 - *Goffs Park* has not functioned as a proper golf facility for over a decade and is now **largely a footgolf course**. Again, full public access makes it inherently unsafe for higher golfing use.

In addition, the **financial figures in the mitigation report are redacted**, leaving no transparency over whether the proposals are viable. Even if the reported £5m investment were committed, experts agree that **at least double this amount** would be required to bring these facilities to the standard of Ifield Golf Course. Even then, our area would still be **18 holes worse off** than before.

This loss adds to the other 117 golf holes that have already been lost in the area, at a time when the **population continues to rapidly increase**. The number of available golf holes is therefore **declining sharply relative to population**, and it is not unfeasible to say that this ratio will **continue to deteriorate dramatically** once another 3,000 homes are added and yet another course is removed.

With thousands of new homes already being delivered at Kilnwood Vale, Mowbray/Bohunt, Forgewood, Highwood Mill, Heathy Wood in Copthorne, and Woodgate in Pease Pottage, the removal of **vital recreational land** is reckless and unsustainable.

Sport England’s statutory role is also critical here. As a statutory consultee on applications affecting playing fields, Sport England’s policy is clear: they **object to any loss of sports facilities** unless full and equivalent replacement provision is secured. Homes England’s proposals do not satisfy this requirement and therefore run counter not only to the NPPF but also to Sport England’s protective remit.

In short: the mitigation report is **fantasy**, the proposed alternatives are **unsafe and inadequate**, and this application is in direct conflict with both **NPPF Paragraph 99** and **Sport England’s statutory protections**.

2. Water Supply and Sewage

Southern Water has acknowledged serious supply and treatment constraints. The addition of 3,000 homes will **overwhelm resources** and increase the risk of **sewage overflows**.

3. Traffic and Transport

The **A23, A264, and surrounding roads are already at breaking point**. Current morning commutes on the A23 are routinely **gridlocked between 7:45–8:45am**, largely due to extra pressure from ongoing large-scale developments such as Kilnwood Vale and Mowbray. Adding another 3,000 homes will make this situation significantly worse. The impacts will not only affect commuters but also the wider public, who will suffer from **increased traffic congestion, longer journey times, and harmful levels of air pollution**.

4. Biodiversity and Green Space

The site provides **valuable habitats** and forms part of the **crucial green buffer** between Horsham and Crawley. This year alone, **two families of badgers (a protected species)** were observed living on Ifield Golf Course. It is a **criminal offence** for the public to disturb or damage their habitat — yet Homes England’s proposal would destroy it entirely. The permanent loss of such habitats will **irreparably damage biodiversity**.

5. Flooding

The land plays a **critical role in natural flood prevention**. Development will increase **flood risks** locally and downstream, with inadequate mitigation for long-term climate challenges.

6. Heritage and Landscape

Ifield’s **rural and historic identity** will be **irreparably damaged** by this speculative urban sprawl.

7. Housing Tenure and Secondary School Provision

The housing mix is **not aligned to local needs**, fails to guarantee **affordability**, and omits confirmed **secondary school provision**, despite overstretched capacity in existing schools.

8. Undemocratic and Speculative Nature of the Application

The local community has consistently raised **strong objections** to this scheme. If the voices of residents were genuinely being listened to, this application would have been withdrawn long ago. Instead, despite widespread and ongoing opposition, the process continues.

Meanwhile, Homes England stands to make an **inevitable profit of many millions of pounds** from this development — profits large enough for them to casually offer £5m towards upgrading unrelated facilities while still retaining vast financial returns. This raises a critical question: *is this application truly about meeting housing needs, or is it about generating tens of millions in profit for people who have never visited, let alone lived in, the area surrounding Ifield Golf Course?*

This demonstrates a deeply **undemocratic and speculative approach**, in which **profit is prioritised over community, environment, and sustainability**.

Summary

This application is fundamentally flawed. It breaches **NPPF Paragraph 99** by removing Ifield Golf Course without proving it is surplus to requirements or offering **equal or better-quality replacement**. The so-called mitigation proposals to invest in **Tilgate, Rookwood, and Goffs Park** are **wholly inadequate**: Tilgate is **poorly maintained** and plagued by antisocial behaviour, Rookwood is more a **public walking space than a serious golf course**, and Goffs Park has not been a functioning golf facility for over a decade and is now mainly a **footgolf course**. These are **not equal replacements** for a full 18-hole course like Ifield, and to suggest otherwise is misleading.

It also fails **Sport England’s statutory test, intensifies traffic gridlock and pollution** on the A23, threatens **protected badger habitats** in breach of wildlife law, and is clearly **profit-driven rather than community-driven**.

Taken together, these failings make the proposal **unsustainable, unlawful in parts, and overwhelmingly against the interests of the local community**.

For these reasons, I respectfully urge Horsham District Council to refuse this hybrid planning application.

[Redacted Signature]
Address: 219a Crawley Road, RH12 4ET
Application Reference: DC/25/1312