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Mr Jason Hawkes  
Principal Planning Officer  
**Planning Department**  
Horsham District Council

The National Golf Centre,  
The Broadway, Woodhall Spa,  
Lincolnshire LN10 6PU  
+44 (0)1526 354500  
info@englandgolf.org  
www.englandgolf.org

**Subject: Objection to Planning Application [Reference: DC/25/1312] – Including the proposed loss of Ifield Golf Club**

Dear Jason,

I am writing to formally object to the above planning application, which proposes the complete loss of Ifield Golf Club (IGC). This objection is supported by England Golf and focuses on four key areas:

**[REDACTED] 1. Accuracy and Relevance of Needs Assessment**

2. **Insufficient Mitigation Proposals**
3. **Current Position at Ifield Golf Club**
4. **Sustainability Value**

**1. Accuracy and Relevance of Needs Assessment**

The needs assessment underpinning this application is out-of-date and inaccurate, failing to reflect current realities of golf participation and local provision. England Golf recommends a full update to ensure decisions are based on robust evidence.

**Supply Assessment Issues**

- **Administrative boundary vs. functional reality** - while IGC sits within the Horsham District Council (HDC) administrative boundary, it is functionally part of Crawley by location, postcode, travel-to-play patterns and membership. The assessment does not sufficiently recognise this, resulting in conclusions that under-weight Crawley's needs.
- **Over-reliance on Horsham LA framing** - several passages reference Horsham only, with no equivalent analysis for the 20-minute catchment or Crawley LA. Given Crawley's much higher population density and the club's member geography, this framing can mislead decision-makers about where need is actually concentrated.
- **Inconsistent study area** - Slinfold GC is 25 minutes from IGC, yet it appears in a study said to use a 20-minute drivetime catchment, creating methodological inconsistency. Club data underscores the disconnect - only 4 IGC members live within 4 miles of Slinfold GC,



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- versus 379 within 4 miles of IGC - evidence that Slinfold is not a realistic alternative for the majority of IGC members.
- **Irrelevant cross-authority membership references** - citing that some members reside outside Horsham or Crawley is not fitting. The correct unit of analysis is drivetime from IGC, not local authority of residence, to reflect how golfers actually choose facilities.
- **Comparable-provision deficit and high demand elsewhere** - the supply assessment should prioritise comparable facilities - i.e. members' clubs offering full 18-hole, WHS-rated competition calendars, and year-round access at a similar price point - because that is [REDACTED] placed IGC golfers would realistically migrate. England Golf's analysis indicates limited comparable alternatives in the catchment, with high demand and waiting lists at several clubs. This calls into question any claim that supply can absorb IGC's displacement.
- **Impending reduction in supply** - since the assessment was undertaken, it has become increasingly likely that Horsham Golf & Fitness will be granted planning permission, removing a further 18 holes within IGC's 20-minute catchment. This prospective loss tightens supply and should be reflected in any up-to-date assessment.
- **Recent closures - latent demand not accounted for** - the area has lost multiple courses in the last decade - Pease Pottage, Rusper, and Redhill which has compressed availability and created latent demand. The assessment needs to recognise this historic attrition of supply when judging current and future capacity.
- **IGC's role in the Golfers' Journey** - IGC is integral to the Golfers' Journey in Sussex: it provides membership, WHS competitions, visitor green fees, and society golf, widening access for Crawley residents. Removing IGC would take out a key supply node that both develops and retains golfers across ability levels.
- **Unqualified assertions on pricing** - statements that membership is "expensive" are unqualified and lack benchmarked comparisons to regional and national fee levels. Without transparent price benchmarking (by facility type and offer), such claims cannot inform supply adequacy or affordability judgments.
- **No strong evidenced spare capacity at alternatives** - assertions that other clubs have adequate capacity to absorb IGC members are unsubstantiated - particularly when filtered for suitable, like-for-like alternatives. If Horsham Golf & Fitness were also lost, the number of displaced members would rise by 500 more, further exposing the absence of spare capacity in the local system.



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- **Drive-time inaccuracies for existing members** - the analysis of current IGC members' drive times is inaccurate against club records. Correcting this would likely increase measured dependence on IGC within the 20-minute catchment.
- **Course conditions not a differentiator** - IGC shares the same wealden clay and rainfall regime as neighbouring courses; winter limitations are area-wide, not unique to IGC. Using seasonal playability to down-rank IGC's supply value is therefore unsound.

## Assessment Issues

- **Strong in-season utilisation and emerging capacity constraints** - during 2024, IGC recorded 5,500 visitor rounds, equating to a 69% in-season tee-time fill rate. This demonstrates healthy utilisation and leads to capacity pinch points at peak times, undermining any assertion that demand is weak or that the club is surplus to requirements.
- **Localised membership base within the Sport England catchment** - 70% of members live within 4 miles of the club. Of 537 members, 321 reside in Crawley, and only 10% live outside the 20-minute core drive time. This concentration evidences IGC's essential role in meeting local demand within the defined catchment.
- **Membership growth and product innovation** - IGC grew their total membership by 4% in 2024. This growth is supported by the introduction of new membership categories tailored to modern participation patterns (e.g., flexible, lifestyle, and pathway options), illustrating that a dynamic product offer created for the local market in which it operates is converting local interest into sustained participation.
- **Lowering the average age profile** - while total membership is stable to growing, IGC is reducing its average age through proactive social media marketing and targeted onboarding of newer golfers - strengthening long-term demand resilience.
- **Inclusive participation in a diverse urban catchment** - IGC is actively lowering its average age and collaborating on outreach programmes. Situated in one of Sussex's most diverse demographic areas, the club offers cross-cultural and cross-ethnic opportunities in a fully integrated club environment - extending demand beyond traditional member profiles.



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- **RGD (Regular Golfer Demand) misinterpretation** - the assessments use of the RGD index is out of context and does not reflect the dataset provided by England Golf. Critically, it omits the RGD calculation for Crawley, which evidences a significant undersupply relative to demand, compounded by Crawley's much higher population density than surrounding authorities.
- **No spare capacity among catchment clubs** - catchment clubs are full or near full, and none can absorb 537 IGC members. The assumed capacity "elsewhere" is not evidenced and conflicts with on-the-ground membership realities.

[REDACTED] **level demand trends are stable to increasing** - evidence across Sussex indicates stable-to-increasing membership. IGC's own growth further corroborates an upward trajectory in regular participation, not a decline.

- **Sport England segmentation used without demand relevance** - the assessment cites Sport England consumer segmentation without context or a clear link to golf-specific demand conversion. Without tying segments to propensity to join, play frequency, price sensitivity, and local accessibility, the segmentation adds little to no value.
- **Inappropriate expansion of the catchment** - inclusion of Slinfold GC, which sits outside the stated 20-minute catchment, over-inflates supply against the very methodology the assessment claims to use. Catchment boundaries must be consistently applied.
- **Participation is not in decline - evidence points upward** - references to falling membership/participation rely on limited, non-representative surveys (e.g. circa 100 club managers in the CCL Benchmarking survey) and are contradicted by broader datasets. The most recent R&A Global Participation figures indicate a 4% increase in golfers in England between 2023 and 2024, and England Golf's larger sample datasets likewise contradict assertions of decline. Locally, IGC's growth and utilisation further rebut any claimed downturn.
- **Demand is strengthening nationally and locally** - far from "struggling," golf demand is on a strong upward trend, reflected nationally and specifically at IGC through membership growth, younger cohort engagement, and high seasonal fill rates.
- **England Golf's position on 18-hole provision** - while England Golf is not singularly focused on growing the raw number of standard-length 18-hole courses, this does not imply they view current provision in this category as excessive. In constrained, urbanising catchments such as Crawley, maintaining accessible 18-hole capacity remains essential to meeting demonstrated demand.



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- **Active Lives measure (2x28) undervalues golf participation** - reliance on the 2x28 metric to define an “active participant” under-counts golfers, particularly pay-and-play and irregular participants who may play less frequently but are nonetheless active, paying users. This methodological choice suppresses measured demand and is not fit-for-purpose when assessing golf facility need.
- **Critical role in the Golfer Journey** - given IGC’s modernisation over the past 18–24 months, it has cemented its place as a critical facility in the golfer journey - from beginner and occasional player (via accessible green fees and outreach) to committed member (via competitions, academies, and structured development). Removing IGC would break this [REDACTED] way and depress conversion from trial to regular participation.

## 2. Insufficient Mitigation Proposals

The mitigation proposals presented in the application do not go far enough to ensure that golfers at IGC will receive a new home that matches what they would lose if the development proceeds - particularly given that the needs assessment evidence cannot demonstrate that IGC is surplus to requirements. Key concerns include:

### Fundamental Shortcomings

- The mitigation package presented appears to lack the scale and scope necessary to replicate the capacity, quality, and accessibility currently provided by Ifield Golf Club.
- Without a like-for-like replacement or equivalent provision, the proposals fail to meet the requirements of NPPF paragraph 99, which seeks to protect existing sports facilities unless equivalent or better provision is secured.

### Specific Concerns Regarding Tilgate Forest

- **Clubhouse Capacity** - to accommodate the projected increase in footfall, the clubhouse would require significant expansion, particularly if additional facilities such as an adventure golf course and the reinstatement of the 9-hole course are introduced.
- **Tree Management** - no consideration has been given to the condition of existing trees, which are likely to be of poor quality and may require substantial management or removal.
- **Course Layout and Infrastructure** - there is a complete lack of detail regarding:
  - Proposed course layout improvements.
  - Upgrades to tees and greens.



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- The extent of drainage works required to ensure year-round playability.

### **Lack of Detail and Planning**

- The mitigation proposal contains obvious gaps and lacks the technical depth needed to assess feasibility. Without detailed specifications, it is impossible to determine whether the proposed works would deliver a facility of comparable quality and capacity.
- A full and costed project plan, including detailed drawings, is essential for England Golf to consider any mitigation proposal as viable.

[REDACTED] detail is required, including comprehensive plans and costings for every aspect of the proposed works at Tilgate Forest Golf Centre.

### **Uncertainty Around Delivery**

- There is a significant element of uncertainty surrounding the proposed mitigation because the lease at Tilgate Forest is due to expire within the next two years. This raises serious questions about the long-term security and sustainability of any investment made at this site.

## **3. Current Position at Ifield Golf Club**

Despite the uncertainty created by Homes England's ownership and the proposed development, Ifield Golf Club (IGC) remains a thriving and strategically important facility for the local community and the wider golfing network in Sussex. Key evidence includes:

- **Membership Growth and Stability** - IGC has grown its membership from 513 in 2022 to 537 in 2024 and is forecast to reach 567 in 2025, aligning with national trends of growth. This demonstrates strong local demand and the club's ability to attract and retain members even under the shadow of potential closure.
- **High Utilisation and Visitor Footfall** - the club delivers over 30,000 rounds of golf annually and attracts more than 5,500 unique visitors each year, operating at a 69% tee-time fill rate during peak season. This level of utilisation indicates that IGC is already close to capacity during the busiest periods.
- **Demographic Breadth and Inclusivity** – IGC's membership reflects golf's "game for life" ethos:
  - 10% juniors under 18
  - 17% aged 20–40



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- 60% aged 55+
- This older cohort cannot easily switch to alternative sports, making IGC essential for maintaining physical activity among older residents. The club also offers reduced fees for juniors and competitive pricing for all categories, ensuring affordability.
- **Geographic Concentration of Members** - IGC serves Crawley's population directly: 62% of members come from two Crawley postcodes within 3 miles, and 77% live within 5 miles. Over 90% of members are within the 20-minute catchment, confirming IGC's role as a local facility rather than a regional destination.
- **Strategic Modernisation and Future Plans** - under new management, IGC has [REDACTED] a modernisation strategy to secure its long-term relevance:
  - [REDACTED] new membership categories to meet changing consumer needs.
  - Junior and Ladies' Academies aligned with England Golf pathways.
  - Planned 3-bay driving range with TrackMan, indoor swing studio, and sports bar to enhance participation and social engagement.
  - Community outreach programmes with local schools and sports teams to promote short-form and starter golf.
  - Rewilding and biodiversity projects to enhance environmental value.
- **Role in the Golfer Journey** - IGC acts as a bridge between beginner and committed golfer, offering accessible green fees for casual players and a structured environment for competitive golf. This dual role is critical for sustaining participation growth in Crawley and North Sussex.
- **Impact of Closure** - removing IGC would halve Crawley's golf provision, leaving the town with only one municipal course (Tilgate Forest) and no members' club. This would disproportionately affect older golfers, reduce affordable access, and undermine England Golf's strategic objectives for participation and inclusivity.

#### 4. Sustainability Value

Ifield Golf Club (IGC) is not just a sporting facility; it is a significant environmental and social asset that aligns with national and local sustainability objectives. Its removal would represent a major loss of green infrastructure and biodiversity potential in the Crawley area. Key considerations include:



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### **Ecological and Biodiversity Value**

- The site contains approximately 15,000 trees across woodland corridors, providing essential carbon sequestration and air quality benefits.
- Three ponds and associated wetland areas create habitats for a range of species, including protected species such as bats and great crested newts, which have been recorded on-site.
- An estimated 35–40% of the land is non-golf playing area, offering substantial scope for Biodiversity Net Gain (BNG) initiatives and habitat creation.

### **Opportunities for Environmental Enhancement**

- IGC is well-positioned to deliver long-term biodiversity improvements through structured habitat management plans, supported by the BNG framework.
- The club could act as a “solutions provider” for local ecological challenges, integrating conservation projects with community engagement.

### **Water Sustainability and Climate Resilience**

- With a sizeable amount of land there is potential to construct a reservoir on-site, enabling the club to become self-sufficient for irrigation and reduce reliance on mains water.
- Additional opportunities include water recycling from balancing ponds and attenuation basins in surrounding developments, supporting water neutrality objectives.

### **Carbon and Green Infrastructure**

- The extensive tree cover and green space contribute to urban cooling, flood mitigation, and carbon storage, all of which are critical in a rapidly urbanising area like Crawley.
- Removal of this green infrastructure would increase surface water runoff and reduce local climate resilience.

### **Social and Community Sustainability**

- IGC serves as a community hub, particularly for older residents, providing social interaction and physical activity that supports mental and physical health.
- The club’s inclusive approach - through junior academies, outreach programmes, and affordable membership options - aligns with England Golf’s strategies to make golf more accessible and will support local health strategies.



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## **Conclusion**

The proposed development represents a fundamental and irreplaceable loss of a key sporting, environmental, and community asset. Based on the evidence presented:

- The needs assessment is outdated, inaccurate, with questions over some of the methodology used, failing to reflect current participation trends, local demographics, and the true capacity of alternative facilities. When corrected, the data clearly shows that Ifield Golf Club is not surplus to requirements and plays a critical role in meeting demand within [REDACTED] minute catchment.  
[REDACTED]ation proposals are wholly inadequate, lacking the scale, detail, and certainty required to replace what would be lost. Without a fully costed, detailed plan - including clubhouse expansion, course upgrades, drainage improvements, and long-term lease security - these proposals cannot be considered viable or compliant with NPPF paragraph 99.
- IGC is a thriving, modernising facility with growing membership, high utilisation, and a strategic role in the golfer journey. Its inclusive approach, junior and ladies' academies, and community outreach programmes make it a cornerstone of local sporting provision. Closure would halve Crawley's golf capacity, leaving residents - particularly older and less mobile golfers - without realistic alternatives.
- The site delivers significant sustainability value, including biodiversity habitats, carbon sequestration, and opportunities for water neutrality. Its removal would undermine local and national environmental objectives and erode green infrastructure in a rapidly urbanising area.

In short, our view is that this application fails to demonstrate compliance with planning policy, fails to provide equivalent or better replacement provision, and fails to recognise the social, sporting, and environmental value of Ifield Golf Club.

England Golf strongly recommends that Horsham District Council refuse this application unless and until:

1. A robust, updated needs assessment is completed using accurate data and methodology.
2. A comprehensive, costed mitigation plan is produced that guarantees equivalent or better provision.
3. The environmental and community benefits of the existing site are fully accounted for in decision-making.



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Finally, England Golf is willing to work collaboratively with all stakeholders to address the issues identified in this objection - including supporting the development of an updated needs assessment, advising on mitigation planning, and providing guidance on sustainability and participation strategies.

A lost golf course cannot be easily replaced. Once gone, this facility - and the opportunities it provides - will be lost to the community forever.

**Yours sincerely,**

Gavin Anderson  
Club, County & Membership Operations Manager  
England Golf