

Appendix B

Ifield Golf Course Mitigation Proposals for Rookwood GC

1. **Golf Course:** Rookwood Golf Centre

2. **Name of Investment:**

Sustainable Adventure Golf (R1)
New practice facilities (R2)
Revised Par 3 Course (R3)
Golf Simulator (R4)
New reception/hospitality facility (R9)

3. **Description of Investment:**

Following discussions with British Ensign, the lease holder at Rookwood, the above individual investments have been consolidated into one. British Ensign have retained the services of a golf course architect to master plan those elements into the footprint of the existing par 3 course at the centre.

Sustainable Adventure Golf

British Ensign have explained that they do not wish to develop a facility with artificial turf, artificial landscaping or “plastic dinosaurs”. This is admirable, but time will tell whether such a facility is interesting, inspiring or exciting enough to attract users, particularly non-golfers, in sufficient numbers as to be viable.

New Practice Facilities

This would comprise of a short game area, allowing players to learn, practice and develop new (or refine) skills.

Revised Par 3 Course

In order to accommodate all of the above elements, some minor changes to the current par 3 course would be required. Based on current plans, there would be up to two holes that would need amendment.

Golf Simulator/Golf Pod

An indoor/outdoor simulator would be developed to allow practice, or leisure play, regardless of weather and/or time of day if indoors). This facility may be accommodated within a proposed new reception area.

New Reception/Hospitality Facility

As the proposed location for all of the above is remote from the existing clubhouse, it is proposed to develop a new reception/hospitality facility from which each element would be operated. There would also be additional car parking associated with the building.

4. Capital Costs

Following discussions with the leaseholder the estimated capital expenditure required for the above, in total, would be [REDACTED] including professional fees, surveys, planning etc.

5. Net Revenue

The net revenue position of the investments are included in the table below:

	Low	High
Income – Sustainable Adventure Golf	[REDACTED]	[REDACTED]
Income – Practice Facilities	[REDACTED]	[REDACTED]
Income – New 3 par course	[REDACTED]	[REDACTED]
Income – Golf Simulator	[REDACTED]	[REDACTED]
Staffing Costs	[REDACTED]	[REDACTED]
Maintenance Costs	[REDACTED]	[REDACTED]
Net Revenue	[REDACTED]	[REDACTED]

Sustainable Adventure Golf – Based on industry intelligence, revenues of [REDACTED] to [REDACTED] per annum could be expected. Maintenance costs are estimated at between [REDACTED] and [REDACTED] per annum.

Golf Practice Facilities – much depends on how access to these facilities is structured: is access included in memberships or licenses to play? Is it charged separately and, if so, on an annual/monthly/daily basis? Assuming this is charged separately, revenues of [REDACTED] would appear to be typical across the industry. We have taken a prudent view and not charged golf club members at this stage.

Revised Par 3 Course – with the amendment to two holes required as a result of developing the other elements of this proposal, and an improvement in the overall maintenance (and, thus, conditioning and presentation) of the course, it would be reasonable to expect revenues of [REDACTED] from this course. Maintenance costs are estimated at [REDACTED] to [REDACTED] per annum.

Golf Simulator/Golf Pod – harder to quantify as detail on what this actually entails is less clear. Equally, for a single simulator, there is a question as to whether this is going to draw enough custom given the rural location. Again, revenues of circa [REDACTED] including VAT could be anticipated if marketed well with a realistic price point and would also be used by the Pro for measuring clubs to player etc., although this is envisaged to be undertaken on the driving range so we have taken a prudent line and put a nominal value of [REDACTED] including VAT.

New Reception/Hospitality Facility – revenues from the hospitality facility will be totally dependent on the type of facility to be developed, and the footfall the other element of this proposal generates. We have reviewed this at R9.

6. Impact on Participation

It can be imagined that this investment will appeal to all levels, from non-golfers through to experienced players.

7. Sustainability

As previously mentioned, the adventure golf element is to be developed without artificial materials. Given that play on such a facility is very concentrated, it will be interesting to see how natural materials stand up to the amount of wear anticipated. Credit should be given where sustainable materials are used.

8. Additionality

With this investment, the facilities at Rookwood are significantly enhanced and offer a pathway for non-golfers to experience the game and for more experienced players to refine skills.

9. Summary

There is no doubt that the addition of these facilities would expand the offering, and increase the customer base, for Rookwood. The overall scale of investment seems reasonable based on current market rates and, therefore, this is an investment that is recommended. It would also support the transfer of Ifield golfers to the site, with the expanded offer.

1. Golf Course: Rookwood Golf Centre

2. Name of Investment:

Greens, Tees, Bunker, Irrigation Upgrades (R5)

3. Description of Investment:

British Ensign have indicated that they are comfortable with the quality of greens and tees on the course. There are some limited upgrades to be achieved with the irrigation pumps but the cost of this is already written into their internal capital expenditure budgets.

The bunkers around the course do require investment to improve quality, playability and challenge. There are 45 bunkers around the course that require renovation. This work will include:

- Removal and disposal of the existing contaminated sand
- Amending existing drainage or replacing with new drainage
- Installing a bunker liner
- Installing new sand

4. Capital Costs

The cost for the above scope would be between [REDACTED] to [REDACTED] per bunker indicating a total capital expenditure budget requirement of between [REDACTED] and [REDACTED] plus VAT.

5. Financial Model

Having made the investment, the question then becomes how that investment generates a return.

Simply put, the return has to be generated through increasing the price to play the course. For the market positioning, price sensitivity is high and adding a few pounds to the cost of a round may have a negative impact on bookings.

Based on advertised rates in October 2024, Rookwood's green fees range from £20.00 to £35.50 including VAT which compares to Tilgate Golf Centre of £17.60 to £24.00 and Ifield's of £20.00 to £40.00. Rookwood is currently achieving around 33,000 rounds annually.

Assuming a five-year return on investment, that would necessitate an increase of about [REDACTED] per round, which is significant and perhaps not realistic.

6. Impact on Participation

Investment of this kind will appeal primarily to existing members and green fee players. Evidence of this investment may persuade some Ifield members to join, but it is unlikely to have much impact on other groups.

7. Sustainability

Assuming normal maintenance practices are carried out over the coming years, which would involve partial sand replacement from time to time, with this investment (particularly in terms of the drainage and liner elements) renovation to the bunkers on this scale would not be expected for another 7-10 years.

8. Additionality

With this investment, the facilities at Rookwood are significantly enhanced and offer a pathway for non-golfers to experience the game and for more experienced players to refine skills.

9. Summary

Perhaps more than any other feature apart from greens, bunkering creates more comment in terms of playability than any other. Renovation would vastly improve the performance of the bunkers and is, therefore, to be recommended, although the return on investment is likely to be long term.

1. Golf Course: Rookwood Golf Centre

2. Name of Investment:

Investment in new golf course machinery (R6)

3. Description of Investment:

Periodic replacement of existing maintenance equipment should be a standard part of any operational budget. With fleets of machinery often exceeding a value of [REDACTED] and with known effective life expectancy for every piece, not having a rolling replacement strategy is likely to create an unsupportable capital investment injection at some point.

British Ensign have such a rolling replacement schedule and have indicated the implications of that over the next 5-7 years.

4. Capital Costs

£nil. The estimated machinery replacement cost per annum is [REDACTED]. Over the next 7 years, this would indicate a total investment of [REDACTED]. This relates to around ten separate pieces of equipment being replaced. No capital is required from mitigation proposals.

5. Financial Model

[REDACTED]

6. Impact on Participation

This investment is unlikely to have a major impact on players, or their perception of the course. This is very much a case of 'good housekeeping'.

7. Sustainability

As described above, with this replacement programme, efficiencies are achieved by turning over equipment at the point it becomes uneconomic to continue to maintain it.

8. Additionality

An investment into machinery will have an impact on the level of maintenance quality but is unlikely to have any appreciable impact on increasing revenues.

9. Summary

This investment is part of the normal replacement strategy, and which is budgeted for by the leaseholder. We don't believe this will have an impact on growing sales.

1. Golf Course: Rookwood Golf Centre

2. Name of Investment:

Upgrade of Course Pathways & Access Routes (R7)

3. Description of Investment:

There is currently approximately 3,500 linear metres of pathway on the course in varying states of repair. With this length, it would be classified as a 'green to tee' or 'partial' network. Keeping the length as it is currently, upgrading the paths would improve the presentation of the course; it would potentially allow increased buggy usage (and revenue) during drier periods of the year and could be used by the maintenance team to travel around the course, reducing wear on grassed areas.

4. Capital Costs

Based on a consolidated gravel aggregate path of 2m width, over MOT Type 1 base and with timber edging on both sides of the path, a CAPEX requirement of between £250,000 [REDACTED] would be required. With the same base and edging, a tarmac top course would be approximately [REDACTED] and a concrete path could be [REDACTED]

5. Financial Model

Assuming the consolidated gravel aggregate (as it is suspected that the alternatives would be non-viable), the major source of revenue is to increase buggy usage. It is noted that, according to information on the Rookwood Golf website, buggy use is currently suspended due to ground conditions. If buggy use was to be increased due to there being better paths, it is likely that the length of path would have to increase to run the full length of the course (effectively doubling the cost), otherwise buggy damage would occur on the non-paved areas. As such, it is difficult to see that there is an obvious return on this investment.

6. Impact on Participation

Increased paths, and access to the course, could allow more golfers with disabilities to play, as well increasing the option of playing a full round (18 holes) for those who would find walking the course challenging.

7. Sustainability

In financial terms, this is a questionable investment.

8. Additionality

No comment.

9. Summary

While desirable, there is little evidence to suggest that this would have a material impact on revenues, or the enjoyment of existing users, and would be unlikely on its own merits to draw non-golfers or those unfamiliar with the course to Rookwood. Based on that, there are more valuable areas for investment to be made and, therefore, this is not a high priority.

Golf Course: Rookwood Golf Centre

1. Name of Investment:

Continuation of Club House Upgrades (R8)

2. Description of Investment:

There are no plans shared for this investment.

3. Capital Costs

N/A.

4. Net Revenue

N/A.

5. Impact on Participation

N/A.

6. Sustainability

N/A.

7. Additionality

N/A.

8. Summary

Following discussion with the Club the feedback was that there are no plans to invest in this area.

1. Golf Course: Rookwood Golf Centre

2. Name of Investment:

Upgraded Food and Beverage offering to support new facilities (R9)

3. Description of Investment:

It has been unclear what this provision may look like, but we envisage a portable catering trailer or a secure catering facility using a container. These types of offer have become the “norm” when it comes to pop up facilities.

4. Capital Costs

████████ for the cost of the container, and an estimate █████ for the equipment. These are excluding VAT.

5. Net Revenue

It is difficult to quantify at this stage the level of usage and revenues from this part of the site and is dependent upon when the new facilities may come on board. As a result, we have assumed a break even position.

The costs of operation will be one or two FTE depending upon opening hours, the cost of stock to resell (circa 40% of the value of the sale price) and any marginal loss from the current catering facility in the club house. It is likely to start with teas and coffees, and confectionary and grow into rolls, panini etc.

6. Impact on Participation

It will not be the reason a person will come and play but will be seen as added value and may leverage a return visit(s).

7. Sustainability

On its own it would not be sustainable but with additional golf investment and improvements he could become sustainable.

8. Additionality

The provision of F&B could be seen as additionality to the overall offer, albeit some income will be migrated from the current service.

9. Summary

Investment could be seen as adding value to supporting any new investment in golf through adventure golf or improving the short game. Need to investigate the costs of providing the service compared to the current offer.



Homes
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The Housing and Regeneration Agency

Part D





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Land West of Ifield

NPPF Para 103 Assessment

DRAFT

July 2024



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Annex A: West of Ifield Golf Needs Assessment (SPC, July 2024)

Annex B: Mapledurham judgement

Annex C: Sport England and England Golf Position Statement (June 2024)

Annex D: Tilgate Course Improvement Opportunities

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Table 1: Potential infrastructure improvements in Crawley (Tilgate / Goffs Park)

Table 2: Potential infrastructure improvements in Horsham (Rookwood)

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Figure e: Distribution of Ifield Golf Club Membership by Postcode

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Figure i: Illustrative sport and recreation strategy layout

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1. Introduction

- 1.1. Ifield Golf & Country Club (hereafter IGC) forms part of land included in the draft site allocation HA2 in the emerging Horsham Local Plan. The draft site allocation comprises a mixed use development, providing approximately 3,000 homes, employment, retail, local services, supporting community infrastructure and new strategic transport infrastructure.
- 1.2. The purpose of this assessment is to:
 - set out the planning policy context and supporting evidence related to the existing use and impact of ICG closure as a result of the allocation .
 - ensure that the impact on IGC is appropriately considered consistently with national planning policy and aligned to local policy requirements.
 - demonstrate how conformity with emerging Local Plan policy can be demonstrated, identifying mitigation options, and demonstrate a clear a reasonable prospect that any required mitigation can be secured.
 - demonstrate that Land West of Ifield is a deliverable site allocation in the context of national policy and specifically NPPF paragraph 103¹.
- 1.3. This report has been prepared by Homes England's Planning and Enabling team, supported by its appointed consultant team, Sports Planning Consultants (SPC) and Prior and Partners. It draws on the emerging masterplan proposals and evidence of golf and wider supporting needs. This assessment should be read alongside the following supporting documents / evidence and appended:
 - Draft Golf Needs and Supply Assessment for the Ifield Golf Club Catchment (Sports Planning Consultants, July 2024)
 - England Golf / Sport England Position Statement (June 2024)
 - Opportunities for Golf Offering Improvements at Tilgate – Summary (January 2024)
 - Draft West of Ifield Sport and Recreation Strategy (Sports Planning Consultants, July 2024)
 - Illustrative Sports and Recreation Layout (July 2024)
- 1.4. This assessment and associated documents supersede the previous Position Statements issued by Homes England (November 2023, March 2024). It provides the necessary evidence to support the proposed site allocation of IGC, demonstrating how the loss and proposed redevelopment of IGC would meet requirements set out in NPPF Para 103 .

¹ The assessment references Paragraph 103 of the NPPF as this is the reference in the latest version of the NPPF. For the purpose of the Local Plan examination, the 2019 version of the NPPF will be used for which the relevant reference is Para 99, however the substantive wording and overall requirements of the assessment remain unchanged.

- 1.5. This assessment has been undertaken on an iterative basis and has been informed through detailed analysis of both the impact and benefits of the proposed West of Ifield allocation presented in the accompanying annexes and other sources of information as referenced throughout the report.
- 1.6. Throughout the assessment process there has been ongoing engagement with Sport England and England Golf as relevant national sporting bodies. While not statutory consultees, they are an important stakeholder as they are able to advise on sporting priorities, long term trends and opportunities to enhance golfing and sporting offer within the IGC catchment area. Engagement has also been undertaken with relevant national sport governing bodies and local authority officers with responsibility for preparing and implementing sports and leisure strategies.
- 1.7. Where appropriate, and to inform the mitigation strategy, engagement has also been undertaken with local authority officers responsible for the management of municipal owned golf courses as well as operators / management companies of courses within the IGC catchment.
- 1.8. To ensure that the impact of closure and redevelopment of IGC is understood and any necessary mitigation identified, the assessment work considers the following:
 - overall supply and demand for golf facilities within the IGC catchment area and the need for IGC to meet future golfing needs in line with wider England Golf objectives.
 - ability for the loss of the course to be mitigated by the provision of alternative golf facilities within the catchment area.
 - ability for the course to be mitigated by the provision of alternative sports and recreation facilities directly and indirectly enabled through the redevelopment of the Land West of Ifield.

Status of the Assessment

- 1.9. While providing an up to date position, the assessment represents a point in time and therefore is presented as draft and Homes England reserve the right to update the assessment in response to ongoing engagement and / or updated information becoming available.
- 1.10. The report provides an overview of the supply and demand position, different mitigation options and delivery options to demonstrate (for the purpose of the Local Plan Examination) that there are a number of realistic options for mitigating the loss of IGC and therefore a realistic prospect that the relevant policy requirements can be met.
- 1.11. The final mitigation package will be confirmed as part of ongoing discussions and negotiations with HDC, Sport England and England Golf to ensure that the appropriate level of mitigation is secured as part of a future planning application and associated s106 agreement as part of the determination of a planning application.

2. Background Context & Policy

Ifield Golf Club

- 2.1. IGC is an 18-hole, par 70, 6,319-yard parkland course founded in 1927. The course was acquired by Homes England in 2020. It is now leased to IGC on an unsecured, short-term lease arrangement that expires on 30 April 2026, with a break clause implementable on 30 April of any preceding year.
- 2.2. The land on which IGC is located has an enabling role in the draft site allocation. The area on which IGC is located is identified in the draft site allocation masterplan (accompanying policy HA2) for a number of land uses including a new 8FE secondary school, 3FE primary school, community uses, residential and employment land as well as creation of new formal and informal sports and recreational facilities.
- 2.3. In addition to directly unlocking alternative land uses on the IGC site itself, the allocation of IGC also has an indirect role in unlocking the remainder of the masterplan area, both in terms of physical connectivity and ensuring overall deliverability of the proposed allocation in the emerging Local Plan.

Policy Context

National Planning Policy Framework (NPPF)

- 2.4. Paragraph 103 states 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 of the current or former use.'
- 2.5. It is important to note that it is not a requirement that all three limbs of Para 103 are met and that:
 - (i) the policy does not establish a sequential approach. There is no requirement to demonstrate that (b) cannot be met before considering (c) etc.
 - (ii) the policy does not establish a hierarchical approach. Compliance with exception (b) is not established to be preferable to compliance with exception (c) and vice versa.

- (iii) the exceptions are treated as alternatives (note the use of “or”).
- (iv) the exceptions are to be treated as alternatives of equal weight or value.
- (v) only one exception needs to be met to achieve compliance.

2.6. For completeness, the assessment considers all three parts of Para 103.

Emerging Horsham Local Plan 2023 – 2040 (Regulation 19)

- 2.7. The Emerging Horsham Local Plan 2023 – 2040 seeks to ensure people of all backgrounds have access to services and facilities and green spaces that are close to home. With reference to new community facilities, the Local Plan’s vision is clear at paragraph 3.18 that there is an expectation that “there are inclusive, vibrant communities with a greater quality and range of services and facilities for all ages and needs, which are close to homes and areas of work and result in a significant investment in the leisure offer and community facilities to provide choice for all” (our emphasis).
- 2.8. Objective #5 of the emerging Local Plan is clear that development should be well designed and inclusive, providing accessible community services and open spaces that meet local and wider District requirements and contributes to healthy lifestyles.
- 2.9. Within this context, draft Policy 28 resists the loss of existing facilities unless it can be demonstrated that there is no longer a demand or that alternative provision will be secured. It supports the provision of new or improved community facilities or services, where they meet the identified needs of local communities as indicated in the current Open Space, Sport & Recreation Study, the Community Facilities Study, the Playing Pitch and Built Facilities Strategies, the Infrastructure Delivery Plan and other relevant studies or updates and local engagement.
- 2.10. Draft site allocation Policy HA2(g) states that the provision of appropriate mitigation for the loss of Ifield Golf facilities will be required in the absence of site specific evidence demonstrating the surrounding area has capacity to accommodate its loss.
- 2.11. It is therefore clear that while the emerging Local Plan has a general presumption against the loss of existing sporting facilities, this is permitted where appropriate mitigation can be identified. Furthermore, there is a significant emphasis on the need to improve the overall quantity and quality of community spaces that respond to a local need. There is an expectation that new development should help deliver meaningful improvements that increases inclusion and accessibility for all.
- 2.12. Draft Local Plan Policy HA2 is supported by an illustrative masterplan that, inter alia, shows the requirement for the allocation to accommodate a number of sport and recreation opportunities.

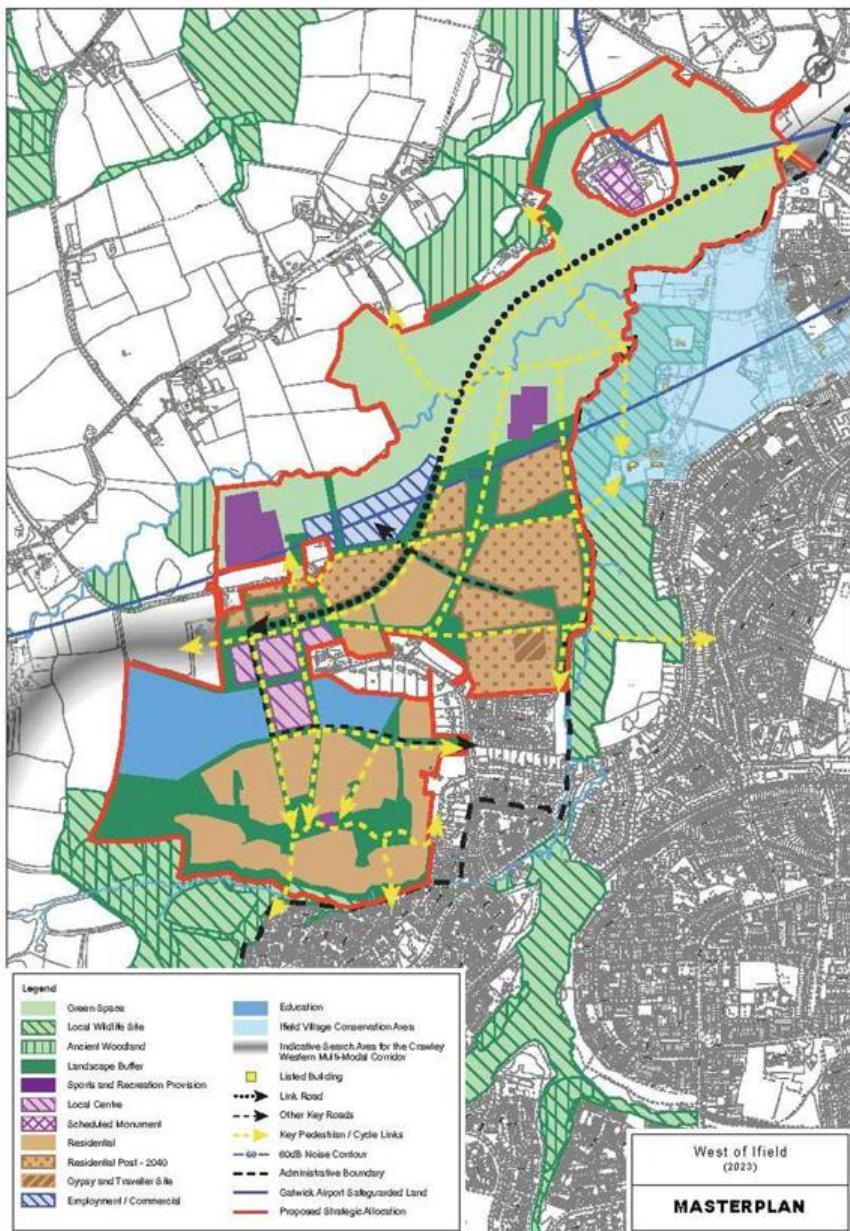


Figure a: HDC Draft Local Plan masterplan for Site HA2

Emerging Crawley Local Plan (2023 – 2040)

2.13. While the proposed development is in the administrative area of Horsham, the IGC catchment includes parts of Crawley and a number of IGC members live in the Crawley area. Furthermore, much of the wider sporting and recreational offer from the proposed development would benefit both Horsham and Crawley residents. Therefore, cross boundary needs and wider sport and recreational objectives are relevant in considering the impact / benefits of the West of Ifield site allocation.

2.14. Providing high quality leisure and cultural facilities to support health and wellbeing is at the forefront of the emerging Crawley Local Plan. Specifically, there is an expectation that neighbourhoods will continue to offer local facilities and amenities that can be easily accessed along with informal green spaces for all to enjoy. Paragraph 12.13vii of the emerging Crawley

Borough Local Plan 2023-2040 confirms that development on or close to the administrative boundaries of Crawley should help address unmet development needs arising from Crawley, including in relation to ... strategic recreation and leisure requirements.

England Golf – The Course Planner

2.15. The Course Planner² sets out the strategic direction for 2021-25 and aims to re-focus England Golf's priorities, energy, and passion on key areas to help widen golf's appeal, promoting the sport as more inclusive and accessible than ever.

2.16. At the core of this strategy, the Course Planner aims to inspire influence, actions and provide support centred around their guiding principles, by utilising '18 Tee Shots to Success' which are designed to best position growth in the game.

2.17. England Golf's key principles relating to the growth of the game aim to:

- Drive equality & equity in everything they do
- Connect & engage with all golfers
- Increase golf's influence within local communities
- Drive diversity at all levels of golf
- Create more opportunities for juniors & young adults
- Inspire more women & girls to play golf
- Deliver an excellent talent development pathway

Sport England – Uniting the Movement

2.18. This is Sport England's 10-year vision to transform lives and communities through sport and physical activity. The strategy sets a vision of 'a nation of equal, inclusive and connected communities and a country where people live happier, healthier and more fulfilled lives' and highlights that being active is one of the most effective and sustainable ways of achieving this.

2.19. The strategy sets a number of objectives and fundamental principles that encourage inclusivity and access to sport and active recreation for all including:

- working in collaboration with communities, local people and organisations, helping to deliver the outcomes that are needed through sport.
- positive experiences for children and young people, working to ensure that every child / young person experiences the enjoyment and benefits that being active can bring.
- making activity easier for everyone.

² [England Golf Course Planner 2021-2025](#)

3. Para 103 (a) – Golf Supply and Demand within the Ifield Golf Club Catchment

- 3.1. Para 103, Part (a) requires any open space, buildings or land to be surplus to requirements, evidenced by an assessment.
- 3.2. A detailed Golfing Needs Assessment (GNA) prepared by Sports Planning Consultants (July 2024) is provided at Annex A.
- 3.3. The outcomes of the needs assessment have been summarised below to consider whether or not the requirements of Para 103 part a) are met. It also provides background information and wider context when considering parts b) and c) of Para 103 below.

Current Golf Provision

- 3.4. The GNA confirms that within the IGC 20-minute drive time catchment there are a range and variety of golf facilities. These cater widely for golfers who seek regular membership of golf clubs, casual access to clubs on payment of green fees, and those who prefer to access municipal courses on a pay and play basis.
- 3.5. Within the catchment area, the Member golf offer (similar to that provided at IGC) is well catered for. The types of courses available are mainly conventional 18 hole standard courses, usually free standing and without ancillary facilities including Golf Driving Ranges (GDRs) or shorter par 3 practice courses (although most will have practice facilities for members and others). The two main municipal ‘public’ pay and play courses make an important contribution to the introduction of newer golfers to the game and their development. Cuckfield also has good affordability and targets golfers engaging with a shorter game by promoting ‘always time for 9’.
- 3.6. The GNA identifies that while there is some provision for leisure users (Goffs Park), this is more limited and there is a distinct gap in the market to support those at the earlier stages of the golfer journey; providing a stepping stone into more regular golf participation and transition to golf on standard courses, without which opportunities for new participants will be restricted.
- 3.7. The overall quality of all facilities within the catchment is of a good standard and broadly comparable between courses. However, there are a number of courses where user satisfaction is slightly lower (Tilgate Forest Centre in particular), than the average score and therefore opportunities exist to improve the golfing experience at these facilities.
- 3.8. In terms of accessibility, most of the population of both Horsham and Crawley can access golf within a 20-min drive time (most within 10 minutes) and there is an element of choice from a number of courses being accessible within the IGC catchment area. Even with the loss of IGC there remains a good choice of provision.
- 3.9. The assessment provides evidence that there is spare capacity for new members (with most courses within the catchment currently wishing to attract new players), though overall pricing is higher than average and a potential barrier for the full range of users across the golfing journey.

Demand

- 3.10. Using the England Golf indicator of Regular Golf Demand Index, the GNA demonstrates that the current supply of golf within Horsham District is well aligned with existing demand, with overall, provision exceeds the county and national average. Within the IGC 20-minute catchment, the current supply and demand is again fairly balanced and there is no evidence of latent/displaced or unmet demand across the catchment as a whole, with most clubs (including IGC) expressing vacancies or actively marketing for new members.
- 3.11. When looking specifically at the IGC membership and demand use of the golf course locally, there were 510 Members in 2023 – a combination of full and flexible memberships. While there is a local concentration of members from the RH10, RH11 and RH12 postcodes (areas closest to the course), the remaining membership is dispersed across the catchment area and there is a relatively high number (32%), who travel from outside of the 20-min catchment currently.
- 3.12. In considering future demand, change in golf participation is difficult to predict and recent trends need to be taken into account in planning for future provision. The trend set out previously at both national level and at IGC itself would suggest that growth is unlikely to be significant and overtime there would be an attrition rate reducing demand for traditional memberships and an increase in more casual pay and play provision. All clubs consulted as part of the GNA reported either static or declining membership and usage and capacity to accommodate new players.
- 3.13. When considering the different types of golf provision required, demand in the future is likely to occur mainly from beginners, juniors and others new to the game – consistent with England Golf objectives. This will have implications for the types of facility that are required in the future, at least in the initial stages.
- 3.14. There is also evidence that future development in golf facilities will need to take into account social factors such as the availability of time and money, the introduction of technology to golf provision and the need for smaller, shorter courses which are more flexible in their use. This will require a balanced market and for the identified gaps to be filled to enable the game to grow and improve accessibility.

Impact of IGC closure

- 3.15. In the event of IGC closing, the GNA identifies there will be an impact on golf supply within the catchment with an overall reduction in the supply of golf, taking the overall provision within the catchment area slightly below the County average but still a good level of provision when considered against provision across the country as a whole. Depending on how the RGD index is applied, there would be a slight worsening of the supply / demand ratio – though there would not be a significant change and overall supply and demand would remain fairly balanced.
- 3.16. Any impact can be expected to be most acute as a result of the displacement of existing IGC members rather than a broader impact on the accessibility of golf within the catchment in as much as:

- of the 510 current members, 372 are living within the IGC 20 min catchment and could require alternative provision within the 20 min catchment area. Alternative provision remains within a 10 min drive as well as a number of alternatives within both the 20 min catchment and 20 – 30 min catchment (for example Sinfold). Therefore, there would not be wholesale reliance on alternative capacity being available within the 20 min catchment to accommodate displaced Members.
- there would be a reduction in overall provision (18 holes) that cater for a traditional golf offering and targeted towards the second half of the golf journey. However, these types of facilities are already (and would remain) well provided for across the IGC catchment and surrounding areas. A good level of traditional golfing provision would be retained with capacity for new members being identified at other facilities.
- There are clear opportunities to improve overall quality and diversity of golf offering within a number of the retained facilities within the catchment and these could form the basis of a future mitigation package.

Summary of Compliance with Para 99/103 a)

- IGC cannot clearly be demonstrated as being surplus to requirements. However, the supply and demand for golf within the 20 min catchment both now and in the future (even with the closure of IGC) will remain broadly balanced.
- There are a number of standard facilities within the catchment all of which are of a similar nature and there is more limited variety in the golfing offer. In the absence of IGC, there would still be a good level of traditional golfing provision and there is capacity elsewhere within the catchment area that is not being effectively utilised.
- As a result, the impact of IGC closure on the overall golfing offer within the catchment as a whole would be limited. Any impact would be greatest on the existing membership rather than the broader golfing community.
- There are clear opportunities to improve overall quality and diversity of golf offering within a number of the retained facilities within the catchment and these could form the basis of a future mitigation package. Municipal courses are well placed to deliver these.

4. Para 103 (b) – Alternative Golf Facilities

- 4.1. Para 99(b) states that '*Existing open space, sports and recreational buildings and land, including playing fields 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*'.
- 4.2. Para 103 b) does not require equivalent or better provision of both quality and quantity. It simply requires equivalent or better provision taking regard of both quantity and quality. This is set out in the recent Mapledurham judgement (Annex B), in which Para 28 establishes the interpretation of para 103b. It confirms that quantity / quality can be offset i.e. both are relevant parameters in the judgment of whether an overall package is equivalent or better, rather than requiring direct like for like replacement that is equivalent of both quality and quantity.
- 4.3. When considering equivalence in the context of the IGC catchment, it is necessary to consider how the limited impacts of a reduction in overall supply that would result from IGC closure could be offset through qualitative and quantitative improvements at other facilities to increase attractiveness to displaced members and improve overall utilisation of the retained facilities.
- 4.4. When considering that betterment in the context of the IGC catchment and opportunities for investment in alternative facilities, there is no further definition of what is meant by 'better'. It is reasonable to assume that it requires an improvement beyond existing provision and can be considered in its broadest sense.
- 4.5. The figure below, summarises how the existing provision caters for different golfer journey positions and the opportunity for further investment and improvements in the broader golfing journey (i.e. that less well catered for) within the catchment area and where opportunities for improvements exist.



Figure b: golfer journey position of facilities with standard provision within 20-min catchment of IGC.

- 4.6. When read alongside the GNA, it can be seen that:

- as evident from interpretation of the figure above (golfer journey), there is currently a limited leisure and recreational offer with a number of existing golf facilities having the potential to improve / diversify. Within the broader operating models considered in the GNA, these are likely to be best suited to those clubs that already cater for more casual golfers – i.e. municipal courses.
- while the greatest shortfall in current provision is for ‘leisure’ and ‘recreation’ opportunities, the closure of IGC would also reduce provision for ‘golfer’ and ‘regular golfer’ opportunities and there would be benefit from exploring opportunities to increase capacity and quality of provision across the wider catchment area.
- all other golfer journeys are well catered for, with capacity within the wider catchment provision to continue to provide more established and traditional golf formats with the potential to accommodate displaced regular (Member) golfers from the closure of IGC.

4.7. Within this context, a ‘like for like’ re-provision is unlikely to be suitable and a broader mitigation package that focuses on overall improvements to the game as a whole more appropriate. The suitability of this approach has been acknowledged by Sport England and England Golf using the emerging GNA and their own understanding of the provision and operating models within the catchment area (see Annex C).

4.8. As demonstrated by the GNA for the IGC 20-min catchment, there is an expectation that any mitigation package will need to consider alternative provision for both displaced members and to meet demand for alternative golf provision that supports diversification of the game and encourages new entrants into the sport in line with England Golf ‘Course Planner’ objectives, widening golf’s appeal within the catchment area and improving both inclusivity and accessibility.

4.9. Discussions with England Golf, Sport England and engagement with other golf providers within the catchment area confirms that there are opportunities to enhance the overall golf offer in existing facilities that would not only mitigate the loss of IGC through targeted investment in both qualitative and quantitative measures on existing courses elsewhere in the catchment, but also diversify the offer to address unmet need in the earlier golfing journey positions.

4.10. For these reasons, it is not proposed to consider the provision of an alternative ‘like for like’ golf facility within the IGC catchment and for the purpose of NPPF Para 103 (b) the intention is to focus on targeting mitigation in a way that minimises the impacts of reduction in supply for displaced members and secures overall ‘betterment’ in existing facilities.

Establishing a Golf Mitigation Strategy

4.11. Through the ongoing discussions with England Golf and Sport England, a mitigation approach has been established that seeks to improve the capacity and quality in courses to help accommodate displaced members and channel investment in new provision that is better aligned with the broader golfing needs and future demand across the ‘leisure’, ‘recreational’ and ‘golfer’ journey, as well as address barriers to golfing for a greater proportion of the catchment population.

4.12. The principles of the mitigation strategy have been discussed with both Sport England and England Golf and are as follows:

- **targeted investment in municipal courses within the IGC catchment** – this approach means there is a suitable route to secure the required mitigation as part of a future s106 agreement that can be managed by the local authorities and used in a way that maximises benefits and aligns with locally led investment strategies.
- **enable / accelerate qualitative investment in traditional golfing facilities** – this approach will make existing municipal courses more attractive to those potentially displaced from Ifield, encouraging golfers to join by increasing the quality and overall capacity for traditional golf formats. This could include course improvements to bunkers, tees and greens and investing in areas that currently restrict playing opportunities over the golf season (i.e. improved drainage where water logging may currently restrict play at certain times of the year).
- **enable / accelerate quantitative improvements in new / alternative golf facilities** – this approach will target new entrants to golf and / or provide alternative facilities such as Adventure Golf, enhanced practice facilities, golf simulators or shorter game formats, in order to broaden the golf offer and encourage new entrants into the game, as set out this represents a significant proportion of future golf demand across the catchment area and a demonstrable current lack of supply.

4.13. Analysis of the catchment and course characteristics, as well as existing deficiencies in provision clearly identify Tilgate, Rookwood and Goffs Park as candidate facilities to implement the required mitigation approach. These courses would be in a suitable location, being accessible by existing members (especially those living closest to IGC) and have the opportunity to improve existing provision and accommodate new uses.

4.14. In developing the mitigation strategy, engagement has been undertaken with England Golf, Sport England, local authority officers from both HDC and CBC (with responsibility for the management of municipal owned golf courses), as well as operators / management companies of both courses, to identify whether or not genuine opportunities exist to deliver the identified golfing needs.

4.15. In addition to meeting the future needs / demands for golf provision over the Local Plan period, the proposed mitigation strategy which targets investment in municipal courses also has a number of other benefits and responses to issues identified in the Assessing Needs and opportunities Guide (“ANOG”) assessment, with the potential to address other barriers to golf within the catchment area including:

- providing an enforceable route to delivery and certainty as to how and when mitigation for the loss of the IGC can be secured.
- allowing greatest flexibility for the mitigation strategy to be aligned with local priorities as well as sport, health and recreational objectives.

- addressing other accessibility issues such as affordability by targeting investment in courses that have a lower 'price point' compared to alternative provision ; and
- enhance viability and long term financial sustainability of publicly owned facilities for which there is a known decline across the country.

Options Appraisal

4.16. An analysis of all three municipal facilities and opportunity for enhancements have identified through discussion with the local authority owners / operators at Rookwood, Tilgate and Goffs Park, which align with the objectives of the mitigation strategy above.

4.17. Improvements at Tilgate are seen as particularly relevant to mitigate the loss of IGC as:

- the course remains within a 10min drive time of IGC and is the closest facility to the greatest proportion of IGC Members and also available to casual users.
- it is recognised within the golfing community as having significant potential but currently has a low user rating compared to other courses in the catchment.
- it has the greatest opportunity to accommodate displaced members has a below average Membership indicating capacity to increase its membership base.
- its pricing point is relatively low (and can be managed long term through local authority led contract management and / or SLA's) and is the most accessible golf facility to both regular and casual users.

4.18. Using the golfer journey classifications identified from the GNA, the various development proposals are evaluated below. Facilities that cater for those in the first three stages of the journey are incredibly important to the future of the sport as they offer a more accessible entry level provision and a variety of different playing opportunities. Ensuring any displaced members from Ifield also have a greater choice of where to play at similar courses as close as possible to current provision at IGC will also be important.

4.19. Investment opportunities to improve overall quality and capacity for golf for both courses have been taken from information provided by the local authority leads at both HDC and CBC (Annex D). and / or operators of the club³. They have been discussed with both Sport England and England Golf to determine their suitability and appropriateness to meet the agreed objectives of the mitigation strategy.

4.20. These discussions and information shared (taken from course masterplan and investment strategies) has identified a range of investment opportunities including:

- infrastructure improvements to increase the capacity of the existing facility either by providing additional provision or improving conditions that will increase playing season – for example the ability for course to remain open during wet weather.

³ Proposals for Rookwood have been discussed with HDC Officers and British Ensign. Identified opportunities are included in Table 1.

- infrastructure improvements that will directly or indirectly increase the quality of experience so that it is more appealing to the more experienced golfer and recreating a more comparable experience to that at IGC currently.

Table 1: Potential infrastructure improvements in Crawley (Tilgate / Goffs Park)

Club / Investment Proposal	Leisure	Recreation	Golfer	Regular golfer	New club member	Retained member
Capacity Improvements						
Improve course drainage			X	X	X	
Golf Driving Range Investment	X	X	X	X	X	
Culvert and waterways clearance			X	X	X	
Improve limited café provision	X	X	X	X	X	
9-hole Reinstatement		X	X			
Adventure Golf	X	X				
Goff Park Pitch and Putt Improvements	X	X				
Quality / Improved Experience						
Course layout improvements			X	X	X	X
Improvements to tees and greens			X	X	X	X
Improve buggy paths across course			X	X		
Improve social space in the club house and enhance shop		X	X	X		
National cycle route across the course improved to direct away from fairways			X	X	X	
Pathway improvements			X	X	X	
Tarmac the adjacent car park and install pay & display machines	X	X	X	X	X	
Reduce the vegetation around the overflow car park to give an improved sense of safety	X	X	X	X	X	
Main road resurfacing and widening	X	X	X	X	X	
Improve signage, currently single poor sign to the course	X	X				

Table 2: Potential infrastructure improvements in Horsham (Rookwood)

Club / Investment Proposal	Leisure	Recreation	Golfer	Regular golfer	New club member	Retained member
Capacity Improvements						
Sustainable Adventure Golf	X	X				
New golf practice facilities		X	X			
Revised short golf format		X	X			
Golf simulator		X	X	X		
Quality / Improved Experience						
Greens, tees, bunkers, irrigation pump upgrades			X	X		
Enhanced investment in new golf course machinery						
Upgrade of on course pathways and access routes			X	X		
Continuation of club house upgrades	X	X	X	X		
Upgraded Food and Beverage offering to support new facilities	X	X	X	X		

4.21. The tables identify a long list of potential investment opportunities that are supported by the owners / operation of the existing courses and therefore shows a reasonable prospect that investment in existing facilities can improve the overall golf offering within the catchment area.

4.22. The analysis in the tables indicates how investment enabled by the redevelopment of IGC can support different aspects of golfer journey and how future investment can be prioritised to meet future golfing needs within the catchment area, with a view to:

- improve the golf infrastructure at Tilgate, to realise the course potential for traditional golfers.
- continue to diversify the leisure and recreational offer at Tilgate to attract new entrants to golf.
- support ongoing course improvements at Rookwood alongside consideration of widening the offer to deliver more entry level participants.
- improvements to leisure improvements at Goffs Park.

Prioritising Investment

4.23. Through the analysis and engagement with Sport England, England Golf, and those responsible for the investment and management of both Rookwood and Tilgate, a wide range of investment opportunities have been identified which could support the overall aims of the mitigation strategy and enhance golfing offer within the golfing catchment.

4.24. Those items highlighted in the table are those that are best aligned with the overarching mitigation strategy and objectives, with the greatest potential to mitigate the loss of IGC and therefore will be prioritised above the other potential interventions.

4.25. At this stage, the investment opportunities identified above are neither committed nor funded by the local authorities or operators of the courses. Therefore, any mitigation secured through the redevelopment of Ifield Golf Club could deliver additionality and / or accelerate the delivery of improvements over and above what may otherwise be achievable.

4.26. As part of any future s106 agreement, it will be possible to secure and enforce an offsite funding contribution towards the delivery of the offsite improvements listed above, in a timely manner ensuring that golf provision within the catchment directly benefits from the scheme.

4.27. As part of the next stage of finalising the mitigation strategy, Homes England has appointed FMG Sports and Leisure Consulting and European Golf Design to review the mitigation options, prepare outline design, establish detailed costings and prioritisation of each of the mitigation options in order to inform an overall package of measures that would substantially mitigate the impact of IGC's closure. The next stage of work will be supported by ongoing consultation and engagement with local authority owners, Sport England, England Golf and relevant operators to ensure the deliverability of proposed mitigation measures and will inform a legally binding agreement as part of a future s106 agreement.

Summary of Compliance with Para 99 (b) -

- Para 103 b) requires suitable mitigation to offset any impact arising from the loss of IGC. Given the marginal deficiencies in supply resulting from the closure and opportunity to enhance early golfer journey provision identified from GNA, a mitigation strategy has been established that seeks to improve capacity and quality of existing facilities to support IGC members who may be displaced by the proposed development and create new golfing opportunities for those not adequately catered for.
- A review of retained courses in the catchment has identified that opportunities exist to deliver a betterment to the sport as a whole and deliver targeted investment in line with the objectives of the mitigation strategy. From the analysis presented in the GNA, there is a clear logic and rationale for investing in the golfing offer at Tilgate, Rookwood and Goffs Park to deliver quantitative and qualitative improvements. Targeting investment in these municipal courses will ensure the benefits of mitigation are retained within the existing IGC catchment and also secure a number of wider benefits, supporting the long term financial viability of these courses and reduce the barriers to golf.
- A list of interventions has been identified in consultation with course owners and operators. This demonstrates a credible approach to delivering against the mitigation objectives. While further work is required to fully define and cost identified measures, the options identified are supported by those who have a detailed understanding of each facility and the opportunities that exist to enhance them.
- As local authority owned sites, there is also a clear and enforceable route to delivery through the use of s106 contributions which can be phased and managed to ensure that any future investment is effective in meeting the overall objectives of the mitigation strategy.
- On this basis, there is a reasonable prospect that even with the loss of IGC, there is a realistic prospect for delivering meaningful investment in these facilities to maintain an equivalent provision of golf within the catchment area and deliver a betterment to golf as a whole across the IGC catchment area.

5. Para 103 (c) – Provision of Alternative Sports and Recreation Facilities

- 5.1. Para 103 (c) is met where *the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.*
- 5.2. Para 103 (c) does not require the assessment to consider proposals solely for alternative sport or recreational facilities⁴ and therefore does not exclude the consideration of a mixed use schemes and the potential benefits of alternative facility or facilities provided as part of a wider development proposal to outweigh the loss of an existing facility.
- 5.3. Furthermore, the intention of the policy wording is broad, covering "sport and recreation" in its entirety. It is therefore reasonable to consider both in their widest sense – for example, "recreation" can be both active and passive and it could include access to open spaces, play equipment, walking and allotments, for example.
- 5.4. To determine whether or not Para 103 (c) is met, the following assessment approach has been adopted:
 - a) establishing a baseline position as to the value of IGC as both a strategic golf facility and value to the local area in terms of provision of sport and recreation offer – this allows a position against which the benefits of the alternative provision can be assessed.
 - b) an assessment of alternative sport facilities enabled directly through the redevelopment of the golf club, their contribution to identified sporting needs and accessibility for local residents.
 - c) an assessment of alternative formal and informal recreation activities directly enabled through the redevelopment of the IGC and the accessibility to local residents.
 - d) Testing of the illustrative masterplan to demonstrate how an enhanced sport and recreation offer can be accommodated within developable area.
 - e) An assessment of potential alternative offsite contributions towards locally identified sporting needs (including potential payments to secure alternative golf provision) enabled through the proposed development.

a) Establishing a baseline position

- 5.5. This section seeks to establish the value of IGC within the context of the supply and demand assessment and other indicators that could demonstrate its contribution to both golf and any wider recreational offer locally.

- 5.6. The assessment considers:

⁴ Appeal Ref: APP/E3715/W/23/3322013 Coventry Stadium, Rugby Road, Coventry, CV8 3GP Para 61 – 62

- i) the strategic contribution IGC makes towards golfing.
- ii) IGC's value as a local golfing facility; and
- iii) other indicators of value as a general sporting and recreational facility for those living closest to the course.

i) Ifield Golf Club's Strategic Contribution to Golf

5.7. As set out in the GNA, IGC does make a contribution to strategic golf provision within the catchment area – predominantly in relation to supply. However, there is similar provision elsewhere and in relation to its broader golfing offer, IGC makes a limited contribution towards the wider golfing journey. If IGC were to close, it would not significantly impact on the availability or accessibility of golf within the catchment area.

5.8. It is clear from reviewing the strategic objectives of England Golf that diversification of the existing golfing offer is a key priority and pragmatic response to changing golf market and likely future demand.

5.9. As a traditional Members Club owned and managed by the club itself, the focus of IGC is not well aligned with the direction of travel of the support or where future demand is expected to be greatest. This is a position that was confirmed in various reports from the 2023 AGM⁵, where it is clear that the overall direction of travel and demand for traditional membership is weak both at Ifield GC and more broadly across the golfing community:

“Membership at all golf clubs is becoming increasingly more difficult due to the economic climate, ever increasing Subscription Fees, pressure on people’s time and a general apathy of members not wanting to get involved...”

5.10. This is further demonstrated by both the continued move within the IGC membership from fixed memberships to more flexible memberships⁶ and the failure of key initiatives designed by IGC to encourage membership golf such as the Member-get-Member scheme and Off Peak Membership which between them only secured one additional member. This shows that Membership at Ifield and the type of golfing offer it provides (and therefore regular and consistent use) is becoming less valued.

5.11. Furthermore, when compared to the wider England Golf objectives set out in '*The Course Planner*', it can also be demonstrated that IGC is not well aligned with the broader long term vision of the game, making a limited contribution to the wider strategic objectives of the sport, in as much as:

- Only (11) 2.1% of IGC members are Juniors and 13% Intermediate (under 35). There is no casual or recreational offer, dedicated golfing academy and other practice facilities (such as Golf Driving Range or Golf Simulator). This means that it has little value to younger players (a key target in EG's 18 Tee Shots to Success) and has a more limited contribution to those early in their golfing journey.

⁵ [2023_agm_-_chairmans_report_2023_.final.pdf \(intelligentgolf.co.uk\)](https://intelligentgolf.co.uk/2023_agm_-_chairmans_report_2023_.final.pdf)

⁶ [agm_2023_-_finance_report.final.pdf \(intelligentgolf.co.uk\)](https://intelligentgolf.co.uk/agm_2023_-_finance_report.final.pdf)

- Only 78 of 510 members in 2023 were under 35 (Junior and Intermediate Members). This represents 14.6% of overall membership. Furthermore, across the total membership only c.15% of members are female – lower than the majority of other facilities within the catchment area. Together these low participation figures and general skew towards older male members demonstrates a more limited benefit in terms of Inclusivity.

5.12. Overall, the strategic contribution of IGC to golf is relatively limited and the GNA and assessment under Part B identifies opportunities for an equivalent and better provision to be provided elsewhere within the catchment.

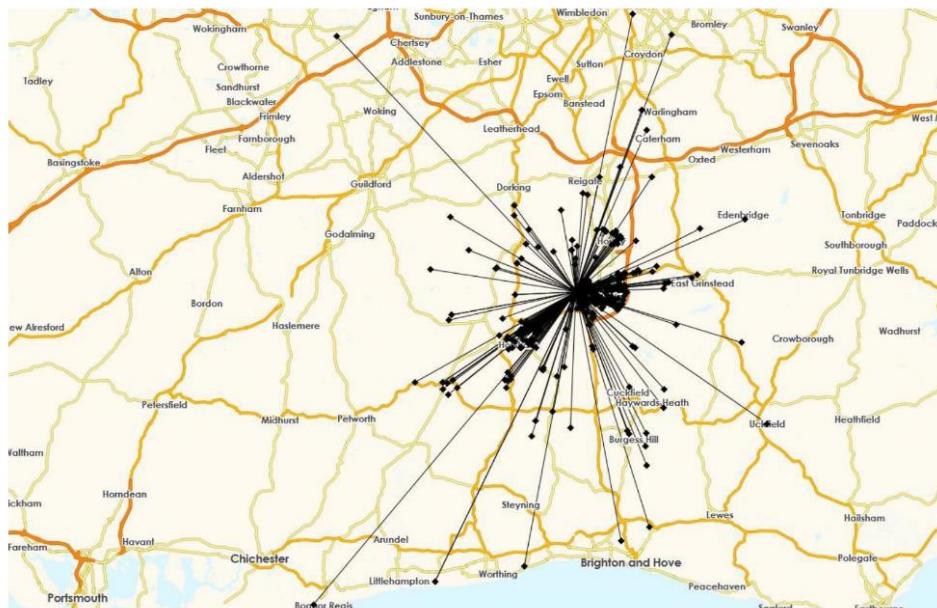
ii) IGC's value as a local golfing facility

5.13. IGC Membership can be considered an indicator of regular use (a regular user being someone playing twice in last 28 days) and therefore can be considered representative of value of IGC as a golfing facility to both the catchment population and more local community – i.e. those living closest to the facility.

5.14. As of October 2023,⁷, there were 510 members at IGC. This included 7 day and Intermediate members (unlimited use), 5 day membership (mon – fri) and Flexible (maximum 60 days) memberships. When considered against the population of the 20-min drive time catchment (243,000), the current IGC membership represents a very small percentage - only 0.21% - of the catchment population who demonstrate a demand to access IGC on a regular basis (i.e. by taking up a membership).

5.15. However, when analysing the breakdown of the membership further, it can be seen that approximately 165 IGC members (c.32%) are located outside of the IGC 20 min -drive time catchment, meaning that the membership within the 20-min catchment reduces to only 0.14% of the total catchment population who demonstrate a demand to access IGC on a regular basis.

Figure c: Location of Ifield Golf Club Membership



⁷ [2023_ifield_golf_club-accounts_for_the_year_ending_april_2023-signed.pdf \(intelligentgolf.co.uk\)](https://intelligentgolf.co.uk/2023-ifield_golf_club-accounts_for_the_year_ending_april_2023-signed.pdf)

Ifield Golf Course Assessment - Member Catchment

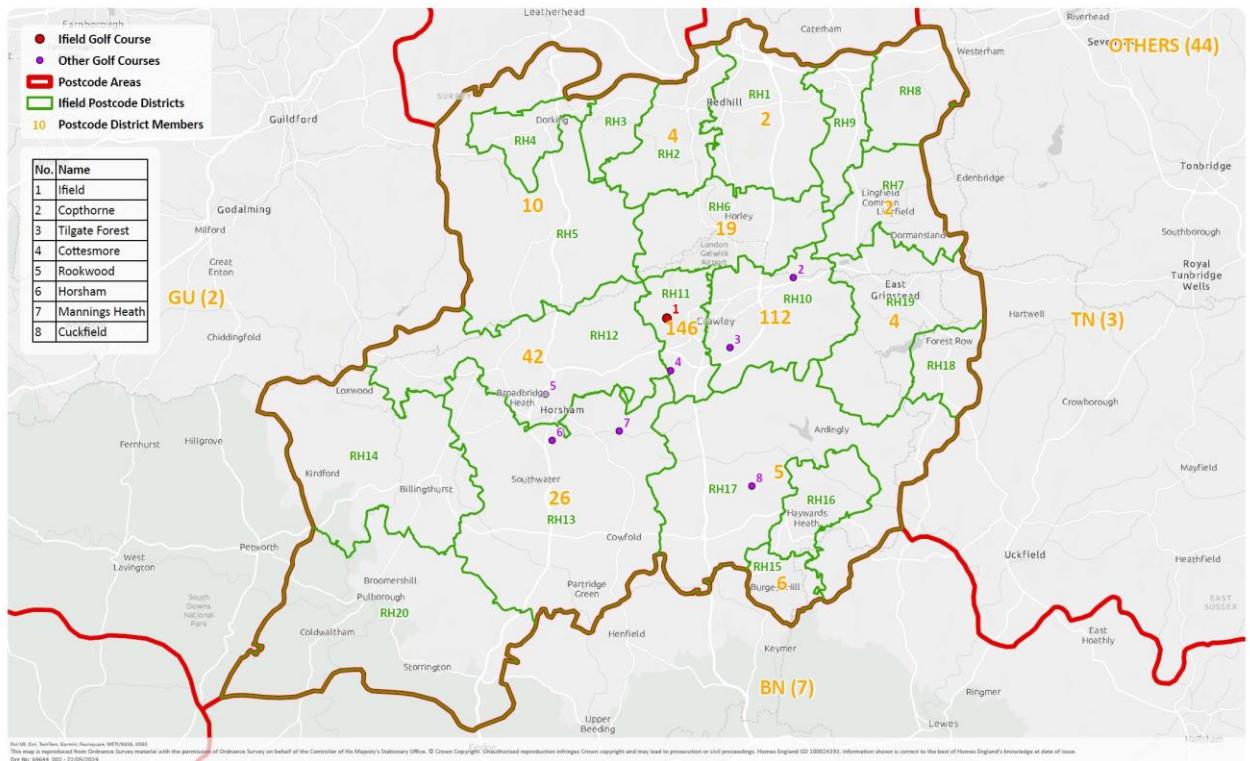


Figure d: Distribution of Ifield Golf Club Membership by Postcode

- 5.16. Within the immediate postcode areas surrounding Ifield (RH6, RH10, RH11, RH12) , there are 319 members compared to a population of 244,403⁸, showing that that IGC membership represents only 0.17% of the immediate local population.
- 5.17. While it is not possible to specifically identify exact address points of Members, the above postcode areas provide a realistic view of the immediate, more localised catchment for IGC. They also broadly align with the 15minute walking / cycling catchment (figure e) which can also be used as a proxy for local accessibility. Within this catchment area, there is a population of 94,500 meaning that within the more immediate area, IGC membership is representative of only 0.3% of the population.

⁸ Census 2021

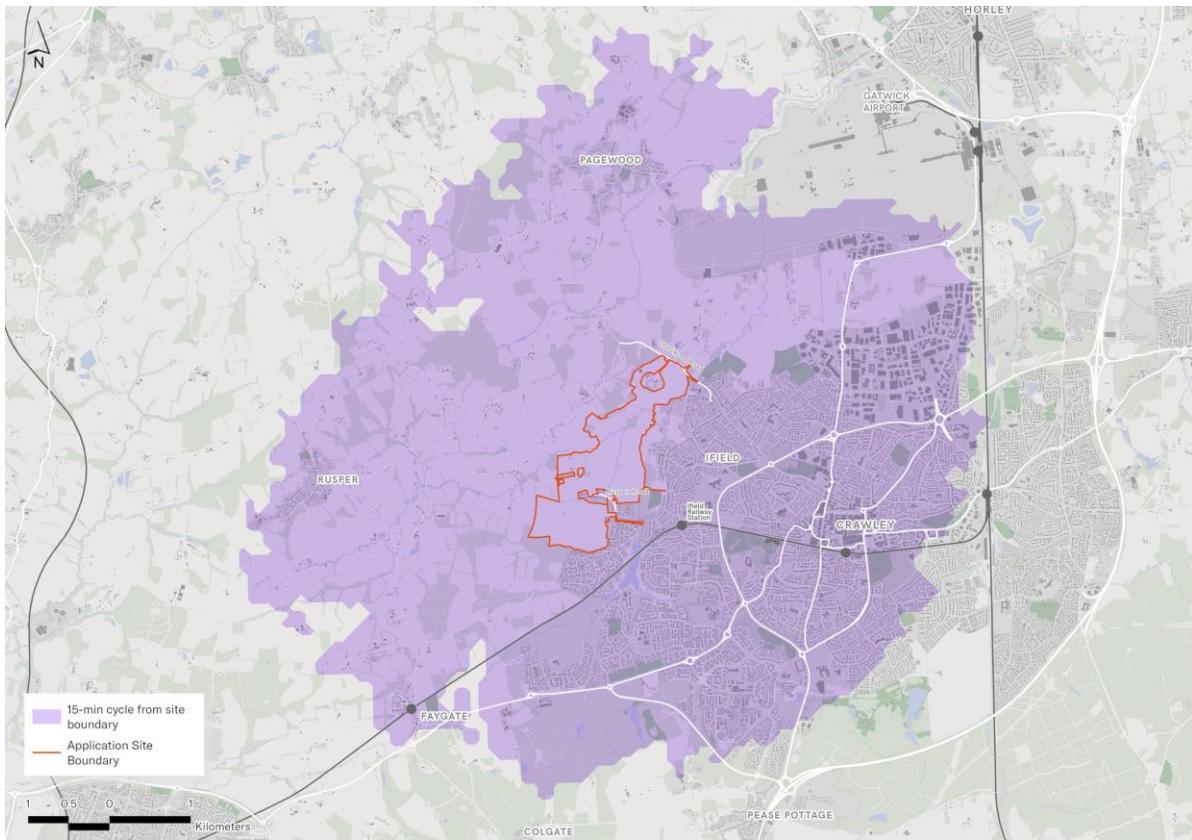


Figure e: Distribution of Ifield Golf Club Membership by Postcode

- 5.18. This analysis shows that while IGC contributes to the golfing offer within the catchment and has a relatively strong focus for membership within the immediate area surrounding it, it is of more limited value as a local sport facility when considering its use by the population as a whole.
- 5.19. While there is clearly a concentration of members living locally (with c. 50% of the Membership coming from the immediate area), further analysis of potential drive/ cycle and walk times of the retained courses shows that there would still be good accessibility for local people to access alternative golf provision within the catchment through a range of transport modes (Figure F).
- 5.20. Given the relatively low use by the local population, it can be demonstrated that the overall value of IGC as a local sport facility is more limited, with the vast majority of the local population not using the facility on a regular basis. It can also be demonstrated that with the closure, the majority of the local population would still be able to access an alternative golf facility within 15min walk / cycle time.

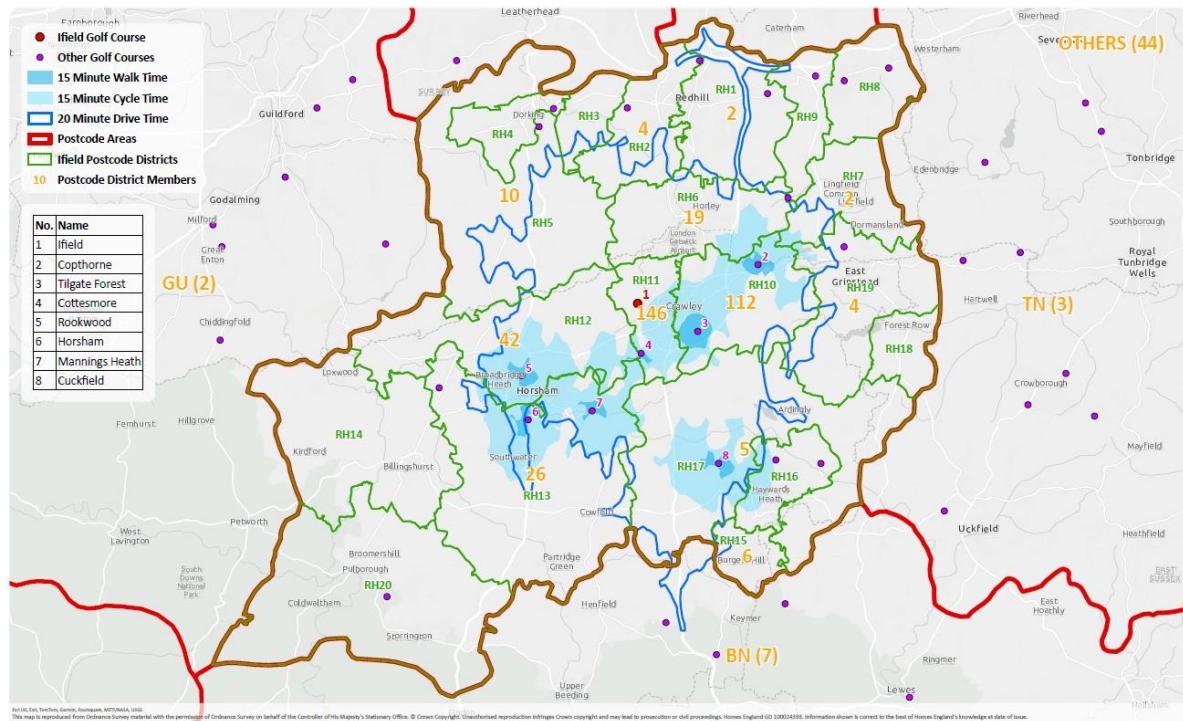
Ifield Golf Course Assessment - Walk/Cycle/Drive Time


Figure f: Drive / Walk / Cycle catchment of retained golf facilities.

iii) other indicators of value as a sporting facility for those living closest to the course

5.21. In considering the wider value of the course as a local sporting and recreational facility, it is important to consider how accessible the facility is to the general population (including non-golfers) and the regularity of use on the site on a more casual basis.

Accessibility

5.22. A key indicator of accessibility is cost and the ability for the local population to access the facility on a regular basis. This was confirmed in the KKP Golf Supply and Demand Assessment (2022) commissioned by HDC stating that while the district is well provided for with the facilities currently on offer, affordability is a key consideration with a potential requirement for more pay and play facilities given the relative lack of choice of facilities in comparison with membership clubs.

5.23. At £1,375, IGC's full annual membership fees are relatively high when compared to the national average (£1,071) and other courses within the catchment area (£997 average across the 9 courses). 5 of the 8 other courses providing cheaper annual fees. While other standard membership options are available, these have restricted use and therefore limit availability for the course.

5.24. When considered against the average net household income⁹ within the surrounding areas – the annual membership fee accounts for more than 5% of the average net income (after housing costs) in the Lower layer Super Output Areas (LSOAs) within 15 minutes walking / cycling of IGC¹⁰. This means that regular or membership golf for which the club primarily caters for is likely to be unaffordable and therefore inaccessible to a large proportion of the surrounding population – reflective of the relatively low take up of memberships by the local population currently.

5.25. While alternative memberships options do improve affordability, IGC reporting as part of the 2023 AGM shows these are having limited impact and continue to limit the use of the club more generally and therefore are still restrictive in terms of making golf accessible to the wider population on a regular basis.

5.26. Notwithstanding this, even where IGC is used by the local population, there are a number of other accessibility issues including:

- **Operating Hours and Seasonality:** as an unlit outdoor facility, the hours of operation are seasonal and restricted to daylight hours. Existing conditions of the course means that the course is unable to be played during periods of wet weather when parts of the course are either waterlogged or there is a risk to damage to playing areas. It is understood that as a minimum the course is regularly closed between December and February (approximately 25% of the year). This means that the course is not a year round facility and accessibility is limited for a period of the year.
- **Wider Recreational Benefits and general access:** there are no wider sporting or recreational benefits directly provided by the club or the land in which is located. While the course is served by Public Right of Way FP1549_2, this is relatively short and not demarcated within the site which discourages its use and provides limited connectivity to the wider area. Similar connectivity is provided by other footpaths to the east and west of the course and alternative routes exist nearby.

Demand by casual users

5.27. While the uptake of Memberships and regular use of the club has been considered above, it is also important to consider how more casual users utilise IGC. While the total number of non-members is unavailable, green fee (i.e. pay and play) and society income can be used as a proxy to determine the number of visits.

5.28. This shows that conservatively in 2022/23¹¹, there were 4,729 green fee players and 1,521 society visitors¹². This represents 2.5% of the 20 min catchment population and 3.3% if all visits came from the immediate surrounding area (RH10, RH11, RH12). As with regular

⁹ ONS dataset [Income estimates for small areas, England and Wales - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/ons/datasets-and-methods/income-estimates-for-small-areas/england-and-wales)

¹⁰ Net average income before housing for LSOAs within the 15min cycle catchment is £32,100. This reduces to £26,900 after housing costs (ONS, 2023)

¹¹ [agm 2023 - finance report.final.pdf \(intelligentgolf.co.uk\)](https://intelligentgolf.co.uk/agm_2023_-_finance_report.final.pdf)

¹² This is based on the lowest green fee of £25 and society package fee at £35. There are a number of higher price points depending on time / nature of play and therefore overall number of players is likely to be lower than that stated.

participation, this shows relatively low participation by the general population – even on a casual basis.

b) Assessment of alternative sport facilities directly provided through redevelopment of IGC.

5.29. The West of Ifield Sports and Recreation Study prepared by Sports Planning Consultants (Annex E) identifies and validates the existing sports provision and the new formal sport requirements generated by the proposed development, establishing the minimum provision that would be required to meet sporting demand generated by the scheme. This report is integral to the consideration potential mitigation for the loss of IGC, as it sets out what facilities are required to mitigate the impact of the proposed development, and what facilities can be provided in addition, to mitigate the loss of IGC.

5.30. It also provides wider analysis of the strategic deficiency in certain sport facilities within the Horsham and Crawley Districts and how as a direct result of providing new sporting facilities onsite (i.e. the need to provide a new swimming pool facility rather than make a partial contribution to a swimming) or through additional provision, the West of Ifield site allocation can also contribute to meeting wider sporting needs that would benefit the wider local population beyond the allocation site boundary.

5.31. Establishing this position is important as any additional facilities over and above the demand generated by the need from the new development (provided as part of, or facilitated by the proposed development) would constitute additional public benefits stemming from the proposals.

5.32. Table 3 sets out, per sport, the requirement generated by the proposed development and the additional facilities that could be included to secure the benefits of alternative sport and recreation proposals.

Table 3: Sport requirements of Proposed Development

Facility Type	Requirement generated by new development at West of Ifield	Facility to be Provided on Masterplan	How equivalent or better sport and recreation provision is secured
Sports Halls	2 court hall to meet demand from new development Potential extension of sports hall to meet identified wider existing deficiencies and improve functionality for sports	4 – 6 court hall	Provided as part of a minimum commitment to a c.3,400m ² Local Leisure Facility within the Neighbourhood Centre, illustratively containing: <ul style="list-style-type: none"> • 4 court sports hall • 4 lane swimming pool • 40-50 health and fitness stations • 3 studios
Swimming Pools	0.33 pools to meet demand from new development, insufficient to require on site provision. Wider existing deficiencies in pools (equivalent to 1 pool), land West of Ifield located in area of deficiency.	New 4 lane swimming pool (therefore delivering water space above baseline requirements to address wider need)	Minimum size delivers 2 courts more than baseline requirements to address wider sporting needs needs)

Facility Type	Requirement generated by new development at West of Ifield	Facility to be Provided on Masterplan	How equivalent or better sport and recreation provision is secured
	On site pool represents added value and meets identified need		Potential provider supports concept of a Community Use Agreement and this will be sought by the Applicant.
Studios	No clear quantitative guidance Studios required in line with population growth.	2 – 3 studios	In terms of swimming pools, the facility will contribute to meeting significant existing and projected unmet needs (particularly in Crawley) and as in excess of that required by the development.
Health and Fitness	No clear quantitative requirement – infrastructure can meet additional demand. Development site is in area of deficiency in accessibility terms. Commercial benefits to offering small health and fitness studio	Small health and fitness studio circa (40 – 50 stations) – delivers above baseline requirements to address wider needs	
Grass football	2 Adult Football 3, Youth Football and 2 Mini Soccer pitches will be generated by the new development. Wider unmet demand and existing deficiency in provision is also evident, but capacity increases to be met through 3G and qualitative improvements elsewhere.	2 AF, 3 YF and 2 MS	To be met through a combination of a focused 'football hub' at the Grove Sports Hub, alongside smaller scale provision at the River Valley Park. The potential education provider supports concept of a Community Use Agreement for the primary and secondary schools and this will be sought by the Applicant.
3G AGP	0.38 AGP required by new development.	3G AGP –	To be met through provision at the Grove Sports Hub, in combination with a CUA for the school site Wider deficiency suggests that 3G onsite would significantly reduce existing widespread deficiencies and onsite provision delivers above baseline requirements to address wider need. MUGA also indicatively proposed within the Ridgeway Park to ensure ease of access for Hillside and Woodlands development plots.
Cricket	New development generates demand for 1.94 cricket pitches. Existing deficiencies in cricket provision in wider area emphasise the importance of this on site provision.	2 grass cricket squares	1 Cricket pitch overlaid with football pitches in the River Valley Park, but wickets kept separately and run off areas. Illustrative Masterplan also includes potential provision on secondary school site.

Facility Type	Requirement generated by new development at West of Ifield	Facility to be Provided on Masterplan	How equivalent or better sport and recreation provision is secured
Tennis	On site requirement for 2 courts generated by new development.	3 tennis courts and 2 padel courts	Padel and Tennis courts co-located and delivers above baseline requirements to address wider need. Wider deficiencies suggest sustainable hub of 3 courts and 2 padel courts could be provided to meet need
Sand based AGP	No on site requirement generated by development. Wider benefits of providing facility from curricular / hockey need	Sand based AGP - delivers above baseline requirements to address wider need	Sought for Secondary School site to provide multi-sport with hockey function to increase hockey capacity in the area.

5.33. It can therefore be demonstrated that a wide range of sporting facilities can be provided within the site allocation – a number of which are in excess of the scheme requirements and would make a positive contribution to addressing sporting deficits within the wider area.

5.34. Even where elements of the overall sporting provision is being provided to meet the demand from the development itself, these facilities would not be for exclusive use by new residents and therefore it is reasonable to consider that they would also benefit existing residents and enhance overall accessibility to formal sport provision to those living close to the site – discussed further below.

5.35. To establish the level of betterment that could be secured through these facilities compared to the current golf provision provided by the existing IGC, a comparative assessment against the ANOG criteria has been undertaken that considers:

- **Quantity** – what facilities are available in the area and what do they offer?
- **Quality** – how good are these facilities and are they fit for purpose?
- **Accessibility** – where are the facilities located and what potential size of the market are they supporting / could they support.
- **Availability** – how available are the facilities, what is the existing capacity and what is the capacity to accommodate future users? capacity to accommodate both existing and future users.

Quantity

5.36. The Sport and Recreational Strategy identifies the need for additional facilities to be provided as part of the scheme and demonstrates how they have the potential to serve an identified need over and above the demand generated from the West of Ifield scheme alone. This demonstrates how the proposed sport provision provided as part of the development of the West of Ifield site would contribute to addressing an identified wider strategic deficits in

formal sporting provision. This is in comparison to the existing IGC which has a more limited contribution to both the strategic golf offer and local participation in sport.

Quality

5.37. As with 'quantity', the Sport and Recreation Strategy demonstrates how the proposed sporting provision at West of Ifield can make a meaningful contribution to the mix of sporting provision in the area, diversifying and creating new sporting opportunities. As new facilities, there is an opportunity for the new provision to be designed in conjunction with future users and relevant sporting bodies to ensure it responds to local needs and is designed to the required standards. Purpose built facilities can also be designed flexibly to adapt to future demand and changes.

Accessibility

5.38. By applying a number of metrics to determine the average use of alternative facilities¹³, it is possible to establish the number of potential users and the estimated capacity and demand for both IGC and the proposed sport and recreation facilities proposed for West of Ifield.

Table 4: Estimated Annual visits.

Facility Type	Estimated Annual Visits	Remarks
Ifield Golf Club	18,490 – 32,770	The average no. annual users for 18 hole golf courses is 26,000 based on national averages (Source: Sports Marketing Surveys). When looking at current usage at IGC there are 6,250 visits by casual users. If applying a RGD index of twice per month, there would be a further 12,240 visits, or applying a more conservative estimate of all 510 current Members undertaking a weekly visit, there would be a further 26,520 visits.
4 court sports hall	20,000	Industry norm but SE have 1,182 Visits per week in peak period which gives a higher value.
Studio	36,400	50 sessions per week, average 20 x 70% utilisation x 52 weeks.
45 station gym	81,000	45 stations x 25 members per station x 1.5 average attendance per week x 48 weeks.
4 lane 25m pool	80,000	Industry norm but SE have 1,412 visits per week in peak period. You would add 20% for off peak usage – could be up to 88,000.
3G Pitch	50,000	Subject to programming. With some summer use. Note Sport England assume 1400 playing opportunities per week (equivalent of 72,800 visits).
Hockey AGP	25,000	Less than a 3G, would depend on if football was programmed, would be less if not football and purely hockey.
Tennis Court	500 per court (1,500 in total)	Our estimate from local authority data.
Padel Court	11,600	Average 32 users per day assuming court utilisation of 70%.
Grass Football	2,128	Average pitch quality with 28 players playing twice a week for 38 weeks (season).

¹³ Source of each of the metrics are taken from a range of sources including Sport England, relevant sporting bodies. Where specific data is unavailable, capacity estimates have been calculated using a range of assumptions set out in the table.

Pitch – Adult		
Grass Football Pitch - Junior	2,128	Average pitch quality with 28 players playing twice a week for 38 weeks (season).
TOTAL (new Facilities only)	309,756	The total number of estimated annual visits excludes the first row of this table – IGC.

5.39. This demonstrates that while the number of visits at IGC is not insignificant, the total capacity of the alternative provision provided on the proposed allocation site would significantly increase capacity and capacity of a range of formal sporting opportunities. In total there would be capacity for up to 309,000 sporting visits within the site – around 10 times as many as currently provided for by IGC. This will provide a step change in the number of people who can access sport and recreation opportunities. The range of facilities which results from the proposed development would also increase the diversity of offer and choice, compared to those who currently benefit from IGC.

5.40. In assessing improved accessibility to sport it is also important to consider the size and diversity of the market that could be served by the new provision and the opportunity to access the facilities by a range of transport modes. It can be demonstrated that:

- the wide range of facilities will cater for a broader demographic than currently provided by IGC – including specific provision for younger generation (such as mini football).
- when applying a 15 minute walking and cycling catchment around the planning application boundary, there is a potential residential population of 94,500. Given the range and greater diversity of facilities provided through the redevelopment and the strategic offer of some of those facilities, it is reasonable to assume a level of use from within this immediate catchment. When applying the average rate of sport participation across Horsham and Crawley at 13%¹⁴, this would mean up to 12,285 residents would have good access to and could be expected to use the facilities – a significant increase on current golfing use. Even if only 1% (945) of the local population utilise the new facilities across the year, this is still around three times greater than the % of the same population who are currently utilising IGC on a regular basis (Members).
- the variety of sport provided for will reduce the ‘cost point of entry’ for sport compared to the existing golf course and comparatively high membership fees. It will cater for different price points.
- sporting opportunities would be provided year round through the inclusion of a number of lit and all weather facilities compared to IGC which has seasonality constraints and limitations on its operating hours.

¹⁴ Based on average fairly active participation rates for Horsham and Crawley taken from [Active Lives data tables | Sport England 2022/23](#)

Availability

5.41. Table 7.4 in the Sport and Recreation Strategy (see Annex E) shows what demand will be generated for the new facilities by the development itself and the surplus capacity that would be available for use by the wider population. This shows that with the exception of football, the overall sporting provision would provide capacity for both new residents and the existing community.

c) **Assessment of alternative informal recreation activities directly enabled through the redevelopment of the Ifield Golf Club**

5.42. NPPF Para 103 (c) allows for a broad range of recreational facilities to be considered as part of the assessment. As a landscape led scheme, the West of Ifield proposals retain a significant amount of formal and informal open space.

5.43. As existing, the West of Ifield site allocation has very limited formal and informal recreation provision. There is no general access to the site, with all activity of the public limited to the use of a limited number of Public Rights of Way (PRoW) across the site that total around 3.5km. These include:

- FP1549_2: 1117m within IGC boundary
- FP1516: 630m within the site.
- FP1510: the total length is 1627m, of which 772m is within the site.
- FP1512: the total length is 1624m, of which 411m is within the site.
- FP1517: the total length is 500m, of which 250m is within the site.
- FP1507_1: the total length is 494m, of which 274m is within the site.

5.44. When considering the policy requirement and published Open Space Standards set out in the emerging Horsham Local Plan evidence base, it can be demonstrated via the illustrative Sport and Recreation Masterplan layout (Figure I) that the proposed formal and informal open space provision would meet the full range of Open Space requirements set out in emerging Local Plan policy and in a number of instances provides over and above what is required, therefore creating surplus capacity which could be utilised by the existing local population – making a positive contribution to objectives around active and healthy lives as set out by both HDC and Sport England.

5.45. The wider recreation offer would be free of charge (e.g. play facilities across the proposed site, bike trails, Ridgeway Park, River Valley Park etc) and therefore more accessible than existing paid facility.

5.46. Table 5 shows the surplus of recreational capacity that would be provided when compared to the published Open Space standards.

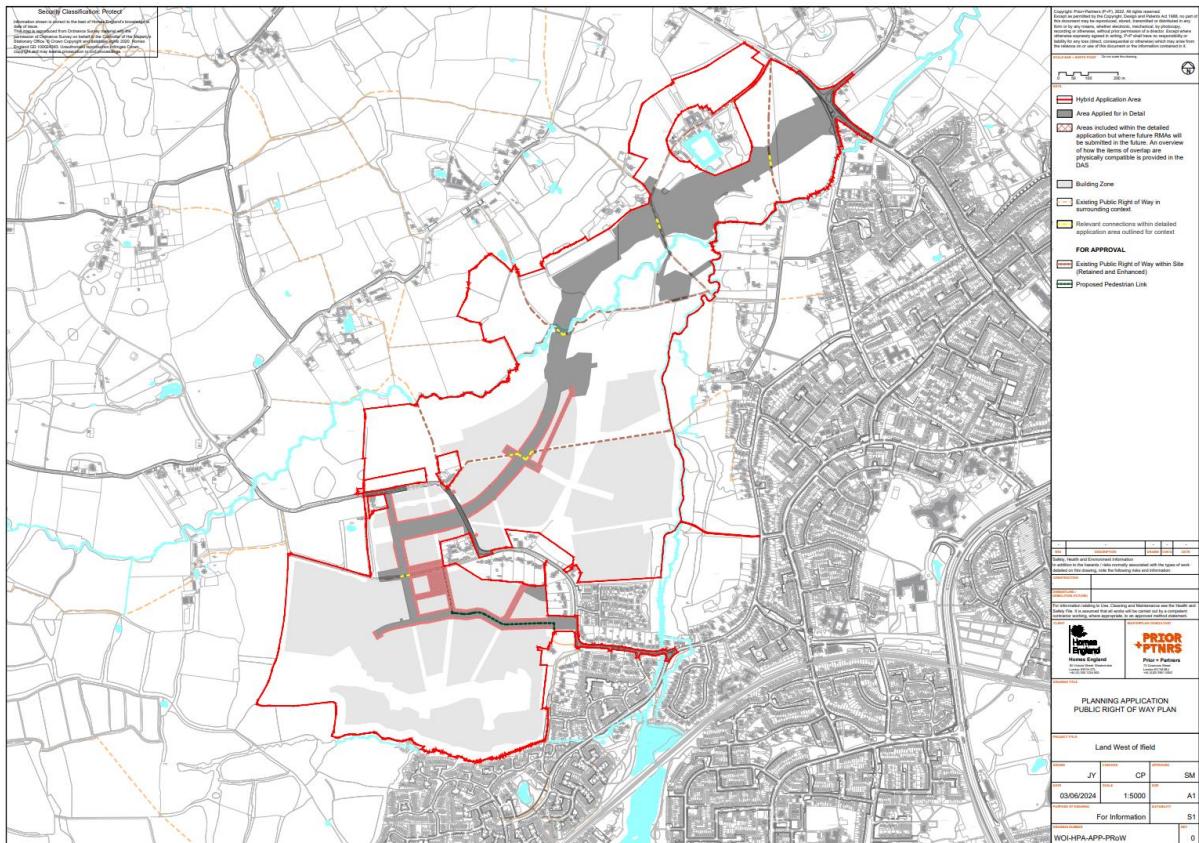


Figure g: Public right of way plan.

Table 5: Surplus recreational capacity

Typology and Sub-typology	Area per resident (sqm)	Estimated requirement (based on population of 6,724) in ha	Provision within illustrative Masterplan (ha)	Surplus provision over and above (ha)
TOTAL MINIMUM OPEN SPACE STANDARD	46.6	31.33	185.16	+153.83
Of which:				
Allotments	1.8	1.21	1.21	0
Multi-Functional Greenspace	43.9	29.55	90.01	+60.46
<i>Natural & Semi-natural Greenspace</i>	24.3	16.34	65.82	+49.48
<i>Amenity greenspace</i>	5.8	3.90	4.21	+0.31
<i>Parks & gardens (includes outdoor sports*)</i>	13.8	9.28	20.98	+11.7
Children and young people	0.9	0.61	1.46	+0.85
<i>Children (playgrounds / landscaped areas of play)</i>	0.5	0.34	0.89ha LEAP – 0.44 NEAP – 0.45	+0.55
<i>Youth areas and facilities (skate parks / bike tracks / open access ball courts – delivering appropriate provision for all genders)</i>	0.4	0.27	0.57	+0.3
Additional built facilities	Area per resident (sqm)	Estimated requirement (based on population of 6,724) in sqm	Provision within illustrative Masterplan (sqm)	Surplus provision over and above (sqm)
<i>Indoor facilities- Community Halls or similar</i>	0.055	369.82	600sqm (excluding health centre)	+230.18
<i>Indoor Sports facilities</i>	<i>See the Sport England Sports Facility Calculator and also the Council's Built Sport Facility Strategy</i>	N/A	<i>Minimum of 3,400 sqm</i>	N/A

5.47. The key recreational features that are directly and indirectly unlocked through the development include:

- **Ridgeway Park** – a new strategic open space to the south of the scheme within the current IGC land. Accessible from Ifield West neighbourhood and wider community adjacent to the site.
- **River Valley Park** – a large area of publicly accessible semi-natural open space with the potential to act as a locally significant recreational space and supporting recreational facilities. Accessible from the proposed Crawley Multi Modal Corridor and existing strategic active travel links as well as being integrated with existing PRoW network and other existing publicly accessible open spaces (Forestry Commission land at Ifield Wood) to create strategic recreational area.
- **Meadow Park** – a new informal recreational facility within the heart of the site, connected to existing PRoW network and extension of River Valley Park strategic recreational area.
- **Grove Sports Hub** – a new multisport facility easily accessible from proposed Crawley Western Multi Modal Corridor and strategic active travel links.

5.48. Given the limited public access currently across IGC and wider site allocation area, any new recreation provision would be genuinely new capacity and provide a significant benefit when compared to the baseline condition.

5.49. When looking at the population within the 15min / walking catchment, there could be potential recreational benefit to between 25,995 existing residents who will have better and improved access to recreational facilities. As with formal sports, if applying an average participation rate of 13%, this would mean that up to 3,400 existing residents, and new residents of the development, would benefit from the new provision and access to improved recreational facilities, compared to a much more limited number who benefit from limited informal use of the PRoW currently on the IGC site.

5.50. Within the proposed site allocation boundary, the illustrative masterplan shows that 11.5km of new active travel routes (including new segregated walking and cycling provision) can be created providing significant opportunities for informal recreation activity. These have been designed to connect to and integrate with the existing PRoW network to improve connectivity beyond the site. When compared to the current PRoW across the site, the development will provide significantly more active travel routes (228%) than currently provided and accommodate a wider range of users. Using the 15 minute cycle catchment and applying a 1% utilisation rate as a worst case indicator, this would mean 945 (existing) residents would have better access to regular recreation opportunities compared to today.

5.51. Together, the provision of formal and informal recreation opportunities demonstrates that when compared to the single PRoW across the IGC site currently and otherwise limited access (via PRoW) across the wider site, the West of Ifield site allocation will significantly enhance and improve the local recreation offer, benefitting both new residents and existing communities.

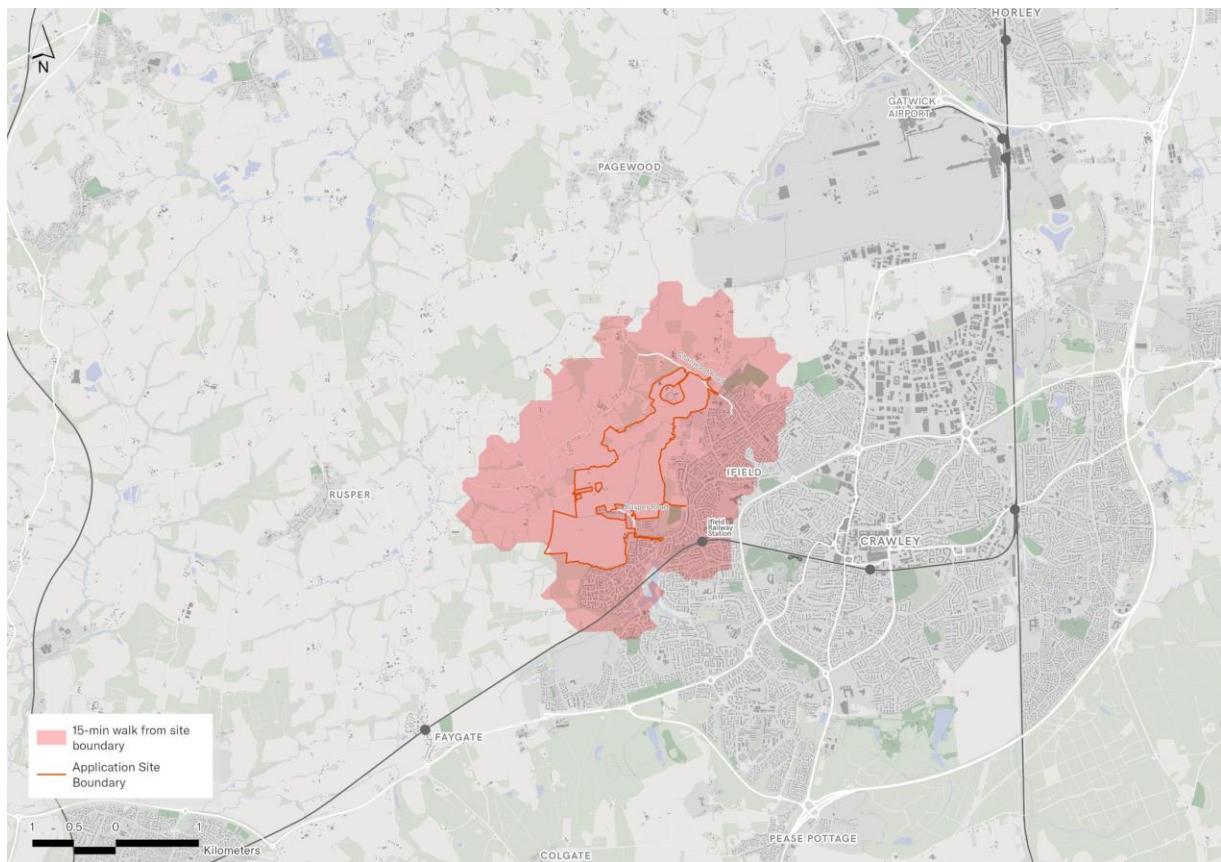


Figure h: 15 Minute Walking Catchment around West of Ifield site allocation boundary.

d) Masterplan Testing

- 5.52. Testing of the illustrative masterplan shows how the sports and recreation facilities identified above can be accommodated within future land use alongside other policy requirements. The proposed facilities complement existing provision, addressing existing identified deficiencies, promote community access to school facilities supporting their long term maintenance, whilst allowing appropriate flexibility to respond to the needs of future communities and providers.
- 5.53. This demonstrates that the identified sporting needs taken from the supporting Sport and Recreation Strategy, can be accommodated within the site and provided in a way that maximises accessibility to both the new and existing community through co-location with active travel corridors, and compatible uses to ensure long term management, viability and success of future operators.
- 5.54. For example, the proposed Local Leisure facility in the Neighbourhood Centre (at a minimum of 3,400sqm) puts sport and recreation within the heart of the proposed development, drawing attention to facilities and promoting key linked trips and access via public transport and active mode connections as far as possible.
- 5.55. Furthermore, the illustrative masterplan shows how the proposed open spaces are accessible and connected via green corridors to create a network of spaces. This will allow users to access all key green spaces, sports and play areas, as well as the wider countryside via dedicated pedestrian and cycle routes to encourage healthy lifestyles.

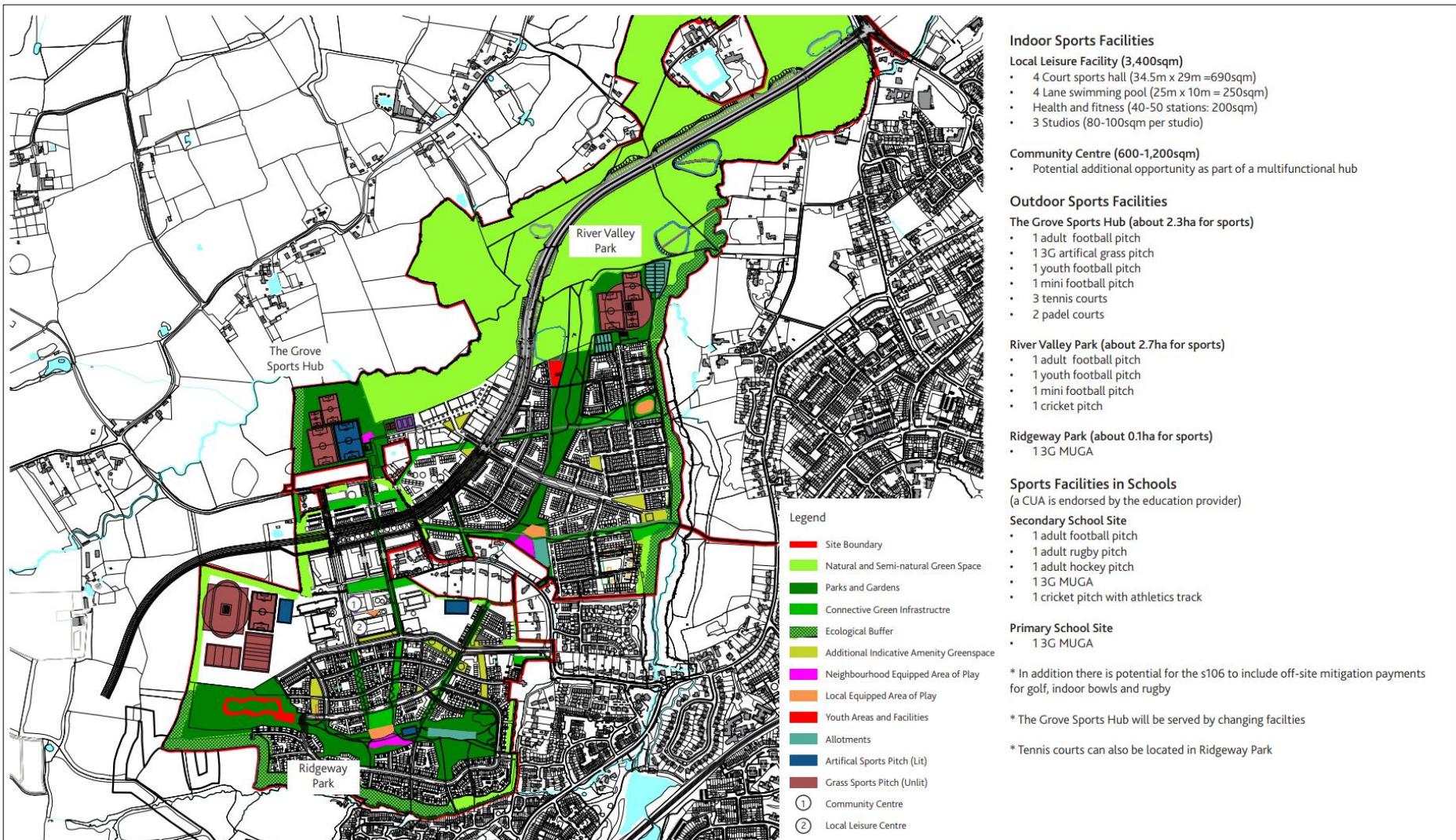


Figure i – Illustrative sport and Recreation Strategy layout

e) An assessment of potential offsite contributions

5.56. In addition to direct onsite provision, there are opportunities to secure additional investment in sporting and recreational facilities which would provide sporting benefit as a whole.

5.57. The Ifield Sports and Recreation Strategy, identifies that for some sports, the demand generated through the development is not best met through onsite provision (e.g. Rugby) and that the additional demand generated by the scheme would best be met through financial contributions to improve provision at existing facilities. By definition, these are already being used by existing residents and therefore any investment in the existing facilities would not just mitigate the impact of the scheme but deliver sport improvements for the wider community as a whole.

5.58. In addition, the golf mitigation package (either in part or in full) set out under part b) could also form part of the mitigation offer under part c), forming part of any alternative sport and recreation offer and significantly increasing the golfing offer and diversify golf provision locally.

5.59. Furthermore, there is a requirement for the West of Ifield site allocation to secure a step-change in active travel. There is a commitment to support the upgrade of active travel corridors to key destinations that are outside of the site boundary as identified in published LCWIP documents¹⁵ (Figure j). These links will not be exclusively for residents of the West of Ifield scheme and therefore would provide a step change in opportunity for existing residents to also utilise active travel modes for informal recreation more easily.

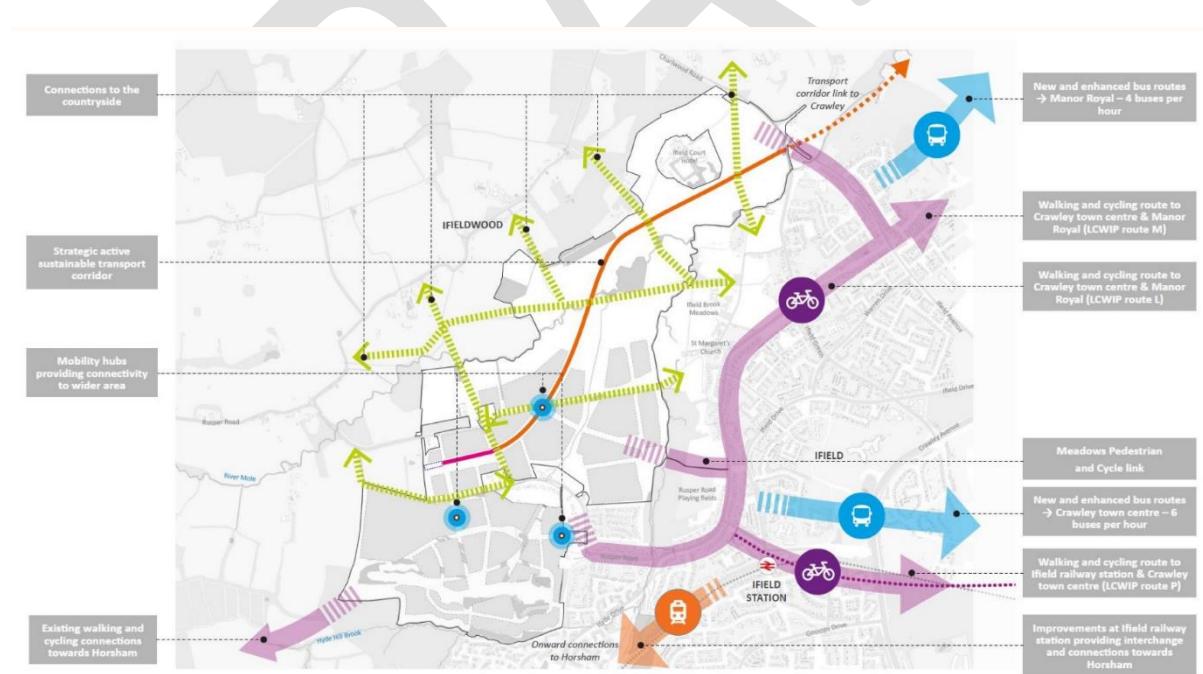


Figure j: Active travel corridors identified in LCWIP documents.

¹⁵ [Crawley LCWIP Full report_0.pdf](#)

Summary of Compliance with Para 103 (c)

- The GNA establishes that IGC makes a contribution to golf within the 20-min catchment area and is currently meeting a demand for golf within the 20 minute catchment. However, its strategic contribution is more limited, especially when considered against broader objectives for the sport and likely changes in demand in the future. .
- When considering utilisation of the course by the local population, it can be demonstrated that the course is only utilised by a small proportion of the 20 -min catchment population (3.3%) and even less when only considering use by local residents, living closest to the course on both a regular and more casual basis. There appear to be a number of barriers for local participation, including cost of membership and has limited wider recreational benefit.
- The alternative sporting provision that could be delivered through the West of Ifield allocation is significant and greater than that needed to mitigate the additional demand from the development alone. It would provide a more diverse mix and greater choice for sport users that is more accessible and inclusive for the local population. The overall capacity of formal sporting facilities would be more than 10 times greater than that of IGC and make a contribution to strategic sporting needs across the wider area. When looking at the potential benefit to the wider area, at least 12,000 local residents who participate in sport on a regular basis are likely to benefit. Even if a smaller proportion of the local population used the new facilities, this would still be greater than those currently using the IGC facilities.
- As a result of the proposed development, there would be a significant increase in the number of formal and informal recreational opportunities across the site that would benefit both the new and existing community. This includes the provision of new parks and Open Spaces as well as significant increase and enhancement of active travel corridors that would help increase recreational participation and encourage active lifestyles. When looking at the potential benefit to the wider area, at least 3,400 local residents who participate in average levels of activity on a regular basis are likely to benefit – compared to a significantly smaller number who currently access the golf course.
- In addition to new onsite provision, a number of realistic and identifiable opportunities for offsite sport improvements have been identified which would further enhance provision for both the new and existing communities.
- Overall, it can be demonstrated that by meeting sporting and recreational needs arising from the proposed development as well as delivering a step change in active travel opportunities, there are a number of identifiable and deliverable options that will make a significant and positive contribution to wider strategic sporting and recreational needs; improving overall accessibility for the wider population and a number of sports. When compared to the current sporting and recreational provision offered by IGC as a golf facility, the benefits of the new provision would significantly and demonstrably outweigh the loss of IGC as a golf facility both in terms of its strategic contribution and local utilisation.

6. Options for securing required mitigation.

6.1. This assessment is a point in time to demonstrate how the redevelopment of IGC can demonstrate conformity with Para 103 of the NPPF.

6.2. While a final mitigation package is not yet confirmed and is subject to ongoing discussions with HDC, Sport England, England Golf and other relevant stakeholders, there are a number of realistic and deliverable options (in relation to both part b) and part c) that would adequately mitigate the loss of IGC.

6.3. To ensure that an appropriate levels of mitigation can be committed to and assurances provided that such mitigation can be secured at site allocation stage, the following actions set out below can be completed to provide a robust policy and implementation framework, in turn providing the certainty that any final mitigation package is both achievable and capable of being secured as part of a future planning application.

Emerging Horsham Local Plan

6.4. The emerging Local Plan already includes both a generic policy (draft Policy 28) and specific West of Ifield Policy (draft policy HA2) that requires the loss of the IGC to be considered in a way that is broadly consistent with Para 103 of the NPPF.

6.5. To provide greater certainty around the deliverability of the mitigation, the draft policy wording of HA2 and supporting masterplan could be strengthened so that there is:

- a broader definition of community uses so as to allow for provision of both the needs of the new community and wider strategic needs identified through existing or updated evidence.
- greater definition and identification of the range of formal sports facilities that would be permitted or considered suitable within the allocation.
- a requirement to demonstrate that the location of sport facilities is deliverable and located to be is accessible (both to the new community and wider population) and support viable operating models.
- recognition of the potential role of offsite contributions.
- greater clarity on the importance of well designed and integrated natural and semi – natural green space and other informal recreational provision.
- confirmation that any requirement to mitigate the loss of IGC to be secured as part of a s106 agreement.

Infrastructure Delivery Plan

6.6. The Infrastructure Delivery Plan (IDP) already sets outs a number of sporting requirements and identifies the West of Ifield site allocation as a potential delivery mechanism. Based on the

updated needs assessment established through the preparation of the Sports and Recreation Strategy, it would be possible to update the IDP where required to ensure that the sporting needs and potential for West of Ifield to act as a delivery vehicle to be accurately reflected.

Planning Application and s106 agreement

6.7. At the planning application stage, a number of key controls can be attached to any consent to ensure that adequate sport and recreation provision will be included to outweigh the loss of IGC necessitated by the proposals.

6.8. Potential controls could include:

- **Development Specification and Parameter Plan Framework (DSPPF):** The DSPPF and embedded parameter plans will include locations for identified formal sports provision identified through the Sports and Recreation Strategy, as well as minimum commitments to areas of landscape, green infrastructure and active mode connections, as well as other community and recreational infrastructure, to establish a framework for the future community at West of Ifield. Associated Land use tables can secure, at the point of permission a number of key commitments including minimum and the delivery of a strategic scale green infrastructure and also minimum commitments to minimum provision per future resident for Amenity Green Space, Allotments, Areas of Play and Youth Facilities. Through conditions on the permission, future RMAs will be bound to deliver these commitments.
- **Section 106 –** the Section 106 (another legal control on future details provided) can secure a number of legally binding commitments to ensure the required mitigation package is delivered. Examples could include:
 - **Minimum commitments:** This will set out the scale of sports and inclusion of minimum associated facilities (such as changing rooms or pavilions).
 - **School site commitments:** ensuring that provision on school sites, delivered as part of curriculum requirements, is complementary to other sporting opportunities provided in the Grove Sports Hub and River Valley Park so that weekend and evening use by the community meets local needs.
 - **Offsite provision:** as required secure offsite payments to enhance existing sports facilities offsite. This could include improved facilities or expansion at existing sports clubs where requirements are not met onsite, or to provide for golf-specific enhancement at local municipal courses, such as Rookwood and Tilgate, should this be required and desirable. Any agreement can include specific triggers to ensure mitigation measures are provided in a timely manner.
 - **Conditioned requirements:** Given the timescales associated with the likely build out of West of Ifield, a conditioned requirement could be attached to any Outline consent that requires the submission and approval of a specific sports strategy, requiring future Reserved Matters applications to show how areas for sport will be laid out and meet identified needs at the point of submission, including liaison with providers to ensure long term management and maintenance, and ultimate success, of the provided facilities.

6.9. As a result of the above mechanisms, there are a number of sufficiently robust controls that in combination with Draft Policy HA2 and illustrative masterplan, can ensure that the necessary improvements in sports and recreational benefits are delivered in a way that clearly outweighs the loss of Ifield Golf Course, ensuring that the relevant tests of Para 103 are met.

7. Conclusion

7.1. This assessment and the supporting documents provide a detailed analysis of the role and contribution that IGC makes to golf. The assessment is based on a 20-minute drive time catchment, in line with best practice and as recommended by the KKP study undertaken on behalf of HDC. It takes account of an advanced masterplan and planning application that has been informed through ongoing engagement with relevant stakeholders and national sporting bodies.

7.2. This shows that when considering requirements of NPPF Para 103 and emerging Local Policy SP8, HA2, the loss of IGC can be justified as:

- there is currently a good supply of golf provision within the 20 min catchment area to meet existing demand. With the loss of IGC there will be an inevitable reduction in supply, however the facilities and type of golf provided by IGC would remain well served within the catchment area and it can be demonstrated that overall, the impact will not be detrimental and there are alternative opportunities for displaced Members to find alternative facilities within the catchment or closer to where they are currently living. Notwithstanding this, it is accepted that at this point in time it cannot be demonstrated that IGC is clearly surplus to requirement and therefore Part b) or Part c) of NPPF Para 103 are engaged.
- while traditional forms of golf are well catered for within the catchment, facilities that are more suited to those earlier in their golfing journey – and would support the broader objectives of England Golf to improve accessibility and support inclusivity within the sport – are more limited. In analysing future demand and trends for the sport and through engagement with England Golf and Sport England, there is a clear rationale for securing increased capacity to accommodate displaced members and betterment for golf as a sport as a whole within the catchment, delivered through a targeted mitigation strategy. A number of realistic and deliverable mitigation solutions have been identified within the three local authority owned courses that could deliver against these objectives that would mitigate the loss of traditional provision currently catered for at IGC and deliver an enhancement in alternative golf provision. Together, these measures can deliver improvements to maintain a broadly equivalent level of provision and betterment to golf and would satisfy requirement (b).
- the wider sports and recreation offer unlocked by the development is significant. It can be demonstrated how the provision can provide capacity that would allow the wider Ifield / Crawley community to better access a diverse range of sporting and recreational activities, as well as make a meaningful contribution to articulated strategic sporting

needs within the wider area. This would support a number of core leisure, health and wellbeing objectives of both Horsham and Crawley authorities as well as the broader active lives objectives supported by Sport England. When considered either individually or taken together, both the sport and recreation offer would clearly outweigh the more limited value of IGC to the non-golfing population as both a golfing, sporting and recreation facility more generally. This would deliver a significant quantum of alternative provision and a range of benefits that would outweigh the loss of the IGC facility and would satisfy requirement (c).

- 7.3. While further work is required to refine and agree the overall scope of mitigation package with England Golf, Sport England, HDC and other stakeholders as part of a future planning application, it can be demonstrated that there is a reasonable prospect of it being achieved.
- 7.4. It can therefore be clearly shown how appropriate mitigation can be delivered and how certainty can be provided as to ensuring the necessary mitigation is realised through both strengthening the Policy wording of HA2 and by applying a number of standard control mechanisms at the planning application stage.