

INTRODUCTION & SUMMARY

For a planning application to be successful it must follow local and national policies on the loss of a sporting facility.

To satisfy national policy, the National Planning Policy Framework (NPPF), a site specific assessment should be prepared of the sports facility involved and it should concentrate on the sport played on that site and the catchment area of the sport. Although para a) is not being contested the assessment is still required to determine if the other 2 limbs of NPPF para 104 have been satisfied.

The assessments prepared by Sports Planning Consultants (SPC) presented by Homes England is called Golf Needs Assessment and it is meant to be the site specific assessment of Ifield golf course. It is not recognisable as such, it is more like a general golf needs assessment of the Crawley/ Horsham area, in fact it uses the HDC assessment of golf in the Horsham district to make its case. It professes to have followed the guidance for preparing assessments but has not done the necessary first stage to prepare the scene. In general, it is just a collection of data and maps from various sources with barely any discernible facts and figures to prove a point. Because of this they have put forward proposals that do not satisfy para 104 b) of the NPPF.

They have misconstrued and manipulated the rules and policies to give themselves wider scope in sport types and locations which if allowed will create a precedent which would allow builders to crucify sport in England. This cannot be allowed so their proposals do not satisfy para 104 c) of the NPPF.

Although they have mentioned local policy 43 they have not gone in to detail probably because it contradicts their stance on limbs b) and c). It clearly states that a loss would be resisted unless equally usable facilities can be conveniently provided nearby.

The above means that Homes England have not satisfied national policy NPPF para 104 and local policy 43 so their application should be rejected.

All of the criticisms above are backed up by detail, much of it is extracted from an assessment I did of Ifield golf course as an objection to the local plan.

The following report will give the detailed analysis missing from the Homes England assessments and statements and it will use the information to show that HE proposals do not satisfy local and national policies.

CATCHMENT AREAS

SPC did no detailed work on catchment areas. The guidance for doing assessments is **ASSESSING THE NEEDS AND OPPORTUNITIES GUIDE (ANOG)** which says:

Proportionate. ANOG 10 bullet point 3 says Site / facility specific needs assessments will require all parts of each stage to be undertaken for a specific catchment area related to the particular type of sports facility under consideration.

Sports Scope ANOG A21 If you are undertaking an assessment to determine if an individual facility or site is surplus to requirements then the scope of the assessment should generally be limited to that particular facility type and the sports played on it.

Geographical Scope ANOG 10 The specific catchment area related to the particular type of sports facility under consideration.

This means that the assessment should concentrate on Ifield golf course catchment area and 18 hole full course golf. It is not proportionate to consider 9 hole golf, driving ranges and pitch and put.

The following table draws together all of the catchment area data for 18 hole golf courses around Crawley which are in the Ifield golf course catchment area

The table shows how all of the areas in the Ifield golf course catchment area are covered by the other golf courses. It clearly shows that four of the courses are Crawley golf course and the other 3 are Horsham golf courses. None of the Horsham golf courses cover all of the districts in the Ifield golf course catchment area.

NONE OF THE HORSHAM GOLF COURSES COULD BE EQUALLY ACCESSIBLE TO IFIELD GOLF CLUB MEMBERS.

AREAS COVERED		GOLF COURSES IN CRAWLEY & VICINITY				NEIGHBOURING GOLF COURSES		
		Ifield	Tilgate	Copthorne	Cottesmore	Mannings	Rookwood	Horsham
Crawley Neighbour-hoods	Forge Wood	All	All	All	All	None	None	None
	Lanley Green	All	All	All	All	Most	All	None
	Ifield	All	All	All	All	All	All	None
	Maidenower	All	All	All	All	All	All	None
	Other 10 N/H's	10:10	10:10	10:10	10:10	10:10	10:10	05:10
Other towns & districts in vicinity	Gatwick Airport	All	All	All	All	None	None	None
	Manor Royal	All	All	All	All	None	Part	None
	Copthorne	All	All	All	All	All	Part	None
	Horley	All	All	All	Most	None	None	None
	Horsham	Say 75%	Say 75%	Say 50%	All	All	All	All
	East Grinstead	None	None	All	None	None	None	None
Catchment populations								
0 /15 min		146998	135150	181268	169511	100786	124453	91961
0 /20 min		238562	229233	263031	246016	222477	234604	181773
% Within 15 Min		61.60%	59%	68.90%	68.9	45.30%	53%	50.60%

GENERAL ACCESSIBILITY

The accessibility section of the Sports Planning Consultants (SPC) Golf Needs Assessment should provide the information to determine if a location is equally accessible. However, it does not. There is nothing in the section on accessibility which is the ease of getting to or using a facility.

Guidance for carrying out the assessment is given in ANOG.

ANOG B19 Map out the locations and catchment populations to get a spatial understanding of the facilities and their locations.

ANOG B20 to consider public transport routes

ANOG B21. It may also be necessary to take account of barriers, or 'severance factors', which prevent free movement, such as motorways, railways, rivers and canals.

The only part that SPS has done is B19 which is the preparation for the detailed analysis which should follow.

My analysis of the distances from all of the neighbourhood and district centres to the 4 Crawley golf courses is set out in the table below.

CRAWLEY NEIGHBOUR- HOODS			TO IFIELD GOLF COURSE		CRAWLEY NEIGHBOUR- HOODS			TO TILGATE G. C. COURSE		CRAWLEY NEIGHBOUR- HOODS			TO COPTHORNE COURSE		CRAWLEY NEIGHBOUR- HOODS			TO COTESMORE GC COURSE	
			MINUTES	MILES				MINUTES	MILES				MINUTES	MILES				MINUTES	MILES
BEWBUSH			6	2.1	BEWBUSH			9	3.1	BEWBUSH			14	6.4	BEWBUSH			9	4.1
BROADFIELD			8	2.8	BROADFIELD			9	3.1	BROADFIELD			14	6.4	BROADFIELD			11.1	4.4
FORGEWOOD			12	5.1	FORGEWOOD			13	4.7	FORGEWOOD			9	3.4	FORGEWOOD			18	9.9
GOSSOPS GREEN			4	1.2	GOSSOPS GREEN			8	2.8	GOSSOPS GREEN			11	5.9	GOSSOPS GREEN			9	4.3
IFIELD			4	0.8	IFIELD			11	4	IFIELD			10	4.6	IFIELD			12	5.5
LANGLEY GREEN			6	2.0	LANGLEY GREEN			10	3.9	LANGLEY GREEN			10	4.1	LANGLEY GREEN			12	5.5
MAIDENBOWER			13	4.9	MAIDENBOWER			12	3.9	MAIDENBOWER			8	3.3	MAIDENBOWER			15	6
NORTHGATE			9	2.7	NORTHGATE			8	2.3	NORTHGATE			7	3.1	NORTHGATE			13	4.7
POUND HILL			13	5.2	POUND HILL			12	3.6	POUND HILL			6	2.3	POUND HILL			15	8.8
SOUTHGATE			6	1.9	SOUTHGATE			6	2.1	SOUTHGATE			11	5.5	SOUTHGATE			8	3.6
THREE BRIDGES			11	3.5	THREE BRIDGES			9	2.4	THREE BRIDGES			8	2.8	THREE BRIDGES			13	4.9
TILGATE			9	3.2	TILGATE			3	0.6	TILGATE			12	4.4	TILGATE			9	3.7
WEST GREEN			10	3.2	WEST GREEN			9	2.5	WEST GREEN			9	4.3	WEST GREEN			11	5.1
FURNACE GREEN			13	3.8	FURNACE GREEN			5	1.5	FURNACE GREEN			9	3.6	FURNACE GREEN			10	4.4
OTHER AREAS					OTHER AREAS					OTHER AREAS					OTHER AREAS				
GATWICK AIRPORT				7	GATWICK AIRPORT				7.1	GATWICK AIRPORT				4.2	GATWICK AIRPORT				9.5
MANOR ROYAL				2.9	MANOR ROYAL				3.5	MANOR ROYAL				3.2	MANOR ROYAL				6.1
COPTHORNE				5.7	COPTHORNE				5	COPTHORNE				1.2	COPTHORNE				7.8
HORLEY				7	HORLEY				6.8	HORLEY				5.9	HORLEY				11
HORSHAM				7	HORSHAM				8.9	HORSHAM				13	HORSHAM				5.2
Total Miles				72.0	Total Miles				71.8	Total Miles				87.6	Total Miles				114.5

The table above shows that Ifield and Tilgate golf courses could be considered equally accessible but the ways and means of getting to Tilgate golf course are not as good. This is because it is not close to a bus stop or railway station nor does it have golf club and trolley storage which facilitates bus, train, drop off, pick up, and cycle travel

The table below shows a much different picture for the Horsham golf courses.

IFIELD GOLF CLUB		DISTANCE IN MILES FROM AREAS		
CATCHMENT AREAS		Mannings	Rookwood	Horsham G F
Crawley Neighbourhoods	Forge Wood	14	12	15
	Langley Green	8.4	9.4	12
	Ifield	8.5	9.9	12
Other towns & districts	Gatwick Airport	14	16	18
	Manor Royal	9	9	13
	Copthorne	11	14	17
	Horley	14	17	20

ALL OF THE ABOVE SHOWS THAT NONE OF THE OTHER GOLF COURSES ARE AS EQUALLY ACCESSIBLE AS IFIELD FOR THE PROVISION OF ALTERNATIVE GOLF FACILITIES.

This is accentuated by the following detailed descriptions of how to get there from Crawley..

Crawley Golf Courses

IFIELD GOLF CLUB. Table 1 shows that all of the neighbourhoods of Crawley are within 15 minutes drive time of Ifield Golf Club. The entrance to the golf club is directly from Rusper Road which is the built up boundary of Crawley. As such Crawley residents have the benefits from the New Town pattern of ring and radial roads. The west of Crawley is served by the A23 Crawley bypass (Crawley Avenue)dual carriageway. The east is served by Southgate Avenue, Hawth Avenue and Haslett Avenue.

Road Conditions. Although the last 400 metres to the golf course is unlined and unlit most of the roads are good urban roads which are lined, lit and have 30 or 40 MPH speed limits. However, Crawley Avenue has short sections which are unlit and have 50 and 70 MPH speed limits. There would be the usual congestion at business and school starting and finishing times.

Alternative modes of travel There are facilities at Ifield Golf Club for the storage of golf clubs and trolleys which enable people to get there by bus, cycle, train and also to car share. Improvement and extension of the storage facilities would increase their usage and result in cost savings and carbon emissions. The proximity of golf club and population makes it ideal for drop off and pick up.

Walking. The neighbourhoods most suited to walking are Ifield and Gossops Green.

Cycling There are several neighbourhoods about 3 miles away which would be suitable for cycling.

Bus. The bus stop for the No.2 bus is .25 miles away and there is direct travel from Tilgate, calling at Furnace Green, town centre, West Green, and Ifield. It is possible to travel from all other neighbourhoods and change at the town centre to the No. 2 bus.

Train It is 0.7 miles from Ifield train station by foot. Stations in the catchment area are Crawley, Gatwick airport and Horley.

B3.4 Because Ifield Golf course is under threat of closure the accessibility to alternate golf courses for people in the catchment area of Ifield Golf club has been investigated.

TILGATE GOLF CLUB Table 1 shows that all of the areas in the Ifield GC catchment area are also in the Tilgate GC catchment area. This means that members of Ifield would be able to have good access by car to Tilgate Golf Club. For Crawley residents there would be no need to leave the Crawley Borough built up area. For the other nearby towns and areas of the Ifield GC catchment area, access would be similar to that to Ifield.

Road conditions Normal town road conditions, mainly 30 MPH limited with street lighting. Usual congestion near industrial estates and schools at beginning and end of day.

Alternative modes of Travel The proximity of golf club and population makes it convenient for drop off and pick up. There is no public transport which stops close enough for its use to be practical.

Walking Golfers definitely walk to Tilgate GC from Tilgate and Furnace Green.

Cycling Possible from several areas but club storage is not available.

COPTHORNE GOLF CLUB Table 1 shows that all of the neighbourhoods of Crawley and the towns and areas in the vicinity, except for Horsham town, which are in the catchment area of Ifield GC, are in the Copthorne GC catchment area. Regarding Horsham town only 50% of Horsham residents, who

are members of Ifield, would be within 20 minutes drive time of Copthorne. Crawley residents travelling by car would leave the built-up boundary of Crawley at Pound Hill and use the East Grinstead road. People from North Crawley, Horley and Gatwick Airport would leave via the roundabout at junction 10 of the M23.

Road Conditions Because both routes impinge with traffic joining and leaving the M23 there is the likelihood of congestion. Part of the route is unlit with 50 mph speed restrictions.

Alternative modes of Travel Although there is a bus stop nearby the service is not regular enough to make bus travel practical. Drop off and pick up are not as attractive as they are at Ifield and Tilgate because of the distance involved.

Walking Only players from Copthorne would be able to walk to the golf course.

Cycling. Because the golf course is a few miles from the main residential areas cycling would not be feasible.

COTTESMORE GOLF CLUB Table 1 shows that, apart for a small part of Horley, all of the neighbourhoods of Crawley and the towns and areas in the vicinity, which are in the catchment area of Ifield GC, are in the Cottesmore catchment area. Although coverage looks good it is only achieved, for the neighbourhoods and areas to the north of Crawley, by the use of high speed roads. Google maps gives the M23 as the best or alternate route for, Forge Wood, Maidenbower, Horley, Gatwick airport and Manor royal.

Road Conditions Golfers would have normal low speed urban road conditions through Crawley but for the last 2.8 miles they would have to contend with the high sped unlit M23 feeder road, the M23 intersection and the limited and unlit A2220.

Alternative modes of Travel The isolated country location of the golf course does not lend itself to alternative modes of transport.

Horsham Golf Courses

MANNINGS HEATH GOLF CLUB The table above on catchment areas shows that, of the Crawley neighbourhoods, none of Forge Wood and only part of Langley Green are included in the Manning Heath catchment. Of the other areas of Ifield GC catchment Horley, Manor Royal and Gatwick Airport are not included. The route, from the areas of Crawley which are included in the Mannings Heath GC catchment, makes use of the A23 Crawley bypass up to the M23 intersection roundabout. After this there are 4.5 miles of country roads. Copthorne is only within 20 minutes because it is close to the M23 which can be used to bypass Crawley

Road Conditions. Typical low speed urban road conditions with street lighting within Crawley. Exit from Crawley is by the fast unlit A23 feeder road to the M23 intersection. Final country roads are unlimited, unlined, unlit and narrow with 2miles width restricted at 2 metres culminating in a short stretch of single no passing carriageway. Usual congestion near industrial estates and schools at beginning and end of day. Additional congestion associated with traffic joining and leaving the M23.

Alternative modes of Travel The isolated country location of the golf course does not lend itself to alternative modes of transport.

ROOKWOOD GOLF CLUB the catchment table shows that Forge wood is the only neighbourhood of Crawley which is not included in the catchment of Rookwood G.C. Of the other areas of Ifield G.C. catchment Horsham is the only area fully covered. Most areas of Crawley would use the A23 Crawley

Way to join the A264 dual carriageway Horsham Road and then the A24 dual carriageway Horsham bypass.

Road Conditions Typical low speed urban road conditions with street lighting within Crawley. After leaving Crawley the total journey is on fast dual carriageway with numerous roundabouts. There is a mixture of speed limits and lit and unlit sections. Usual congestion near industrial estates and schools at beginning and end of day. Risk of build ups approaching Horsham and Crawley.

Alternative modes of Travel It is only feasible for Horsham residents to use alternative modes of transport.

HORSHAM GOLF CLUB. The catchment tabble shows that of all the areas of Ifield G.C. catchment only 5 of Crawley's neighbourhoods are included in Horsham Golf club's catchment. The route for most areas of Crawley is the same as that for Rookwood G.C. except that it is 4 miles further around the A24 Horsham bypass.

Road Conditions Typical low speed urban road conditions with street lighting within Crawley. After leaving Crawley the total journey is on fast dual carriageway with numerous roundabouts. There is a mixture of speed limits and lit and unlit sections. Usual congestion near industrial estates and schools at beginning and end of day. Risk of build ups approaching Horsham and Crawley.

The report and tables I have provided show that Ifield golf course is the most easily accessible golf course in the region by car, bus, train, bike and foot allowing pick up, drop off and car share. For this reason none of the other golf courses are equally accessible.

LOCAL AND NATIONAL POLICIES

LOCAL POLICY HDPF 2015 Policy 43

Homes England mentioned Policy 43 of the Horsham District Planning Framework 2015 (HDPF2015) in their planning statement but they did not use it in their arguments.

Policy statements such as this are drafted in a way to keep them short and punchy using few words and no paragraphs. This leaves them open to misinterpretation. When faced with as much information as Homes England have produced many people would jump to the last words of a policy and think that in this case it was acceptable to use the two options.

This is not the case and its intentions are made clear by breaking it down into sentences which are:

- 1, Proposals that would result in the loss of sites and premises currently or last used for the provision of community facilities or services, leisure or cultural activities for the community will be resisted unless equally usable facilities can be conveniently provided nearby.
- 2, It will be necessary to demonstrate that continued use of a community facility or service is no longer feasible, taking into account factors such as; appropriate marketing, the demand for the use of the site or premises, its quality and usability, and the identification of a potential future occupier.
- 3, Where it cannot be demonstrated that such a loss is surplus to requirements, a loss may be considered acceptable provided that:
 - a. an alternative facility of equivalent or better quality and scale to meet community needs is available, or will be provided at an equally accessible location within the vicinity; or

b. a significant enhancement to the nature and quality of an existing facility will result from the redevelopment for alternative uses on an appropriate proportion of the site.

To understand the meaning consider each sentence separately

Sentence one means that a loss of facility would be resisted unless an equally useable one is provided nearby

Sentence 2 means that you will have to use various means to show that continued use is not feasible.

Sentence 3 means that if you still cannot show that use is not feasible you still have two options

In this case where the applicant admits that the continued use of the facility is feasible (not surplus to requirements). It would be necessary to provide equally usable facilities conveniently provided nearby.

AS HE ARE NOT PROPOSING EQUALLY USABLE FACILITIES NEARBY THEIR PROPOSALS FAIL TO SATISFY THE POLICY.

NATIONAL POLICY NPPF PARA 104

Para 104 says that “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.

a) SURPLUS TO REQUIREMENTS

Homes England state in 7,6,23 of their planning statement that limb (a) is not relied upon to demonstrate acceptability of the loss of the Ifield Golf and Country

b) REPLACED BY ALTERNATIVE OR BETTER PROVISION.

Despite the above revelation an assessment is still required to provide evidence to determine if Limbs 104b) and 104c) have been satisfied. The most important aspects of these two limbs are catchment populations and accessibility but SPC has not carried out any detailed analysis of the catchment area of Ifield golf course. They are suggesting that the loss of Ifield could be mitigated by improvements to Tilgate and Rookwood golf courses but Para 104 b) says it should be in a suitable location. Without doing detailed work it is impossible to say whether or not a location is suitable.

The tables shown earlier in this report are the result of careful analysis of the catchment areas, within a 20 minute drive, of all of the golf courses in the area. It shows that there are only 4 golf courses which fully cater for the catchment population of IGC. Regarding Rookwood none of Ifields districts, Forgewood, Gatwick Airport, and Horley are in the catchment area within a 20 minute drive. It must be appreciated that Forgewood, being on the far side of Crawley is almost a 40 minute drive from Rookwood golf course

THE ALTERNATIVE FACILITIES ARE NOT IN A SUITABLE LOCATION SO LIMB 104b FAILS.

Although this section fails on accessibility there is also the matter of equivalent or better provision in terms of quantity and quality. Homes England quote case law on this subject which I am sure means that you can reduce provision if it is of better quality. In the case of the HE proposals, three golf courses reduce to two but the remaining courses are well known to be of inferior quality. The proposal is that an S106 arrangement will bring about an increase in quality but it does not come with a guarantee that two municipal golf courses can be improved to make up for the 33% loss of a private course.

c) HE DEVELOPMENT IS FOR ALTERNATIVE SPORTS AND RECREATIONAL PROVISION.

The development is not for alternative sports and recreational provision, it is for housing and a school, so limb 104 c) is not applicable.

The above is reasonable when you consider that K2 in Crawley which is similar but much bigger takes up 14.1 acres and Ifield golf course is 120 acres of prime building land. Additionally, the sports hub is not on golf course land it is close to the flood plain where the walking and cycling activities will be situated.

Homes England quote the Gatley Golf Club appeal as case law for limb b) of para 104. This also supports my interpretation of para 104 c) as shown in the extracts below.

“Appeal Ref: APP/C4235/W/24/3349825 Gatley Golf Club, Styal Road, Gatley, Cheadle, SK8 3TW

19 . Case Law⁵ has determined that equivalent or better provision referred to in Paragraph 104b) is more open than the Council suggest and does not require a like for like replacement both in terms of sporting activities i.e. golf for golf or the amount of land. Paragraph 104c) is not engaged in this appeal as the appeal scheme is not predominantly for alternative sport and recreational provision.

It gives footnote 5 which I checked out.

MARTIN JOHN BROMMELL ON BEHALF OF MAPLEDURHAM PLAYING FIELDS ACTION GROUP - and -
READING BOROUGH COUNCIL

25 6.10 This is not an area where the Borough Open Space Strategy is identifying a surfeit of open space. Neither is the development primarily an overtly leisure or recreation provision. Therefore, the application would need to demonstrate that the loss of openness and functionality of the playing fields directly resulting from the proposed development would be replaced by an equivalent or better provision in terms of quantity or quality.”

THE DEVELOPMENT IS NOT FOR ALTERNATIVE SPORTS SO PARA 104 C) FAILS

IMPACT OF PROPOSALS

This can be the impact of the loss of the golf course and/or the impact of the new sports facilities.

The loss of Ifield Golf Club would have an adverse impact on its 500 golfing members and 50 social members. Also, the 3940 green fee players and 1485 society players who used it in 2022/23. A severe impact will be made on the charities who have used the golf club for money promoting events and it will be felt much more by the people receiving help from those charities. In the same period the clubhouse was used for 19 parties, 8 wakes and 18 other private parties, carveries and Christmas events and local people will suffer because the venue will not be available in the future..

The loss of Ifield Golf Club would adversely impact by all of its members who appreciate the wide range of competitive golf and social functions that it offers. It is also important to the green fee players and the golf societies who appreciate the good quality of the course and the catering service. It is also important to members who do not want to leave the town to play golf because they are uncomfortable driving on narrow unlined country roads and fast dual carriageways and motorways. It is also important and its loss will be felt by people who want to store their clubs and trolley and either travel by bus or be dropped off.

The residents of Crawley would suffer tremendously from the loss of Ifield golf course. Crawley is the 10th most populated town in the South East of England and it is unforgivable to make them travel on narrow unlined country roads and fast dual carriageways and motorways to the far side of another town to play golf.

The loss of Ifield would severely reduce the health and wellbeing of older golfers, for whom golf is their only outlet, by halving the availability of golf near their homes.

IMPACT OF ALTERNATIVE SPORTS PROVISION

The remoteness of the replacement sports hub is such that its viability is in question. This is because The Bewbush centre which was situated 1.5 miles away closed in 2009 and was replaced by a much smaller facility. This should have awakened the need for market surveys but these have not been done.

It would not have an impact on Crawley residents because they could not afford to use it. A family of parent and two children who were not on the direct bus route would have to pay £36 to visit the sports hub or leave Crawley and travel by car.

There would be little benefit from the proposed sports because they are just a replica of what must be provided for the new estate, with a little extra capacity and a swimming pool. Because of this they could only be viable if they were used by the wider Crawley population. This is unlikely because all of the facilities are available nearer to their homes and currently they have ample spare capacity as shown in the Crawley Borough Council Playing Pitch Strategy.

The unlikely success of the 3g football at the sports hub would upset the business plan of Three Bridges football club who have invested in a new 3g football pitch. This is on top of the new 3g pitch at Oakwood. Because of the superior location of the 3g pitches at Ifield community college and Broadfield Stadium, any adverse impact would be on the new West of Ifield pitches which would be underutilised

CONCLUSIONS

The Homes England proposals do not follow national policy NPPF para 104 or local policy HDPF 2015 policy 43 so the planning application should be rejected.

The loss of Ifield golf course would have a terrible impact on Crawley residents and neighbours.

Regards [REDACTED]