



Horsham District Local Plan 2023-2040 Examination in Public

Matter 9 – Sites Allocated for Development in the
Plan

Hearing Statement

Date: November 2024



Issue 1 – Whether the strategic sites allocated in the Plan and associated policies are justified, effective, consistent with national policy and positively prepared?

Introduction

- 1.1 This statement has been prepared by Homes England (HE) in its capacity as landowner and promoter of West of Ifield (Wol), Horsham, identified as a strategic site HA2 in the Horsham Local Plan (HDLP) 2023-2040.

Q1 - Is Strategic Policy HA1: Strategic Site Development Principles sound? The justification refers to “Strategic Scale allocations” and “smaller housing allocations” and the policy refers to land allocated for “strategic scale development”. Is it clear which sites this policy applies to?

- 1.2 HA1 provides an over-arching policy framework for the larger strategic allocations within the plan. This is inferred by the reference to “Strategic Sites” and the heading that precedes these policies, however, it would be clearer for the policy to be modified to ensure Policy HA1 only refers to the three strategic sites.
- 1.3 In terms of overall soundness, our Reg 19 Representation expressed concern that Policy HA1 is duplicated elsewhere (and in places cuts across the objectives of other strategic policies) which impacts on the effectiveness of the Plan as a whole and is contrary to Paragraph 16(f) of the NPPF. Despite the proposed modifications, these concerns remain. Suggested amendments to the policy are included at **Annex 1**.
- 1.4 There are several specific requirements of Policy HA1 that are not justified:
- explicit reference to lower cost housing models such as Community Land Trusts (CLT) is neither justified nor effective. It is not an affordable housing tenure defined in the NPPF. This aspiration is more appropriate for the sub-

text to the policy aligned with the approach at paragraph 10.94 of the sub-text to site allocation HA2.

- Criteria 7 of HA1 sets a target of one job per new home on strategic sites. Please refer to concerns raised in HE's responses to Matter 7 and the Regulation 19 consultation. As set out in Para 9.8 and 9.9 of the Plan, this overarching aim is intended to complement the wider sub-regional economy and contribute to the wider economic health of the area. The 1:1 ratio is an aspiration **NOT** a target and while the proposed strategic allocations are intended to make a positive contribution to new employment opportunities, it would be more beneficial for the aspiration to be met through delivering employment elsewhere (for example new or intensification of existing employment areas), ensuring that these are accessible. The proximity of Wol to strategic employment locations such as Manor Royal, existing town centres and new employment locations in North Horsham, means that it would be logical for Wol to contribute to the success of these areas rather than competing against them. Employment requirements at Wol should, therefore, be flexible so that they are informed, and secured by, an Employment and Economic Delivery Strategy ("EEDS") submitted with a planning application, rather than being led by an arbitrary requirement that is more appropriate to be considered at a district wide level.
- Criteria 8 and 9 should be amended to reflect that the successful delivery of new services, facilities and infrastructure requires a collaborative approach working with a range of providers and not solely the responsibility of individual site owners. The wording should be amended accordingly.

Q3 - Are the allocation policies all consistent with the wording in the NPPF and legislation with regard to heritage assets? e.g. preserve or enhance the character or appearance of a Conservation Area?

- 3.1 The requirement within Policy HA2 to preserve and enhance all designated and non-designated heritage assets is not consistent with the NPPF or the Planning (Listed Buildings and Conservation Areas) Act 1990. The policy should be reworded to reflect these to encourage the preservation and/or enhancement of heritage assets considering the wider public benefits of any proposals.

Q4 - Are Figures 7-9 consistent with the submission Policies Map, particularly the site allocation boundaries? What is the purpose of including Figures 7-9 in the Plan, are they effective? Do they reflect the proposed level of development within the Plan period? Should they be referred to as illustrative masterplans unless approved as part of a planning application?

- 4.1 We support modification HM058 which updates Paragraph 10.94 to refer to illustrative Figure 7 as a “comprehensive masterplan”. While the masterplan is broadly consistent with the emerging proposals for WoI, there is no published detailed evidence behind it and therefore no certainty that it has been appropriately tested to ensure it is deliverable, impacting on the overall effectiveness of the draft HDLP.
- 4.2 It is appropriate for any illustrative “masterplan” for WoI to show the site area of the allocation holistically, not just the minimum level of housing expected to come forward over the Plan period. This will ensure the Plan remains effective and does not prejudice the full capacity of the site being realised over the medium – long term.
- 4.3 We would also like to flag the inconsistency

Q5 - Should Policies HA2-HA4 explicitly state whether or not a masterplan will be required as part of any planning application and whether such masterplans should include details of the phasing of development based on the development constraints and infrastructure provision?

- 5.1 HE supports the requirement for an illustrative masterplan to be provided with a planning application, which is underpinned by parameter plans and a site-wide Design Code. This would illustrate how the different aspects of the development can be phased and delivered. The illustrative masterplan will demonstrate how the parameter plans could be delivered but should not form part of any permission as flexibility is needed on strategic sites.
- 5.2 Phasing and infrastructure details would be submitted with a planning application and secured via a planning condition or obligation, to allow updates/revisions of these documents to be submitted to the LPA in the future.

Q6 - Are the employment requirements detailed in Strategic Policies HA2-HA4 consistent with other policies in the Plan? Should the requirements be specified in terms of both employment land and employment floorspace? Are the employment requirements specified within each allocation expected to be delivered within the Plan period?

- 6.1 Please refer to Q1 response.
- 6.2 The requirement for an ‘innovation and enterprise’ centre is not defined sufficiently or justified in the evidence base. Whilst HE supports the vision, and can work with partners to facilitate this aspiration, it is reliant on third party operators outside of LPA and HE control.
- 6.3 Whilst HE support the requirement for dedicated employment land to be included within HA2, we do question the effectiveness of the 2ha allocation. As currently worded the requirement is ambiguously presented as ‘2ha of employment floorspace’. The requirement should be for 2ha of employment land with flexibility as to the type of floorspace that can be provided – at the planning application stage and informed by the site specific EEDS and market needs that can be used as a monitoring tool setting out long term objectives of outcomes over time..

Q9 Is Strategic Policy HA2: Land Wol sound?

a) What is the justification for the proposed number of dwellings and employment in total and over the plan period?

- 7.1 Wol will deliver the right number of homes, in the right place to meet the requirements of the Strategic HMA. It is a logical location for HDC’s largest site allocation. The site has been fully tested against alternative options in HDC’s Sustainability Appraisal (SA). The SA demonstrates that, at this scale, a number of benefits can be secured, and it shows it as the best performing option.
- 7.2 The impacts of development have been assessed through a suite of HDC evidence documents. These provide that, in terms of transport and infrastructure, Wol can accommodate 3,000 homes. The site is suitable, deliverable and available. Where mitigation is required, this will be secured through the proposed policy wording. A hybrid planning application is at an advanced stage of preparation, through extensive pre-application engagement and technical assessment, the impacts of development are fully understood. HE support modification HM063 which refers to a blended housing mix for Wol. In respect of housing typologies, comments made in relation to CLTs in respect of HA1 are applicable to HA2.

- 7.3 Housing delivery is a key element of the strategic site allocation. HE supports the minimum target for the site of 1,600 homes in the Plan period. This threshold (informed by the availability of SNOWS credits) strikes a sensible balance between housing delivery and mitigation. However, as referenced in HE's Matter 8 Hearing Statement, the allocation for 3,000 homes is appropriate as it allows future capacity to be protected, ensures wider benefits are fully justified, and provides flexibility for a site specific water neutrality solution.
- 7.4 It is our objective to exceed 1600 homes in the plan period, with an anticipated trajectory of achieving up to 300 dwellings per annum that would provide around 3,000 homes during the plan-period.
- 7.5 In relation to employment, please refer to responses at Q.6 above and the hearing statement for Matter 7.

b) Does this allocation accord with the Plan's vision and objectives?

- 7.6 Wol performs consistently well in HDC's SA which positively demonstrates its adherence to the Plan's vision and objectives. It will deliver a highly sustainable development that will provide a diverse mix of housing with access to employment, leisure, services and other facilities, and the natural environment. Where mitigation is required to ensure the vision and objectives are met, it is embedded in policy HA2.

c) What is the latest position with regard to the Development Consent Order for the Gatwick Northern Runway Project and are main modifications needed to this policy, other policies of the Plan or the Plan's evidence base to reflect this?

- 7.7 The Wol allocation is compliant with the DCO, which relates to land to the north of Gatwick.
- 7.8 The policy allocation provides a contingency to ensure that any future application is accompanied by a noise assessment that demonstrates that accommodation and other noise sensitive uses will not be exposed to aircraft noise levels above 60dB Laeq 16hr. Given the ambiguity in the term "noise sensitive uses" it would be preferable for the policy text to simply so "no dwellings".
- 7.9 The analysis forming part of the DCO (**Annex 2**), shows the relevant noise contours from the airport covering the northern part of the Wol (identified at Figure 7 as green space) with a noise level of 51 dBA Leq,16hr . The anticipated difference at the noisiest

year 2032¹ baseline with the northern runway delivered would be marginal, the contour plans showing a +1db worsening during nighttime but an actual decrease in noise levels at this location during the day. The evidence, therefore, demonstrates that there is little risk that the outcome of the DCO and the delivery of a second runway at Gatwick would require any modifications to the policy.

7.10 The Safeguarded land, which is secured to the south of Gatwick, should any future expansion for a southern runway be approved, does not relate to the DCO. The safeguarding, therefore, allows further growth to the airport and this approach was recently found sound during the Crawley Local Plan examination.

d) Is the allocation consistent with paragraph 99 of the NPPF, particularly with regard to the loss of Ifield Golf Course?

7.11 The 2022 KKP study (IO3) prepared on behalf of HDC provides an overview of golf provision within the district. It concluded that overall: *“Horsham District is currently well provided for in relation to golf supply, with it having considerably more facilities than both national and regional rates as well as a good variety of provision”* but identified the importance of undertaking site specific assessments to determine impacts and potential need for mitigation.

7.12 HE published a series of site-specific assessments on 5th September 2024, comprising: i) a Golf Needs Assessment (GNA); ii) Sports and Recreation Strategy; and iii) an assessment of the proposals against the tests set out in NPPF Paragraph 99/103. See website² and **Annex 3**. These assessments have been undertaken in close cooperation with Sport England, England Golf and other relevant stakeholders. They identify that:

- Ifield Golf Club (IGC) makes a limited contribution to existing golfing needs
- There are similar provisions in the nearby area and the existing golf offer would not be adversely affected should the course close.
- Despite this, the course cannot be identified as surplus to requirements, therefore compliance with Para 99 a) cannot be relied upon.
- The assessments demonstrate that both b) and c) of Para 99 can be met through suitable and deliverable improvements to existing municipal golf courses in the area, and a comprehensive and wideranging sports and recreation strategy for the development.

¹ Paragraph 14.9.172 of Chapter 14: Noise and Vibration of the London Gatwick Northern Runway Environmental Statement July 2023

² www.westofield.co.uk

7.13 The Para 99/103 assessment clearly demonstrates how adequate golf mitigation can be secured, how extensive alternative provision in formal and informal sports and recreation provision within the site can be delivered and how accessibility to the facilities would be improved. The approach has the support of Sports England and England Golf. The benefits would clearly outweigh the loss of the current or former use, therefore satisfying Para 99.

e) Have the transport impacts of the proposed development been adequately assessed and is the mitigation proposed sufficient?

7.14 The proposed allocation has been considered in both the traffic modelling supporting the HDLP and the CBC Local Plan. Both assess the development proposed within the plan period and have identified a range of mitigation measures to ensure that the cumulative impacts arising from development within the plan can be suitably accommodated through a range of sustainable transport and capacity led interventions.

7.15 The Transport Strategy for Wol (**Annex 8**) has been developed through pre-application discussions and underpins the vision for the site. It aims to create a sustainable community which supports residents, employees and visitors to prioritise sustainable modes. The Strategy moves away from the traditional approach to transport planning (predict and provide) and is based on a vision led “decide and provide” approach. Significant progress has been made in relation to identifying and securing the delivery of active and sustainable travel measures, including:

- Establishment of high Frequency bus services, served by mobility hubs, linking residents of Wol with both employment and onward public transport options by rail / bus interchange
- Improving Ifield Station in respect to waiting areas, circulation, accessibility and access by sustainable travel modes.
- A detailed and costed Local Cycling and Walking Infrastructure Plan (LCWIP) to promote active travel

7.16 Key elements of the improvements identified in the Crawley LCWIP include the widening of routes where possible, traffic calming and cycle priority at junctions and better crossings. A plan showing these arrangements is provided at **Annex 9**.

7.17 It is proposed that contributions towards targeted highway and junction improvements, are on a ‘decide and provide’ approach to highway capacity rather

than 'predict and provide' to ensure that investment is targeted at improving conditions for all users.

- 7.18 The need to ensure that traffic mitigation is only put in place when absolutely required with funds prioritised to support more non-car modes is increasingly important.
- 7.19 The bullet points below set out the proposed highway / traffic measures for Wol that could be implemented, based on the decide and provide approach (in addition to those identified above):
- The 'middle section' of the Crawley Western Link multi-modal corridor (CWMMC) - will be fully funded and completed as part of the early phase of development;
 - Junction improvements where shown to be necessary through local junction modelling; and
 - Framework Travel Plan, and further detailed Residential and Workplace Travel Plans to be secured as part of S106.
- 7.20 The proposed mitigation ensures that Wol promotes sustainable transport and will not lead to a severe residual cumulative impact (NPPF paragraph 115).
- 7.21 The transport impacts arising from the Wol development have been adequately assessed and a mitigation package identified which will address any impacts and ensure that any residual impacts are not severe.

f) Have the air quality impacts been adequately assessed and is the mitigation proposed sufficient?

- 7.22 HE supports the evidence prepared by HDC which appropriately consider air quality impacts within the SA. Any mitigation required, cumulatively or individually, is secured in the proposed policy wording for HA1. HE supports the requirement for a site specific air quality assessment to be provided at planning application stage.

g) Have water and flooding impacts been adequately assessed and is the mitigation proposed sufficient?

7.23 HDC's evidence base demonstrates that water and flooding impact have been suitably assessed. HDC have carried out a flood risk sequential and exceptions test (September 2024). There are clear policies in the Plan that show how flood issues have to be addressed including policies HA1 and HA2. Whilst there are areas of flooding at Wol, the HE masterplan, which closely aligns with Figure 7, directs all but necessary infrastructure away from Flood Zones 2 and 3 in accordance with the NPPF. HDC's Environmental Statement Scoping Opinion (July 2024) confirms this approach, which has evolved following engagement with HDC, CBC and WSCC as part of the pre-application engagement, and the Environment Agency and Local Lead Flood Authority.

h) Have heritage, biodiversity and landscape impacts been adequately assessed and is the mitigation proposed sufficient?

7.24 In terms of heritage and landscape, yes, the impacts have been adequately assessed and the mitigation proposed is sufficient. Part E of the Cultural Heritage Assessment (EN09) assesses the Wol site in detail setting out a list of issues that require consideration in respect of the site in regards to both below and above ground heritage. The HDC Landscape Capacity Assessment (EN08) accurately notes that the site is partly enclosed by belts of woodland and thick hedgerows that give it only moderate sensitivity, therefore it could absorb large scale development. The findings of the evidence is clearly addressed at criteria 3 of HA2 setting out landscape and heritage considerations to be addressed within the Wol development.

7.25 The evidence base comprises a significant amount of ecology related evidence work that has informed the policy test to ensure suitable mitigation is secured for ecology and green infrastructure within the site. Natural England have previously raised concerns about the Wol proposals primarily on the possible impacts on the Bechstein Bats that habitat Hyde Hill Wood nearby. The NE/HDC SOCG (DC14) flagged that the scale quantum and location of development as illustrated at Figure 7 would have a negative impact on the population of bats. Since the publication of the SOCG, HE, HDC and NE have been working to overcome these concerns and have now identified an appropriate mitigating solution for the site (see meeting minutes at **Annex 4**).

7.26 In terms of biodiversity, Strategic Policy HA2(4) requires a minimum of 12% Biodiversity Net Gain on site. Homes England support the principle of this, however,

to ensure the Plan is sound, the Council need to evidence the need for a higher percentage than the statutory objective of 10%, as required by NPPG Paragraph 006 Reference ID: 74-006-20240214.

i) Do homeworking facilities form part of the 2.0ha of employment floorspace?

7.27 This is to be answered by the LPA, however, it is submitted that the employment policies and more particularly the requirement in the allocation for 2.0ha of employment land should be drafted in a manner that is flexible and allows land uses to adapt to market changes rather than requiring specific uses that there may be no market appetite for.

j) Have the impacts on Crawley been adequately assessed and mitigated?

7.28 HDC's IDP considers needs beyond its boundaries. In doing so, it has assessed the impacts of development on Crawley and proposed mitigation.

7.29 HE supports infrastructure projects directly required to mitigate the impact of Wol. This includes multiple projects related to Crawley. With exception, we do not support modification HM065 regarding education. Please refer to **Annex 5** – a draft Statement of Common Ground on education between WSCC, HDC and HE, a signed final version will follow in due course.

7.30 **Annex 6** provides a letter from the DfE setting out the collaborative working between DfE and HE in respect of Secondary School provision, required to meet an existing need within the wider area.

7.31 **Annex 7** demonstrates HE's positive working with the NHS to provide primary care provision at Wol, to address a lack of provision within Crawley.

7.32 The strategic modelling undertaken by WSCC for the Crawley Local Plan fully assessed the impacts of the proposed development at Wol. This includes a range of sustainable interventions, which the development will either deliver or contribute towards.

7.33 The Draft Sports and Recreation Strategy at Annex 3(e) has undertaken an assessment of existing provision and need within both Crawley and Horsham.

7.34 Criteria 10 of the policy requires the delivery or a new or expanded Wastewater Treatment Works (WwTW) to "provide timely additional capacity for the sewage

network”. The policy is sound and robust setting out the requirements for the developer to engage with the relevant utilities company to establish an appropriate strategy to ensure wastewater is dealt with. This will require a single or a series of solutions to be identified at outline application stage depending on the context of the existing infrastructure at this time. The development is likely to help enhance the existing wastewater facilities providing betterment over the existing treatment conditions/facilities.

- 7.35 HE considers that the IDP should be treated as a live document and anticipates it will need to be reviewed and updated over time. In addition, the Wol planning application will be accompanied by a site specific IDP.

k) Are the infrastructure requirements identified reflective of the latest evidence, justified and effective?

- 7.36 Given Wol’s location on the edge of Crawley, HE’s has combined its response to j) and k).
- 7.37 We do, however, flag our concerns raised regarding the Viability Addendum (HDC15) published 22 November 2024. We have sent a letter to HDC outlining our observations to this document (**Annex 10**).

Appendix 1

Horsham District Council
Planning Policy
Parkside
Chart Way
Horsham
West Sussex
RH12 1RL

BY EMAIL

1 March 2024

Dear Sir/Madam

HORSHAM DISTRICT COUNCIL DRAFT LOCAL PLAN REGULATION 19 CONSULTATION – JANUARY 2024

Please find enclosed representations by Homes England to the Draft Horsham Local Plan Review 2023 – 2040 Regulation 19 consultation (herein referred to as the 'draft Local Plan').

This response relates to Homes England's interests as a major landowner / promoter with a land interest at the Land West of Ifield which is included as a strategic site allocation under Policy HA2 of the Regulation 19 consultation document.

The inclusion of the Land West of Ifield and it being demonstrated as necessary to meet the future development needs of Horsham is supported in the strongest possible terms. Through the supporting evidence base and recent Examination of the Crawley Local Plan (2023 -2040)¹, the scale of housing need within the North West Sussex Housing Market Area, the challenges in meeting cross boundary development needs, and the importance of joint working to delivery strategic infrastructure improvements has been clearly established.

The importance of ensuring Horsham District Council ("HDC") has an up to date Local Plan that supports housing delivery and the need to work collaboratively across the sub-region has also recently been highlighted by Crawley Borough Council's declaration of a housing emergency, stating the need to work with neighbouring authorities and the Government to develop long-term solutions to address the national housing crisis².

It is therefore also strongly welcomed that the draft Local Plan acknowledges Land at West of Ifield's unique position, both now and beyond the Local Plan period, to contribute to wider development needs and sub-regional growth priorities – in particular the continued economic growth of the Gatwick Diamond and housing needs across the wider North West Sussex Housing Market Area.

Given the extended timescales in preparing the HDC Local Plan Review and long-standing engagement between Homes England, HDC, Crawley Borough Council and West Sussex County Council through the formal pre-application process, the rationale and evidence base supporting the site allocation Policy HA2 is considered justified and has

¹ Inspector's post hearing letter 31 January 2024 [ID-026 Post Hearings Letter 31 Jan 2024.pdf \(crawley.gov.uk\)](#)

² [Notice of Motion Amendment.pdf \(crawley.gov.uk\)](#)



developed through ongoing collaborative working to ensure that the benefits that will flow from the site allocation are maximised and realised at the earliest opportunity.

This representation is therefore targeted, focusing on a small number of **technical objections** and a number of **clarifications and amendments** considered necessary to ensure that the draft Local Plan and the specific policies supporting the delivery of Policy HA2 is effective, consistent with national policy and does not frustrate its timely delivery.

The **objections** and **issues of soundness** that need to be addressed are:

- **Policy HA1** – a number of modifications are necessary to reduce duplication and inconsistencies with the Plan’s other strategic policies, to ensure that the Plan is both justified and effective.
- **Policy HA2** – a number of modifications are necessary to ensure the policy remains effective, is fully justified, consistent with national policy and other Strategic Policies in the draft Local Plan.
- **Crawley Western Multi Modal Corridor (“CWMMC”) Safeguarding** – while the principle of safeguarding of the CWMMC is strongly supported, modifications to the safeguarding approach currently set out in Policy HA2 and shown on the Proposals Map are required to ensure that the Plan is justified and effective in enabling the future delivery of the CWMMC over multiple Plan periods.
- **West of Ifield Masterplan (Figure 7)** – the masterplan should be embedded as part of Policy HA2 to ensure the Plan is effective. Modifications are needed to make clear that the masterplan is conceptual and to be used as a basis for preparing detailed masterplanning for the site.
- **Policy SP2 and SP35** – policies SP2 and SP35 and the relevant supporting text needs to be expanded so as to include reference to the West of Ifield and provide clarity on its role within the settlement hierarchy and ensure the Plan is effective in managing ongoing development beyond the Plan period.
- **Policy SP9** – SP9 and the supporting text requires additional wording to recognise the importance of the strategic solution and be clear on what trigger events would necessitate an early Plan review. Modifications are also required and in the absence of this, Homes England object to the restriction of 1600 homes within the Plan period.
- **Policy SP19** – needs amending to recognise the opportunity of strategic allocations to create new defensible boundaries. This will ensure that the Plan is both effective and justified.
- **Policy SP23** – requires modifications to ensure the Plan is effective and the approach to securing infrastructure through new development is consistent with national policy.
- **Policy SP28** – requires modifications to ensure it is consistent with national policy.
- **Policy SP37** – requires modifications to clarify housing needs being met through the Plan and identify relevant triggers for early Plan reviews.
- **Policy SP43** – further justification is required, and modifications needed to provide greater flexibility and ensure the Plan remains effective over the Plan period.



The Housing and Regeneration Agency

Our response also sets out a number of areas where minor modifications would strengthen HDC's commitment to and support delivery of Policy HA2 as a logical extension to the Crawley area that can meet long term development needs over the Plan period and beyond and assist HDC in satisfying its responsibilities to seek to meet any needs that cannot be met within neighbouring administrative areas.

Homes England considers that the changes set out in this response are necessary to address the above points and to ensure that the draft Local Plan is found to be sound, legally compliant and ultimately adopted by HDC. Homes England wish to participate at the Examination in Public in order to make any necessary submission in respect of the above matters and any other matters arising that could impact upon Policy HA2.

Please do not hesitate to contact me if you would like to discuss any points raised in this submission. In the meantime, I would be grateful if you could continue to keep Homes England informed in relation to the draft Local Plan and progression towards an Examination in Public.

Yours faithfully,



Kate McBride

Interim Regional Development Director
Homes England



Draft Horsham Local Plan Regulation 19 consultation (January 2024)

Homes England Representations: Land West of Ifield (HA2)

Introduction

- 1.1 Homes England is an executive non-departmental public body, sponsored by the Department of Levelling Up, Housing and Communities, and the governments' Housing and Regeneration Agency. Homes England has the aspiration, influence, expertise and resource to drive positive market change. By releasing more land to developers who want to make homes happen, Homes England assists in the delivery of the new homes England needs and helps to improve neighbourhoods and grow communities. Homes England works in collaboration with partners who share our ambition, including local authorities, private developers, housing associations, lenders and infrastructure providers.
- 1.2 As set out in Homes England's new Strategic Plan 2023-28, our mission is to drive regeneration and housing delivery to create high-quality homes and thriving places. This will support greater social justice, the levelling up of communities across England and the creation of places people are proud to call home.
- 1.3 A key focus for Homes England is the quality of what is being delivered, including championing environmental sustainability, design and beauty in homes and places that we support to create distinctive places and spaces that are designed for people to use and thrive. We also recognise that mixed-use regeneration to deliver housing alongside employment, retail and leisure space helps to create vibrant and successful places.

Purpose of Representations

- 1.4 Pursuant to Regulation 19 of Town and Country Planning Act (Local Planning) (England) Regulations 2012 these representations are made in respect of the Draft Horsham Local Plan 2023 – 2040 (herein referred to as the 'draft Local Plan') to confirm our position in respect of our land interests at Land West of Ifield. We also confirm that we wish in due course to participate in the relevant sessions of the public examination that will discuss matters concerning this site and Policy HA2.
- 1.5 Split into two parts, these representations provide an overview of the site and the work undertaken to date to inform the proposed site allocation HA2, and it sets out the position of Homes England and its strong support for the draft Local Plan and identifies the changes Homes England consider to be necessary to make the Local Plan sound, legally compliant and/or provide further clarity on how the policies in the draft Local Plan will be applied in the future.
- 1.6 Where amendments are proposed, these are considered necessary to ensure that the draft Local Plan fully meets the soundness tests as set out in Paragraph 35 of the National Planning Policy Framework ("NPPF") and / or ensure the Plan is effective. For the avoidance of doubt, references to the NPPF in this representation relate to the version published in September 2023 as this is the version against which the draft Local Plan will be assessed in accordance with the transitional arrangements set out in the updated December 2023 publication.

Documents Reviewed

- 1.7 In preparing these representations, the following documents have been reviewed:

The Housing and Regeneration Agency

- Horsham District Local Plan 2023-2040 Regulation 19 (January 2024)
- Crawley Borough Council Statement of Common Ground (July 2023)
- Sussex North Water Resource Zone Statement of Common Ground – Water Neutrality (July 2023)
- Duty to Cooperate Statement (January 2024)
- Built-Up Area Boundary Review (November 2023)
- Green Infrastructure Strategy (January 2024)
- Horsham Biodiversity Net Gain Assessment (January 2023)
- Settlement Sustainability Assessment 2019-2020 (December 2022)
- Cultural Heritage Desk Based Assessment – Gypsy and Traveller Sites
- Cultural Heritage Desk Based Assessment – Strategic Sites
- Sustainability Appraisal Update (December 2023)
- Site Assessments Report (December 2023)
- Horsham Local Plan Viability Assessment (November 2023)
- Horsham Housing Delivery Study Update (December 2023)
- Housing Trajectory (January 2024)
- Northern West Sussex Economic Growth Assessment Focused Update for Horsham (November 2020)
- Draft Infrastructure Delivery Plan (December 2023)
- Horsham District Council Golf Supply and Demand Assessment (December 2022)
- West Sussex Local Transport Plan 2022-2036 (October 2021)
- Horsham Local Plan Neutrality Technical Note (March 2021)
- Joint Topic Paper: Water Neutrality (May 2023)
- Water Neutrality Study: Part A – Individual Local Authority Areas (July 2021)
- Water Neutrality Study: Part B – In-combination (April 2022)
- Water Neutrality Study: Part C – Mitigation Strategy (December 2022)
- Horsham Transport Study - Local Plan 2039 Assessment (December 2022)
- Horsham District Local Plan Transport Study - Local Plan Transport Assessment – Autumn 2023 Review (November 2023)
- Horsham Local Plan Review – Highway Safety Study (November 2023)
- Horsham District Council Electric Vehicle Charge Point Strategy (March 2020)

2. Land West of Ifield

- 2.1 For clarity and as referenced through this representation, 'Land West of Ifield' is the land shown as the strategic allocation HA2 shown on the Proposals Map and presented in Strategic Policy HA2. The site is under the sole control of Homes England, either as freeholder or with the necessary land agreements in place with those additional third party interests, to enable the development to be delivered.
- 2.2 While a number of tenancies are currently in place within the site boundary, there is no impediment to bringing forward the site allocation as the necessary contractual arrangements are in place to facilitate early delivery of the site commencing upon adoption of the Local Plan.
- 2.3 The site is located within the administrative area of HDC. The site is therefore ideally located to make a significant contribution to the housing, infrastructure needs and economic priorities of both Horsham and Crawley, with the ability to respond proactively and in a timely manner to the strategic growth priorities and unmet development need across the wider area.
- 2.4 Much of the site has long been in public ownership with the core purpose of meeting long term housing needs. The majority of the site was acquired initially in support of Crawley's New Town aspirations, with more recent acquisitions again focused on housing delivery and delivering a sustainable extension to the Crawley conurbation. The site was previously considered as part of the previous Horsham District Planning Framework (HDPF) 2015 preparation where it was accepted that the site is located in a relatively sustainable position and that there were no insurmountable issues to its delivery.
- 2.5 While the site was not taken forward as part of the current HDPF for the reasons set out in the Inspector's report³, Homes England has undertaken a significant programme of detailed design and technical work alongside land assembly, so that these issues are adequately addressed and to ensure there is now the necessary certainty needed to take forward the proposed allocation in a way that supports Homes England's mission and aligned with the draft Local Plan's objectives.
- 2.6 Homes England also own adjacent land within Crawley Borough (Ifield Brook Meadows Local Wildlife Site (emerging Policy GI2) and Local Green Space (emerging Policy GI4)). While adjacent to the allocation boundary, this land does not form part of the West of Ifield scheme, nor is it necessary for its delivery other than its potential use for offsite biodiversity enhancements and providing active travel options.

Developing a shared vision for the site

- 2.7 The overall aims and objectives of the draft Local Plan aligns with the objectives found in Homes England's Strategic Plan (2023 to 2028). Specific synergies relate to the delivery of "*key enabling infrastructure in place to unlock development*" and to deliver "*mixed-use places that create value and benefit local communities*". Working with a range of delivery partners, it is Homes England's intention to act as a master developer to accelerate the delivery of key infrastructure, facilitate housing delivery in an efficient and effective manner, achieving the highest design and sustainability standards across the scheme as well as delivering significant social, economic and environmental benefits to the existing communities.

³ [HDPF-Inspectors-Report.pdf \(horsham.gov.uk\)](#) Para 78 – 80

The Housing and Regeneration Agency

- 2.8 The site-specific vision and objectives for the site has been shaped through extensive and ongoing engagement between Homes England, HDC, Crawley Borough Council and West Sussex County Council as part of a formal Planning Performance Agreement that has been in place since January 2020. This collaborative approach has ensured that there has been a collective understanding of the opportunities and constraints across the site and the wider area and how the site can best meet development needs and mitigate any impacts, as well as ensure consistency across available evidence.
- 2.9 Some examples of how this collaborative approach has positively influenced sustainable outcomes for both the site and for realising benefits for the wider area include adopting a 'decide and provide' approach to the overarching transport strategy which will achieve a greater modal shift towards more active and sustainable travel modes; the landscape led approach to masterplan design; preparation of an overarching economic strategy that aligns with local economic objectives; pro-active engagement with infrastructure providers, and requirement for the site to fully integrate with the neighbouring Crawley neighbourhoods.
- 2.10 Land West of Ifield provides the opportunity to realise significant opportunities and benefits and is unique in this regard when considered to alternative site allocations. The site allocation performs consistently well in sustainability terms when compared to other reasonable alternatives and there is an unrivalled potential as part of the West of Ifield allocation to make a significant contribution towards Horsham's development needs.
- 2.11 As set out in both the draft Local Plan and recognised in the Statement of Common Ground (SoCG) between HDC and Crawley Borough Council⁴, the geographical location of the site and proximity to the District's boundary also means that the site can make provision for a number of unmet needs identified in the Draft Crawley Local Plan⁵, Topic Paper 1: Unmet needs and Duty to Co-operate⁶ and supporting Infrastructure Delivery Plan⁷, in a manner which aligns with the Vision and objectives of the draft Local Plan.
- 2.12 Outlined in Strategic Policy HA2 and demonstrated through Homes England's engagement with local communities to date, strategic scale development to the site will create high quality placemaking, enable the delivery of much needed local services, facilitate strong communities, improve job opportunities, meet housing needs and protect the environment. Key benefits of the site proposals include:
- Retention, protection and enhancement of highly valued landscape and ecological features supporting local nature recovery objectives.
 - New and improved publicly accessible open space, outdoor recreation and leisure facilities.
 - 3,000 market and affordable homes, to help meet the needs of Horsham and Crawley.
 - 2no. New Schools, a 3FE Primary and 8FE Secondary, and SEND, along with 2no. early years facilities.
 - Up to 2,700 jobs, skills and training opportunities.
 - A Neighbourhood Centre, with community space, indoor leisure, retail and opportunities for health provisions.
 - Delivering the first phase of the Crawley Western Multi-Modal Transport Link and investment in other sustainable and active travel opportunities identified in local Infrastructure Delivery Plans.
- 2.13 As part of this commitment, Homes England is now at an advanced stage of preparing a hybrid planning application for the site with an intention to submit this later in 2024. Taking a hybrid format, the planning

⁴ [Crawley-BC-Statement-of-Common-Ground-July-2023.pdf \(horsham.gov.uk\)](#)

⁵ [Local Plan Modifications Consultation February 2024.pdf \(crawley.gov.uk\)](#)

⁶ [10. Topic Paper 1 Unmet Needs and DtC.pdf \(crawley.gov.uk\)](#)

⁷ [Horsham District Council Infrastructure Delivery Plan 2023](#)

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application will seek consent in outline for the overall site with detailed consent for early enabling infrastructure – including delivery of the first phase of the Crawley Western Multi Modal Corridor (CWMMC) to mitigate transport impacts and accelerate delivery over the plan period.

2.14 As part of the preparation of the planning application, and in addition to pre-application discussion, Homes England has undertaken extensive engagement on its proposals with the local community to seek their involvement and views on the emerging proposal⁸, infrastructure providers and delivery partners and stakeholders to ensure that the potential impacts of the proposals are understood, appropriate mitigation identified and a credible route to delivery is identified. Key engagement activities summarised below:

- **Department for Education:** ongoing liaison with DfE and academy sponsor in relation to the early delivery of a new secondary school onsite, approved under the free schools programme. Heads of Terms have been agreed, and the required approvals in place to secure the land needed for the secondary school and allow construction to commence in Phase 1 of the scheme.
- **Sport England, England Golf and other national sporting associations** – ongoing liaison to ensure the impact of closing the Ifield golf facility is understood and, where needed, appropriate mitigation identified to ensure any loss of this facility accords with national policy and provides betterment for golf, sport and recreation more widely within the locality.
- **Network Rail / Govia Thameslink** – ongoing liaison in relation to station improvement at Ifield station. Homes England have funded a feasibility study undertaken by Invvu Construction Consultants on behalf of Govia Thameslink to identify meaningful improvements that could be made to align with the overarching transport strategy for the scheme.
- **Metrobus** – early engagement with Metrobus to inform bus strategy planning and determine necessary levels of subsidy in support of overarching transport strategy.
- **Thames Water** – early engagement to understand constraints on foul water capacity and wider cumulative impacts. This has resulted in areas of the masterplan being safeguarded to enable future expansion of the sewer network and shared understanding of phasing limitations linked with upgrades to Crawley WwTW.
- **Gatwick Airport** – early and ongoing engagement with Gatwick Airport to understand development limitations relating to safeguarding, noise and operational risks.
- **NHS Sussex Integrated Care Board** – regular engagement with the ICB to determine future impacts on health provision and opportunities to accommodate new provision as part of the scheme to meet needs arising from the development and the wider area as part of a wider accommodation strategy.
- **Gypsy and Traveller community** – engagement with Friends, Families and Travellers Group to understand community requirements and accommodation preferences.

Wider Strategic Opportunity – Land West of Crawley

2.15 For the avoidance of doubt, these representations focus on Homes England’s current promotion of the site within the boundary outlined as part of Policy HA2 and shown on the accompanying proposals map. With the

⁸ public engagement events on West of Ifield proposals were held three times between 2020 and 2023. Each stage of engagement has been used to inform and influence the design of the scheme ensuring it responds to local concerns and direct future investment in a way that maximises its impact.

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exception of comments relating to the safeguarding route of the multi-modal link, all comments relate to the allocation as set out in the draft Local Plan – namely an allocation for (inter alia) around 3,000 homes.

- 2.16 Notwithstanding this, it is noted that as set out in the Regulation 18 consultation, the allocation forms part of a broader area of search identified as 'Land West of Crawley'. Although this does not form part of Homes England's proposals and the Strategic Policy HA2 allocation is in no way dependent upon it, it is considered relevant in the context of both the 30 year vision set out in Para 1.2 and 4.3 of the draft Local Plan and the importance of ongoing cooperation and joint working with neighbouring authorities to respond positively to sub-regional growth priorities and wider development needs; as well as the requirement to deliver the Crawley Western Multi-Modal Corridor (CWMMC) Transport Link which is identified as an infrastructure priority in both the Transport for South East Strategic Investment Plan and WSCC Local Transport Plan (2022 – 2036).
- 2.17 While any decisions regarding this wider growth opportunity is a decision to be taken as part of future Local Plan review, it is clear from the evidence on future needs both within Horsham and elsewhere, the Council's earlier consultations and acknowledgement of longer term development needs, that it could continue to play an important role in meeting future development needs over multiple plan periods and therefore it is necessary to ensure that these are not fettered or prejudiced through this draft Local Plan. For this reason, the principle of an alignment for the CWMMC is supported subject to consideration of the points on the safeguarding corridor set out below.

3. Comments on the draft Horsham Local Plan Regulation 19 consultation document January 2024

- 3.1 As previously stated, Homes England support the inclusion of Land West of Ifield as a strategic site allocation for approximately 3,000 homes in the draft Local Plan, of which 1,600 homes are suggested can be delivered during the Local Plan period.
- 3.2 The specific comments below and the proposed changes required to policies and text set out in Annex 1 have been identified and are submitted to ensure that HDC's draft Local Plan provides a sound framework to facilitate the delivery of this key strategic site, whilst still meeting the strategic objectives of the draft Local Plan. To ensure the draft Local Plan is robust, these representations draw out some comments and recommendations with regards to the detail of Strategic Policy HA2 and the wider draft Local Plan policies, which we set out below.
- 3.3 As an overarching comment, there is a reasonable degree of duplication within the draft Local Plan across many of the strategic policies. Furthermore, not all the strategic policies are consistent, particularly when cross referencing between the strategic policies and the strategic allocations. The duplication and inconsistencies identified could impact on the effectiveness of the Plan, and therefore introduce risk to its soundness in as much as there are several conflicts that would impede on overall delivery of the strategic allocations. These matters are set out in more detail below with suggested modifications.

Approach to Growth and Change

- 3.4 Strategic Policy 37 sets a target of delivering at least 13,212 homes over the Local Plan period (until 2040) at a delivery rate of 777 new homes per year. The site makes an important contribution to this housing provision, with at least 1,600 homes identified for delivery within the Local Plan period from an allocation of 3,000 dwellings.
- 3.5 The rationale for taking a more cautious approach taken to housing delivery within the Local Plan period as a result of water neutrality is noted and commented on elsewhere. However, within the context of the planning application that is being prepared in parallel to the draft Local Plan, Homes England consider that there is a specific onsite solution to achieving water neutrality at the site which would reduce overall reliance on Sussex North Offsetting Water Scheme (SNOWS) credits compared to what has been assumed in the Local Authority Part C Water Neutrality Study. In addition, during the early years there is an opportunity to introduce water efficiency measures and reuse technologies that exceed the water reduction targets assumed in Part C as well as offsetting against existing uses. Whilst there is a realistic prospect that the site allocation can be delivered in full over the Local Plan period, the identified delivery of a minimum of 1,600 homes at the site will be effective and sound.
- 3.6 The NPPF recognises at paragraph 73 that the delivery of a large number of new homes can often be best achieved through planning for larger scale development where they are well located, designed and are supported by necessary infrastructure. Homes England therefore welcome the approach adopted by HDC within Strategic Policy 37 to meet the development needs of the administrative area through the strategic scale expansion of existing settlements (with the site being identified as an expansion to the urban form of

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Crawley) to deliver housing, jobs, open spaces and high-quality services and community facilities. This approach is consistent with national policy and considered sound, providing appropriate diversification in overall housing supply and facilitating strategic infrastructure delivery across the Local Plan period.

- 3.7 However, it is not clear within the draft Local Plan what the future status of the strategic site allocations, such as the site, and their associated centres will be in the development hierarchy. Supporting paragraph 4.29 refers to Crawley as a higher order settlement and a location for growth and directs to [Strategic Policy 37](#) and [Strategic Policy HA2](#). However, [Strategic Policy 2](#) (which defines settlement hierarchy) only refers to existing settlements within HDC's administrative boundary and does not identify where in the hierarchy the site will sit and what it will be assessed against. Similarly, [Strategic Policy 3](#) sets out general criteria for settlement expansions, including allowing for allocations that adjoin a settlement edge, but as above Crawley is not defined in the Strategic Policies as a 'settlement'. Lastly [Strategic Policy 35](#) only refers to existing town and village centres, and there is no reference to how 'neighbourhood centres' that are to be delivered in strategic allocations will be assessed within this hierarchy and policy.
- 3.8 The site is an integral part of the future growth in Horsham, but it is clear it is associated with the settlement of Crawley. Without a reference to Crawley within the Strategic Policies, there is a risk that the draft Local Plan will be ineffective in dealing with any future planning applications within the site once built (especially those relating to the neighbourhood centre) and the draft Local Plan lacks overall clarity required by paragraph 16 of the NPPF. Homes England therefore request clarification on this matter within the draft Local Plan and the inclusion of Crawley, the site and its neighbourhood centre within the development hierarchy and the town centre hierarchy in [Strategic Policy 2](#), [Strategic Policy 3](#) and [Policy 35](#) to ensure consistency across policies and to allow clear management of these centres in the future.
- 3.9 In addition to the above, Homes England wish to reiterate previous comments on part 5 of [Strategic Policy 3](#) in relation to the requirement for a settlement expansion to relate to an existing defensible boundary (i.e. a road, stream or hedgerow). In relation to the site allocation, the ability to identify a single defined boundary is difficult, however through masterplanning work and as shown by the concept masterplan in Figure 7, a defensible boundary can be created that is more effective than what is already on the ground. Homes England requests that the wording of this policy is amended to recognise that in developing (particularly larger) masterplans, it may be appropriate to establish new boundaries. Accordingly, the wording of [Strategic Policy 3](#) should be updated to be clear that newly formed boundaries would also be accepted in order for the policy to be **effective** and considered sound to support the proposed allocations within the draft Local Plan.

Unmet Housing Need (Cross-Boundary Issues)

- 3.10 Paragraphs 4.8 and 4.9 (and paragraphs 10.12 and 10.13) of the draft Local Plan identifies that the starting point for the Local Plan strategy is to seek to meet HDC's own housing need and other development needs as far as possible, within the constraints of water neutrality, focussing on prioritising consideration of meeting unmet needs with the strongest economic and housing links to the administrative area.
- 3.11 HDC have historically played an important part in contributing towards the unmet housing needs in the wider sub area and in particular for Crawley Borough Council. As recognised in the evidence, the site is uniquely placed to assist in continuing this pragmatic response and as recognised in the Plan, once completed development to the West of Ifield will form part of the wider urban form of Crawley.

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3.12 The evidence is clear that housing challenges within the wider housing market area remain acute⁹ has been recently confirmed recently in the Housing Emergency declaration by Crawley Borough Council, which is clear that despite strong housing delivery, Crawley is one of the worst affected Boroughs in the country as a direct result of (inter alia):

- the provision of new housing not keeping up with population growth.
- the unaffordability of home ownership for an increasing number of people.
- a shrinking private rented sector.
- the shortage of council and other social housing to meet demand.

3.13 Paragraph 10.12 of the draft Local Plan confirms HDC position that due to water neutrality constraints, it is not possible to meet the Standard Housing Methodology housing target set for the administrative area, and contrary to the previous approach taken by HDC, it is, at this time, not able to contribute to meeting unmet housing needs for Crawley, although this will be kept under review as and when water neutrality constraints ease.

3.14 While the constraints of water neutrality are understood, there is a clear strategy in place to address this¹⁰. It is therefore reasonable to assume that the implementation of a strategic solution by Southern Water and / or the opportunity to bring forward site specific solutions during the Local Plan period will increasingly ease the constraints on housing delivery over the Local Plan period. It is therefore important that this is kept under regular review and that there is a commitment to setting out key changes in the water neutrality position that would trigger an early Local Plan review – either in full or targeted ahead of the statutory five year review period required by the the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).

3.15 Therefore, to ensure the draft Local Plan is justified and effective in meeting Local housing needs, Policy SP37 should identify how far the housing provision allowed for in the Plan goes to meet the housing needs of Horsham, the extent of the unmet need in Horsham and Crawley, why these needs cannot be met within the Plan period, and what trigger events would initiate a Plan review. **Suggested amendments to SP37 are out in Annex 1.**

West of Ifield relationship with Crawley

3.16 It has been established that the site allocation has a clear relationship with Crawley and that over the Local Plan period or as part of any Local Plan review there is likely to be the opportunity to meet unmet housing needs from Crawley. This is set out in paragraph 10.13 of the emerging local plan which states:

*Whilst there is no potential to meet unmet housing needs directly, there remain opportunities to support economic growth in the area and deliver education needs arising in Crawley as part of development within Horsham District, including as development of Land to the West of Ifield. It is also envisaged that in the longer term additional water offsetting schemes and technologies will come forward which would allow Horsham District to revisit the level of unmet needs which it can accommodate as part of any future Local Plan Review. Beyond this local plan, it will therefore be **necessary to continue discussions with North West Sussex***

⁹ [Northern West Sussex Strategic Housing Market Assessment \(horsham.gov.uk\)](https://www.horsham.gov.uk/strategic-housing-market-assessment)

¹⁰ [Water Neutrality Part C - Mitigation Strategy \(horsham.gov.uk\)](https://www.horsham.gov.uk/water-neutrality-part-c-mitigation-strategy)

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authorities in terms of meeting unmet needs 'at Crawley' or in alternative locations, such as the provision of a new settlement."

- 3.17 However, given the significant and urgent housing challenges arising adjacent to the site allocation and the likelihood that a water neutrality solution could unlock the site in full over the Local Plan period (see response to Policy SP9), it would be pragmatic to consider the strategic role of the site allocation as part of Policy HA2, ensuring at the outset that the Plan has been positively prepared so as to help meet cross boundary needs as and when the opportunity arises.
- 3.18 Such an approach would be consistent with the Horsham Site Assessment Report¹¹, Para 7.2 of the Statement of Common Ground between HDC and Crawley Borough Council¹² and expectation of HDC that half of the affordable housing nomination rights at the site are available to Crawley¹³.
- 3.19 To not recognise the continued relationship of the site with Crawley's long terms needs and allowing this to inform future planning applications would effectively 'close the door' on the ability for the site to respond to these challenges and introduce potential Duty to Cooperate weaknesses. Conversely, to do so would be consistent with the NPPF¹⁴ requirement for 30-year, vision-led approach to strategic sites such as West of Ifield.
- 3.20 It is therefore important that the draft Local Plan is clear about how land to the West of Ifield should be planned to meet wider strategic housing needs. Without such a commitment, or clarity as to what housing needs the allocation should respond to, it is not clear how the Plan can be effective nor how the higher affordable housing requirement for the site allocation can be justified.
- 3.21 To this effect, while Para 10.88 and Para 10.90 of the Plan make clear the potential for West of Ifield to meet strategic, cross boundary housing needs, this is not reflected in the draft Policy and greater clarity is required within Policy HA2 and the supporting text. Without further clarity and justification, there is not a sufficiently sound policy basis on which to plan for future development at the site and the draft Local Plan is likely to be ineffective in ensuring that it adequately responds to local housing needs. In the absence of this, Homes England will object to this approach and reserves the right to comment on this additional evidence if and when available. **Suggested amendments to HA2 and the supporting text are set out in Annex 1.**

Applying a differential housing mix for site allocation HA2

- 3.22 Within the context of the above, a more nuanced approach is needed to ensure the site allocation is effective in addressing housing needs over the Local Plan period and beyond. Evidence on housing need is comprehensively set out in the Northern West Sussex Strategic Housing Market Assessment (SHMA, 2019, the document upon which Strategic policy 38 is based)¹⁵. The SHMA is clear that, while there is a clear

¹¹ https://www.horsham.gov.uk/_data/assets/pdf_file/0020/131735/HDC-Reg-19-Site-Assessment-Report-Part-II-Strategic-Sites-Dec-2023.pdf

¹² Statement of Common Ground between Horsham District Council and Crawley Borough Council July 2023 [Crawley-BC-Statement-of-Common-Ground-July-2023.pdf \(horsham.gov.uk\)](https://www.horsham.gov.uk/_data/assets/pdf_file/0020/131735/HDC-Reg-19-Site-Assessment-Report-Part-II-Strategic-Sites-Dec-2023.pdf)

¹³ HDC Cabinet Member for Planning has repeatedly confirmed HDC expectation that 50% of AH allocation in west of Ifield to be made available to Crawley [Minutes_2024-02-13.pdf \(rusper-pc.org.uk\)](https://www.horsham.gov.uk/_data/assets/pdf_file/0020/131735/HDC-Reg-19-Site-Assessment-Report-Part-II-Strategic-Sites-Dec-2023.pdf)

¹⁴ Paragraph 22 "... Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery"

¹⁵ https://www.horsham.gov.uk/_data/assets/pdf_file/0020/79130/Northern-West-Sussex-Strategic-Housing-Market-Assessment.pdf

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housing need across the market area as a whole, the existing and future demographics for Horsham and Crawley are different. Paragraph 1.6 of that document it states:

“Crawley Borough’s boundaries are drawn relatively tightly around the Borough’s existing urban area and will limit what scale of development can be met within the Borough. **Should significant development occur adjacent to Crawley’s administrative boundaries, this would contribute to meeting Crawley’s housing needs, and would thus be expected to have regard to the nature of Crawley’s housing need identified within this Study**”. (our emphasis)

- 3.23 Table 9, pursuant to Strategic Policy 38 of the draft Local Plan, repeats verbatim the conclusions for Horsham. However, a district wide approach does not consider the differences for Crawley pertinent to the site. To ensure the draft Local Plan is effective, has been positively prepared and is consistent with the supporting evidence base, it is necessary for additional supporting text for Policy HA2 to clarify expectations and for Policy HA2 to include a more flexible, site-specific approach to the housing mix rather than relying on the district wide approach. Taking a flexible approach would also be consistent with the advice provided as part of pre-application discussions and the basis upon which the planning application is being prepared.
- 3.24 To be effective and justified by the evidence base, the housing mix for the site allocation should account for the recommendations of the evidence base, as outlined in the below table taken from the SHMA:

Table 70: Strategic Conclusions on the Need for Different Sizes of Homes – Crawley

	Affordable Rented	Low Cost Home Ownership	Market Housing
1-bed	30%	25%	10%
2-bed	30%	35%	25%
3-bed	30%	30%	40%
4+ bed	10%	10%	25%

Table 71: Strategic Conclusions on the Need for Different Sizes of Homes – Horsham

	Affordable Rented	Low Cost Home Ownership	Market Housing
1-bed	35%	25%	5%
2-bed	30%	40%	30%
3-bed	25%	25%	40%
4+ bed	10%	10%	25%

- 3.25 It is therefore recommended that Strategic Policy HA2: Land West of Ifield is updated to reflect the site’s unique relationship with Crawley Borough Council, to ensure the Plan is justified. The soundness issues raised in this response regarding housing mix, relating to the effectiveness of the draft Local Plan and whether the proposed policy is justified by the evidence base, can be amended by a main modification. Two options for Main Modifications which would alleviate these concerns are set out below, although other solutions :
- **Option 1)** the introduction of additional wording (bold and underlined, or similar) to Limb 1 of Strategic Policy 38 as follows: “Other factors that may be taken into account include the established character and density of the neighbourhood, the viability of the scheme, and locally and robustly prepared evidence such as a local (parish) housing needs assessment. **This may include cross boundary considerations of need where proposals are adjacent to Horsham’s boundary**”.

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- **Option 2** the introduction of text into Policy HA2 (such as to Limb 2.a) to recognise the “at Crawley” location of the West of Ifield allocation and that a bespoke approach to identifying local needs is the more appropriate starting point for the site’s unique position. This will enable clarity during determination of the future planning application that an understanding of local needs including Horsham and Crawley need is the more appropriate starting point, as opposed to Table 9 of the emerging Local Plan. This could also be supplemented by an additional modification to supporting text to make this clear.

Long-Term (30 Year) Vision

- 3.26 Paragraph 22 of the NPPF states that strategic policies should look ahead over a minimum 15-year period from adoption, and where larger scale developments set as significant extensions to existing settlements form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years). This is relevant to the draft Local Plan where (notwithstanding the position regarding housing delivery above), as the delivery of the site allocation in full and a number of strategic issues – such as the delivery of the full Crawley Western Multi Modal Corridor and other infrastructure delivery – are expected to be delivered across more than one Local Plan period.
- 3.27 Whilst paragraph 4.3 and 4.19-4.21 state that a 30-year vision has been considered, the supporting text summarises local issues, rather than clearly setting out what the long-term vision for Horsham is, how the strategic allocations contribute towards this vision, or how the current site allocations / local plan policies contribute to this. The current wording could be clearer in setting out a long-term vision for Horsham, in accordance with paragraph 22 of the NPPF and without this results in ambiguity about how later reference to future development needs and strategic opportunities (such as meeting unmet development needs or safeguarding the delivery of strategic infrastructure) should be considered.
- 3.28 While it for HDC to decide how it articulates its vision for the administrative area, it is suggested that HDC strengthen the articulation of their long-term vision to give clarity to this matter.

Representations on Policy HA1: Strategic Site Principles

- 3.29 Strategic Policy HA1 sets out key principles for strategic sites to adhere to, alongside their individual policy allocation and other policies in the draft Local Plan. **Homes England supports this Policy in principle, however has concerns about its soundness and there is duplication across the other policies** and requires greater clarity on how the policies inter-relate impacting on the effectiveness of the draft Local Plan. For example:
- Strategic Policy HA1(1) requires the strategic site’s design and layout to be landscape-led and include strong landscape buffers. This requirement is duplicated in Strategic Policy HA2(3).
 - Strategic Policy HA1(2) requires proposals to demonstrate a minimum of 12% biodiversity net gain can be achieved. This requirement is duplicated in Strategic Policy HA2(4) as well as Strategic Policy 17: Green Infrastructure and Biodiversity.
 - Strategic Policy HA1(4) states that development will be expected to contribute to the achievement of net zero carbon through a range of measures. This requirement is duplicated in Strategic Policy 6: Climate Change.
- 3.30 Clarification is needed on the purpose of Strategic Policy HA1 when read in the context of other policies in the draft Local Plan. Indeed, Strategic Policy HA1 does not appear to provide any policy which is not stated elsewhere and therefore we question its added value within the draft Local Plan when the policies are read

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as a whole, given the NPPF is clear at paragraph 16(f) that plans should avoid unnecessary duplication of policies. Notwithstanding this, should the policy articulate specific differences between the expectations of strategic allocations and where different approaches are justified and should be taken, there would be merit in retaining this policy. Furthermore, if retained, Homes England recommends that cross referencing to Strategic Policy HA1 is included within the strategic allocation policies rather than duplication, where relevant in order to comply with paragraph 16 of the NPPF.

3.31 In addition, Strategic Policy HA1(4) includes reference to a “range of measures” development will be expected to contribute towards in order to achieve net zero carbon, which includes indirect measures such as minimising the need to travel by car. However, part 10 of the policy also relates to designing developments to minimise the need to travel by car, leading to duplication within the policy itself.

3.32 For effectiveness and to avoid duplication, the policy wording should be simplified and align with Strategic Policy 6: Climate Change. For example: .

“4. Development will be expected to contribute to the achievement of net zero carbon through a range of measures in accordance with Strategic Policy 6. ~~Development will be expected to achieve this through direct measures such as the design and construction of development and the provision of alternative sources of energy such as heat pumps and solar pv with battery storage, together with indirect measures such as design of the development to minimise the need to travel by car.~~ Strategic Scale development must also be designed to minimise water consumption and contribute to water neutrality in line with Strategic Policy 9.”

3.33 With regards to the range of housing expected within strategic site allocations under HA1(5), Homes England supports the intention to diversify the housing mix and maximise opportunity for home ownership. However, reference to specific delivery models such as Community Land Trusts (CLTs) are delivery mechanisms rather than a specific housing typology . Retaining the requirement as a specific policy requirement is **not effective** and therefore sound as by its definition, it is community led and not within the control of the site promoter or development partners – i.e. if there is no local interest in establishing a CLT then it cannot reasonably be expected to come forward. The reference to lower cost housing models such as CLTs within HA1(5) should be included as an aspiration within supporting text rather than specific policy requirement. It is also noted that, as currently drafted, the wording of Strategic Policy HA1(5) reads as though lower cost housing models, such as CLTs, are sought in addition to affordable housing provision, rather than as part of the total provision of affordable housing. The inclusion of CLTs in this context is **not justified** or consistent with other policies and is therefore not sound. Homes England resist such inclusion. ***Suggested amendments to HA2 and the supporting text are set out in Annex 1.***

3.34 Part 7 of Strategic Policy HA1 sets out a requirement to deliver one new job per home on strategic site allocations. This requirement appears to be derived from garden city principles – although this is not a stated objective of strategic allocations or specified in Strategic Policy HA1. Homes England support the creation of sustainable development balancing homes with jobs, but the specific requirement for one home per job appears arbitrary and has no clear links with other policies within the Plan, including Strategic Policy 29: New Employment or Strategic Policy HA2 nor is there clear evidence to demonstrate that this ambition has been tested, is viable or deliverable. Homes England is supportive of the aspiration but consider that the provision of employment space on strategic settlements such as the site should be locationally specific and meet identified needs in that area. This should be led by the employment strategy (as is recognised in paragraph 10.89) and considered at the planning application stage.

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3.35 This is particularly important for the site given its relationship to the major employment locations of Crawley, Manor Royal and the Gatwick Triangle, where specific types of employment floorspace are targeted to be delivered. It is, therefore, requested that this policy criteria is amended as follows, to introduce suitable flexibility to ensure the policy is effective:

*“7. Provide sufficient new employment opportunities through new employment land and through other opportunities **in line with a site specific employment strategy to prepare for each strategic site allocation to meet the principle of one new job per home.***

3.36 Part 9 of Strategic Policy HA1 requires development to deliver the necessary new infrastructure to support the new development. Whilst Homes England agrees that appropriate infrastructure needs to be provided, there should be recognition within the policy that developers may not be responsible for the delivery of all new infrastructure, as any contribution will need to meet the relevant tests and as in some cases (for example waste water and electricity upgrades) the infrastructure provider are responsible for directly delivering offsite reinforcements. The wording should be updated as follows:

*“9. ~~Development should~~ **Developers should work with the relevant body/provider to deliver the necessary new infrastructure to support the new development, including provision of utilities, water supplies, waste water treatment and any necessary transport mitigation. The design of development should consider the future direction of refuse collection and disposal. All developments will be expected to provide full-fibre, gigabit-capable broadband infrastructure.**”*

Representations on Strategic Policy HA2 (Land West of Ifield)

3.37 As set out in Part 1 above, the site represents an opportunity to deliver a high quality and sustainable place that is well connected and can deliver early infrastructure to support the new community, in line with the vision for the draft Local Plan. **Homes England therefore strongly supports the inclusion of HA2 but has concerns about its soundness and has a number of technical objections where Policy requirements are not justified by the supporting evidence.**

3.38 Within the spirit of the established collaborative approach to informing the proposal, Homes England wish to work with HDC to clarify aspects of Strategic Policy HA2 to ensure that the mixed-use allocation can be delivered during and beyond the draft Local Plan period and ensure there is sufficient flexibility to adapt to market changes over this time. As such, the comments set out below identify where it is considered the policy should be amended to be (more) effective and sound, and to support delivery of the site over the Local Plan period.

Housing Provision

3.39 Housing delivery is a key element of the strategic site allocation. Homes England is pleased that the wording on Strategic Policy HA2(1) does not restrict the number of homes to be delivered on the site during the plan period and can confirm that as a minimum 1,600 homes in the Plan period is achievable and deliverable, but as set out in paragraph 3.5, there is likely to be a site specific solution to water neutrality that will ensure it can be delivered in full over the Local Plan period.

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- 3.40 Although in principle Homes England support a minimum of 40% affordable housing within the site allocation, given its potential long term role in meeting housing needs across the wider housing market area, for the reasons above, there needs to be sufficient justification for applying a site-specific policy to this site and clarification does need to be provided as to how this should be considered when taking account of unmet needs from Crawley. This suggested approach will also need to be fully tested as part of the viability assessment. At this stage, while there are no concerns as to viability impacts, if increasing the level of affordable housing provision, it is important that it has been fully tested and that the rational and justification for increasing the affordable housing provision is clear in order to support overall delivery. This will ensure that it is justified in line with paragraph 16 of the NPPF.
- 3.41 The principle of delivering different typologies identified at Strategic Policy HA2(2)(a) of the site allocation is supported by Homes England, in order to meet housing need. However, we **object** to the wording as currently drafted and clarification is needed in the wording of the policy criteria that the different housing typologies set out within Strategic Policy HA2(2)(a) form part of the overall housing provision of 3,000 homes and not specifically in addition to the affordable housing element, to align with the NPPF.
- 3.42 As with our comments on Strategic Policy HA1, Homes England will work with HDC to diversify housing delivery in a way that best meets local needs. Models such as CLTs are delivery mechanisms rather than a specific housing typology and there is no evidence to a specific need at this time. Retaining the requirement as a specific policy requirement is **not effective** and therefore not sound as by definition it is community led and not within the control of the site promoter or development partners – i.e. if there is no local interest in establishing a CLT then it cannot reasonably be expected to come forward. It should therefore be included in supporting text rather than in the Policy itself. Given the above, we **object** to the wording as currently drafted and propose the following amendment:
- “a) Approximately 3,000 homes (C2 and C3 Use Class), a minimum 40% of which will be affordable homes, ~~together with~~ **including** the provision for young families, **and** older people, ~~and for~~ ~~Community Land Trust (or similar community led scheme) housing~~ and the provision of a permanent Gypsy and Traveller site of 15 pitches. Housing mix shall also have regard to the Council’s latest Strategic Housing Market Assessment and Crawley Borough Council’s housing need.”*

Employment Provision

- 3.43 Homes England supports the flexibility in policy with regards to the amount and type of employment uses allowed within the site allocation. Homes England also support the requirement for an Economic and Employment Strategy to be submitted and agreed by HDC as part of the planning application at an advanced stage. However, further clarification as to how the Economic and Employment Strategy will relate to the strategic site policies as well as the wider economic objectives of the draft Local Plan (including the current wording of Strategic Policy HA1(7) – see above) is required.
- 3.44 Indeed, given the role of this site and its extension as part of the urban form of Crawley, the Economic and Employment Strategy should be a starting point to inform appropriate employment uses within the site allocation. This will ensure that the employment delivered on site will be informed by market evidence and meet an identified local need, complementing rather than competing with the wider economic objectives for the sub-region. Therefore, there should be flexibility in the types of employment land uses allocated so that the allocation can adapt to market changes rather than be required to deliver employment uses such as Class B2 and B8 if it becomes evident that there is no appetite for such uses at the time of the planning application submission.

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3.45 It is also unclear what an 'enterprise and innovation centre' would be and therefore the exploration of what this facility should comprise should be dealt with in the Economic and Employment Strategy to accompany the planning application. The simplification of this policy would avoid further duplication within the draft Local Plan and better align with other employment policies (including the amended wording of Strategic Policy HA1 above). Accordingly, we **object** to the wording as currently drafted and request that it is updated as follows:

*"d) Around 2.0 ha of employment floorspace to **potentially** incorporate an enterprise and innovation centre, and to include **non-retail E class and employment uses in line with the site specific Economic and Employment Strategy agreed with the Local Authority:***

i. ~~non-retail and restaurant E class employment uses (offices, research, professional services and light industrial);~~

ii. ~~B2/B8 uses (general industry and warehouse/distribution; and~~

iii. ~~provision for improved home working facilities and desk space units within the development."~~

Education Provision

3.46 Homes England supports the provision of education facilities within the site allocation Strategic Policy HA2(2)(e). However, we **object** to the wording as currently drafted.

3.47 As currently drafted, the policy requires both land and financial contribution to each of the education facilities listed. As HDC is aware, delivery of the secondary school is being taken forward in partnership with the DfE with Homes England making available the site as part of the masterplan and DfE delivering initial 6FE capacity, with the balance to be met through proportionate financial contributions.

3.48 While there is not considered a risk to this delivery strategy given the positive and ongoing discussions between both parties, in the event that the current delivery strategy changes, any financial contribution towards secondary provision should be proportionate and in line with the relevant tests as set out in the Community Infrastructure Levy Regulations 2010, which is reiterated in the NPPF and, in NPPG Paragraph: 029 Reference ID: 10-029-20190509. Therefore, any requirement for the site to deliver the secondary school in full would not be justified and likely to negatively impact on the overall viability of the site (also impacting on other policy requirements such as higher levels of affordable housing). **The supporting text also needs to be clear that any financial contributions towards the schools will be proportionate to the need generated by the development, in accordance with CIL Reg 122 and Homes England requests the word "proportionate" is inserted before "contributions" in the policy criterion e).**

3.49 Furthermore, the education provision detailed for primary school is not in line with the pre-application discussions that have taken place with HDC and WSCC. Indeed, the Site Assessments Report¹⁶ (December 2023) only refers to the provision of one primary school within the site allocation, and the Viability Study (November 2023)¹⁷ also has only tested the viability of the site to include one primary school. The Strategic

¹⁶ Site Assessment Report (December 2023) https://www.horsham.gov.uk/data/assets/pdf_file/0019/131734/HDC-Reg-19-Site-Assessment-Report-Part-I-Introduction-Dec-2023.pdf

¹⁷ Local Plan Viability Study (November 2023) https://www.horsham.gov.uk/data/assets/pdf_file/0016/131605/Horsham-Local-Plan-Viability-Assessment-November-2023RS.pdf

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Site Assessment also assesses the potential for one primary school, and the Infrastructure Delivery Plan ("the IDP") only identifies one primary school at the site. As such, the introduction of additional primary school provision within this policy is not justified.

3.50 Given the above, in order for the wording to be sound and deliverable, it is recommended that Strategic Policy HA2(2)(e) is amended as follows:

"e) Land and proportionate contributions to meet the education provision standards advised by the Local Education Authority, (or any future updates) as follows:

*i. ~~two~~ **One** 23-form entry primary schools, to incorporate support centres for special educational needs (SEND);*

ii. an 8-form entry secondary school, to incorporate support centres for special educational needs (SEND) and meet existing education needs in Crawley;

iii. two new full-day care nurseries; and

iv. an education, skills and innovation facility.

Open Space, Sport, and Recreation Provision

3.51 Homes England supports the provision of open space, sport and recreation within the site allocation. However, as currently drafted, the policy is unclear how the developer or decision maker should interpret the policy and there is duplication between the formal sports and open space requirements identified in part g) of the policy and the informal provision identified in part i). Homes England therefore **object** to the wording as currently drafted and suggest that the policy is redrafted in line with paragraph 16 of the NPPF to provide clarity and remove ambiguity, in line with paragraph 16 of the NPPF:

*"g) Formal and informal open space, sport and recreation provision ~~is provided to~~ **must** meet the needs of the new community in accordance with standards and the respective recommendations in the Playing Pitch Strategy and Open Space, Sport & Recreation Review 2021, **or other future iterations.***

h) ~~In addition,~~ The provision of appropriate mitigation for 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.

i) Informal open space provision must be designed for all and shall include (but not be limited to):

i. a network of nature paths throughout the development, integrating with existing public rights of way;

ii. ~~accessible natural green space;~~

iii. ~~3G football pitches & Multi Use Games Area;~~

iiiv. equipped childrens play facilities;

iiiv. social seating areas."

3.52 In relation to the loss of Ifield Golf Club (new part (h)), Homes England has previously submitted to HDC a position statement outlining the engagement that has occurred to date with Sport England and England

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Golf¹⁸ and whilst the accepted position is that at this stage no definitive position can be reached on the overall conclusion of whether or not the current facility is surplus based on a local needs assessment, this does not prohibit the site's allocation in the Local Plan. Para 99 provides a robust mechanism to mitigate any loss if required, noting that a like for like replacement is not required and that a suitable mitigation package aligned with the tests set out in part b) and c) of paragraph 99 of the NPPF is achievable.

- 3.53 Since the November 2023 position statement was issued, further engagement with Sport England, England Golf, local authority officers and golf club operators has been ongoing to agree the objectives of the mitigation strategy and to identify specific opportunities for mitigating the loss. Further detail is provided in Appendix 2.

Delivery of Sustainable Travel Improvements including Crawley Western Multi Modal Corridor (CWMMC)

- 3.54 Strategic Policy HA2(2)(h) refers to the provision of comprehensive sustainable travel improvements some of which are set out within the Draft IDP. This duplicates the requirements under HA2(8) and both the Policy and IDP lacks clarity as to what specific transport improvements are required and when they are required to be delivered. Although the Draft IDP provides some indicative delivery timescales for each item, it is assumed that these will be determined through the evidence presented within the required Transport Strategy and associated Transport Assessment as part of any future planning application.
- 3.55 It is suggested that the relevant text is relocated to Part 8 of the Policy HA2, so that transport issues are considered as a whole and that the text is updated to be clear on how sustainable transport requirements will be brought forward.

“h) Comprehensive sustainable travel improvements, including the first phase of a multi modal link road to connect the A264 at Faygate to the A23 north of Crawley alongside high-quality bus service connections and sustainable travel options, including cycling, for first residents to be phased in accordance with the development requirements to be determined through a Transport Strategy and supporting Transport Assessment submitted alongside a planning application.”

- 3.56 Given the importance of the CWMMC and its strategic importance to help support future growth across the sub-region, the principle of safeguarding is supported, but Homes England **object** to current approach (see comments below). It would also be helpful for the policy and supporting text to recognise the importance of the scheme to enable the onward extension beyond the site boundary. ***Suggested amendments to HA2 and the supporting text are set out in Annex 1.***

Landscape and Heritage

- 3.57 Strategic Policy HA2(3) requires the site allocation to be landscape-led, to reflect the landscape and townscape context, and the pattern of development should enhance the identified landscape and heritage features. In particular, part (c) of the policy requires proposals to preserve and enhance all designated and non-designated heritage assets and their setting. Whilst Homes England support the principle of the policy, and any planning application brought forwards on the site will be landscape-led and have regard to heritage assets, it is unlikely that by its nature as a strategic allocation and the requirement to deliver strategic road

¹⁸ [Homes-England-Statement-Ifield-Golf-Club.pdf \(horsham.gov.uk\)](#)

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infrastructure within the identified safeguarded corridor, the scheme will be able to enhance the setting of all of the heritage assets it may affect.

- 3.58 Therefore, in line with national policy, this policy should be amended to reflect paragraph 194 to 208 of the NPPF which states where a proposal will lead to less than substantial harm to a designated heritage asset (or non-designated heritage asset), this harm should be weighed against the public benefits of the proposal. Homes England also raise similar concerns with the draft wording of Strategic Policy 21, and request that the wording reflects national policy in order to be considered sound.

Ecology

- 3.59 Homes England also supports the protection of species and any future development on the site allocation will incorporate necessary mitigation measures. However, we **object** to the inclusion of and specific reference to Bechstein's bats within the policy and challenge whether it is necessary or justified.
- 3.60 While the Site Assessment Report (December 2023) notes that there is a presence of Bechstein bats, all bats and their roosts are protected by domestic and international legislation, including by the Wildlife and Countryside Act 1981 (as amended) and the Conservation of Habitats and Species Regulations 2017 (as amended) and are adequately covered by Policy SP17. Therefore, there is no need to make specific reference to one species over others, and doing so is likely to be inconsistent with national policy. There is also scope for this position to change.

Biodiversity

- 3.61 Strategic Policy HA2(4) requires a minimum of 12% Biodiversity Net Gain on site. Homes England support the principle of this, however, to ensure the Plan is **sound**, the Council need to evidence the need for a higher percentage that the statutory objective of 10%, as required by NPPG Paragraph 006 Reference ID: 74-006-20240214.

Sustainability and Net Zero

- 3.62 Strategic Policy HA2(7) requires proposals to demonstrate the delivery of net zero carbon, but then goes on to state that proposals on the site should include a strategy to ensure that by 2025, all homes built on the site are designed as net-zero carbon through their expected lifetime.
- 3.63 This requirement of net zero is inconsistent with the Strategic Policies 6, 7 and 8, which require proposals to contribute towards achieving net zero emissions, rather than the requirement of net zero. Furthermore, national policy states at paragraph 152 of the NPPF that the "*planning system should support the transition to a low carbon future in a changing climate*" rather than a whole lifecycle zero carbon position.
- 3.64 In order for this policy to be **effective**, the Council needs to define what exactly it means by "net zero" as there is no standardised definition, and as currently drafted can lead to ambiguity and misinterpretation.
- 3.65 For the avoidance of doubt, Homes England is committed to sustainable development. The proposals for the site will meet Future Homes Standards, and includes numerous measures for active and sustainable travel, thereby reducing the impact the biggest contributors to carbon emissions (housing and cars). However, achieving net zero during construction **and** operation is a challenge for many developers, and whilst Homes

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England supports HDC's aspiration towards net zero, there must be flexibility within the policy should achieving a whole cycle net zero position be prohibitive.

- 3.66 The policy must also take account of the Written Ministerial Statement made on 13 December 2023 which refers to local energy efficiency standards and is a material consideration. The Minister of State for Housing stated that the Government is committed to ensuring new properties have a much lower impact on the environment in the future, however, the Government:

“does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned building regulations. The proliferation of multiple, local standards by local authority area can add further costs to building new homes by adding complexity and undermining economies of scale. Any planning policies that propose local energy efficiency standards for buildings that go beyond current or planned buildings regulation should be rejected at examination if they do not have a well-reasoned and robustly costed rationale.”

- 3.67 In short, HDC's proposed requirement for net zero goes beyond the current building regulations and unless robustly justified should be modified to be consistent with national policy.

Transport Strategy

- 3.68 As set out in Part 1 of this response, by adopting a 'decide and provide' approach as part of a comprehensive transport strategy for the site, it is possible to achieve greater rates of internalisation and sustainable / active travel mode shares than other strategic allocations. Therefore, the overall transport objectives set out in Strategic Policy HA2(8) are supported.
- 3.69 The supporting text suggests that the evidence from strategic transport modelling shows that to deliver the site, significant improvements will be necessary to mitigate the impacts on the local road network, including as a minimum the development of a multi-modal route (the CWMMC) to be delivered within the site. With the exception of the CWMMC (discussed further below), the transport supporting evidence produced by the Council¹⁹ and detail in the supporting IDP identifies generic improvements which are aligned with the transport objective but remains vague in terms of specific scheme details, costings and the role the site will have in its delivery.
- 3.70 There is therefore a disconnect between the documents and a degree of ambiguity around the expectations as to what the site should contribute towards, meaning that the draft Local Plan may not be fully effective. To address this, it is suggested that an additional criteria is included within Strategic Policy HA2(8) that requires any future planning application for development at the site to include a Transport Assessment (as required by Strategic Policy 24) which will consider in detail potential impacts and there should be a clear reference to this being the appropriate mechanism to determine the appropriate level of mitigation.

“(8) f) - A Transport Assessment should be submitted to provide evidence of the potential impact of the development on the transport network in determining the appropriate level of mitigation required. The Transport Assessment should set out the Transport Strategy including details of the specific improvements required to make the development

¹⁹ Horsham Transport Study - Local Plan 2039 Assessment (December 2022) and Horsham District Local Plan Transport Study - Local Plan Transport Assessment – Autumn 2023 Review (November 2023)

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acceptable (e.g. scheme details, costings and implementation programme), and should be prepared in line with advice from the Local Highway Authority.”

Crawley Western Multi Modal Corridor (CWMMC)

- 3.71 The importance of the early delivery of the CWMMC within the site as part of the first phase of the development is acknowledged by Homes England and forms one of a number of commitments made through community engagement to early infrastructure delivery.
- 3.72 Its early delivery is important given that it will provide access to the site, managing construction traffic impacts and establishing sustainable travel patterns from the outset. However, as with wider transport mitigation, it will be important that the timing and any triggers for the opening of the CWMMC are considered as part of a detailed Transport Assessment and it is therefore not appropriate or justified for the Policy to determine the opening triggers without the necessary evidence to support this. The suggested wording for Strategic Policy HA2(2)h) in paragraph 3.39 above is reiterated.

“h) Comprehensive sustainable travel improvements, including the first phase of a link road to connect the A264 at Faygate to the A23 north of Crawley alongside high-quality bus service connections and sustainable travel options for first residents to be phased in accordance with the development requirements to be determined through a Transport Assessment and associated Transport Strategy submitted alongside a planning application. Any future design of the CWMMC within the site must demonstrate the ability to facilitate the A23 – A264 link in full”

- 3.73 The alignment shown in the concept masterplan in Figure 7 reflects the overarching objectives of the CWMMC and based on a detailed assessment of technical and environmental constraints and is supported. Together with the suggested amended wording to HA2(8) set out above; this means that the identification of a duplicate safeguarding corridor within the allocation boundary (as shown on the Proposals Map) is overly restrictive and potentially conflicts with the masterplanning or future reserved matters for the site. Homes England therefore suggests that the Policies Map is amended to only include safeguarding of the area outside the boundary of the site allocation (Strategic Policy HA2) (see comments below).
- 3.74 Should HDC determine that the indicative safeguarded corridor within the site should remain as part of the Proposals Map, the alignment should be adjusted to reflect the most recent discussions with Homes England as part of pre-application discussions and as shown on Figure 3.1 of the Homes England EIA Scoping Opinion Request Report of 17th October 2023. This will ensure that the Plan remains effective and the infrastructure can be delivered.

Delivering the A23 – A24 CWMMC

- 3.75 The CWMMC is a strategic priority and ambition within the Plan to bring forward its delivery is supported. Notwithstanding this. Homes England agree with evidence base and acknowledgement in the supporting text that the full CWMMC (A23 – A264) is neither required, nor viable to be delivered by the site in isolation and therefore recognition of the need to phase its delivery beyond the Local Plan period.

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- 3.76 While a decision on alternative delivery and funding mechanisms will form part of subsequent Local Plan reviews, the West Sussex Local Transport Plan²⁰, Crawley Local Plan 2023 -2040 and supporting Horsham IDP are clear that the full connection over time is important and that developer led delivery is important, and for this reason the principle of safeguarding a route outside of the site allocation is supported.
- 3.77 However, when considering the remaining safeguarding alignment for the CWMMC shown on the proposals map, **Homes England object** to the current wording under Part 9 of Policy HA(9) which does not align with the need for phased delivery (i.e. it is not a component part of the site allocation), therefore this should be treated separately from Policy HA2 and set out as a new separate Strategic Policy. This is a similar approach to that taken in the recent Crawley Borough Council Local Plan (2023 – 2040).
- 3.78 In finalising the new Strategic Policy, it is not clear currently how the safeguarded corridor for the northern area (between the allocation boundary and Crawley boundary) and southern section (allocation boundary to A264 has been derived). While a detailed study like that undertaken by Crawley Borough Council in relation to the northern section is not considered necessary, consideration should be given as to whether further flexibility could be provided (potentially by way of identifying a broader area of search rather than specific safeguarded area) to allow further optioneering to be considered once preferred funding and delivery mechanisms have been identified.
- 3.79 To support any future optioneering and consideration of the alignment, supporting text could also be included alongside the new Strategic Policy, setting out objectives or considerations which would influence the design for example an objective to maximise distance between the corridor and existing properties such as those at Stumbleholme Farm.
- 3.80 This approach would still fulfil the safeguarding objectives and protect against development in the broader area by requiring any development “to show how it would not prejudice the delivery of the CWMMC” rather than restricting development in its entirety. Taking a more flexible approach would also allow consideration to be given to maximising the potential opportunities / benefits of a future multimodal link, such as enabling multimodal interchange, its role as a new defensible boundary between settlements, providing access to the countryside and ensuring that detailed alignments also take account of environmental constraints.
- 3.81 The suggested wording for a new safeguarding policy is as follows:

“No development shall occur within ~~a safeguarded~~ the broad area of search as shown on the Policies Map without first demonstrating to the Local Highway Authority that it would not that may prejudice the delivery of a full Crawley Western multi-modal corridor from the A264 near Faygate to the A23 south of Gatwick, north of County Oak.”

Representations on Figure 7 (Land West of Ifield Masterplan)

- 3.82 Homes England support the inclusion of a conceptual masterplan to illustrate and inform future applications (Figure 7). However, wording should be added to make clear that the masterplan is a concept plan, rather than comprehensive as is currently suggested, which has been included to visualise policy expectations and inform further detailed masterplanning.

²⁰ West Sussex Transport Plan 2022 to 2036: <https://www.westsussex.gov.uk/media/17428/wstp.pdf>

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- 3.83 While the masterplan is broadly consistent with the emerging proposals for the site and reflects the information presented through public consultation and as part of the pre-application discussions, there is no published detailed evidence behind the masterplan and therefore no certainty that it has been adequately tested to ensure it is deliverable, impacting on the overall effectiveness of the draft Local Plan.
- 3.84 Furthermore, it also seeks to fix certain land uses and/or connections – for example, the location of the Gypsy and Traveller pitches or cycle connections – which again are subject to future detailed matters and should be informed by a site-specific design code (a requirement of the draft Local Plan policy) – and therefore should not be fixed through the Local Plan but is better determined at the planning application stage and in consultation with the end user / likely development partner.
- 3.85 Homes England therefore **objects** to the suggestion that is a comprehensive masterplan and suggest that Figure 7 be referred to as an “**Indicative Framework Plan**”, to ensure that a planning application for the site is not constrained. It would assist with effectiveness if the masterplan was embedded as part of Policy HA2.

Representations on other Strategic Policies

Strategic Policies 6, 7 and 8: Climate Change and Net Zero Emissions

- 3.86 Homes England is supportive of the requirement to create places where people can live and can work with access to services, facilities and green spaces that are close to home and therefore within walking distance, thereby reducing the need to travel longer distances. As set out elsewhere in this representation, providing sustainable and active travel opportunities as priority travel modes in order to reduce the high reliance on car travel where longer trips are necessary is also supported given the benefits that this will bring to reduced emissions and the associated contribution to net zero carbon targets, as set out in Strategic Policy 6(1)(e), and is fully aligned with the transport strategy and design principles for the scheme.
- 3.87 Together with Strategic Policies 7 and 8, these policies deal with the climate change issues that have been identified by HDC and how proposals can address these issues and move towards net zero emissions by 2050. Homes England is generally supportive of these policies but questions its effectiveness as it is unclear whether the net zero requirement relates to the construction and / or operation of the proposals, and the policies seem to duplicate the requirements of the site allocation policies themselves. Homes England requests that HDC review the wording of the strategic policies to provide clear policy requirements that are not repetitive with the wording contained in the site allocation policies. Further discussion on this issue is dealt with above under HA2(7).
- 3.88 On a matter of detail, it is unclear from Strategic Policy 6(4) what details should be provided in the Sustainability Statement in order to be considered policy compliant. Homes England suggests that a definition is provided within the supporting text or the glossary of the Local Plan to provide clarity as to what should be included.
- 3.89 In addition, as set out within the comments above and in relation to Strategic Policy HA2(7), Homes England requests that there is acknowledgement of the Written Ministerial Statement made on 13 December 2023 by Minister of State for Housing Lee Rowley. Local planning policy should replicate the requirements of national policy on energy and sustainability in order to ensure deliverability of housing proposals unless they have a “*well-reasoned and robustly costed rationale*”.

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Strategic Policy 9: Water Neutrality

3.90 Strategic Policy 9 sets out the requirement that all development within the Sussex North Water Resource Zone will need to demonstrate water neutrality through water efficient design and offsetting of any net additional water use of the development. While this is accepted, the draft Local Plan should be clear that there is an agreed plan to address the issue of water neutrality and that over the Local Plan period every effort should be made to bring forward the strategic solution in a timely manner. As set out above, in doing so, the draft Local Plan should also identify the trigger events that will necessitate a Local Plan review, which as well as assessing the impacts on housing delivery, could also review the expectations of Policy SP9 in terms of the need for onsite solutions.

3.91 Notwithstanding this, and recognising the current position, Homes England **objects to the current wording** as a number of changes are required to Policy SP9 to ensure that it provides sufficient flexibility to allow the full range of site specific solutions to be identified to enable housing delivery in the short term.

3.92 The current drafting of Policy SP9 (6) states:

“Where an alternative water supply is to be provided, the water neutrality statement will need to demonstrate that no water is utilised from sources that supply the Sussex North WRZ. The wider acceptability and certainty of delivery for alternative water supplies will be considered on a case-by-case basis.”

3.93 This is considered to be overly restrictive and likely to impact on the effectiveness of the Local Plan as there may be limited circumstance where an alternative water supply may reduce the demand on the public water supply but not eliminate such a demand. For example, on strategic sites such as West of Ifield, there is unlikely to be a single solution to water neutrality, with a need for a package of measures to be applied to reduce demand, re-use water onsite, utilise alternative supplies and offset use. It may also be necessary to apply different solutions on a phase by phase basis.

3.94 One example would be where the alternative (groundwater) supply is of a quality that requires blending to achieve the drinking water standards set by the Drinking Water Inspectorate. While blending may be preferentially achieved using harvested rainwater, it would be necessary to have a back-up supply from the public network for situations in which rainwater isn't sufficient (potentially in a dry summer). This arrangement would be necessary to maintain continuity of the alternative supply. Any water taken from the public supply for blending (or other purposes) would of course need to be mitigated through the purchase of SNOWS credits or must be otherwise offset. Having an outright prohibition on the use of any water from the public supply, in conjunction with an alternative water supply, is therefore overly restrictive and could prejudice otherwise suitable solutions that would beneficially reduce the demand in Sussex North WRZ. Suggested alternative wording is as follows:

*“Where an alternative water supply is to be provided, the water neutrality statement will need to demonstrate **the reduction in demand on that no water is utilised from** sources that supply the Sussex North WRZ. **If a residual demand on the sources that supply the Sussex North WRZ is still required (for example, for blending groundwater to achieve drinking water standards) the water neutrality statement will need to clearly state how this will be offset or mitigated.** The wider acceptability and certainty of delivery for alternative water supplies will be considered on a case-by-case basis.”*

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Strategic Policy 15: Settlement Coalescence

3.95 Strategic Policy 15(1) applies to all settlements and seeks to ensure that further urbanisation can be resisted in order to retain settlements unique identity and safeguard undeveloped landscape. Homes England **objects** to the current wording of this policy, particularly as the policy appears to prevent the expansion of existing settlements, unintentionally meaning that the strategic site allocations would be contrary to this policy. In addition, the CWMMC would also be contrary to this policy as it would reduce the existing landscape and 'openness', and therefore, reduce the break between settlements. In short, the policy, as worded, prevents the effective delivery of strategic sites and key infrastructure identified in the draft Local Plan. Therefore, this policy should be redrafted to provide further clarity about its relationship with strategic site allocations and infrastructure proposed in the draft Local Plan.

*“Development between settlements, **with exception to strategic sites**, will be resisted unless it can be demonstrated that the proposal meets all of the following criteria:*

- a) There is no significant reduction in the openness and 'break' between settlements.*
- b) The related urbanising effects within the retained 'break' between settlements are minimised, including artificial lighting, development along and / or the widening of the roads between the settlements, and increased traffic movements.*
- c) Proposals respect the landscape and contribute to the enhancement of their countryside setting, including, where appropriate, enhancements to the Green Infrastructure Network, the Nature Recovery Network and / or provide opportunities for quiet informal countryside recreation.”*

Strategic Policy 19: Development Quality

3.96 Policy SP19 seeks to ensure that development in the administrative area of HDC promotes a high standard of design, architecture and landscape. Homes England is supportive of this policy and the council's commitment to delivering sustainable, good design and endorsing Design Codes. However, Homes England requests further clarity from HDC with regards to the role of a site-specific Design Code referenced in Strategic Policy HA2(2) and its relationship with this policy, as the current drafting indicates that it is for the site promoter to prepare relevant design codes as part of the planning application, rather than being led by and endorsed by the local authority.

Infrastructure Provision

3.97 The principles of Strategic Policy 23 to deliver infrastructure alongside development is supported, where the evidence justifies the need for the infrastructure to come forward at a specific time or phase of development taking into account future travel trends and new technologies.

3.98 The provision of additional highway capacity should be reviewed with key stakeholders to ensure the council's vision to prioritise pedestrians and cyclists remains achievable through reducing the attractiveness of travel by private motor vehicles. Increasing the capacity of the highway infrastructure could have the effect of increasing the attractiveness, therefore a balance will be required. Homes England will support the provision of additional highway capacity where this is justified and in line with the vision of the draft Local Plan. Suggested amended wording to Strategic Policy 23(2):

“Where there is a need for extra capacity, this will need to be provided in time to serve the development or the relevant phase of the development, or as otherwise agreed with the

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relevant authority, in order to ensure that the environment and amenities of existing or new local residents is not adversely affected.”

3.99 With regard to major highways schemes, in line with latest Department for Transport Guidance within Circular 1/22 this means ensuring that proposals are designed to encourage and optimise sustainable travel modes and changing travel behaviours with a ‘monitor and manage’ approach adopted that delivers infrastructure when it is required by evidence and modelling. Justified infrastructure requirements related to development at the site will be provided through appropriate mechanisms including through Planning Obligations/CIL at agreed trigger points throughout the lifecycle of the development. Suggested amended wording to Strategic Policy 23(3):

“To ensure required standards are met, arrangements for new or improved infrastructure provision will be secured by Planning Obligations/Community Infrastructure Levy, or in some cases conditions attached to a planning permission, so that the appropriate improvement can be completed ~~prior to occupation of the development, or the relevant phase of the development~~ in line with an appropriate implementation strategy demonstrated through the planning application evidence base.”

Policy 25: Parking

3.100 Homes England supports Policy 25 and the requirements to provide for both vehicle and cycle parking in a way that actively encourages sustainable and active travel and the use of low emission vehicles including electric vehicles. However, Homes England **objects** to the current wording as Para 8.18 requires development proposals to be aligned with adopted parking standards (currently WSCC standards) and does not allow a more flexible approach to site specific circumstances.

3.101 Although WSCC standards should be the starting point, there may be opportunities – particularly on large scale urban extensions where a ‘decide and provide’ is being taken – to reduce parking or introduce further flexibility overtime to reduce provision so as to actively encourage alternative transport modes. Without doing so the ability to meet the overarching transport objectives of the draft Local Plan are unlikely to be met and the specific requirements for strategic allocations, such as those set out under Strategic Policy HA2(8) are unlikely to be effective. Additional supporting text is therefore required within paragraph 8.18 to identify circumstances when it may be appropriate for developments to diverge from adopted standards, subject to agreement of West Sussex County Council and HDC:

“The number of car parking spaces provided should similarly be in line with adopted standards, currently the West Sussex County Council Guidance on Parking at New Developments, and taking into account guidance on parking standards and design that may be produced by the Council. For strategic allocations, where evidenced and agreed with the relevant authorities, a departure from the standard may be acceptable to encourage alternative transport modes. All parking should be well-designed, to respond to relevant design guides and codes and ensure that pedestrians/wheeling, cyclists and communities are put before cars. It is critical that the needs of disabled drivers, and users of mobility scooters, are accommodated.”

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Suggested amendment to Policy 25(2):

“Adequate parking facilities in accordance with adopted parking standards guidance must be carefully designed into developments to meet the needs of users whilst achieving people-focused streets, unless otherwise agreed with the relevant authorities. Consideration should be given to the needs of motorcycle parking, and vehicles for the mobility impaired including mobility scooters.”

Policy 26: Gatwick Airport Safeguarding

3.102 Policy 26 states that land will be safeguarded from development which would be incompatible with the expansion of the airport. Development in identified aerodrome safeguarded areas will only be supported if consistent with continued safe operations of Gatwick Airport.

3.103 Whilst the intention of the policy is supported, reference should be included within the policy wording towards the CWMCMC and the necessary small-scale changes to road layouts within the safeguarding area that may be required to accommodate the first phase of the link road. In addition, the safeguarded areas should allow for ancillary infrastructure (such as SUDs) which can easily be adapted to be incorporated into any future runway scheme and do not impact bird strike risk.

3.104 Furthermore, the wording of Policy 26(5) is not considered to be sound as it places too much emphasis on the view of the relevant statutory consultees. Indeed, the wording in its current form would negate the local planning authority’s responsibility to apply the planning balance in the determination of planning applications. Local planning authorities are the decision-makers of planning applications (Section 70 of the Town and Country Planning Act 1990 (as amended)) and therefore, in order for the draft Local Plan to be legally compliant and sound, this part of the policy must be removed.

Strategic Policy 27: Inclusive Communities, Health and Wellbeing

3.105 Homes England is supportive of Strategic Policy 27 and the intention of the policy to support and encourage inclusive communities. However, not all criteria listed at part 2 will be relevant for all developments, for example requirements for rural workers should not be required for proposals in an existing or proposed urban area. In order for the policy to be justified and sound, flexibility should be added to the policy to ensure the criteria is considered, “*where relevant*”.

Policy 28: Community Facilities, Leisure and Recreation

3.106 Policy 28 covers a variety of facilities and services that help fulfil the community’s recreational, cultural and social needs, including health and emergency services. The site allocation proposes the inclusion of community facilities, which Homes England supports. However, Homes England is concerned about the current wording of Policy 28(1) as it requires compliance with all documents stated, and does not provide flexibility for updated versions of these documents. Therefore, the wording should be updated as follows to ensure the draft Local Plan remains up to date throughout the plan period:

*“1. The provision of new or improved community facilities or services will be supported, where they meet the identified needs of local communities as indicated in the ~~current~~ **latest** Open Space, Sport & Recreation Study, the Community Facilities Study, the Playing Pitch and Built Facilities Strategies, the Infrastructure Delivery Plan ~~and~~ **or** other relevant studies or*

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updates and local engagement; and / or contribute to the provision of Green Infrastructure and nature recovery.”

3.107 With regards to Policy 28(2), Homes England is supportive of the requirements for community use of facilities but **object** to the current wording and request that the community use is appropriate to the development. The following wording is suggested to ensure that the provision of community facilities is proportionate, relevant and necessary for the proposed development and therefore will reflect the requirements of the Community Infrastructure Levy Regulations 2010 as reiterated in the NPPF.

3.108 Furthermore, it is considered that community use of school facilities through the use of Community Use Agreements is an important part of ensuring sustainable communities – both in terms of access but also supporting financial sustainability for schools. Therefore, the blanket restriction on how potential community use within schools can be accounted for as part of overall provision may lead to overprovision, resulting in a level of competition between facilities that may impact on overall viability of both school and other public /private facilities located nearby, undermining the aim of the policy as whole. Therefore, there should be flexibility for the role of community use within school to contribute to overall provision on a case-by-case basis and for it to be accepted where supported by a site specific sport strategy.

*“To facilitate community cohesion, integration, healthy and active living, all proposals for additional dwellings will be required to contribute **proportionately** to the provision and improvement of the quality, quantity, variety and accessibility of public open space, ~~and~~ public indoor meeting and/or sports halls to meet the needs generated **by the development** in accordance with the local minimum standards set out in Table 4. All open space and indoor provision will be required to have an agreed funded maintenance and management plan. The community use of school facilities will be supported **and should not be counted towards overall requirements generated by new developments unless it can be demonstrated that there may be impacts on the viability of facilities as a whole and is supported by a site-specific sport and recreation strategy.**”*

3.109 Policy 28(3a), while covering a broad range of community uses, makes clear that it also relates to open space, sports and recreation facilities. As such the current wording is not consistent with NPPF Para 99 in as much as it does not provide the full circumstances that would allow for the loss / replacement of facilities. **Additional wording is suggested in Annex 1.**

Strategic Policy 29: New Employment

3.110 Strategic Policy 29 supports the provision of sufficient employment land to meet the needs of existing and future businesses requiring office, industrial, storage and distribution floorspace within B2, B8 and E(g) Use Classes, together with other employment generating uses as appropriate within the strategic allocations including Land West of Ifield. The draft local plan policy requires a range of unit sizes, tenures and flexibility of use, which in principle is supported. However, as per our comments at paragraph 3.31, the inclusion of B8 and B2 uses in particular may impact on the development’s ability to be led by a site-specific economic strategy and meet a ratio of 1 job for every home, and the two policies are therefore inconsistent .

3.111 Clarity should be provided on the intention for the employment floorspace within the strategic allocations, and this should be consistently applied across policies in order for the draft Local Plan to be consistent with NPPF paragraph 16 and therefore sound. As highlighted above in paragraph 3.22 in relation to Strategic

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Policy HA1(7), Homes England consider the approach to employment for strategic sites should be led by an Employment Strategy, to ensure that employment at the site responds to a clear vision for the strategic sites and is specific to the local employment demands.

Policies 31 and 32: Rural Development

3.112 Policy 31 seeks to maintain and enhance the rural economy. Policy 32 sets out criteria for conversion of redundant rural buildings to residential use. Homes England requests that confirmation is provided that development within strategic site allocations would not fall within the definition of the rural area and would not be required to comply with these policies, an issue that is exacerbated by the lack of clarity around the status of strategic allocations as part of the settlement hierarchy.

3.113 In order to avoid ambiguity between policies in the draft Local Plan, as per paragraph 16 of the NPPF, and therefore to be sound, it is recommended that Policy 31(2) and Policy 32 is amended to include 'Outside built-up area boundaries, secondary settlements *or strategic site allocations*'.

Policy 39: Affordable Housing

3.114 Policy 39(2) sets out the requirement for First Homes stating that they must attract a 40% discount compared to the open market value. While this appears justified through the viability assessment, to ensure consistency with paragraph 72 of the NPPF and Affordable Homes Update Written Ministerial Statement, Homes England determine that further text should be added to make it clear that First Homes will be subject to a three-month timeframe for marketing under the local eligibility criteria before reverting to the national criteria set out in the NPPG ²¹.

Strategic Policy 43: Gypsies and Travellers

3.115 SP43 breaks down the need and provision of sites for gypsy and traveller and travelling showpeople. The site is proposed to provide towards 15 pitches. **Homes England object to the policy as drafted** as it is not clear how the requirement for 15 pitches to specifically be provided on the site has been determined and therefore further justification is required.

3.116 On the assumption that the 15 pitches can be sufficiently justified, further flexibility is required to ensure the Plan is effective and responsive to changing needs over time. Given the length of the Local Plan Period, the need or demand for gypsy and traveller provision on a particular site could change against the assumptions made at this stage, for example if other non-allocated sites come forward as per criterion c) or other external or unknown factors. Therefore, the number of pitches required on the strategic sites within the policy should be presented as an 'up to' figure and be subject to evidence of need and demand at the time of any planning application. In order for the draft Local Plan to be justified, flexibility on the number of pitches should be added to the policy wording.

3.117 On this basis it is recommended that Table 11 is amended to reflect '*Indicative additional net pitches*' and criterion b) is amended to include 'maximum number of additional pitches *subject to evidence of need at the time of any planning application*'.

Representations on the Viability Assessment (Aspinall Verdi, 2023)

²¹ [First Homes - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

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3.118 As part of the Local Plan preparation, Homes England has been actively engaged by Aspinall Verdi in preparing the viability assessment and providing relevant inputs that reflect the detailed work undertaken to date. While the overall conclusion that the site is viable aligns with viability testing undertaken by Homes England, it is difficult to fully understand the assumptions that have been applied when reviewing the redacted version of the assessment. It appears that a number of more general assumptions have been applied to the site, not necessarily reflecting the information provided to HDC or accurately representing the site-specific infrastructure requirements or mitigation needed.

3.119 Furthermore, there are a number of site-specific requirements for the site (such as 40% affordable housing) which again do not appear to be fully tested, although we do not expect these to change the outcome of the assessment overall. Homes England would welcome a further opportunity to engage with Aspinall Verdi to ensure these points are addressed.

Representations on Infrastructure Delivery Plan (Horsham District Council, December 2023)

Transport

3.120 The Draft IDP supporting the draft Local Plan sets out the collaboration with partners regarding the infrastructure needs to deliver the Local Plan growth. West Sussex County Council as local highway authority and National Highways are included in the list of partners that HDC have worked with in developing the IDP.

3.121 The IDP explains the current and planned provisions, potential sources of funding and key issues and future considerations in relation to four categories of transport; Road Network, Bus Service, Rail Network, and Cycling, Walking and Equestrian Routes. That information has informed the list of infrastructure requirements set out in Part 3 of the IDP. The infrastructure identified with justification relating directly in whole or part to Strategic Policy HA2 that are considered 'essential' are listed below:

- A 'middle section' CWMMC to include shared transport, high quality bus provision and active travel facilities throughout the route
- Bespoke Sustainable Transport measures for Land West of Ifield and Land North West of Southwater. Measures to include (but not limited to) Transport on Demand, Shared Transport solutions, MaaS (Mobility as a Service), Behaviour Change, Micromobility and Active Travel Solutions
- BRT bus routes to serve Land West of Ifield and other bus-based measures such as dedicated bus lanes, bus only routes and bus priority at junctions. Bus routes should provide connections to Manor Royal, Gatwick Airport, Ifield and Three Bridges Railway Stations
- Major high capacity / frequency bus priority corridor between Horsham and Crawley (including West of Ifield)
- Horsham and Crawley Bus Station improvements e.g. at Horsham Bus Depot, improved capacity by additional drive-in, drive-out stand at the south end of the station or addressing pedestrian/bus conflict at this site
- Enhanced walking and cycling routes between the strategic site allocations and nearby rail stations (Ifield, Christ's Hospital, Horsham and Billingshurst)

3.122 Further improvements are listed as 'desirable' in relation to the strategic allocation at Ifield:

- Ifield Station enhancement (e.g. platform widening and/or lengthening canopies, accessible footbridge)
- Ifield station enhancement – platform widening, lengthening, accessible footbridge
- Works to change Bewbush level crossing to a footpath and bridleway crossing

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- Bridleway links from Ifield to: Ifieldwood; to Rusper; to Lambs Green; to Kilnwood Vale and a link from Charlwood Road to County Oak
- Improve cycling and pedestrian connectivity between Horsham and Crawley and Kilnwood Vale and Faygate

- 3.123 The improvements listed above are detailed as being developer funded but with cost and (for the vast majority) delivery timescales still to be determined. Whilst Homes England supports the provision of improvements to sustainable travel in and around Ifield, for infrastructure to be funded by the developer it needs to be justified and evidenced as necessary, reasonable in scale and directly related to the development. In many cases, there is no transport evidence presented by HDC to demonstrate the justification for the items of infrastructure linked to specific allocations, including the site.
- 3.124 Homes England therefore assert that the list of infrastructure to be directly related and delivered by the site should be reviewed and agreed in conjunction with the evidence on expected impact set out within the Transport Strategy and supporting Transport Assessment which would accompany a planning application, and in discussion with key stakeholders including WSCC and National Highways. Ensuring Strategic Policy 23 and Strategic Policy HA2 of the draft Local Plan contains sufficiently flexibility to assess and agree infrastructure that is fully justified through evidence is critical.
- 3.125 The suggested amendments to the policies earlier within this representation and set out in Annex 1 should therefore be adopted by HDC.

Conclusion

- 3.126 Within this representation, Homes England is requesting further information that it requires to satisfy itself that the evidential basis exists to justify particular wording/policies in the draft Local Plan such that it is ultimately found to be sound. In addition, Homes England is, in places, suggesting specific amendments to policy wording where it is clear that changes are required to ensure the aspirations for the site are met and the policy wording is not overly restrictive, such that it adversely impacts opportunities and benefits that could flow from the scheme.
- 3.127 For the reasons outlined in this representation, in its current form the draft Local Plan is not acceptable for Homes England who, as promoter of this site, is seeking to deliver much needed housing for the area.
- 3.128 In the spirit of collaboration, Homes England is hopeful that the parties can work together to overcome the concerns that it has raised in this representation.

ANNEXE 1: SUMMARY OF CHANGES REQUIRED TO ADDRESS SOUNDNESS ISSUES WITHIN THE PLAN

Policy	Proposed Changes	Reason
HA1 (4)	<i>"4. Development will be expected to contribute to the achievement of net zero carbon through a range of measures in accordance with Strategic Policy 6. Development will be expected to achieve this through direct measures such as the design and construction of development and the provision of alternative sources of energy such as heat pumps and solar pv with battery storage, together with indirect measures such as design of the development to minimise the need to travel by car. Strategic Scale development must also be designed to minimise water consumption and contribute to water neutrality, in accordance with Strategic Policy 9."</i>	For effectiveness.
HA1 (5)	Development will be expected to deliver high-quality mixed-use communities that provide a range of housing types and tenures, including provision for young families, older people, Gypsies and Travellers and enable the provision of lower cost housing models such as CLTs. [deleted text to be moved to supporting text]	For effectiveness
HA1(7)	<i>"7. Provide sufficient new employment opportunities through new employment land and through other opportunities <u>in line with a site-specific employment strategy to prepare for each strategic site allocation</u> to meet the principle of one new job per home."</i>	For effectiveness.
HA1 (9)	<i>"9. Development <u>Developers should work with the relevant body/provider</u> to deliver the necessary new infrastructure to support the new development, including provision of utilities, water supplies, waste water treatment and any necessary transport mitigation. The design of development should consider the future direction of refuse collection and disposal. All developments will be expected to provide full-fibre, gigabit-capable broadband infrastructure."</i>	For effectiveness.
Part 2(a) of Strategic Policy HA2	<i>"a) Approximately 3,000 homes (C2 and C3 Use Class), a minimum 40% of which will be affordable homes, <u>including the</u> together with provision for young families, and older people, land for Community Land Trust (or similar community led scheme) housing and the provision of a permanent Gypsy and Traveller site of up to 15 pitches. <u>Housing mix shall have regard to the Council's latest Strategic Housing Market Assessment and shall also have regard to Crawley Borough Council's housing need.</u>"</i>	For effectiveness.
Part 2(d) of Strategic Policy HA2	<i>"d) Around 2.0 ha of employment floorspace to <u>potentially</u> incorporate an enterprise and innovation centre, and to include non-retail, E class, and employment uses in line with the site specific Economic and Employment Strategy agreed with the Local Authority.</i> <i>i. non retail and restaurant E class employment uses (offices, research, professional services and light industrial);</i>	For effectiveness.

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	<p>ii. B2/B8 uses (general industry and warehouse/distribution; and</p> <p>iii. provision for improved home working facilities and desk space units within the development."</p>	
Part 2(e) of Strategic Policy HA2	<p>"e) Land and <u>proportionate</u> contributions to meet the education provision standards advised by the Local Education Authority, (or any future updates) as follows:</p> <ul style="list-style-type: none"> i. One <u>two</u> 2-form entry primary schools, to incorporate support centres for special educational needs (SEND); ii. an 8-form entry secondary school, to incorporate support centres for special educational needs (SEND) and meet existing education needs in Crawley; iii. two new full-day care nurseries; and iv. an education, skills and innovation facility. 	For effectiveness.
Part 2(g) of Strategic Policy HA2	<p>"g) Formal and informal open space, sport and recreation provision is provided to <u>must</u> meet the needs of the new community in accordance with standards and the respective recommendations in the Playing Pitch Strategy and Open Space, Sport & Recreation Review 2021, <u>or other future iterations.</u></p> <p>h) In addition, <u>The provision of appropriate mitigation for 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.</u></p> <p>i) Informal open space provision must be designed for all and shall include (but not be limited to):</p> <ul style="list-style-type: none"> i. a network of nature paths throughout the development, integrating with existing public rights of way; ii. accessible natural green space; iii. 3G football pitches & Multi-Use Games Areas; .ii. equipped childrens play facilities; iii. social seating areas." 	For effectiveness.
Part 2(h) of Strategic Policy HA2	<p>"h) Comprehensive sustainable travel improvements, including the first phase of a multi modal link road to connect the A264 at Faygate to the A23 north of Crawley alongside high quality bus service connections and sustainable travel options, including cycling, for first residents <u>to be phased in accordance with the development requirements to be determined through a Transport Assessment submitted alongside a planning application. Any future design of the CWMMC within the site must demonstrate the ability to facilitate the A23 – A264 link in full</u></p> <p><u>"</u></p> <p><u>–</u></p>	To ensure the Plan is justified and effective.

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Part 3 of Strategic Policy HA2	Text to be updated to ensure consistency with NPPF Para 194 – 208	Consistency with National Policy
Part 4 (g) of Strategic Policy HA2	Necessary mitigation measures are included in the site design to mitigate impacts on protected species, including Bechstein's bats	Consistency with national policy
Part 8 of Strategic Policy HA2 – new part (f)	<i>“(8) f) - A Transport Assessment should be submitted to provide evidence of the potential impact of the development on the transport network in determining the appropriate level of mitigation required. The Transport Assessment should set out the Transport Strategy including details of the specific improvements required to make the development acceptable (e.g. scheme details, costings and implementation programme), and should be prepared in line with advice from the Local Highway Authority.”</i>	For effectiveness
Part 9 of Strategic Policy HA2	To deleted from Policy HA2 and included as a standalone policy. Suggested new policy wording <i>“No development shall occur within a safeguarded <u>the broad area of search as shown on the Policies Map without first demonstrating to the Local Highway Authority that it would not that may prejudice the delivery of a full Crawley Western multi-modal corridor from the A264 near Faygate to the A23 south of Gatwick, north of County Oak.</u>”</i>	For effectiveness
Additional supporting text to be included in Para 10.90	Allocation of this site would have benefits in bringing forward a significant level of residential accommodation that would help in meeting identified housing needs including a range of housing types and sizes. Taking account of the wider housing market needs and the proximity of the site to Crawley, it is considered that 40% affordable housing should be provided in this location.”	For effectiveness
New text to be inserted into Policy HA2 or Supporting Text	<p>Option 1 the introduction of additional wording (bold and underlined, or similar) to Limb 1 of Strategic Policy 38 as follows: “Other factors that may be taken into account include the established character and density of the neighbourhood, the viability of the scheme, and locally and robustly prepared evidence such as a local (parish) housing needs assessment. <u>This may include cross boundary considerations of need where proposals are adjacent to Horsham’s boundary</u>”.</p> <p>Option 2 the introduction of text into Policy HA2 (such as to Limb 2.a) to recognise the “at Crawley” location of the West of Ifield allocation and that a bespoke approach to identifying local needs is the more appropriate starting point for West</p>	To ensure the Plan is justified. For effectiveness

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	of Ifield's unique position. This will enable clarity during determination of the future planning application that an understanding of local needs including Horsham and Crawley need is the more appropriate starting point, as opposed to Table 9 of the emerging Local Plan. This could also be supplemented by an Additional modification to supporting text to make this clear.	
Figure 7	<i>Be clear that masterplan is conceptual. Include reference to 'indicative framework plan'</i>	For effectiveness
Para 4.3 /4.19 -4.21	<i>Additional wording needed to strengthen / clarify long term (30 year vision)</i>	For effectiveness
Strategic Policy 2	<i>Table 3: Settlement Hierarchy [Insert reference to Land West of Ifield]</i>	For clarity and effectiveness.
Strategic Policy 3	<i>6. Settlement boundaries may be altered through the development of Strategic Site Allocations</i>	For clarity and effectiveness.
Strategic Policy 9	<i>"Where an alternative water supply is to be provided, the water neutrality statement will need to demonstrate <u>the reduction in demand on that no water is utilised from</u> sources that supply the Sussex North WRZ. <u>If a residual demand on the sources that supply the Sussex North WRZ is still required (for example, for blending groundwater to achieve drinking water standards)</u> the water neutrality statement will need to clearly state how this will be offset or mitigated. The wider acceptability and certainty of delivery for alternative water supplies will be considered on a case-by-case basis."</i>	For effectiveness.
Strategic Policy 15	<i>"Development between settlements, <u>with exception of strategic sites</u>, will be resisted unless it can be demonstrated that the proposal meets all of the following criteria: a) There is no significant reduction in the openness and 'break' between settlements. b) The related urbanising effects within the retained 'break' between settlements are minimised, including artificial lighting, development along and / or the widening of the roads between the settlements, and increased traffic movements. c) Proposals respect the landscape and contribute to the enhancement of their countryside setting, including, where appropriate, enhancements to the Green Infrastructure Network, the Nature Recovery Network and / or provide opportunities for quiet informal countryside recreation."</i>	For clarity and effectiveness
Part 2 of Strategic Policy 23	<i>"Where there is a need for extra capacity, this will need to be provided in time to serve the development or the relevant phase of the development, <u>or as otherwise agreed with the relevant authority</u>, in order to ensure that the environment and amenities of existing or new local residents is not adversely affected."</i>	For effectiveness

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Part 3 of Strategic 23	<i>“To ensure required standards are met, arrangements for new or improved infrastructure provision will be secured by Planning Obligations/Community Infrastructure Levy, or in some cases conditions attached to a planning permission, so that the appropriate improvement can be completed prior to occupation of the development, or the relevant phase of the development in line with an appropriate implementation strategy demonstrated through the planning application evidence base.”</i>	Effectiveness Consistency with national policy
Part 2 of Policy 25	<i>“Adequate parking facilities in accordance with adopted parking standards guidance must be carefully designed into developments to meet the needs of users whilst achieving people-focused streets, <u>unless otherwise agreed with the relevant authorities</u>. Consideration should be given to the needs of motorcycle parking, and vehicles for the mobility impaired including mobility scooters.”</i>	For effectiveness
Para 8.18	<i>number of car parking spaces provided should similarly be in line with adopted standards, currently the West Sussex County Council Guidance on Parking at New Developments, and taking into account guidance on parking standards and design that may be produced by the Council. <u>For strategic allocations, where evidenced and agreed with the relevant authorities, a departure from the standard may be acceptable to encourage alternative transport modes</u>. All parking should be well-designed, to respond to relevant design guides and codes and ensure that pedestrians/wheeling, cyclists and communities are put before cars. It is critical that the needs of disabled drivers, and users of mobility scooters, are accommodated.”</i>	For effectiveness
Part 2 of Policy 27	<u>Where relevant</u> , new development must be designed to achieve healthy, inclusive and safe places, which enable and support healthy lifestyles and address health and wellbeing needs. It should be designed with mental and physical wellbeing in mind and seek to minimise 96 the negative health impacts arising from development. Proposals will be supported provided that they address requirements stemming from:	For effectiveness
Part 1 of Policy 28	<i>“1. The provision of new or improved community facilities or services will be supported, where they meet the identified needs of local communities as indicated in the current latest Open Space, Sport & Recreation Study, the Community Facilities Study, the Playing Pitch and Built Facilities Strategies, the Infrastructure Delivery Plan and <u>or</u> other relevant studies or updates and local engagement; and / or contribute to the provision of Green Infrastructure and nature recovery.”</i>	For effectiveness.
Part 2 of Policy 28	<i>“To facilitate community cohesion, integration, healthy and active living, all proposals for additional dwellings will be required to contribute <u>proportionately</u> to the provision and improvement of the quality, quantity, variety and accessibility of public open space, and public indoor meeting and/or sports halls to meet the needs generated <u>by the development</u> in accordance with the local minimum standards set out in Table 4. All open space and indoor provision will be required to</i>	For effectiveness. Consistency with national policy.

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	<p><i>have an agreed funded maintenance and management plan. The community use of school facilities will be supported but should be additional to that required to meet generated needs and should not be counted towards overall requirements generated by new developments unless it can be demonstrated that there may be impacts on the viability of facilities as a whole and is supported by a site-specific sport and recreation strategy.”</i></p>	
<p>Part 3(a) Policy 28</p>	<p>Proposals that would result in the total or partial loss of sites and premises currently or last used for the provision of community facilities or services will be resisted unless it has been demonstrated that one of the following applies:</p> <p style="padding-left: 40px;">a) the proposal will secure replacement facilities or services of equivalent or better quality, with appropriate capacity, and in an equally accessible location within the vicinity; or,</p> <p>(a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or</p> <p>(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</p> <p>(c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use; or.</p> <p style="padding-left: 40px;">b) —</p> <p>d) evidence is provided that demonstrates the continued use of the site as a community facility or service is no longer feasible, taking into account factors such as; appropriate active marketing, the demand for a community use within the site or premises, the quality, usability, viability and the identification of a potential future occupier.</p>	<p>For effectiveness</p>
<p>Part 1 of Policy 31</p>	<p><i>“Outside built-up area boundaries or secondary settlements, <u>or strategic site allocations</u>, economic development, which maintains the quality and character of the area whilst sustaining its varied and productive social and economic activity, will be supported in principle. Any development should be appropriate to the countryside location, and will be supported provided that:</i></p> <p style="padding-left: 40px;"><i>a) It does not prejudice, and contributes to, the diverse and sustainable farming enterprises within the District;</i></p> <p style="padding-left: 40px;"><i>b) It contributes to the sustainable custodianship of the countryside; and</i></p>	<p>For clarity.</p>

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	<p><i>c) In the case of non-farming countryside-based enterprises and activities, it contributes to the wider rural economy and/or promotes recreation in, and the enjoyment of, the countryside, and complies with the following hierarchy:</i></p> <ul style="list-style-type: none"> <i>i. As first preference, is contained within suitably located existing buildings which are appropriate for conversion or, in the case of an established rural industrial or commercial site, within the existing boundaries of the site;</i> <i>ii. Where i) is not feasible, proposals for new buildings or development will be supported where it can be demonstrated that the proposal will contribute to sustainable rural economic growth that supports balanced living and working communities.”</i> 	
<p>Policy 32</p>	<p><i>“Outside defined built-up areas and secondary settlements, <u>or strategic site allocations</u>, conversion of redundant agricultural and forestry buildings to residential use, will be supported where all of the following criteria are met:</i></p> <ol style="list-style-type: none"> <i>1. The building is in established agricultural or forestry use and it can be demonstrated that: <ul style="list-style-type: none"> <i>a) the current use is no longer necessary, or</i> <i>b) the proposal would secure the future of an existing heritage asset or a building worthy of retention.</i> </i> <i>2. The building is appropriate for conversion given its existing scale, architectural merit, character and setting, including its relationship with surrounding uses.</i> <i>3. The existing building is not so derelict as to require substantial reconstruction, significant alteration or extension.</i> <i>4. The site is served by an existing metalled road or other suitable access to the local road network.</i> <i>5. The proposal would not result in a property with an overly domesticated or urban character, nor adversely affect the character, appearance or visual amenities and the intrinsic character and beauty of the countryside of the wider area.</i> <i>6. It is demonstrated that the proposal will: <ul style="list-style-type: none"> <i>a) Enhance the immediate setting through its design and appearance, landscape design and materials;</i> <i>and</i> <i>b) enhance biodiversity in and around the site.”</i> </i> 	<p>For clarity and effectiveness.</p>
<p>Policy 35</p>	<p><i>Table 8: Town Centre Hierarchy</i> <i>[Insert] <u>Neighbourhood Centre: Land West of Ifield</u></i></p>	<p>For effectiveness.</p>

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Strategic Policy 37	<p><i>[Insert the unmet housing need for Horsham District Council, over the Plan period].</i></p> <p><i>[Insert the unmet housing need for neighbouring authorities over the Plan period]</i></p> <p><i>[Identify the trigger events that would require a Plan review]</i></p>	For effectiveness				
Part 1 of Strategic Policy 43	<p><i>“1. The Council will seek to meet the identified current and future accommodation needs of Gypsies, Travellers and Travelling Showpeople in Horsham District by:</i></p> <p style="padding-left: 40px;"><i>a) Safeguarding existing authorised sites for Gypsies, Travellers and Travelling Showpeople in the District, unless it can be demonstrated that the site is no longer required to meet identified needs;</i></p> <p style="padding-left: 40px;"><i>b) Allocating the following sites for Gypsy & Traveller accommodation, and Travelling Showpeople accommodation, as shown on the Policies Map and as set out in table 11, to contribute towards the identified 10-year need, subject to evidence of need at the time of any planning application;</i></p> <p style="padding-left: 40px;"><i>c) Consider planning applications for non-allocated sites that will contribute towards meeting identified needs in accordance with paragraph 2 of this policy...”</i></p>	To ensure the Plan is justified.				
Table 11 of Strategic Policy 43	<p><i>“Table 11: Gypsy and Traveller & Travelling Showpeople Site Allocation</i></p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 30%;">Site</th> <th style="width: 20%;">Existing Authorised Gypsy & Traveller Pitches</th> <th style="width: 20%;">Proposed <u>Indicative</u> Additional Net Pitches</th> <th style="width: 30%;">Total Gross Pitches (Total <u>Indicative</u> Net Pitches)</th> </tr> </thead> </table>	Site	Existing Authorised Gypsy & Traveller Pitches	Proposed <u>Indicative</u> Additional Net Pitches	Total Gross Pitches (Total <u>Indicative</u> Net Pitches)	
Site	Existing Authorised Gypsy & Traveller Pitches	Proposed <u>Indicative</u> Additional Net Pitches	Total Gross Pitches (Total <u>Indicative</u> Net Pitches)			
Policies Map	<i>Remove CWMMC safeguarding within the Land West of Ifield Boundary</i>	For effectiveness				
Policies Map	<i>Update CWMLL safeguarding corridor to provide greater flexibility to allow for alignment to be led by detailed design / optioneering as part of future Local Plan reviews</i>	For effectiveness				
Policies Map	<i>Remove specific location of Gypsy and Traveller pitches</i>	For effectiveness				

ANNEXE 2:

Ifield Golf Club

Homes England Updated Position Statement

March 2024

Introduction

- 1.1 In November 2023, Homes England submitted to Horsham District Council (HDC) a position statement regarding the potential impacts arising from the loss of Ifield Golf Facility, as a direct result of redeveloping the site. This updated position statement provides an overview of the ongoing assessment and confirms the previous position that any loss of the sporting facility could be justified in accordance with Paragraph 99 of the National Planning Policy Framework (“NPPF”)²².
- 1.2 Following the publication of the Horsham Local Plan Review (2023 – 2040) in January 2024, Ifield Golf Facility has now been confirmed as forming part of the Land West of Ifield Strategic Allocation (Policy HA2). It will therefore be necessary for HA2 to be assessed against Paragraph 99 of the NPPF and for any future planning application to accord with the requirements of the Plan Policy 28(3)²³ and Policy HA2(g).
- 1.3 Through the position statement issued in November 2023, it was indicated that following an assessment of the supply of existing golf facilities, and future demand for golf provision within the catchment of Ifield Golf course, there was no overriding case to retain the existing Ifield golf facility, and that there was sufficient opportunity locally to meet future demand, and be better aligned with future golfing needs identified by England Golf.
- 1.4 Consideration was also given to how mitigating the loss of the Golf Facility could be secured through the proposed redevelopment. Consideration was given both in terms of the securing off site mitigation that better meets future golfing needs (NPPF Para99 (b)) and direct delivery of alternative sports and recreation provision (NPPF Para99 (c)) which would outweigh the loss of the current use. While there were no definitive conclusions, ongoing discussions and early engagement with England Golf and Sport England confirmed that the requirements of Para 99 when considered as a whole could likely be met.
- 1.5 Ahead of a final Para 99 assessment being issued later this year in support of a future planning application and ahead of the Examination on the draft Local Plan, this update note sets out further work that has been undertaken since November 2023, providing further certainty around the opportunities for any redevelopment to be brought forward in line with the requirements of draft Policy HA2 allocation to justify the loss of Ifield Golf facility and satisfy the tests of NPPF Para 99.

Para 99 (a) – Consideration of Golfing Needs

- 1.6 Ongoing engagement between Homes England’ project team, Sport England and England Golf has continued to consider future need and supply for Golf over the Plan period. Supplemented through more detailed engagement with golf providers within the catchment area, the position set out in the November 2023 statement remain valid. The position therefore remains that there is no overriding need to retain the

²² Note Para99 refers to the September 2023 version of the NPPF against which the Local Plan will be assessed. In December 2024 an updated version of the NPPF was published, with the relevant tests set out in Para 104. It is this version that any future application will be assessed. There is no substantive difference between the two versions of the NPPF and therefore this position stands for both versions of the NPPF.

²³ Note Policy 28(3) as currently drafted is not consistent with NPPF and changes are required to ensure soundness of the Plan.

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Ifield Golf Facility or to re-provide the facility on a like for like basis, and that any displaced golfing function and demand for future golfing needs could be met better elsewhere within the catchment area.

- 1.7 As set out in more detail below, further discussion between the parties regarding a potential mitigation package shows that a number of qualitative and quantitative improvements could be secured within the catchment area that would sufficiently enhance overall golf provision that is better aligned with future needs than could otherwise be met through the Ifield Golf Facility alone.

Para 99 (b) – replacement of equivalent of better provision

- 1.8 In the context of the Part A assessment and in considering future golfing needs within the catchment area, it has been established that there isn't a need for a like for like replacement of the Ifield Golf Facility. Notwithstanding this, it is clear that opportunities exist within the catchment area to increase participation in golf and mitigate the loss through targeted investment in both qualitative and quantitative measures. These interventions would be better aligned with future golfing needs and addresses existing barriers to golfing for a greater percentage of the catchment population.
- 1.9 Through ongoing discussions with England Golf and Sport England, a mitigation approach has been discussed that would seek to channel future investment within the Ifield Golf Course Facility catchment area in a way that is aligned with the needs identified above.
- 1.10 As such an overarching mitigation strategy is being developed that will:
- **target investment in municipal courses within the IGF catchment** – this approach means there is a suitable route to secure the required mitigation as part of a future s106 agreement, 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 municipal courses more attractive to those potentially displaced from the Ifield Golf Facility, encouraging new and displaced golfers to join other clubs 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, this represents a significant proportion of future golf demand across the catchment area.
- 1.11 As well as meeting the future needs / demands for golf provision over the Local Plan period, the overarching mitigation strategy also has a number of other benefits and responses to issues identified in the ANOG assessment, with the potential to address other barriers to golf accessibility within the catchment area including:
- providing certainty as to how and when mitigation for the loss of the IGF can be secured.
 - allowing greatest flexibility so that the mitigation strategy can be aligned with local priorities.
 - addressing other accessibility issues such as affordability and
 - enhance viability and long term financial sustainability of publicly owned facilities.
- 1.12 In developing the mitigation strategy, further engagement has been undertaken with England Golf, Sport England, Horsham and Crawley local authority leads and centre operators to identify whether or not credible opportunities for improvements exist at both municipal facilities in the catchment (Rookwood and Tilgate) and that these align with the objectives set out above. To date a number of options at both courses

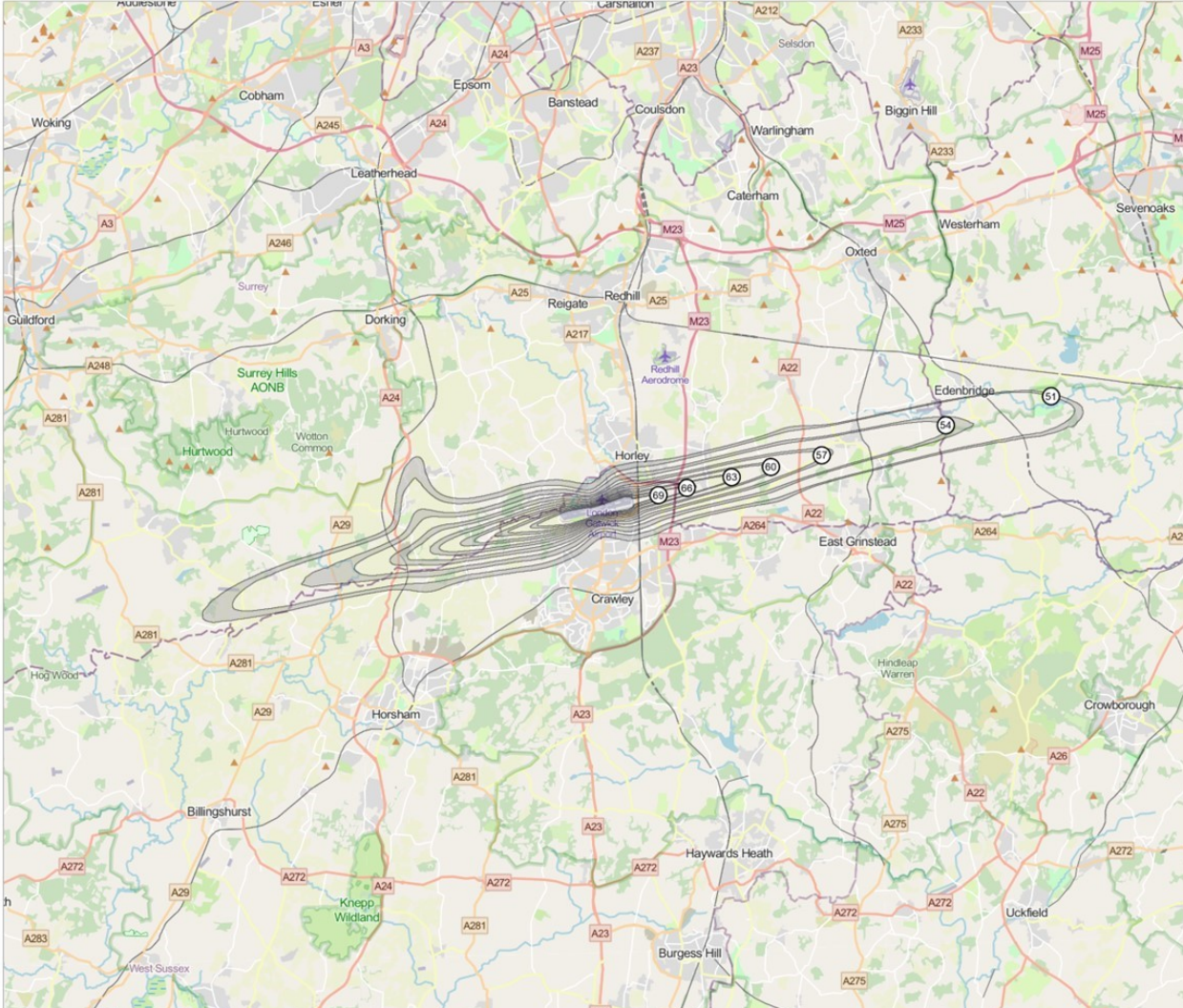
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have been identified and further work is now being undertaken to refine these and cost these to ensure any mitigation package is targeted to those improvements that will have greatest impact against the overarching objectives.

Paragraph 99 (c) - Alternative Sports and Recreation Provision

- 1.13 As set out in the November 2023 update, development at West of Ifield proposes a significant package of investment in alternative sports and recreational facilities which can be delivered through the redevelopment of both the existing Ifield Golf Facility and wider site allocation; the benefits of which are anticipated to clearly outweigh the loss of the Ifield golf facility.
- 1.14 Specific sport and recreational requirements are now set out in draft Local Plan Policy HA2, giving greater certainty that qualitative and quantitative improvements will be secured through redevelopment of the Ifield Golf Facility and wider masterplan area. These include both formal and informal facilities, providing the broadest range of improvements in sporting and recreational provision, improving access to these facilities for a larger proportion of the local population than is currently met through the golf course alone.
- 1.15 To support the implementation of sports and recreation uses across the site and ensure future provision aligns with local needs, a site specific Sport and Recreational strategy is being prepared. This strategy will provide an updated assessment of sporting and recreational needs within the catchment of West of Ifield site allocation (Policy HA2) and has been informed through consultation with Sport and Leisure Officers from both Horsham District Council and Crawley Borough Council, Sport England, as well as engagement with a wide range of national sporting bodies.
- 1.16 The strategy has been developed in-line with Sport England's previous comments on the draft Local Plan that any planning application should consider the implications for sport in the context of NPPF Paragraphs 98 and 99, local plan policy and any strategic evidence set out in local playing pitch and/or built facilities strategies. The strategy has also built in the impact of growth on the sporting infra-structure, utilising Sport England planning tools to assess the impact of increased demand generated by the development.
- 1.17 While still subject to ongoing engagement with both local authorities and sporting bodies, the strategy has informed the illustrative masterplan, and shows that there is an existing demand for sports facilities within the wider catchment of the West of Ifield site allocation that can be addressed through the proposed sports and recreational facilities. Specific opportunities include the provision of a new local leisure facility to meet future swimming pool needs; increased health and fitness and indoor sports facilities; additional pitch and court provision and club access to high quality training and playing facilities; as well as a range of informal recreational spaces that support Sport England's Active Design principles.
- 1.18 Informed by the strategy, it is intended that the planning application will facilitate the provision of sport and recreation which aligns with the identified need, evidenced by the engagement with relevant bodies, and underpinned by the draft Local Plan evidence base. Given the hybrid nature of the proposed planning application for site allocation HA2, whereby the development will be secured in "outline", it is proposed that the provision, and phased delivery, of these sport and recreation facilities will be secured through the planning permission, through planning conditions, Section 106 legal agreement or CIL funds, as appropriate. This will ensure that early benefits are derived from the site, including establishing community use agreements as part of the delivery of the secondary school, so as to realise opportunities from the site at the earliest opportunity.

Appendix 2



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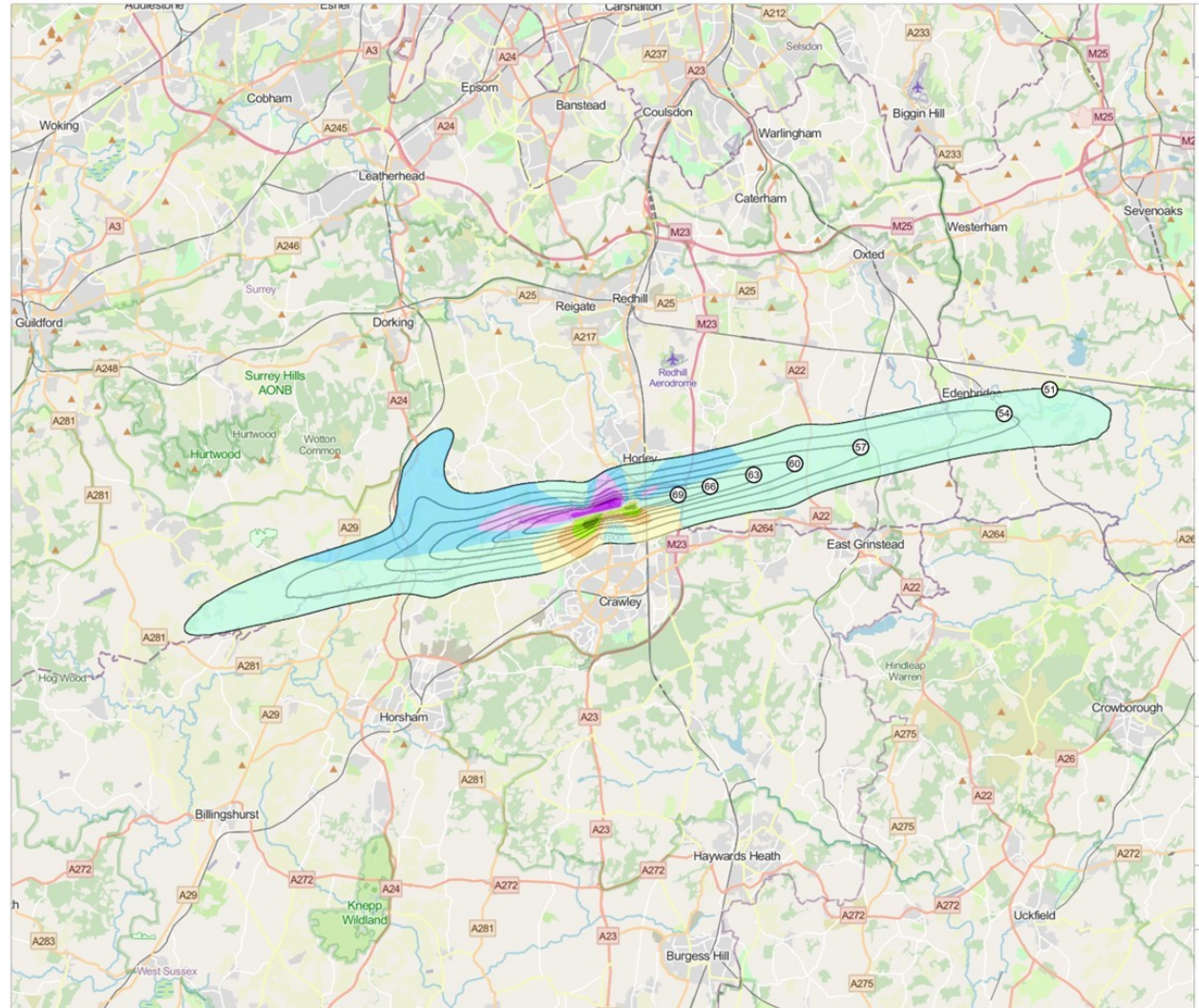
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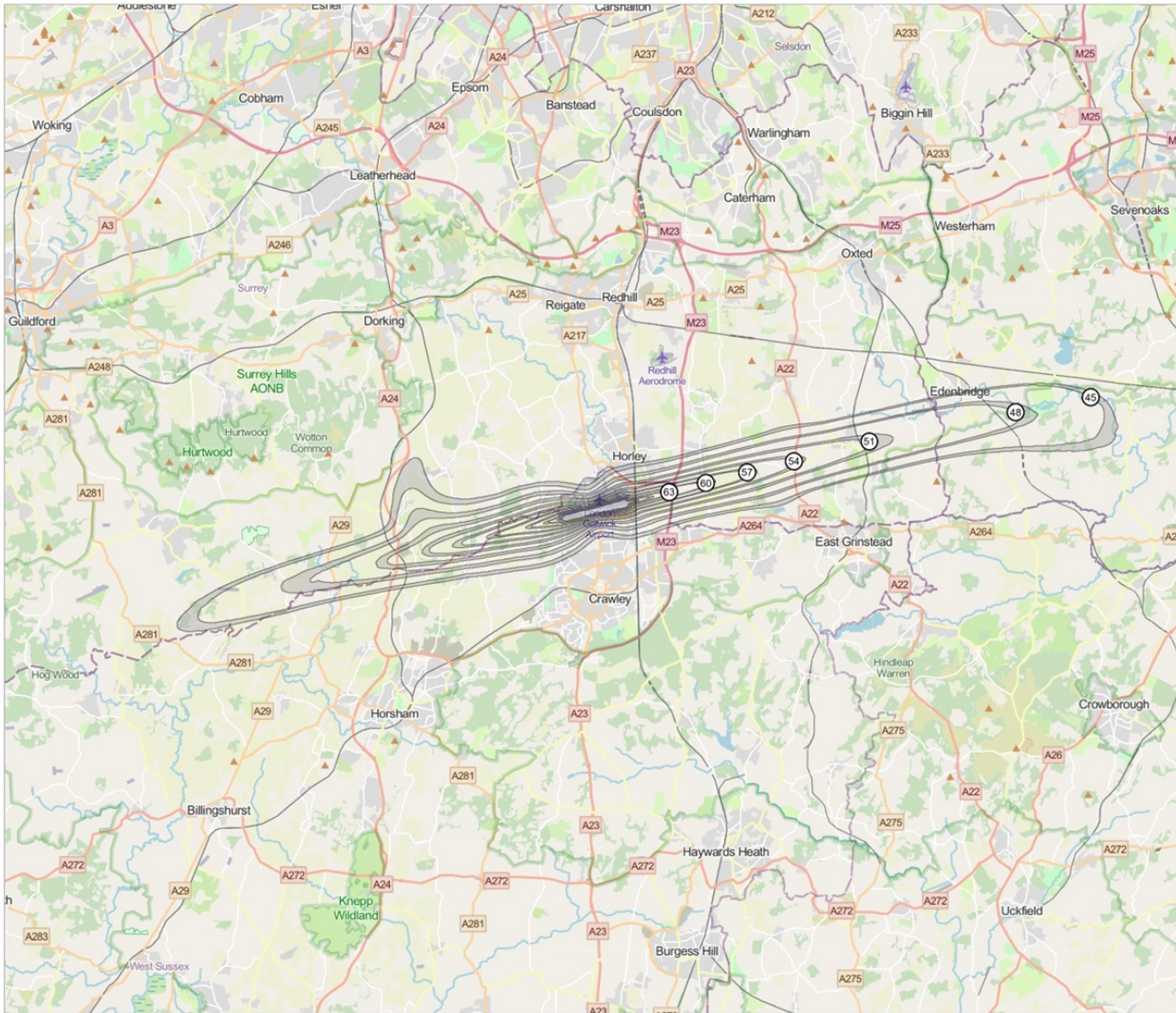
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KEY
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DOCUMENT
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DRAWING TITLE
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DATE
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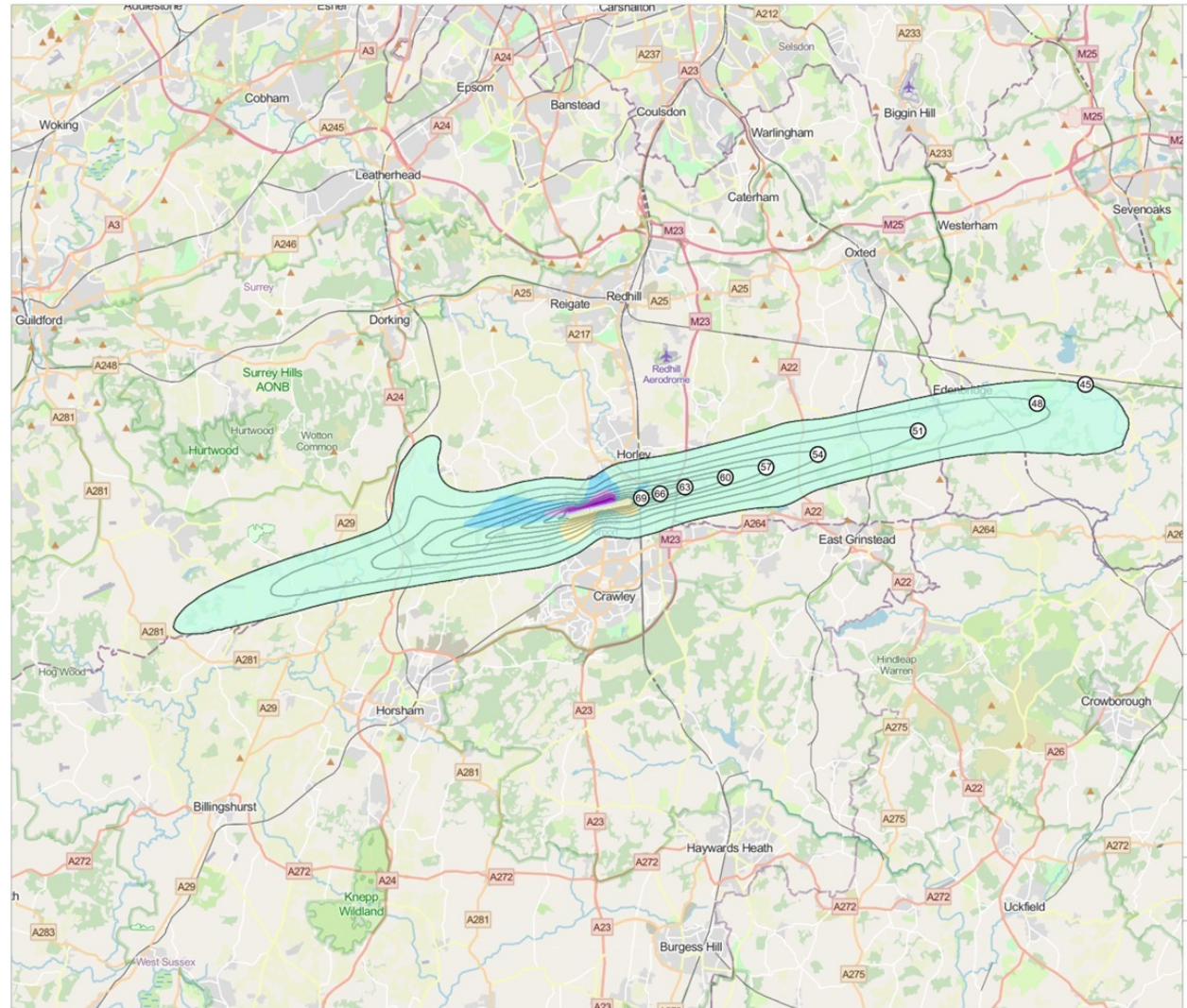
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Appendix 3



The Housing and Regeneration Agency

Homes
England

Land West of Ifield

NPPF Para 103 Assessment

DRAFT

July 2024



Contents

1. Introduction
2. Background Context & Policy
3. Para 99 / 103 (a) – Golf Supply and Demand within the Ifield Golf Club Catchment
4. Para 99 /103 (b) – Alternative Golf Facilities
5. Para 99 /103 (c) – Alternative Sports and Recreation Facilities
6. Options for securing Mitigation
7. Conclusion

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

Annex B: Mapledurham judgement

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

Annex D: Tilgate Course Improvement Opportunities

Annex E: West of Ifield Sport and Recreation Strategy (SPC, July 2024)

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

Table 2: Potential infrastructure improvements in Horsham (Rookwood)

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Figure a: HDC Draft Local Plan masterplan for Site HA2

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

Figure c: Location of Ifield Golf Club Membership

Figure d: Distribution of Ifield Golf Club Membership by Postcode

Figure e: Distribution of Ifield Golf Club Membership by Postcode

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

Figure g: Public right of way plan

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

Figure i: Illustrative sport and recreation strategy layout

Figure j: Active travel corridors identified in LCWIP documents

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 IGC 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 (September 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.

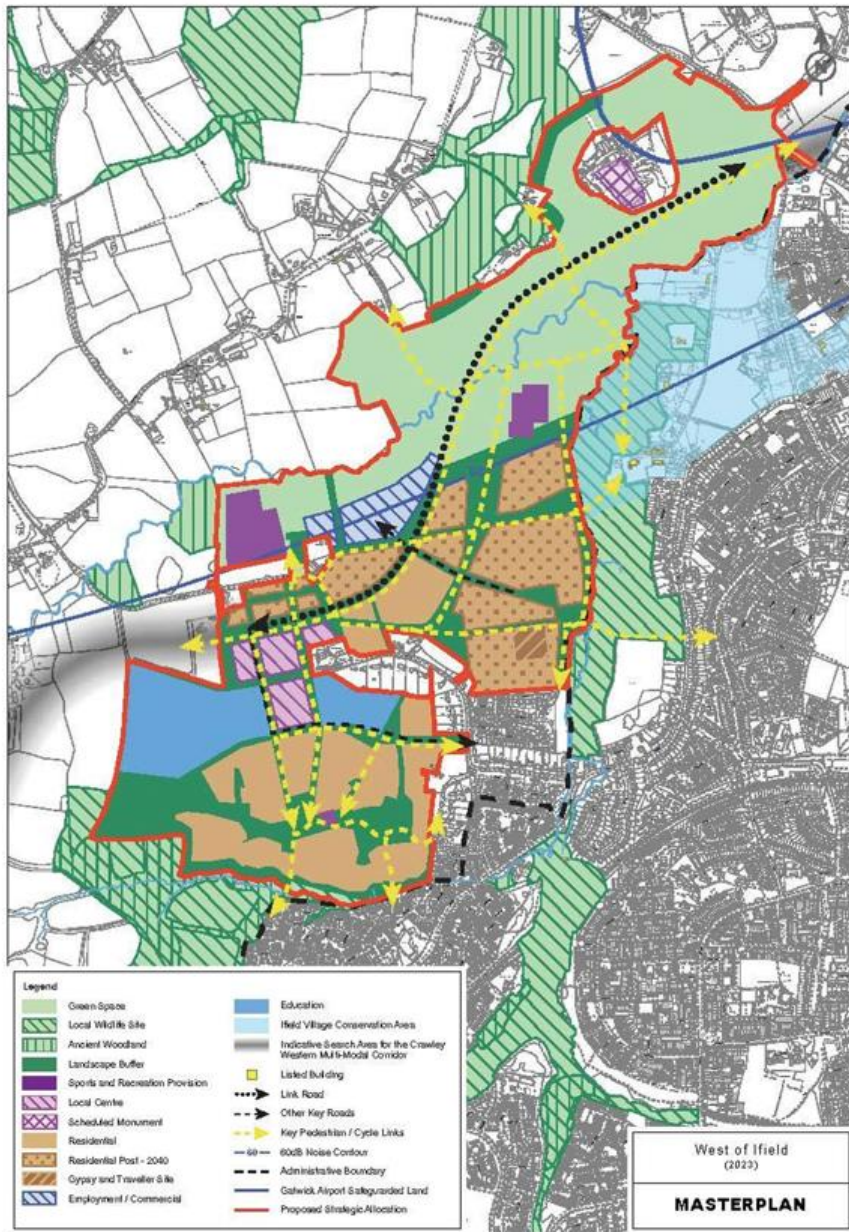


Figure a: HDC Draft Local Plan masterplan for Site HA2

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 golfs 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 Sinfeld). 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 prospects 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 \(intelligentgolf.co.uk\)](#)

⁶ [agm_2023 - finance_report.final.pdf \(intelligentgolf.co.uk\)](#)

- 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.

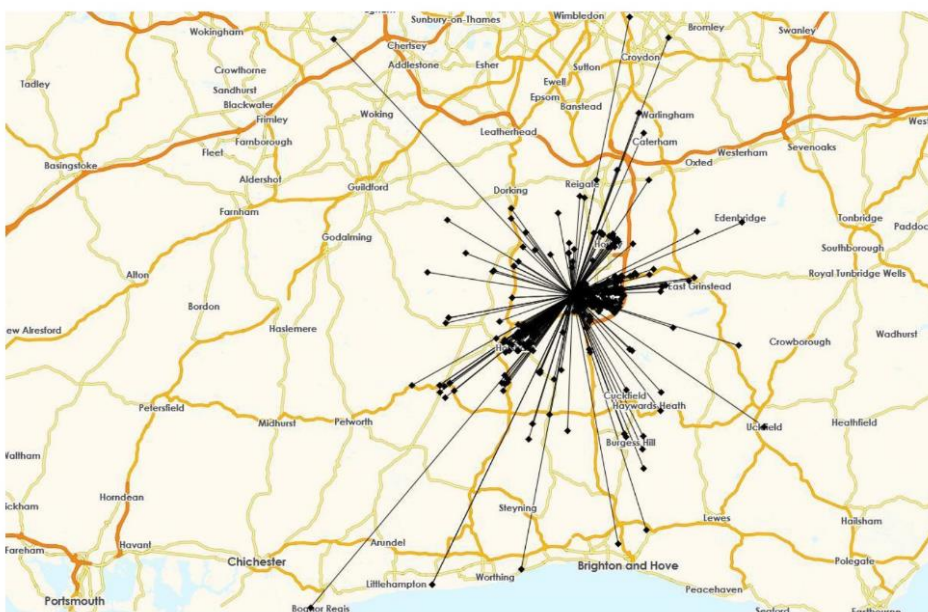
ii) IGC's value as a local golfing facility

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://www.intelligentgolf.co.uk/wp-content/uploads/2023/04/2023-ifield-golf-club-accounts-for-the-year-ending-april-2023-signed.pdf)

Ifield Golf Course Assessment - Member Catchment

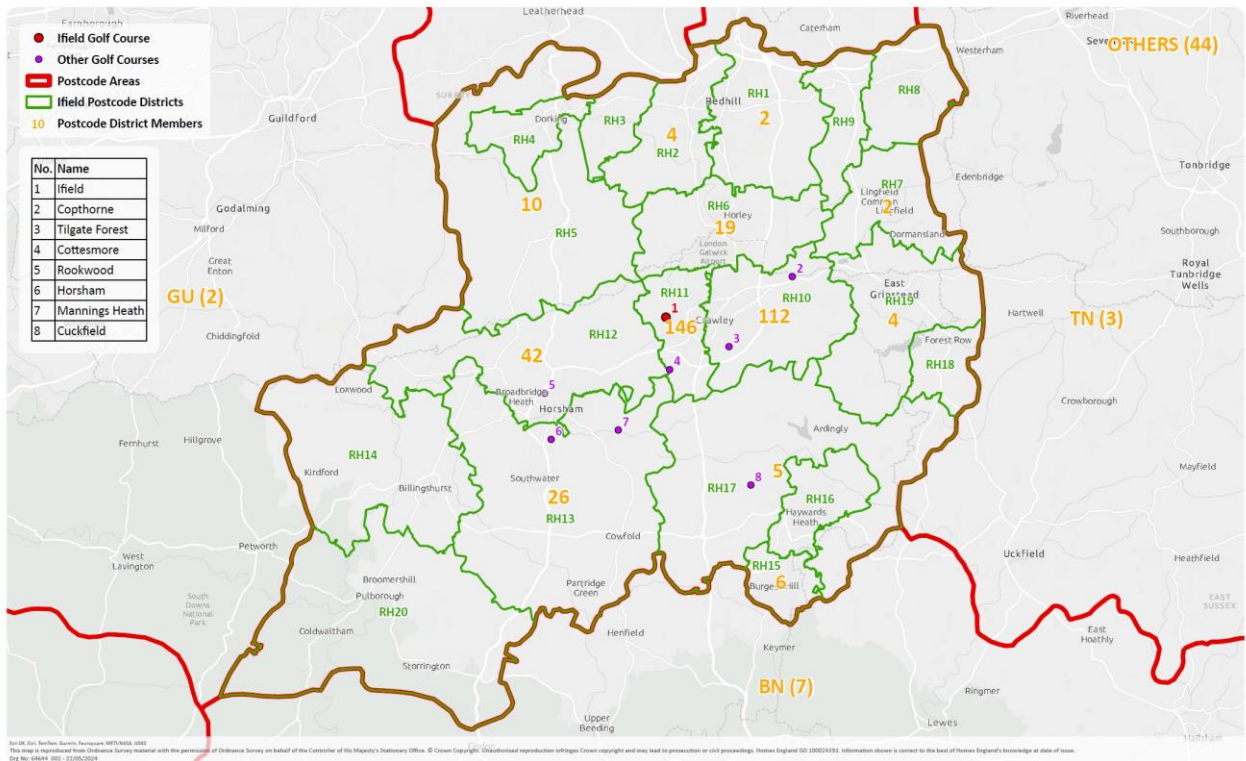


Figure d: Distribution of Ifield Golf Club Membership by Postcode

- 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

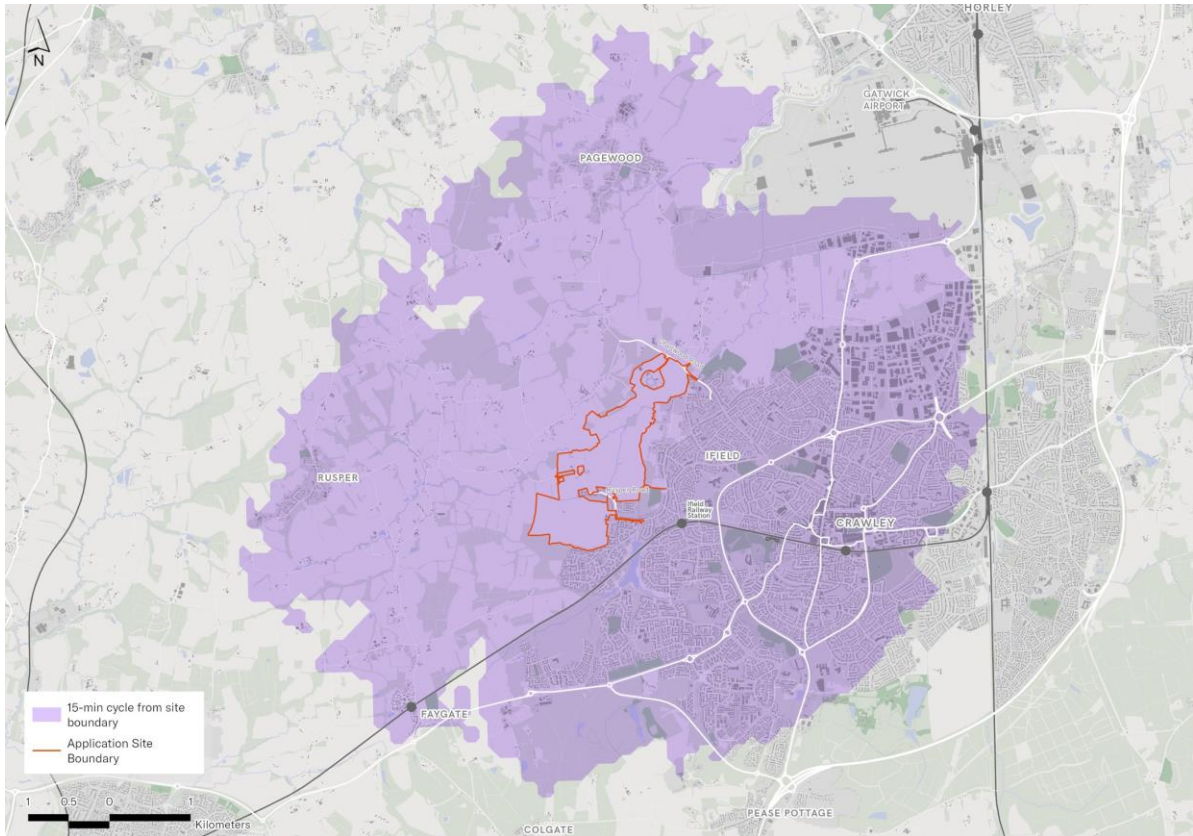


Figure e: Distribution of Ifield Golf Club Membership by Postcode

- 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

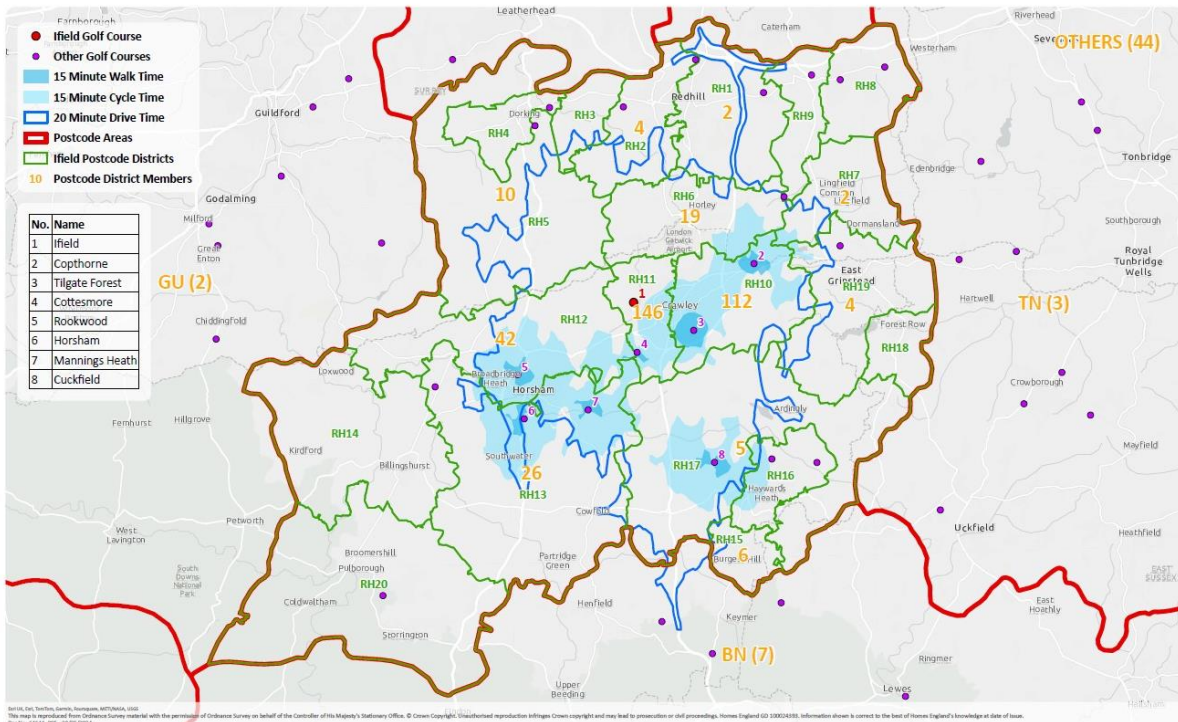


Figure f: Drive / Walk / Cycle catchment of retained golf facilities.

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://ons.gov.uk)

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 \(intelligentgolf.co.uk\)](#)

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 Minimum size delivers 2 courts more than baseline requirements to address wider sporting needs needs)
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)	

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.

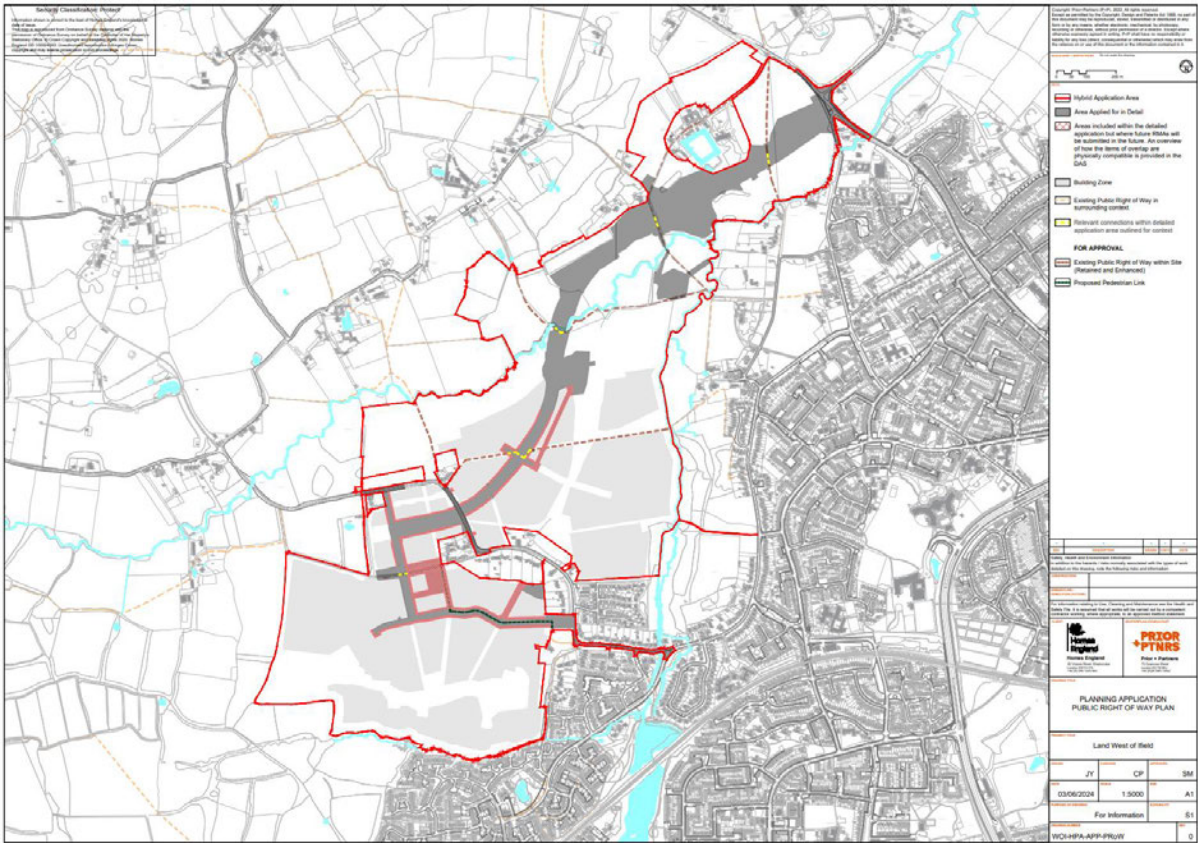


Figure g: Public right of way plan.

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	Minimum of 3,400 sqm	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.

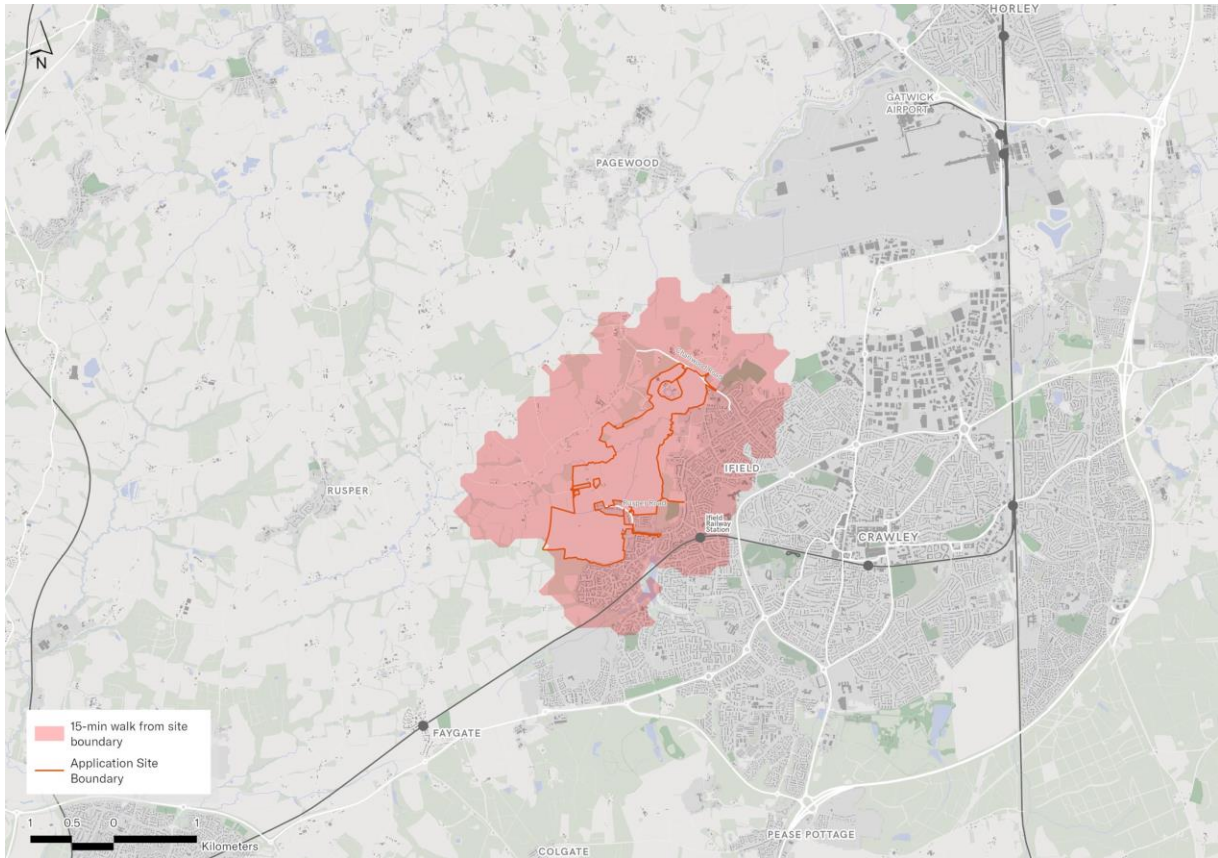


Figure h: 15 Minute Walking Catchment around West of Ifield site allocation boundary.

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.

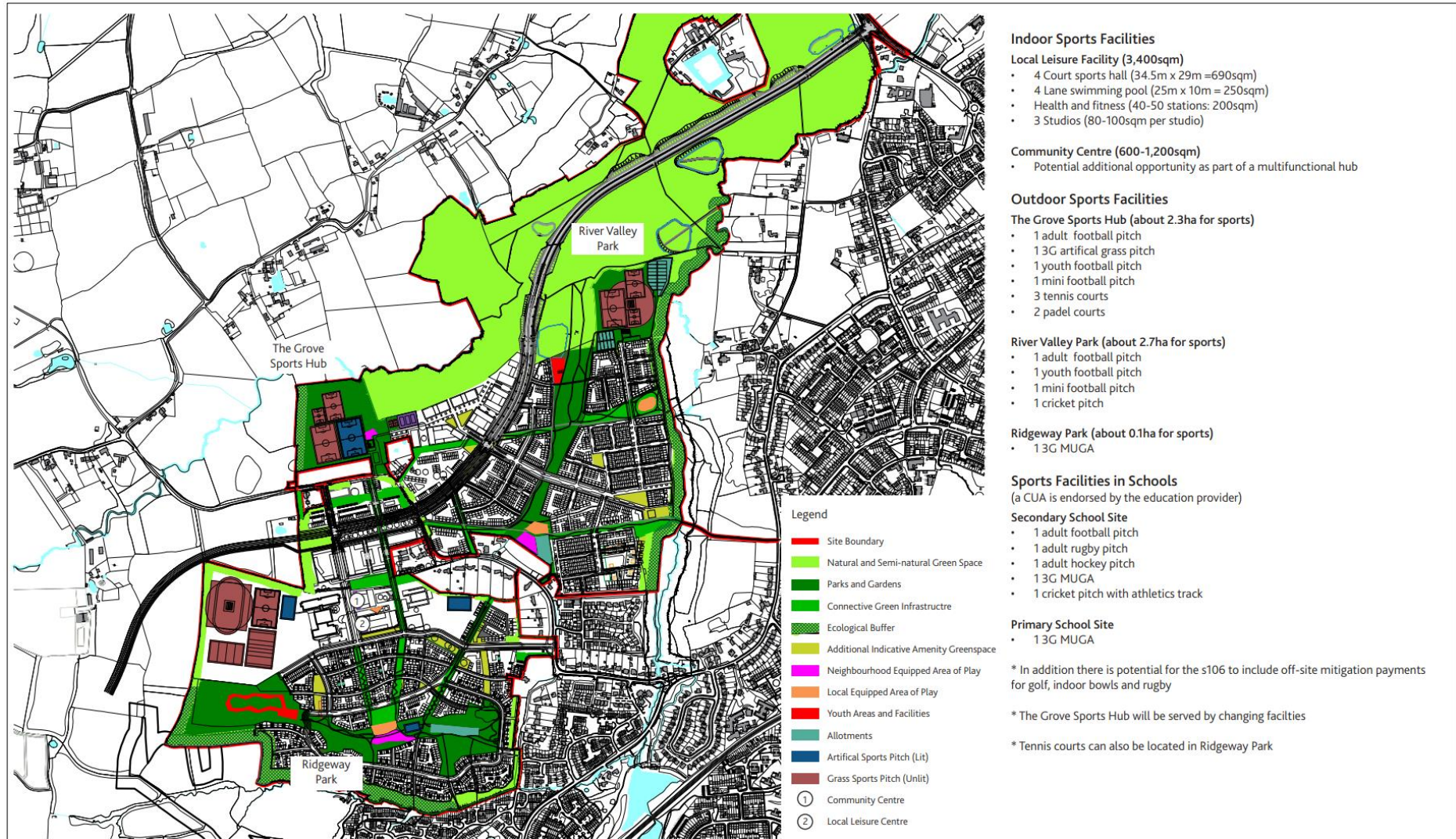


Figure i – Illustrative sport and Recreation Strategy layout

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.

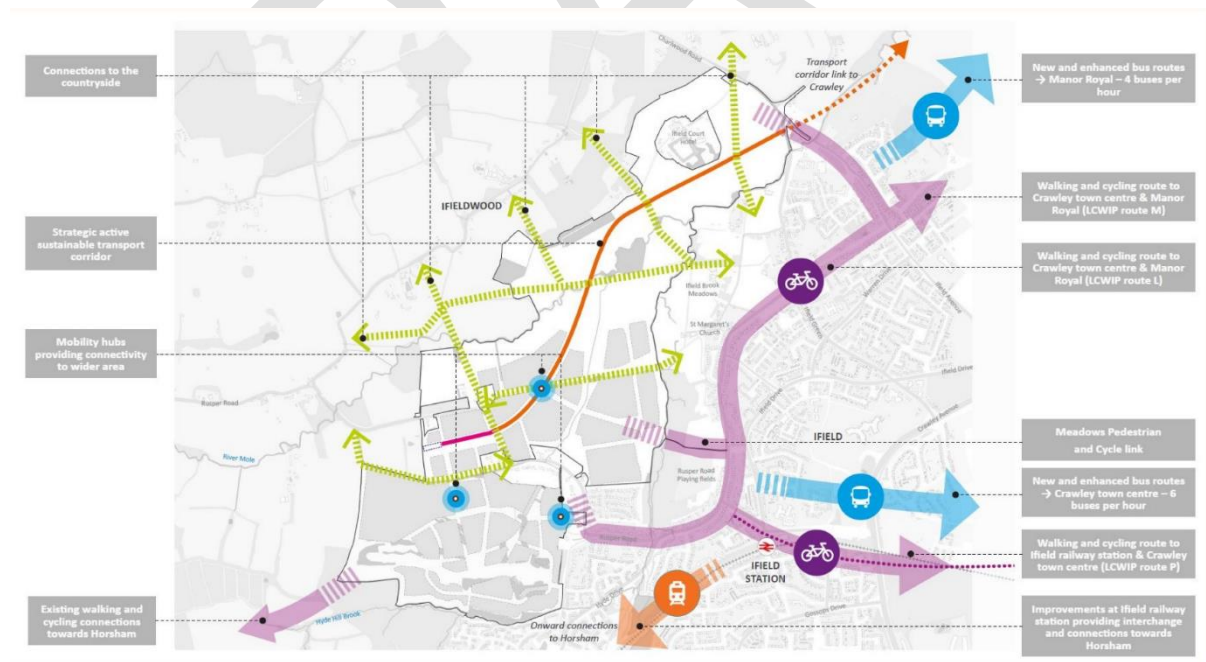


Figure j: Active travel corridors identified in LCWIP documents.

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 out 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.

DRAFT

Land West of Ifield

Golf Needs Assessment DRAFT

Prepared on behalf of Homes England

By Sports Planning Consultants

July 2024

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DRAFT

Executive Summary

Introduction

IGC Golf and Country Club (IGC) is located within the administrative boundaries of Horsham District Council (HDC) and close to Crawley Borough Council (CBC), the Land West of IGC proposal involves land owned by Homes England south of Rusper Road, which is currently run as an 18-hole golf facility and is leased to IGC on an unsecured, short-term lease arrangement that expires on 30 April 2026.

In order to understand the longer-term future of IGC and to support the Local Plan submission and subsequent planning application, Sports Planning Consultants (SPC) have been commissioned by Homes England to undertake a needs assessment for golf.

The assessment follows the guidance of the National Policy Planning Framework (NPPF) that a robust assessment is required, which compares supply with demand to identify need. The accepted approach for undertaking this is the Assessing Needs and Opportunities Guide (ANOG). This report therefore considers the supply and demand of facilities in the 20-minute core drivetime catchment area, using the appropriate planning tools, in-line with ANOG and the NPPF.

The assessment has considered the strategic context, the long-term trends in golf. Golf participation profile across the area, examines supply and demand of golf facilities in terms of *quantity, quality, access and availability* and utilises Sport England and England Golf's planning tools, as appropriate, to develop the needs and evidence base and subsequent conclusions.

HDC's own golf study concludes there is adequate supply in Horsham to meet local need, with above average provision, and demand can be accommodated at present. However future demand must be taken into account, and it is unlikely that any closure of facilities could be justified, as there would be capacity issue, without mitigation. This would be dependent on separate site-specific assessments of golfing needs across relevant catchment areas, in-line with the NPPF requirements. This study responds to the recommendations set out.

Golf does not operate on the basis of Council administrative boundaries. It is accepted by England Golf that the primary catchment area for a golf course is a 20-minute drive time. Normally over half of a club's regular golfers live within this drive time. In undertaking an analysis of need it is therefore more relevant to consider catchment areas as opposed to local authority administrative boundaries. The 20-minute core drivetime catchment Ifield Golf Club takes in parts of both the Horsham and Crawley districts. The assessment therefore focuses on the needs in the catchment as opposed to individual local authority administrative areas in line with planning policy.

This report therefore sets out a needs assessment for golf in line with the NPPF, to consider the need for a golf course in the 20-minute core drivetime catchment area of Ifield. The analysis draws the evidence together and reaches a conclusion on need to inform the future use and planning for the Land West of IGC site in the context of the Local Plan. The assessment is a work in progress and will be constantly reviewed and updated as the West of IGC application progresses through the planning process

Supply

Quantity

The core 20-minute drivetime catchment around IGC has 8 courses (sites) 9 equivalent standard courses in total, 3 par three / pitch and putt course and 4 driving ranges. Relative provision for all standard courses in the core 20-minute catchment is well provided, and above the county and regional average and above the national average. This accords with the findings for Horsham Council area study (KKP, 2022), where supply was also found to be well matched with demand.

If IGC were to close, the ratio of courses would fall to 0.56/1000 in the core 20 minute catchment, just below the county average, but still above the England average. In terms of relative supply alone, the loss of IGC would have an impact but any displaced golfers could travel to other courses, with reasonable levels of provision remaining, and to be both accessible and available.

In relation to the golfer journey, the provision within the catchment appears reasonably well balanced. There is however no obvious Leisure offer, (other than Goffs Park, which has seasonal opening) e.g., adventure or crazy golf etc, whilst there are some opportunities for the Recreation Golfer to be introduced to the game, these are also limited, however there is a good, universal offer catering for more established golfers and those who choose to become members of clubs.

Quality

Despite there not being any official rankings or objective way of assessing the quality of golf courses, it would appear from the reviews that each of the facilities within the core catchment is offering a course (and in most cases supplementary amenities) of good to high quality.

In terms of playability and quality IGC is reflective of other courses in the core catchment and other courses reflect the IGC quality and positioning. Whilst a well-respected course, IGC does not appear to have any unique value in comparison with other offers in the catchment. At IGC itself, existing conditions of the course means that the course has regular periods of closure during winter months which limits accessibility for a period of the year.

In terms of fitness for purpose, it is necessary to look at quality from a wider perspective and consider the need for good quality entry-level golf in line with strategic priorities of the England Golf and the needs in the catchment. The types of courses available are therefore mainly conventional 18-hole standard courses. The member offer is therefore well catered for, through various operational models. The two main municipal 'public' pay and play courses make a contribution to the introduction of newer golfers to the game and their development, this could be enhanced further through targeted investment.

The loss of IGC would not therefore have a significant impact on the mix of facilities or limit opportunities for newer golfers looking to take their first steps into the game. There remains a gap in the *leisure, recreation and golfer market*, which provides the stepping stones into more regular golf participation and transition to golf on standard courses.

Accessibility

Accessibility by car to facilities by car in the whole Horsham and Crawley area is good – almost the whole population can access a golf facility within a 20-minute drive, and the majority within 10 minutes. There is also an element of choice for local residents to more than one course or facility, and overall accessibility would not be impaired if IGC were to close.

The majority of IGC members have easy access to other course within a 10 and 20-minute catchment. When analysing the breakdown of the membership provided by IGC it can be seen that approximately 165 members (circa 32%) are located outside of the core 20-minute catchment, meaning other courses outside the core catchment will also provide further opportunities for any displaced use.

Availability

There is evidence of vacancies at many of the clubs in the core-catchment (5), and from consultation, websites and other sources clubs are generally keen, or need, to attract new players. There is an absence of waiting lists at most if not all courses, 2 clubs have waiting lists and 3 of the clubs have joining fees.

Most if not all are seeking new members. Most clubs in the core catchment, including IGC are experiencing declining or static usage and membership. Whilst there are lots of flexible offers, IGC is

not the cheapest course, so any loss would not be impacted by price. There appears to be capacity in the catchment to accommodate any displaced IGC members, price would not appear to be a barrier.

Demand

Golf is the fifth largest participation sport in the country, with around 730,000 members belonging to one of 1,750 affiliated clubs. Research led by the R&A in 2020 together with the home nation golf unions found that there were 5.2 million on-course adult golfers, playing full-length courses (either 9 or 18-holes) in Great Britain. The latest figures showed that 4.8 million people played in 2021, down from the COVID peak. Sport England Active Lives Survey, measures regular participation in sport as twice in the last 28 days, the figure for golf in 2021/22 was 2.2%, which is the same as recorded in 2015/16. Alongside membership, participation would therefore appear to be static.

Up until the mid-1980s, the demand to play golf in the UK comfortably exceeded the supply of golf courses. This reversed the mid-1980s supply/demand position to one where, on a national basis, there was generally supply/demand equilibrium but edging towards golf course oversupply. From around the year 2003, the UK experienced a steady decline in golf club membership numbers. These trends were confirmed in the 2023 BRS Golf participation survey, which concluded that registered member numbers at golf clubs has started to decline. This was further evidenced by Contemporary Club Leadership, who regularly survey golf club leaders, the most recent survey in 2023 found that membership resignation had risen, with the average rate tracking at 6%. Membership attrition rates and generally considered to be running at 7% per annum.

Demand for membership is also struggling at IGC and more broadly across the catchment in-line with these national trends.

Against this backdrop England Golf is focussed on sustainability and consolidating current clubs rather than expanding the market but also developing clubs to be more viable.

Based on the England Golf regular participation measure of twice per year when assessing the RGD for Horsham it shows an index of 90, which is just below the national average which could suggest that the facilities available are adequate to meet the demand of those in the authority who play golf regularly. Taking Ifield out of the equation would reduce the RGD index for Horsham to 108.

In the 20-minute core catchment using the 2 x 28 metric as a scenario, the catchment has an index of exactly 100, which suggests there is a balance of supply and demand, equal to the national average. Within this area, and at a more local level, Horsham has an index lower than 100, suggesting low demand compared with supply. If Ifield was removed from the 20-minute core catchment the RGD would change to 112 for the core 20-minute catchment. The inclusion of Slinfold would re-establish a balanced position without IGC in the 20-minute core catchment.

The trends at both national level and at IGC itself would suggest that overall growth is unlikely to be significant. All clubs consulted reported either static or declining membership and usage. Any increases via population growth is therefore likely to be negated by downward trends and attrition.

Most additional future demand is likely to occur mainly from beginners, juniors and others new to the game, particularly women and girls, and this will have implications for the types of facility and offer that are required in the future, at least in the initial stages.

Conclusion

The ANOG process requires the triangulation of evidence; taking account of all factors in terms of supply; *quantity, quality, access and availability* and set against national trends and local demand. The findings of this assessment have been set out in the proceeding sections.

There will be impacts of the potential closure of IGC, as it is a much loved and operational course, however in planning terms we conclude that there is a relatively balanced position in terms of current supply and demand. The closure of IGC would have an impact on this position, but any displaced golfers

could travel to other courses, with good levels of provision remaining and which appear to be accessible and available, based on recent consultation. The existing supply could accommodate the loss of IGC, given 5 courses have availability and are looking to increase membership and usage, plus predicted growth. Growth will have limited impact given the trends and likely attrition over the period up to 2041.

We do not deem the IGC clearly surplus to requirements, however we conclude that the position is marginal and given the market characteristics, it does not require replacement on a *like for like* basis, given the supply and demand position set out and the nature of the existing provision. The deficiency in the 20-minute core catchment is considered marginal so a full replacement 18 hole golf course is not proportionate, instead alternative golf enhancements to provide a more varied offer, whilst protecting the needs of established members, would more appropriately mitigate for the loss of IGC.

Opportunities exist within the catchment to mitigate any impact through targeted investment in both qualitative and quantitative measures that are better aligned with golfing needs and addresses barriers to golfing for a greater percentage of the catchment population.

Mitigation for the closure of IGC, therefore needs to be delivered to alleviate the impacts and provide opportunities, which better meet the market needs. Given the findings of the needs assessment, the impacts of the closure can be mitigated for and the detail of this will be set out in the mitigation proposals, which will form a significant overall package for golf based on the following principles:

- Closing the marginal deficiency in standard golf course equivalents by investment and improvements to improve the quality and capacity of existing courses to increase the attractiveness to potentially displaced members. This could include course improvements, to bunkers, tees and greens and drainage, investing in areas that currently restrict playing opportunities over the golf season, making courses more attractive to prospective members.
- Targeting gaps in the market to attract new people and grow the game at the start of the golfer journey. 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, which represents a significant proportion of future golf demand across the catchment area.

Mitigation proposals should improve the quality and capacity of courses to meets the needs of displaced users and new people seeking to take up the game

1.0 Introduction and Context

1.1 IGC Golf and Country Club (IGC) is located within the administrative boundaries of Horsham District Council (HDC) and close to Crawley Borough Council (CBC), the Land West of IGC proposal involves land owned by Homes England south of Rusper Road, which is currently run as an 18-hole golf facility and is leased to IGC on an unsecured, short-term lease arrangement that expires on 30 April 2026. IGC was first established in 1927 and is an 18-hole private members' parkland course, which measure 6,319 yards, par 70.

1.2 In order to understand the longer-term future of IGC and to support the Local Plan submission and subsequent planning application, Sports Planning Consultants (SPC) have been commissioned by Homes England to undertake a needs assessment for golf.

1.3 The assessment follows the guidance of the National Policy Planning Framework (NPPF) that a robust assessment is required, which compares supply with demand to identify need. The accepted approach for undertaking this is the Assessing Needs and Opportunities Guide (ANOG). This report therefore considers the *supply and demand* of facilities in the 20-minute core drivetime catchment area, using the appropriate planning tools, in-line with ANOG and the NPPF.

1.4 The NPPF requires that:

'.....planning policies are based upon robust and up-to-date assessments of needs for open space, sport and recreation facilities and opportunities for new provision.

Furthermore *Paragraph 99¹ 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.'*

1.5 Sport England published two guidance documents in 2013 highlighting how NPPF compliant needs assessment work should be undertaken: The ANOG and The Playing Pitch Strategy methodology (PPS). Essentially these provide guidance on 'how to do' needs assessments for indoor / outdoor sport and pitch sports in England and represent Sport England's response to the NPPF.

1.6 Golf need has been assessed independently by HDC on the basis of its administrative boundaries, given IGC is located in Horsham. The original Golf Supply and Demand Assessment was undertaken by KKP in February 2021 and was updated in December 2022. The 2022 Assessment concluded that:

- The administrative area of HDC is currently well provided for in relation to golf supply, with it having considerably more facilities than both national and regional rates as well as a good variety of provision, although most sites are expensive to access.
- Supply is currently deemed to be sufficient to meet demand; however, it is also clear that each facility is meeting a need due to current membership and usage levels.
- Potential future demand provides further evidence that each existing facility is required.

¹ Throughout we will refer to para 99 as opposed to 103 (the new NPPF para) for consistency with other work streams.

- It is unlikely that any loss of provision could be supported without appropriate mitigation being secured due to capacity pressures that would be created, despite the development aspirations that are in place.
- If existing development proposals and/or the potential loss of any golf provision are to be pursued, separate site-specific needs assessment studies are needed to fully determine requirements, with a full and specific focus on the site/s in question and concentration on a more closely defined and more relevant catchment area (a 20-minute drive time from the site/s).
- For a proposal to go ahead, any needs assessment will need to evidence that the provision is surplus to requirements or set out a mitigation proposal, as per the NPPF's requirements.

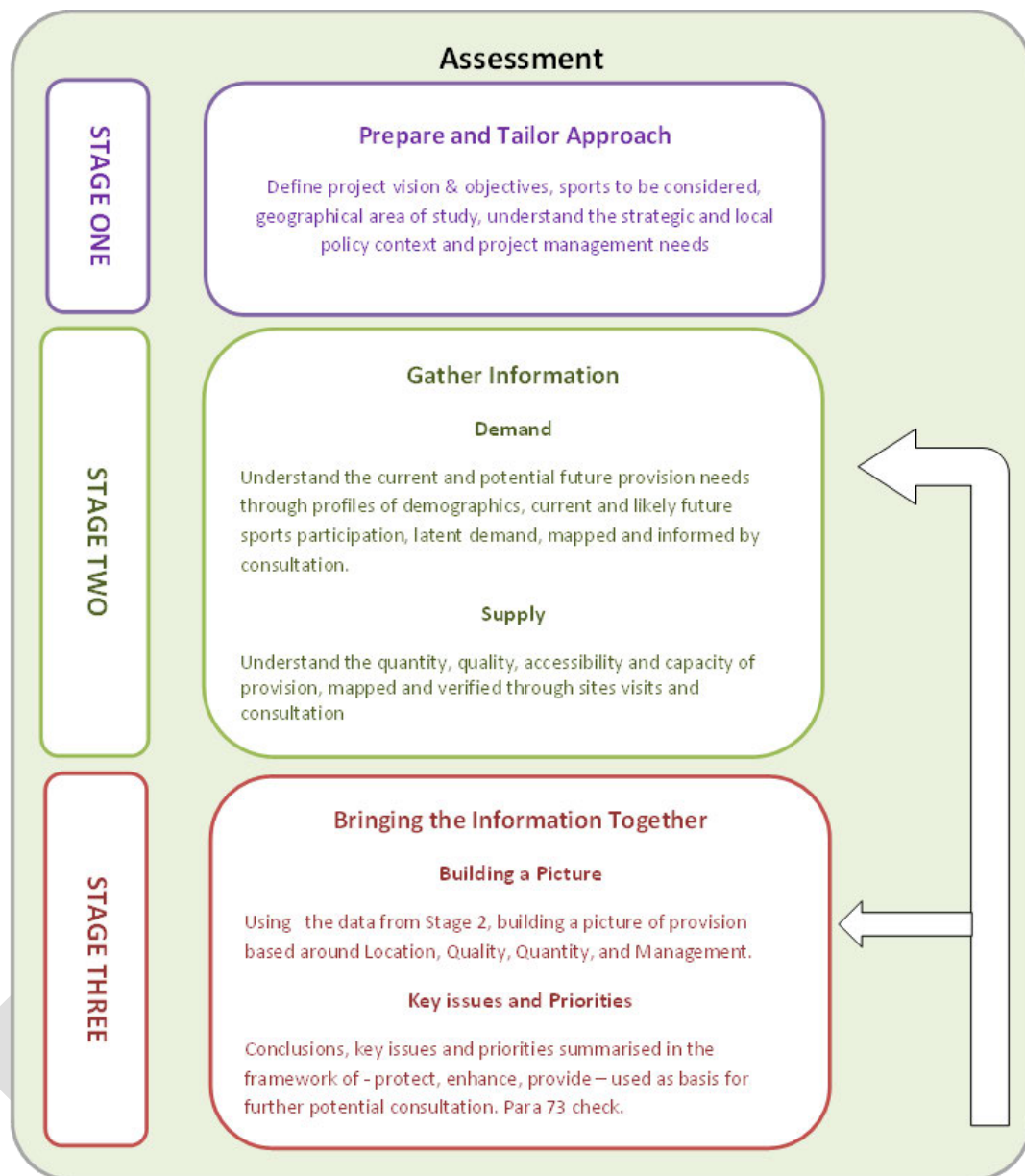
1.7 In summary the HDC's own golf study concludes there is adequate supply in Horsham to meet local need, with above average provision, and demand can be accommodated at present. However future demand must be taken into account, and it is unlikely that any closure of facilities could be justified, as there would be a capacity issue, without mitigation. This would be dependent on separate site-specific assessments of golfing needs across relevant catchment areas, in-line with the NPPF requirements. This study responds to the recommendations set out.

1.8 Golf does not operate on the basis of Council administrative boundaries. It is accepted by England Golf that the primary catchment area for a golf course is a 20-minute drive time. Normally over half of a club's regular golfers live within this drive time. In undertaking an analysis of need it is therefore more relevant to consider catchment areas as opposed to local authority administrative boundaries. The 20-minute core drivetime catchment Ifield Golf Club takes in parts of both the Horsham and Crawley districts. The assessment however focuses on the needs in the catchment as opposed to individual local authority administrative areas in line with planning policy.

Assessing Needs and Opportunities Guide (ANOG)

1.9 The ANOG has been developed by Sport England and sets out an approach to undertaking an assessment of need for sport and recreation facilities, in order to be compliant with the NPPF. The approach adopted to develop this needs assessment has utilized the broad process set out in the ANOG guide, as illustrated in the diagram overleaf. This assessment is therefore produced in accordance with the requirements of the NPPF and associated guidance.

Figure 1.1 – ANOG Methodology



1.11 A Needs Assessment using the ANOG framework is required to consider whether the course fulfils a role in the catchment in line with need. This should comprise the following elements:

- **Quantity** – What facilities and how many there are in the area. It is necessary to look at different 'types' to challenge this and assess the quantity in a more segmented way e.g. ratio of different courses as opposed to all courses.
- **Quality** – How good they are. Accreditation and course ratings will help to define quality, along with slope ratings. It is also necessary to look at quality from a wider perspective and assess whether courses are 'fit for purpose' in meeting the strategic need for golf in the area.
- **Accessibility** – Where they are located. This will include catchment areas and demonstrate whether there are sufficient courses in the area.

- **Availability** – How available they are e.g., whether is any spare capacity in the surrounding courses, in terms of traditional 18-hole golf or for those looking to start and take-up the game. Are there any barriers in terms of costs or membership categories.
- 1.12 The first element of ANOG seeks to tailor the approach to reflect the geographical and sporting nature of the local area. In this context, as set out, the assessment looks at catchment areas around IGC as opposed to local authority boundaries, and takes in parts of both Horsham and Crawley districts.
- 1.13 ANOG also stresses the need to consider strategic issues. The assessment has therefore also considered the strategic context, the long-term trends in golf. Golf participation profile across the area, examines supply and demand of golf facilities in terms of *quantity, quality, access and availability* and utilises Sport England and England Golf's planning tools, as appropriate, to develop the needs and evidence base and subsequent conclusions.
- 1.14 This report therefore sets out a needs assessment for golf in line with the NPPF, to consider the need for a golf course in the 20-minute core drivetime catchment area of Ifield. The analysis draws the evidence together and reaches a conclusion on need to inform the future use and planning for the Land West of IGC site in the context of the Local Plan. The assessment is a work in progress and will be constantly reviewed and updated as the West of IGC application progresses through the planning process.

2.0 Supply Assessment

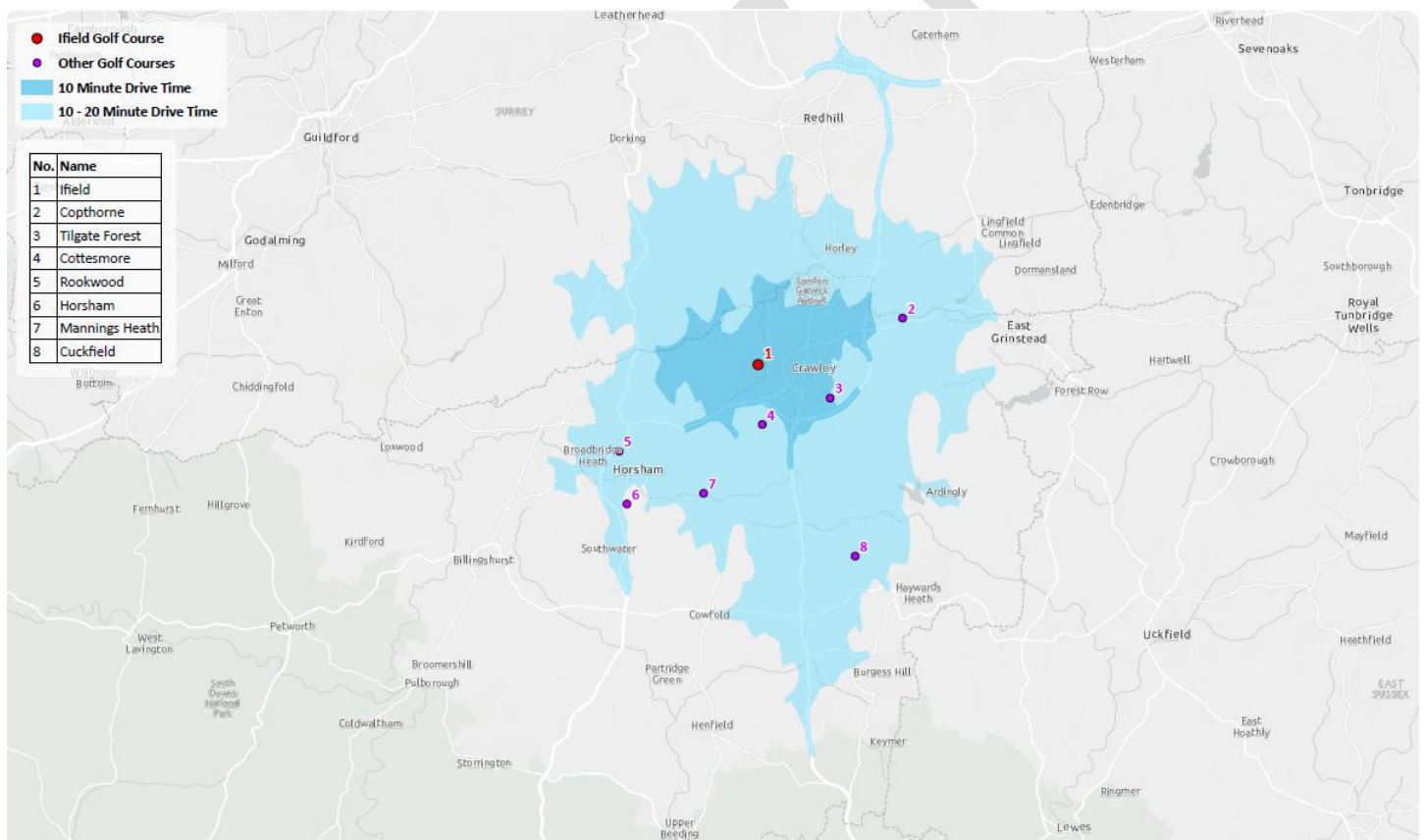
Introduction

1.15 The supply of golf courses is based on Sport England’s Active Places Power (APP) data, supplemented by website and other checks, and has been refined through reference to other studies and consultation. The core facilities within the 20-minute drivetime catchment area are generally agreed as the supply, through reference to other studies and assessments.

Quantity

1.16 The golf facilities shown on Map 2.1 are identified to be within a 20-minute driving catchment of IGC. Slinfold Golf Course lies just outside the 20-minute core catchment shown below but is considered to be in the 20-minute catchment area by England Golf.

Map 2.1 - Golf Facilities in the core catchment area around IGC



Standard Golf Courses

1.17 The APP and other data searches therefore identify 8 standard courses (sites) in the immediate 20-minute catchment of IGC, 9 x 18-hole equivalent courses (when considering some are 9-holes), including IGC. Slinfold lies just outside. For the purposes of this analysis therefore, there are considered to be 9 standard golf courses, with 153 holes in the area. Seven of these courses are full 18-hole courses, the remainder 9 holes, though Cuckfield Golf Club has 9 holes and 18 tees.

Table 2.1 - Standard Golf Courses

Site name	No on map 2.1	Range mins	Holes	Length m	Access	Ownership /management	Year built/ refurb	Local Authority
IGC GOLF AND COUNTRY CLUB	1	0-2.5	18	5778.09	Pay and Play	Sports Club/others	1927	Horsham
Total 0-10 mins		1 course	18					
COPTHORNE GOLF CLUB	2	10-15	18	6654	Pay and Play	Sports Club/others	1892	Mid Sussex
COTTESMORE GOLF & COUNTRY CLUB	4	10-15	18	5717.74	Pay and Play	Commercial	1974	Horsham
COTTESMORE GOLF & COUNTRY CLUB	4	10-15	9	1359.71	Pay and Play	Commercial	1975	Horsham
TILGATE FOREST GOLF CENTRE	3	10-15	18	6317	Pay and Play	Local Authority/ commercial	1982	Crawley
Total 10-15 mins		4 courses	63					
CUCKFIELD GOLF CENTRE	8	15-20	9	2926.08	Pay and Play	Commercial	1997	Mid Sussex
HORSHAM GOLF & FITNESS	6	15-20	18	6111	Pay and Play	Commercial	2014	Horsham
MANNINGS HEATH GOLF CLUB	7	15-20	18	6110.94	Sports Club / Community Association	Commercial	1905	Horsham
MANNINGS HEATH GOLF CLUB	7	15-20	9	3030	Pay and Play	Commercial	1991	Horsham
ROOKWOOD GOLF COURSE	5	15-20	18	5725.06	Pay and Play	Local Authority	1997	Horsham
Total 15-20 mins		4 courses	72					
Total 0-20 mins		8 courses	153					

Par 3 / Pitch and Putt Courses

1.18 There are three par 3 / pitch and putt courses within the 20-minute catchment of IGC at Horsham Golf and Fitness, Goffs Park in Crawley and Rookwood.

Table 2.2 - Par 3 / Pitch and Putt Courses

Site name	No on map 2.1	Range mins	Holes	Length m	Access	Ownership /management	Year built/ refurb	Local Authority
GOFFS PARK	3	10-15	9	1000	Pay and Play	Local Authority/ commercial	1982	Crawley
ROOKWOOD GOLF COURSE	5	15-20	9	1000	Pay and Play	Local Authority	1997	Horsham
HORSHAM GOLF & FITNESS	6	15-20	9	959	Pay and Play	Commercial	2014	Horsham
Total 10-20 mins		3 courses	27					

Golf Driving Ranges (GDRs)

- 1.19 There are 4 GDRs within the 20-minute driving catchment of IGC, including Horsham. These comprise 71 bays, of which only 47 are floodlit. All form part of a wider golfing facility including a standard course. There are no free-standing GDRs in the area.

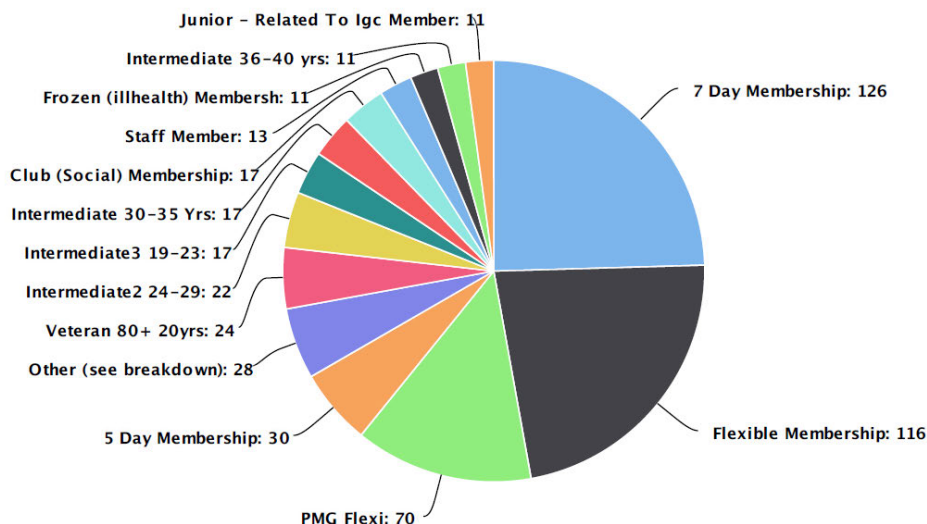
Table 2.3 - GDRs

Site name	No on map 2.1	Range mins	Bays	Floodlit	Access	Ownership /management	Year built/ refurb	Local authority
TILGATE FOREST GOLF CENTRE	4	10-15	27	Yes	Pay and Play	Local Authority/ commercial	1992/ 2017	Crawley
CUCKFIELD GOLF CENTRE	5	15-20	14	No	Pay and Play	Commercial	2013	Mid Sussex
HORSHAM GOLF & FITNESS	6	15-20	20	Yes	Pay and Play	Commercial	2014	Horsham
MANNINGS HEATH GOLF CLUB	7	15-20	10	No	Pay and Play	Commercial	1990	Horsham
Total 10-20 mins		4 ranges	71					

Detailed Assessment

- 1.20 APP describes most of these facilities as pay and play facilities, and this is certainly applicable to the GDRs. It has been verified that most/all of the standard golf courses also allow some casual play on payment of a visitors' green fee. However, some courses are still run as members' clubs and in reality, fewer clubs/courses than suggested in the table (defined by Active Places Power) are fully pay and play - i.e., do offer facilities that are always available to full community access at all times on demand.
- 1.21 A fuller description of all the local facilities within the core 20-minute drivetime catchment (i.e., within a 20-minute drive of IGC) is set out below, as a means of identifying the roles that all facilities play in meeting demand in the area for golf. This information is compiled from a variety of sources; consultation with clubs, website interrogation, data from England Golf, other assessment reports produced in the last two years. This is critical to understand the parts of the golf market the current courses are meeting, the value of IGC specifically and where any gaps lie.
- 1.22 **IGC** was first established in 1927, and the layout has remained largely unaltered since then. It is a private members' club and caters largely for the traditional established member. The 18-hole course measures 6,319 yards from the white tees, par 70 and has a stroke index of 118. From the yellow tees the course measures 5,986 yards with a stroke index of 110. Membership costs £1,376 pa (7 days), £1151 (5 days), and there is a flexible credit-based option, together with Play More Golf and other flexible membership offers, which evolve from time to time. The use of flexible membership offers has helped to support the club significantly. There is also a healthy corporate and society market. There is no joining fee. Green fees are available for £25-40 pp.
- 1.23 There is a clubhouse with bar, so that golfers can purchase food and drink, both before and after their round. With a slope rating of between 110-118, it is a good test of golf. In terms of Golf Pass the course is rated overall at 4.2 out of 5. In 2023 the club had a total of 510 members across a range of flexible membership categories, as illustrated in the figure overleaf, supplied by the club.

Figure 2.1 - IGC Membership (2022)



- 1.24 At the time of the assessment, the breakdown for 2023 membership was not available. However, it is considered that the overall mix remains broadly consistent with 2022 and therefore representative for the purpose of this assessment. As set out later membership has been static at IGC for the past few years.
- 1.25 Further analysis undertaken of the 2022 membership breakdown, shows that while the club is valued by its members, it makes a more limited contribution towards the wider golf offer within both the catchment and when considered more broadly against the aims and objectives of England Golf's Course planner in as much as only (11) 2.1% of members are juniors and there is a limited casual or recreational offer, meaning that it makes a more limited contribution to the golfing journey than other courses within the catchment area. This is set out in detail later. Only 15% of members are female. When compared to other courses within the catchment area, only one (Mannings Heath) has a lower %. It therefore has more limited benefit in terms of inclusivity. Whilst there is a total of 510 members the number that are active and regular golfers is significantly less, with only 126 7 day members in 2022. Membership has remained relatively static since.
- 1.26 The catchment for members is largely drawn from the RH10, RH11 and RH12 postcodes, as set out in the map overleaf. The blue boundaries show the administrative boundaries of Horsham and Crawley and illustrate how a large proportion of members are located outside the administrative boundaries of the two authorities.

Map 2.1 - IGC Membership Location



The Housing and Regeneration Agency

Ifield Golf Course Assessment - Member Catchment



1.27 In terms of price the various price points are set out in the table below, as of early 2024. There are no waiting lists or joining fees.

Table 2.4 - IGC Price Structure

	Membership	Green fees
IGC GC	7 day - £1376.75 pa 5 day - £1151.75 pa Off peak (new) £911.75 pa Intermed 36-40 - £996.75 pa Intermed 30-35 - £846.75.pa Intermed 24-29 - £696.75 pa Intermed 19 -23 - £326.75 pa Flexible - £586.75 pa Play More Golf - £375 pa Junior 14-18 - £131.75 Junior u14 - £101.75 pa Overseas/county - £696.75 pa Social £75 pa	Members' guests Sat am - £35/20 pp 18/9 holes Sat pm - £25/17.50 pp Sun early - £35/20 pp Sun after 11 - £25/17.70 pp Weekdays - £25/17.50 pp Visitors Weekdays am – £30/20 pp Weekdays after 11 - £25/17.50 pp Sat am – na Sat pm - £30/20 pp Sun up to 11 - £35/20 pp Sun after 11 - £30/20 pp

	Membership	Green fees
		County card – £28 pp weekday, £35 pp Weekend Juniors - £15/10 pp

- 1.28 Analysis of other courses in the core catchment area reveals the following:
- 1.29 **COTTESMORE G&CC** was established in 1974/75 and comprises an 18 hole and 9-hole course as part of a wider hospitality health club venue, run commercially on a pay and play and membership basis. The Griffin course is a classic parkland course with many trees, lakes and vistas, and comprises 18 holes, length 6,450 yards, par 72. The Phoenix course is an introductory 9-hole course with a similar landscape, measuring 2 x 2,170 yards, par 66. Green fees are £35-40 pp on the Griffin course, £16-24 on the Phoenix. Country Club membership offers access to 10 leisure facilities including golf, and fees are £69 per month, which includes off peak golf on either course, although peak time golf charges apply. There is currently a joining fee of up to £100.
- 1.30 **ROOKWOOD GC** is situated on the western outskirts of Horsham, accessible from the A24 and the road network. The course was developed on farmland and opened for play in May 1997, and now is set in undulating parkland with several lakes. It is described as one of the best pay and play courses in Sussex. It was designed as a municipal/public pay and play golf course and comprises an 18-hole golf course, 6,261 yards, par 72, 9-hole pitch & putt (not par 3), footgolf, clubhouse and other ancillary facilities. It is suitable for novices and experienced golfers alike and offers open access for all ages and abilities. Green fees are available for £20-35 pp, currently offers include £20 to play anytime. Annual season tickets/membership cost £1,356 pa/£113 per month. Usage appears to have varied in recent years, with up to 40,000 rounds pa.
- 1.31 Rookwood is operated by British Ensign, on behalf of HDC, who also manage Slinfold Golf Club. Up until recently the course was not affiliated to England Golf (EG), the course is however now affiliated to EG, which elevates it and enables the course to offer members traditional membership and competition opportunities. With a slope rating of 124 on the men’s white tees, to 120 on the yellow, the course provides a good test of golf. There are no barriers to membership and significant capacity exists for new members and casual users.
- 1.32 **COPTHORNE GC** is an 18-hole private members course, with a pro shop and clubhouse available for outside use. Copthorne Village Artisans GC also plays out of the course. It was first established in 1892, with various modifications to the course over time. The course measures 6,654 yards par 72, and the club also has two practice grounds, a putting green, chipping green and short game practice area. It hosted the 2017 county amateur championships. At present membership costs £1,560 pa, and a joining fee of £750 payable over two years. Green fees are available for £50-60 pp. With a slope rating of 130 from the men’s yellow tees, the course is a stern test of golf.
- 1.33 **TILGATE FOREST GOLF CENTRE** was first established in 1982, with the opening of an 18 hole pay and play standard course of 6,238 yards, par 72, and supplemented with a GDR in 1992. The centre is run by Glendale Golf on behalf of the local authority, CBC, and is open on a pay and play basis for all, with memberships/passes also available. Green fees are flexible, with each round costing £18-30, and flexible membership plans from £65-105 per month. Footgolf and tuition are readily available.
- 1.34 Locally Tilgate is known as being a well-designed course and a good test of golf, which is reflected in the slope index rating of 130. The basic course layout and test of golf therefore provides a good offer for the established golfer, alongside facilities for those starting their golfing journey. The course is however in need of investment in order that it can realise its potential and become the good standard golf course it is capable of becoming.

- 1.35 **MANNINGS HEATH GC** was first established in 1905 as an 18-hole course, with the addition of a GDR in 1990, and 9-hole course in 1991. It is now part of a commercial proprietary facility, which also includes accommodation and a wine estate. The Waterfall course is 6,700 yards long, par 72, and is described as scenic and challenging, with a signature hole praised by Gary Player. The course has often hosted European PGA events. The 9-hole Kingfisher course was redesigned and measures 3,600 yards, par 36. Both courses lie within the AONB. There is a wide range of membership options (previously £1,725 for 7 days/£1456 for 5) with a flexible credit-based option, and there is understood to be no current joining fee. Green fees are £70-80 for the main course, £25-30 for the Kingfisher. There is a thriving junior coaching set-up, and the grass unlit GDR is available on a pay and play basis.
- 1.36 **CUCKFIELD GC** was first established in 1997 with a 9-hole course, and a GDR added in 2013. It is a proprietary club, which offers pay and play and membership, on an affordable basis and especially for those with 'time for 9' holes. Each hole has two tees, and the full 18 holes measure 5,380 yards, par 71. The GDR is unlit and comprises 14 bays. Membership is available for £875 pa, and there is a £100 joining fee. Green fees cost £20-22 pp. The course markets itself as offering opportunities for absolute beginners to experienced golfers alike.
- 1.37 **HORSHAM GOLF & FITNESS** is a commercial pay and play/members facility comprising two standard courses and a golf driving range. The range originates from 1993, and the courses were opened in 2014. The Oaks course is 18 holes, length 6,000 yards, par 70, and described as a championship course, while the Firs course is 9 holes, par 27, 950 yards long, with holes varying from 60-154 yards, and intended for beginners. Development programmes such as Get into Golf and Fairways to Horsham (primary school competition) are promoted, and there is a coaching academy. Green fees cost £29-42 pp online on the Oaks course, £10 on the Firs course, £6 for children. Membership is available for £1,300/7 days, and £1,100/5 days, with intermediate packages. There is no joining fee. The covered, heated and floodlit GDR has 20 (circa 16) bays, costs £10.80 for 100 balls, and incorporates radar technology.
- 1.38 The catchment therefore has a wide variety of golf offerings and different models. IGC and Copthorne reflect a traditional membership model. Cottesmore, Horsham and Mannings Heath reflect a more commercial / proprietary model, but with membership very much a key part of the offering, alongside wider leisure facilities. Cuckfield, Rookwood and Tilgate offer facilities and access policies to enable golfers to access the sport at the start of the journey, whilst again providing club membership opportunities. Rookwood is now affiliated to EG in order to provide traditional membership and competition opportunities.
- 1.39 **GOFFS PARK** is an 18 hole pitch and putt course located in Goffs Park in Crawley. It is a pay and play facility, including hire of clubs and equipment on weekends and during the summer holidays. Opening is limited between Easter and October.

Categorisation of Courses

- 1.40 The existing courses/facilities in the IGC core catchment area can be categorised as follows, to highlight their main function and usage/availability.
- 1.41 Of the variety of courses in the area, two are long established private members clubs, mainly well established, which offer a conventional standard course primarily for the benefit of members, although in all cases visitors are welcome, and there are three other newer proprietary clubs. Two courses are 'municipal' pay and play courses. Only two facilities have more than one standard course, and four have ancillary facilities such as GDR on site.
- 1.42 There are 3 par 3 courses/starter facility which specifically meets the needs of developing players, with a progression from short course to main course, and no free-standing GDR, although Cuckfield promotes itself on its affordability and suitability for those with less time to play.

Golf Driving Ranges, valuable for practice, coaching and teaching and for golfers without the time to play a full round, and supplementing GDRs at other golf centres/courses (4 in total)

4 GDRs as part of existing courses.

Golfer Journey Classification

- 1.43 Through research of the total golfer market in the country, England Golf (EG) has developed a graphical representation of the various types of golfer and the different stages a participant is likely go through before coming an established and retained club member.
- 1.44 Gaining a better understanding of the types of golfers, their behaviours and attitudes, and the formats of the game they play the most has helped to support EG's work in ensuring they remove barriers and increase opportunities for golfers to travel through the pathway. It also helps to assess the value of golf courses in the market and where any gaps may exist.
- 1.45 In relation to facilities, EG is able to review how the mix of facilities in an area supports this journey and allows them to better identify where potential gaps in provision could be. As the research quite clearly shows, it is unlikely that the majority of golfers will start their journey as a regular golfer, so it is important that suitable opportunities exist to enable access for potential participants in the first three stages.

Figure 2.2 – Stages of the Golfer Journey



Definition of stages:

The Leisure Golfer

- Not a golf club member and don't consider themselves to be golfers. Have played adventure/crazy golf or Topgolf in the last 12 months, but not played any other form of the game in that time.

The Recreational Golfer

- Not a golf club member and don't consider themselves to be golfers. Have played some form of the game other than, or in addition to, adventure/crazy golf or Topgolf in the last 12 months.

The Golfer

- Not a golf club member, but do consider themselves to be golfers. In the last 12 months, they've played a form of golf less than twice a month during the peak season. Some have played on a full-length course in that time.

The Regular Golfer

- Not a golf club member, but do consider themselves to be golfers. In the last 12 months, they've played a form of golf twice a month or more often during the peak season. At least once a month on a course.

The New Club Member

- A golf club member who has joined in the last three years.

The Retained Club Member

- A golf club member who has been in membership for more than three years.

Table 2.5 - Golf Journey Classification

Club	Leisure	Recreation	Golfer	Regular golfer	New club member	Retained member	Comment
IGC				X	X	X	<ul style="list-style-type: none"> Members club, with the focus on members through flexible offers, as opposed to introducing people to the game Some casual booking, society and corporate bookings means there is also a role re the Regular golfer
				X	X	X	<ul style="list-style-type: none"> Members club, with the focus on members as opposed to introducing people to the game Some casual booking, society and corporate bookings means there is a role re the Regular golfer
COPTHORNE GC				X	X	X	<ul style="list-style-type: none"> Members club, with the focus on members as opposed to introducing people to the game Some casual booking, society and corporate bookings means there is a role re the Regular golfer
			X	X	X	X	<ul style="list-style-type: none"> Cater for members and casual bookings The Phoenix introductory course provides opportunities for the Golfer
COTTESMORE G&CC			X	X	X	X	<ul style="list-style-type: none"> Cater for members and casual bookings The Phoenix introductory course provides opportunities for the Golfer
		X	X	X	X	X	<ul style="list-style-type: none"> Cater for members and casual bookings GDR, learn to play offers, free open days and marketing aimed at <i>golf for absolute beginners</i>, provide Recreation opportunities onwards
CUCKFIELD GOLF CENTRE			X	X	X	X	<ul style="list-style-type: none"> Cater for members and casual bookings 9-hole course and GDR provide opportunities at Golfer level
HORSHAM G&F			X	X	X	X	<ul style="list-style-type: none"> Cater for members and casual bookings 9-hole course and GDR provide opportunities at Golfer level
				X	X	X	<ul style="list-style-type: none"> Propriety club, with a member offering Some casual booking, society and corporate bookings, plus GDR means there is also a role re the Regular golfer
MANNINGS HEATH GC				X	X	X	<ul style="list-style-type: none"> Propriety club, with a member offering Some casual booking, society and corporate bookings, plus GDR means there is also a role re the Regular golfer
		X	X	X	X		<ul style="list-style-type: none"> Municipal model with a wider offering, GDR, pay and play, flexible membership packages and lesson offer Quality of course also has potential for member appeal and become a 'retained member' course via investment
TILGATE FOREST GOLF CENTRE				X	X	X	<ul style="list-style-type: none"> Municipal model with a wider offering, GDR, pay and play, flexible membership packages and lesson offer Quality of course also has potential for member appeal and become a 'retained member' course via investment
		X	X	X	X	X	<ul style="list-style-type: none"> Municipal model, also caters for 'member' experience now EG
ROOKWOOD GC		X	X	X	X	X	<ul style="list-style-type: none"> Municipal model, also caters for 'member' experience now EG

Club	Leisure	Recreation	Golfer	Regular golfer	New club member	Retained member	Comment
							<ul style="list-style-type: none"> affiliated and casual pay and play bookings Pitch and Putt and Footgolf offer provide Recreation opportunities
GOFFS PARK	X						<ul style="list-style-type: none"> Pitch and Putt offering leisure golf opportunities however opening times are limited to 6 months of the year from Easter to Summer

- 1.46 In relation to the golfer journey, the provision within the catchment appears reasonably well balanced. There is no obvious Leisure offer other than Goffs Park, which is limited in terms of seasonal opening times as set in the table above, there is no provision of adventure or crazy golf etc, whilst there are some opportunities for the Recreation Golfer to be introduced to the game these are also more limited, however there is a good, universal offer catering for more established golfers and those who choose to become members of clubs.
- 1.47 Table 2.5 illustrates the main gaps are in *the leisure, recreation and golfer* market, which provide the stepping stones into more regular golf participation and transition to golf on standard courses. Facilities that cater for those in the first three stages of the journey are important to the future of the sport as they are normally offering a more entry level provision which appears more accessible and offer a variety of different playing opportunities.
- 1.48 Although there appears to be a strong amount of driving range provision, not all of this will necessarily be accessible to new or developing golfers and instead likely cater for more established players looking to grow their skills and members of the host clubs. This could be an area for further development in the market.
- 1.49 The member offer is well catered for, through various operational models. This is the clear role and value of IGC, consultation with the IGC club secretary confirmed the focus is on retaining members through flexible offers and providing offers for current and prospective members. The closure would impact on this but there is capacity in the core and wider catchment for members to find alternatives of similar quality and price-point and opportunities to enhance courses to provide further for displaced members. The closure of IGC would not have a significant impact on the mix of facilities or limit opportunities for newer golfers looking to take their first steps into the game.

Facilities in the Wider Catchment

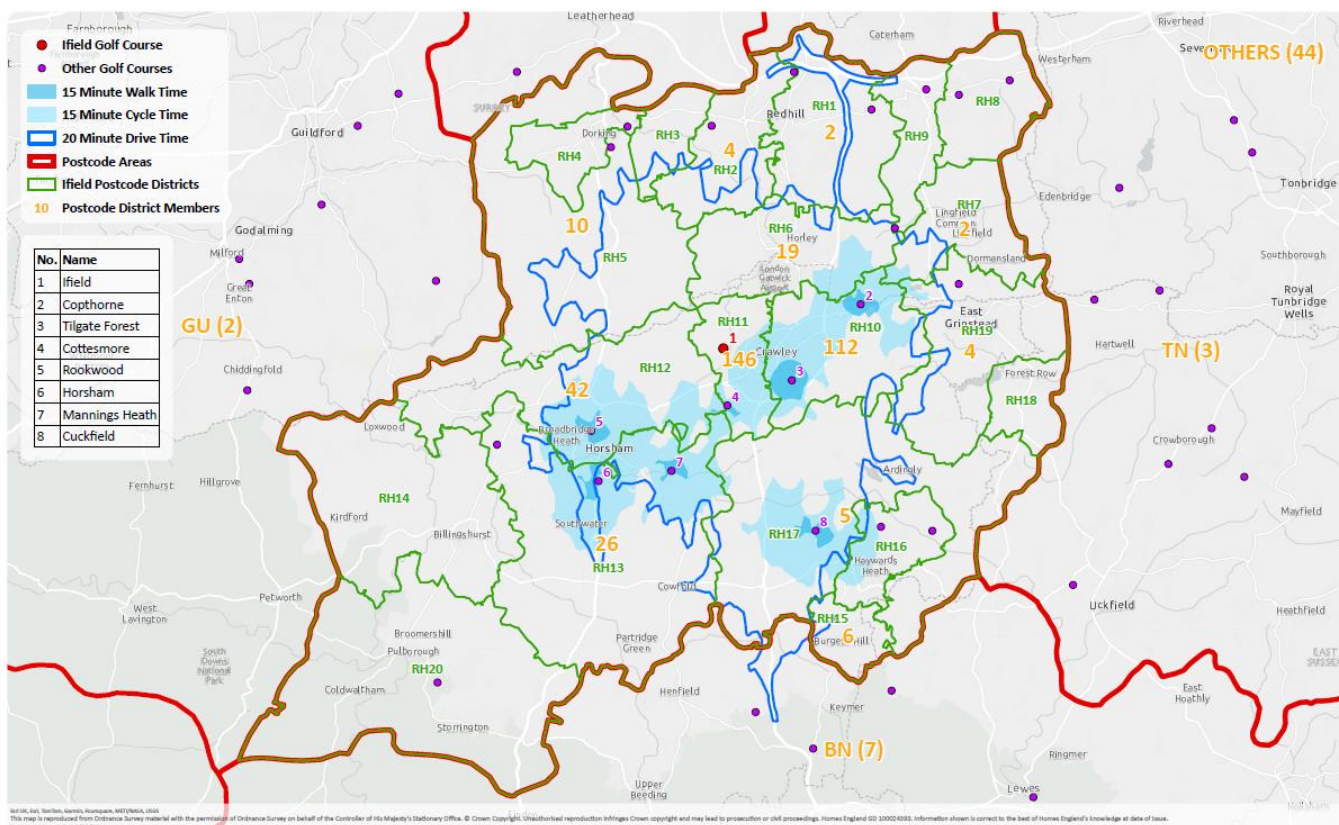
- 1.50 In addition to courses within a 20-minute core drivetime catchment of IGC, there are a large number of other golf facilities in a wider catchment within 20-30 minutes. As set out Slinfold is just outside the 20-minute catchment. The wider catchment comprises 17 standard courses (with 279 holes), 2 par 3 courses (18 holes) and 8 GDRs with 134 bays. Although likely to offer less opportunity for local residents to play golf in its various forms, given the travel time from IGC, the wider 20min – 30min catchment will still play a role for any displaced IGC members, given the wide spread of IGC members. When analysing the breakdown of the membership provided by IGC it can be seen that approximately 165 members (circa 32%) are located outside of the core 20-minute catchment, meaning other courses outside the core catchment, will also provide opportunities for any displaced use for IGC members.
- 1.51 The map overleaf illustrates the numerous courses in the wider catchment to serve the outlying members.

Map 2.2 – Courses in wider catchment serving outlying IGC members



The Housing and Regeneration Agency

Ifield Golf Course Assessment - Walk/Cycle/Drive Time



Summary of Existing Facility Provision

1.52 In summary, the supply of golf facilities in the core catchment and wider area within a 20 and 30-minute drive of IGC is as follows.

Table 2.6 – Summary Existing Provision

Catchment	Standard Courses	Holes	Par 3 courses	Holes	GDRs	Bays
Facilities within 0-10 minutes*	1	18	0	0	0	0
Facilities 10-15 minutes	4.5	63	1	9	1	27
Facilities 15-20 minutes	4.5	72	2	18	3	44
Facilities 0-20 minutes*	9	153	3	27	4	71
Additional facilities 20-30 minutes	17	279	2	18	8	134
Facilities 0-30 minutes*	27	432	5	45	12	205

Summary of Local Provision

1.53 The core 20-minute catchment around IGC has 8 standard courses in total (9 equivalent), 3 par three / pitch and putt course and 4 driving ranges. The local area population within 10/20 minutes of IGC is 87,000/243,000.

- 1.54 Five of the standard courses are either private members clubs or proprietary facilities, mainly well established, which offer a conventional standard course primarily for the benefit of members, although in all cases visitors are welcome. There is a good supply of 'municipal' pay and play courses. All but 3 courses have 18 holes, and mostly of a consistent length of 5-6000 yards, although the 9-hole courses are shorter.
- 1.55 Two facilities have more than one standard course, and four more have ancillary facilities such as GDR on site. There are 3 par 3 /pitch and putt courses, generally on multi-use sites, which specifically meets the needs of developing players, with a progression from short course to main course, and no free-standing GDR.
- 1.56 Where private clubs exist, the emphasis is on catering for the needs of club members, but at the same time making their courses available to visitors, more casual golfers and golf societies, on payment of green fees. Green fees at these clubs range from £25-80 pp per round/day, and the variation in these figures suggests that the private clubs cater for a range of different types of golfer on a varied range of courses.
- 1.57 Annual membership fees at commercial/members' clubs are generally expensive, and in all cases but one are in the range of £1,350-1,750 pa. Membership/season tickets or passes available at municipal courses tend to be cheaper, but not to a significant extent. Regular golf at private or 'public' courses is therefore relatively expensive in this area, although in some cases, there are incentive deals offering flexible memberships and other deals.
- 1.58 At least 3 clubs were identified as currently charging a joining fee (£100-750) for the first year of membership. Club and course websites offer little specific information on membership levels and possible vacancies, though some general information has been gleaned after conversations with club managers. Most courses suggest on their websites that they welcome new members, sometimes with membership offers or concessions.
- 1.59 The lack of joining fees in some cases, and the availability of some membership offers, suggest that in general new members are welcome and there would therefore appear to be some spare capacity overall in the area, and therefore the opportunity for clubs/courses to accommodate additional regular players, meeting the needs of any displaced golfers.
- 1.60 The presence of 'municipal' or other pay and play courses in the area suggests that there is opportunity for casual play on a pay and play basis, without the need to join a club.
- 1.61 **Wider area** – In addition to courses within a 20-minute catchment of IGC, there are a large number of other golf facilities in a wider catchment within 20-30 minutes. Slinfold lies just outside the 20-minutes. These comprise 17 standard courses (with 279 holes), 2 par 3 courses (18 holes) and 8 GDRs with 134 bays. Although likely to offer less opportunity for local residents to play golf in its various forms, given the travel time from IGC, will still play a role, given the wide spread of IGC members. When analysing the breakdown of the membership provided by IGC it can be seen that approximately 165 members (circa 32%) are located outside of the core 20-minute catchment, meaning other courses outside the core catchment core provide further opportunities for any displaced use. See map 2.2.
- 1.62 **Overall** - The area around IGC therefore has 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.
- 1.63 The types of courses available are mainly conventional 18-hole standard courses, usually free standing and without ancillary facilities including 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 boasts affordability and targets golfers engaging with a shorter game by promoting 'always time for 9'. There remains however a gap in *the leisure, recreation and golfer* market, which provides the stepping stones into more

regular golf participation and transition to golf on standard courses. Only Goffs Park provides a very limited offer in this regard.

- 1.64 Without these opportunities, new participants will be restricted. Most additional future demand in the future is likely to occur mainly from beginners, juniors and others new to the game, particularly women and girls, and this will have implications for the types of facility that are required in the future, at least in the initial stages. 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.

Standards of Provision

- 1.65 The most basic way of assessing quantity is to apply standards of provision. Previous benchmarks in terms of levels of provision suggest one course per 20-25,000. Applying this to the IGC 20-minute catchment would equate to one course per 27,000, in-line with the benchmark, suggesting a balanced position. This would reduce if IGC were to close. The standards approach is however no longer accepted as an approach.
- 1.66 It was first adopted by the golf sector when the Royal & Ancient (R&A) identified a shortfall of 700 courses in 1989, based on Scottish and other areas of good supply, based on the benchmark. It was effectively replaced by Sport England advice in the early 1990's when new more sophisticated planning tools were introduced, and the local needs approach came in, first under PPG17 and then in the ANOG guidance in 2013. The ANOG approach is more robust and relevant.

Relative Supply

- 1.67 Relative provision of courses is a useful indicator of how well an area is doing for facilities, but again is only a benchmark against which to judge supply. It provides a *starting point* and only one indicator. Relative provision of golf facilities in the local and wider area, regionally and nationally is set out in the tables below.
- 1.68 This section makes no comments at this stage on the local (or wider) need for golf, which can only be dealt with after an assessment of demand, utilising England Golf tools, the RGD index provides a more balanced assessment of supply against demand this is set out in the next section.

Standard Courses

Table 2.7 – Ratio Standard Courses

	Courses	Holes	Population 2021	Holes per 1000 population
Within 10 mins	1	18	87,360	0.21
Within 20 mins	9	153	243,057	0.63
Horsham	9	144	147,487	0.98
Crawley	1	18	118,580	0.15
Mid Sussex	7	126	152,949	0.82
Mole Valley	7	105	87,608	1.20
Chichester	8	126	124,531	1.01
Arun	4	72	165,225	0.44
Adur	0	0	64,626	0
Brighton & Hove	4	63	276,334	0.23
Waverley	9	144	128,878	1.12
West Sussex	32	540	885,055	0.61
South East region	421	6543	9,294,023	0.70
England	1931	30286	56,536,419	0.54

- 1.69 Relative provision for all standard courses in the core 20-minute catchment is well provided, and about the county and regional average and above the national average. This accords with the findings for HDC, where supply is also well matched with demand.
- 1.70 If IGC were to close, the ratio of courses would fall to 0.56/1000 in the core 20 minutes, just below the county average, but still above the England average. In terms of relative supply alone, the closure of IGC would have an impact but any displaced golfers could travel to other courses, with reasonable levels of provision remaining.

Par 3 / Pitch and Putt Courses

Table 2.8 – Ratio Par 3 / Pitch and Putt Courses

	Courses	Holes	Population 2021	Holes per 1000 population
Within 10 mins	0	0	87,360	0
Within 20 mins	3	27	243,057	0.1
Horsham	3	27	147,487	0.18
Crawley	1	9	118,580	0.08
Mid Sussex	1	9	152,949	0.06
Mole Valley	0	0	87,608	0
Chichester	2	18	124,531	0.14
Arun	0	0	165,225	0
Adur	0	0	64,626	0
Brighton & Hove	0	0	276,334	0
Waverley	2	18	128,878	0.14
West Sussex	6	54	885,055	0.06
South East region	57	552	9,294,023	0.06
England	225	2247	56,536,419	0.04

- 1.71 There are three par 3 / pitch and putt courses in the core catchment area, which is higher than the county, regional and national average. Rookwood and Horsham are part of existing courses, only Goffs Park is standalone and this requires investment to make it a potential all-year round offering. Access to 'beginners'/training/short recreational courses represented by par 3 courses, and favoured by England Golf to improve participation is therefore constrained, some consideration might need to be given to such provision in any future proposals.

Golf Driving Ranges (GDRs)

Table 2.9 – Ratio GDRs

	Courses	Bays	Population 2021	Bays per 1000 population
Within 10 mins	0	0	87,360	0
Within 20 mins	4	71	243,057	0.29
Horsham	4	60	147,487	0.41
Crawley	1	27	118,580	0.23
Mid Sussex	4	81	152,949	0.53
Mole Valley	2	48	87,608	0.55
Chichester	4	47	124,531	0.38
Arun	0	0	165,225	0
Adur	0	0	64,626	0
Brighton & Hove	1	20	276,334	0.07
Waverley	1	7	128,878	0.05
West Sussex	14	225	885,055	0.25
South East region	150	2660	9,294,023	0.29

	Courses	Bays	Population 2021	Bays per 1000 population
England	647	11318	56,536,419	0.20

- 1.72 The provision of GDRs throughout the whole study area is variable. Within 20 minutes of IGC, provision is about average, in-line with England, county and regional averages. There are 2 GDRs in the catchment area of Horsham, and each is attached to an existing golf club, not necessarily suitable or available for casual play, or seemingly accessible to new or developing golfers and instead likely to cater for more established players looking to grow their skills.
- 1.73 **Overview** - As suggested above, relative supply is only a useful indicator in terms of benchmarking local provision alongside other similar areas. Relative provision for all standard courses in the core 20-minute catchment is well provided, and about the county and regional average and above the national average. This accords with the findings for HDC's area, where supply is also well matched with demand.
- 1.74 If IGC were to close, the ratio of courses would fall to 0.56/1000 in the core 20 minutes, just below the county average, but still above the England average. In terms of relative supply alone, the closure of IGC would have an impact but any displaced golfers could travel to other courses, where capacity exists, with reasonable levels of provision remaining.
- 1.75 There are 3 par 3 and pitch and putt courses in the core catchment area, which is higher than the county, regional and national average. There is also good provision in Horsham itself. Rookwood and Horsham are part of existing courses, only Goffs Park is standalone and this requires investment. Access to 'beginners'/training/short recreational courses represented by par 3 courses, and favoured by England Golf to improve participation is however constrained given access to Goffs Park and the location of Rookwood and Horsham, some consideration might need to be given to investment and location of such provision in any future proposals.
- 1.76 The provision of GDRs throughout the whole study area is variable. Within 20 minutes of IGC, provision is about average, in-line with England, county and regional averages. Two GDRs in the catchment are in Horsham, and each is attached to an existing golf club, not all are necessarily suitable or available for casual play, or accessible to new or developing golfers and instead likely to cater for more established players looking to grow their skills.
- 1.77 Quantity (absolute and relative) however is only part of the assessment of supply, which also needs to take into account *quality, accessibility and availability*, as well as demand, and these are addressed below. Establishing a picture of demand will be critical to develop a clear position on need. The full supply and demand assessment is set out in the next section.

Quality

- 1.78 When assessing quality, it is necessary to review both condition and *fitness for purpose*.
- 1.79 Slope rating represents the relative difficulty of a course for a bogey golfer compared to a scratch golfer and helps to understand and compare course playability and standards. A course with long carries, narrow fairways, lots of hazards and thick rough will have a high slope rating because these features are more of a challenge to bogey golfers. Slope rating can be anywhere between 55 and 155. 113 is the neutral slope rating that indicates a course of equal difficulty for scratch and bogey golfers. The GB&I average slope rating is 125.
- 1.80 The quality of the golf course and test presented at various courses is comparable with IGC across the core catchment in the table below.

Table 2.10 – Slope Rating Comparisons

Course	Slope Rating Men's Yellow	Men's White
IGC	110	118
COPTHORNE GC	130	133
COTTESMORE G&CC	121	129
CUCKFIELD GOLF CENTRE	-	-
HORSHAM G&F	116	135
MANNINGS HEATH GC	115	134
TILGATE FOREST GOLF CENTRE	-	130
ROOKWOOD GC	120	124

- 1.81 There are no official or standard measurements to assess course quality in golf, therefore making it difficult to establish benchmarks. In general terms, facilities which charge a higher amount for both membership and green fees are likely to offer a better-quality course and more extensive ancillary facilities, and most membership fees and green fees in the study area are relatively high. This is addressed further under the availability criteria.
- 1.82 Because of the nature of golf, the predominance of clubs in managing their own facilities, the demands of users and the levels of annual subscriptions and daily green fees, the standard courses in the study area are of acceptable or high quality or in good condition. Reviews of courses and other facilities on websites (including Golfshake) and similar broadly confirm that golf courses, and in particular the main standard courses on site, are of good quality.
- 1.83 There are various rankings created through golf publications which can also give a steer as to how well regarded a course is. Golfshake is an active online community of regular golfers and group organisers. Their site has a popular course section, which is a good resource in the UK for golf course information and reviews, featuring every golf course in the world and over 280,000 independent golf course reviews. The course section is accessed by over 125,000 golfers every month who can read in depth course information and reviews from the Golfshake community. An analysis of the scores given by subscribers to all the standard course in the study area is set out in the table below (maximum score 5).

Table 2.11 – Golfshake Rating Comparisons

Facility Name	Overall Rating	Course Rating	No. of Reviews
IGC	4.03	4	93
COPTHORNE GC	4.11	4	127
COTTESMORE G&CC	4.03	3.9	270
CUCKFIELD GOLF CENTRE	3.92	4	105
HORSHAM G&F	3.94	3.9	107
MANNINGS HEATH GC	4.27	3.7	443

Facility Name	Overall Rating	Course Rating	No. of Reviews
TILGATE FOREST GOLF CENTRE	3.04	3	441
ROOKWOOD GC	3.98	3.6	485

- 1.84 Despite there not being any official rankings or objective way of assessing the quality of golf courses, it would appear from the reviews above that each of the facilities within the core catchment is offering a course (and in most cases supplementary amenities) of good to high quality. Overall, the ratings are consistent across all facilities with only Tilgate Forest being noticeably lower than the others, this is likely due to its local market position and price point and recognises the acknowledged need for investment in the course and need to improve the quality to maximise the potential of the quality of the course layout and playability.
- 1.85 In terms of playability and quality IGC is reflective of other courses in the core catchment and other courses reflect the IGC quality and positioning. Whilst a well-respected course, IGC does not appear to have any unique value in respect of the type and quality of offer, in comparison with other offers in the catchment.
- 1.86 At IGC itself, 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. While the impact on the playability of the course is weather dependent, there are regular closures during winter months which means that IGC is not a year round facility and limits accessibility for a period of the year over the winter months.
- 1.87 In terms of *fitness for purpose*, it is necessary to look at quality from a wider perspective and consider the need for (say) good quality entry-level golf in line with strategic priorities of the England Golf and the needs in the catchment. The aspirations of beginners to the game will be different from those who have played golf at a commercial or members' club for years. In this way quality would be linked to purpose, and the criteria would differ between golf course needs of different types.
- 1.88 As set out previously, the area around IGC therefore has 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.
- 1.89 The types of courses available are mainly conventional 18-hole standard courses, usually free standing and without ancillary facilities including 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 boasts affordability and targets golfers engaging with a shorter game by promoting 'always time for 9'. There remains however a gap is in *the leisure, recreation and golfer* market, which provides the stepping stones into more regular golf participation and transition to golf on standard courses.
- 1.90 The member offer is therefore well catered for, through various operational models. This is the clear role of IGC, consultation with the IGC club secretary confirmed the focus is on retaining members through flexible offers. The closure of IGC would not therefore have a significant impact on the mix of facilities or limit opportunities for newer golfers looking to take their first steps into the game. Tilgate, Rookwood, Horsham, and Cuckfield provide a good starting point, given the provision of ancillary facilities e.g., GDRs, practice and 9-hole provision, plus 'member' offerings to play this role, however investment is required to further enhance this, particularly in respect of the leisure and recreation offer.
- 1.91 Course improvements at both Tilgate and Rookwood could also enhance the offer for more traditional golfers seeking a member experience and potentially transferring in part from IGC. Both Tilgate and Rookwood offer a good test of golf for experienced members owing to the course construction and layout, broadly comparable with IGC, however quality improvements to the course will be required to attract members who may be interested in joining. There is

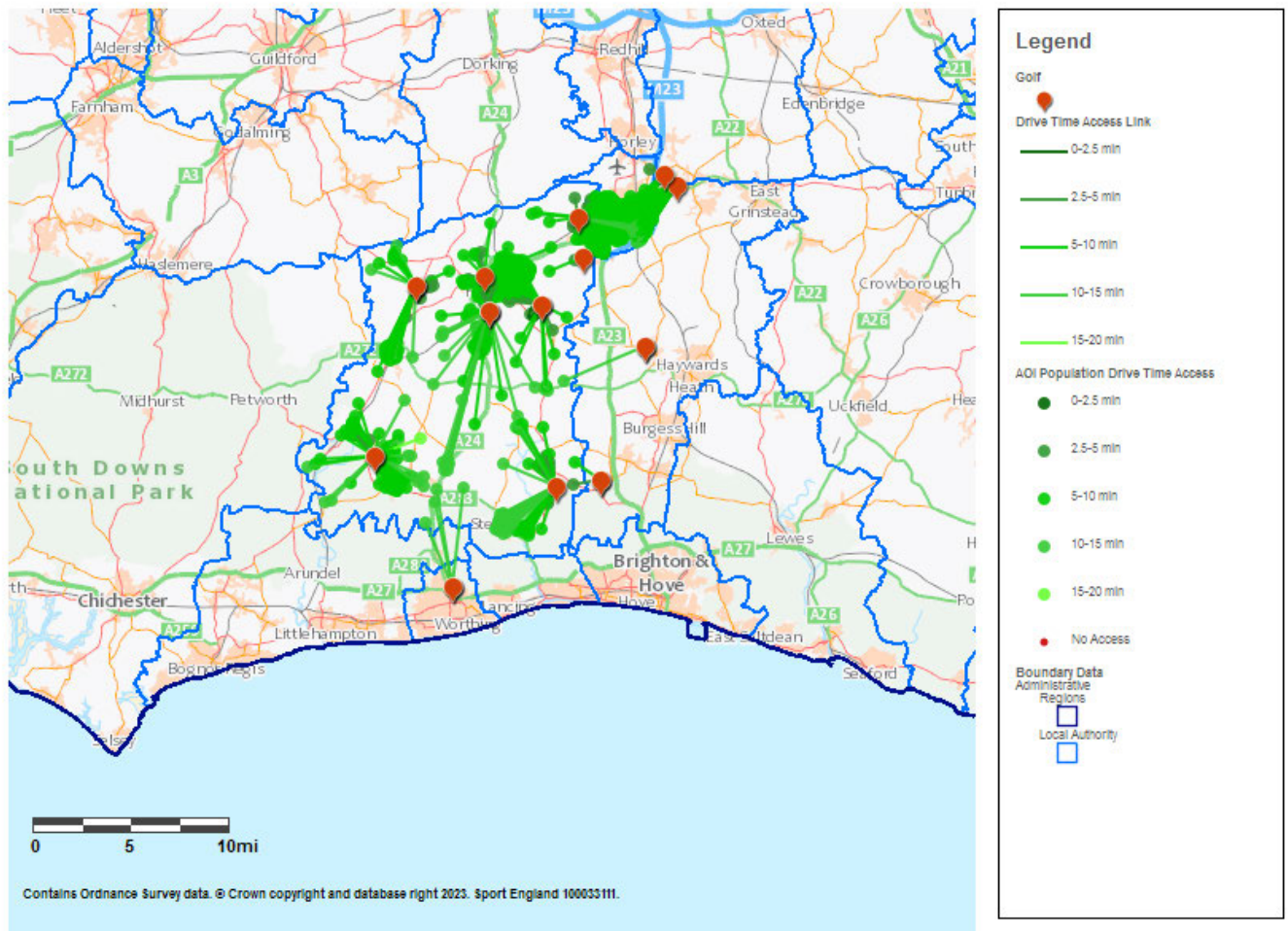
clearly potential for improvement through directing mitigation contributions to course improvements to ensure any displaced members are catered for and the overall quality matches needs and expectations, alongside those starting the golfer journey.

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Accessibility

1.92 Sport England’s accessibility tool on Active Places provides the opportunity to estimate the population profile within a given catchment area of a (new or existing) facility, or the competing facilities within a given catchment area of a (new or existing) facility. In addition, the population within an area of interest served/able to access facilities, based upon given catchment parameters can be identified. The assessment below considers accessibility within the administrative areas of HDC and CBC. The map and data demonstrate the accessibility of the local population to golf facilities both within Horsham and Crawley and those just outside.

Map 2.3 – Accessibility to Golf in Horsham and Crawley District



Sport England assumes no responsibility for the completeness, accuracy and currency of the information contained on this map/report. This information is taken from the Active Places Power website and its terms and conditions apply. 17/4/2023 16:54

The Summary Results Area shows the population counts within range of a facility (shown by whether the facility is within or outside the selected area of interest)

	0-14	15-24	25-39	40-59	60-79	80+	Total
Combined							
Total with nearest site:							
- within the AOI	40181	20906	40724	61773	47105	12469	223158
- outside the AOI	7959	3876	8333	11220	6232	1415	39035
Total AOI population	48140	24782	49057	72993	53337	13884	262193

The Summary Results Area shows the population with access to the requested facility type by range bandings

Combined	0-14	15-24	25-39	40-59	60-79	80+	Total
0-2.5	314	137	371	512	444	183	1961
2.5-5	6746	3445	6739	10165	7985	2511	37591
5-10	29707	15229	30793	44698	32202	8327	160956
10-15	3339	2069	2778	6253	6357	1423	22219
15-20	75	26	43	145	117	25	431
Total In Range	40181	20906	40724	61773	47105	12469	223158
Total Outside Range	7959	3876	8333	11220	6232	1415	39035
AOI Total	48140	24782	49057	72993	53337	13884	262193

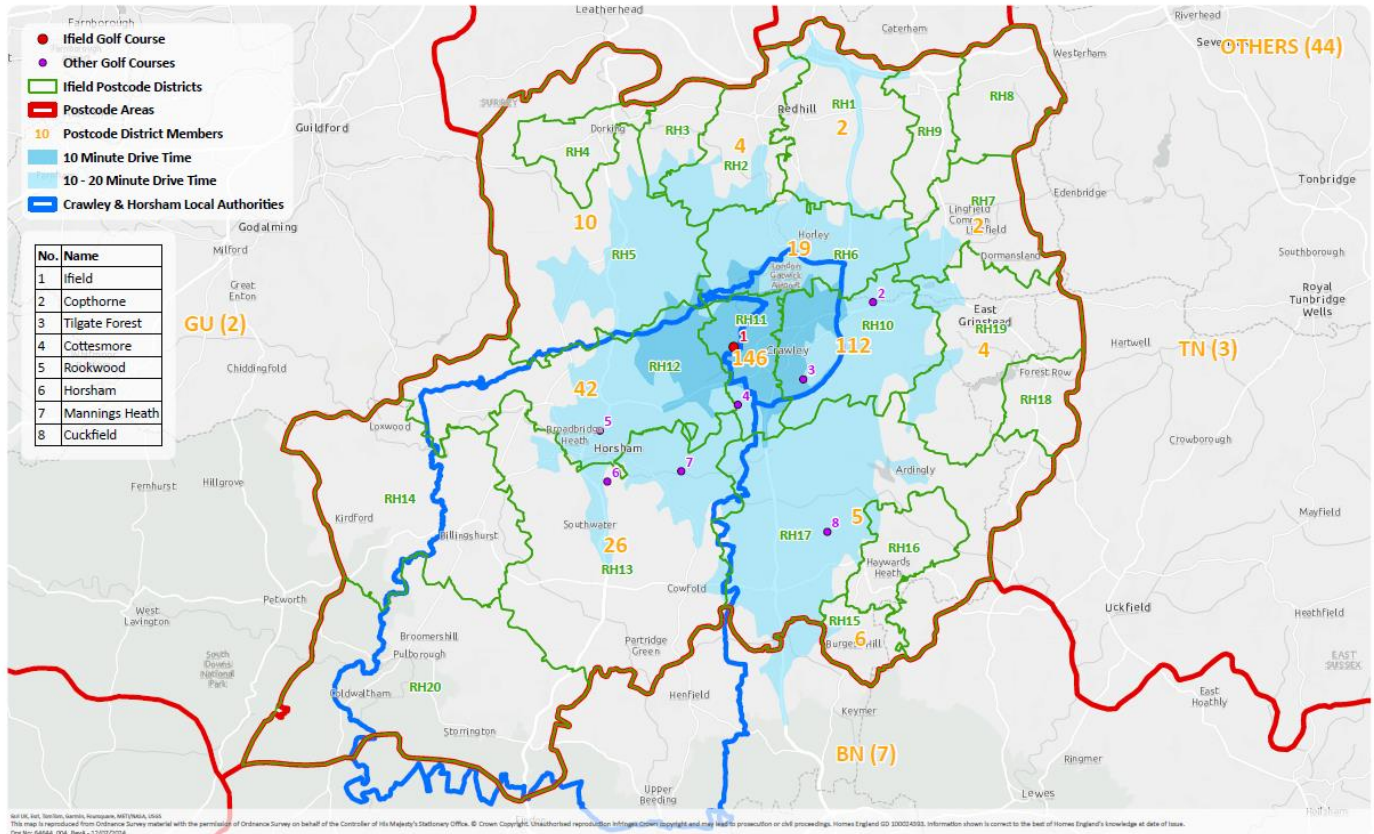
- 1.93 The tables and map demonstrate that almost the whole population of Horsham and Crawley can access a golf facility within a 20-minute drive, and the majority within 10 minutes. Most of these are within the AOI itself (i.e. the two local authority areas), though facilities just over the boundary in neighbouring districts including Worthing, Mid Sussex, NE Crawley in Tandridge and Reigate) also have a role to play, for those residents not close to a course or range in Horsham or Crawley. There is also an element of choice for local residents to more than one course or facility.
- 1.94 As stated previously the catchment for IGC members are largely drawn from the RH10, RH11 and RH12 postcodes, as illustrated in the map overleaf, there are several accessible courses for the vast majority of members within accessible 10 and 20-minute travel distances.

Map 2.4 – Accessibility of Members to courses in the core IGC catchment



The Housing and Regeneration Agency

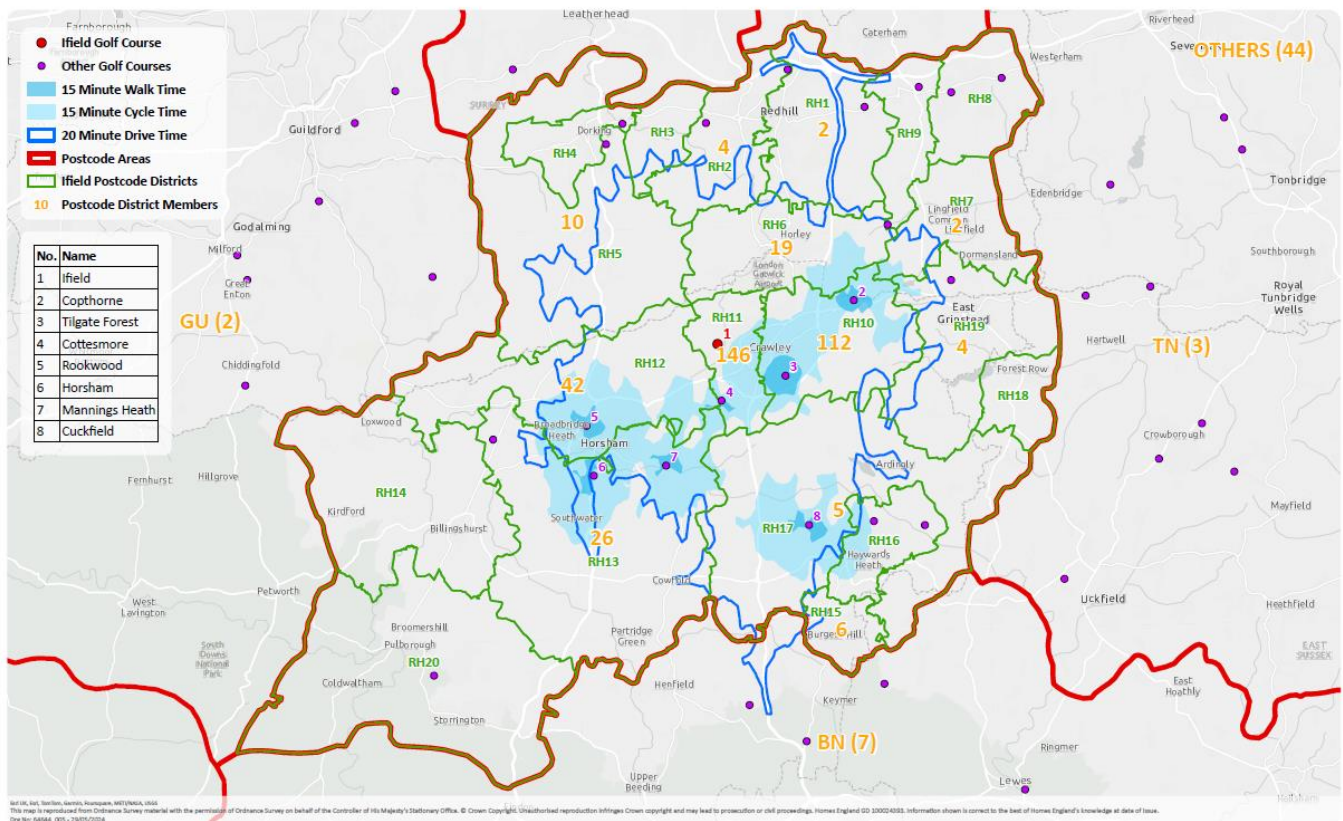
Ifield Golf Course Assessment - Member Catchment



1.95 People will chose where to play for many individual reasons, it is however evident that the majority of IGC members have easy access to other course within a 10 and 20-minute catchment and therefore opportunities to continue to play at other courses, within a reasonable travel time.

1.96 As set out previously, when analysing the breakdown of the membership provided by IGC it can be seen that approximately 165 members (circa 32%) are located outside of the core 20-minute catchment, meaning other courses outside the core 20-minute catchment, of which there are 17 in total, will also provide further opportunities for any displaced users as illustrated in map 2.2 previously and set out overleaf.

Ifield Golf Course Assessment - Walk/Cycle/Drive Time



1.97 Facilities just outside the 20-minute catchment in neighbouring districts including Worthing, Mid Sussex, NE Crawley in Tandridge and Reigate also have a role to play, for those residents and displaced member not close to a course or range in Horsham or Crawley.

Availability

1.98 Availability needs to consider the following (see ANOG):

- How much existing courses are actually used, how full they are?
- How much they could be used?
- What scope is there for increasing their availability?

1.99 These are in turn influenced by a number of factors, including:

- The management and ownership e.g. whether facilities are public, private or education based
- A programming and sports development policy e.g. is availability given over to specific sports, initiatives and range of activities at certain times. Some facilities may be programmed only for specific sports, users or activities
- The cost of use e.g. a high cost may result in a facility having more limited use
- Hours of use e.g. opening times available for public use, this will be linked to the programming policies above
- Facility design e.g. the physical design and layout of a facility may limit or prevent use by specific users.

- 1.100 Membership numbers provide a proxy for assessing availability however all golf clubs operate different models, and capacities will vary as a result, some clubs looking to maximise golf revenues and driving membership numbers, with others seeking to restrict membership in order to provide a better member offer via a less busy course.
- 1.101 The membership baseline used by England Golf (EG) has fluctuated from 484 in 2018 to 389 and is now assessed to be 407 by EG. It is evident therefore that the membership baseline fluctuates and the value of this as a measure should be seen in this context.
- 1.102 Furthermore, recent case history suggests that simply proving that other courses have capacity to accommodate displaced users does not constitute a lack of demand and rationale for deeming a course to be surplus, in isolation. Nevertheless, understanding the capacity in the catchment and any constraints is important to understand the capacity in the catchment to meet the needs of any displaced users of IGC and triangulate this with other evidence.
- 1.103 In terms of the market, the analysis of clubs has not suggested any with restrictive management and ownership models, or restrictive opening hours. There are no design limitations and it could be reasonably concluded that all the courses in the core catchment are *available*. Although by virtue of price, some are more restrictive, set out are the most up to date price points as of March 2024, although it is acknowledged these change regularly but it provides an indication of the relative costs of golf across the catchment and the impact of price as a barrier in terms of availability. Set out in the tables below are the price comparisons across the course in the core 20-minute drivetime catchment.
- 1.104 For the most part, the data refers to the latest membership fees (2023/24), joining fees, waiting lists and green fees charged across the whole spectrum of golfers, including full membership, 7 day and shorter membership, juniors, flexible options, newcomers to the sport and other categories. Green fees for visitors were also considered, and provide a complexity of different scales of fees, depending on the precise form of payment (e.g., online booking), which tends to be more responsive the individual demand on the day.
- 1.105 The prices and figures set out in the table below will inevitably fluctuate as will membership over the next few years.

Table 2.12 – Price Comparisons

	Membership	Green fees
IGC	7 day - £1376.75 pa 5 day - £1151.75 pa Off peak (new) £911.75 pa Intermed 36-40 - £996.75 pa Intermed 30-35 - £846.75 pa Intermed 24-29 - £696.75 pa Intermed 19 -23 - £326.75 pa Flexible - £586.75 pa Play More Golf - £375 pa Junior 14-18 - £131.75 Junior u14 - £101.75 pa Overseas/county - £696.75 pa Social £75 pa No waiting list No joining fee	Members' guests Sat am - £35/20 pp 18/9 holes Sat pm - £25/17.50 pp Sun early - £35/20 pp Sun after 11 - £25/17.70 pp Weekdays - £25/17.50 pp Visitors Weekdays am – £30/20 pp Weekdays after 11 - £25/17.50 pp Sat am – na Sat pm - £30/20 pp Sun up to 11 - £35/20 pp Sun after 11 - £30/20 pp County card – £28 pp weekday, £35 pp Weekend Juniors - £15/10 pp
Mannings Heath GC	Full 7 day - £1725 pa 5 day - £1456 pa Plus Assoc 18-22 up to 37 Flexible Kingfisher Country Academy Waterfall (juniors) No waiting list No joining fee	Main - £70-80 pp Kingfisher - £25-30 pp

	Membership	Green fees
Horsham G&CC	7 day - £1300 pa Joint 7 day - £2400 pa 5 day - £1100 pa Joint 5 day - £2100 pa 5 day 60+ - £1080 pa Intermed 25-34 - £795 pa Intermed 18-24 - £495 pa No waiting list No joining fee	Oaks Course Online up to 11.00 - £42 pp Online 11.00 on - £38 pp Online 2.00 on - £29 pp Pro shop - £45/40/32 pp Junior £20 pp With member £30/25/20 pp Junior £16 pp Firs Course Adult – £10 pp Junior - £7 pp
Cuckfield GC	Full adult - £875 pa Joint adult - £1425 pa Weekend - £625 pa New to Golf - £600 pa Twilight - £500 pa Intermed 25-28 - £650 pa Intermed 29-34 - £700 pa Intermed 35-39 - £750 pa All above joining fee - £100 Junior u11 - £100 pa Junior 12-15 - £175 pa Junior 16-18 - £250 pa Student u25 - £400 pa No waiting list or joining fee	Summer 9 holes - £18.75 pp 18 holes - £26.25 pp Twilight – adult - £15 pp Junior u10 - £12.50 pp
Copthorne G &CC	7 day - £1638 pa 5 day - £1396.50 pa (both joining fee £750) Intermed 18-29 - £404.40-1475.25 pa (joining fee £275-450) Country - £816 pa (joining fee £265) Junior from £52.50 pa Social - £60 pa Joining fee and waiting list	Visitor Weekday - £55 pp, Weekend – pm only – £65 pp 4 ball special Weekday £200, Weekend pm only £220 Junior £25/30 pm only pp County Card – Weekday - £35 pp Mid Sussex League – Weekday - £30 pp Member guest – weekday - £30 pp, weekend £35 pp James Braid courses - weekday £35 pp, weekend pm £35 pp
Tilgate Forest GC	7 day - £1045 pa 5 day - £715 pa Junior 7 day £10 per month Young adult – 7 day - £45 per month No waiting list No joining/induction fee	Current (February 2024) Weekday am - £20 pp, pm £16 pp Weekend – am £24 pp, mid-day £20 pp, pm £16 pp
Cottesmore GC	Country Club membership Adult - £79 per month Corporate - £72 per m Intermediate (19-29) - £79 per m Junior (3-18) - £20 per m Joining fee (£100) and waiting list	Griffin course Winter after 11 - £25 pp County card - £22 pp Phoenix course Winter 9 hole – £14pp, 18 holes - £20pp
Rookwood GC	7 day - £1356 pa 7 day restricted - £1230 pa Off peak 5 day - £810 pa No joining fee No waiting list	Weekday - £18-30 pp Weekend - £18-35 pp

1.106 Summary of fees in order of cost of full 7-day membership reveals the following:

- Mannings Heath (highest)
- Copthorne
- IGC

- Rookwood
- Horsham
- Tilgate Forest
- Cottesmore
- Cuckfield

1.107 Summary of visitor green fees in order:

- Mannings Heath (highest)
- Copthorne
- Horsham
- Rookwood
- **IGC**
- Cuckfield
- Cottesmore
- Tilgate Forest

1.108 IGC is certainly not the cheapest course, so any closure would not be impacted by price. Furthermore, in terms of affordability for Crawley residents and the type of golf that is needed, there is more limited household disposable income closest to the course with more limited opportunity to access. This is important in the context of the KKP study that puts emphasis on affordability of provision.

1.109 There is an absence of waiting lists at most courses, only Cottesmore and Copthorne have waiting lists, 3 of the clubs have joining fees.

1.110 To understand this issue a bit further England Golf have supplied the average membership numbers for courses across the catchment for the years 2022 and 2023. This recorded an average of 466 members per course in 2022 and 464 members in 2023, a pretty static position.

1.111 Using the EG benchmark of 407, the average in the catchment is currently above this. It should be noted that 2 of the courses have 27 holes giving a potential benchmark figure of 610 at these courses. What we know from individual courses is that there is availability and most are seeking new members. From the evidence presented there is capacity in the catchment to accommodate IGC members, and as table 2.12 illustrates, 5 have no waiting lists or joining fees. The 7 day membership of IGC is 126, the 500 IGC members are not all active golfers or 7-day players.

1.112 As part of this process, to understand the position in more detail, we have consulted further with the clubs and the following responses have been received to date.

1.113 **Copthorne** report that membership has been static for the past few years.

1.114 Centre Manager at **Tilgate Forest** reports that, most of the Tilgate market and client base is pay and play golf / driving range users, but it does have the capacity to grow the membership base. Investment in course quality would enable this and provide a potential alternative for displaced members.

1.115 Director of Golf at **Mannings Heath** reports that membership is down as well as green fees from 2022/23. Pay and play represents approximately 20% of usage at Mannings Heath. They have capacity to accommodate new users.

1.116 British Ensign manager at **Rookwood** reports that they have approximately 100 season ticket holders (the membership equivalent), leaving significant headroom. In terms of usage the trend is of slight decline since covid, over the past 3-years. They can accommodate more season ticket and pay and play usage and are focussed on trying to attract these users following the England Golf accreditation, which provides a platform for a better member offering. Here again investment can deliver this.

- 1.117 A recent planning application by **Horsham Golf club** set out the issues they were having in terms of membership and usage.
- 1.118 These comments from courses in the 20-minute core catchment reflect the struggles reported by **IGC** at the 2023 AGM, set out in the next section.
- 1.119 Without a detailed operational knowledge and understanding of each individual course it is difficult to quantify precisely the exact nature of the capacity but it is not unreasonable to assume that those active IGC members seeking to continue to play could be accommodated at courses in the core 20-minute catchment and wider afield depending on their personal circumstances, where they live, friendship groups and course preferences. There is a wide choice of alternatives.

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Supply Summary

Quantity

- The core 20-minute drivetime catchment around IGC has 8 sites and 9 equivalent standard courses in total, 3 par three / pitch and putt course and 4 driving ranges.
- Relative provision for all standard courses in the core 20-minute catchment is well provided, and above the county and regional average and above the national average.
- This accords with the findings for Horsham Council area study (KKP, 2022), where supply was also found to be well matched with demand.
- If IGC were to close, the ratio of courses would fall to 0.56/1000 in the core 20 minute catchment, just below the county average, but still above the England average.
- In terms of relative supply alone, the loss of IGC would have an impact but any displaced golfers could travel to other courses, with reasonable levels of provision remaining and which as set out below appear to be both *accessible* and *available*.
- In relation to the golfer journey, the provision within the catchment appears reasonably well balanced. There is however no obvious Leisure offer, (other than Goffs Park, which has seasonal opening) e.g., adventure or crazy golf etc, whilst there are some opportunities for the Recreation Golfer to be introduced to the game these are also limited, however there is a good, universal offer catering for more established golfers and those who choose to become members of clubs.

Quality

- Despite there not being any official rankings or objective way of assessing the quality of golf courses, it would appear from the reviews that each of the facilities within the core catchment is offering a course (and in most cases supplementary amenities) of good to high quality.
- In terms of playability and quality IGC is reflective of other courses in the core catchment and other courses reflect the IGC quality and positioning. Whilst a well-respected course, IGC does not appear to have any unique value in comparison with other offers in the catchment.
- At IGC itself, existing conditions of the course means that the course has regular periods of closure during winter months which limits accessibility for a period of the year.
- In terms of fitness for purpose, it is necessary to look at quality from a wider perspective and consider the need for good quality entry-level golf in line with strategic priorities of the England Golf and the needs in the catchment.
- The types of courses available are therefore mainly conventional 18-hole standard courses. The member offer is therefore well catered for, through various operational models.
- 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, this could be enhanced further through targeted investment.
- The loss of IGC would not therefore have a significant impact on the mix of facilities or limit opportunities for newer golfers looking to take their first steps into the game. There remains a gap in the *leisure, recreation and golfer* market, which provides the stepping stones into more regular golf participation and transition to golf on standard courses.

Accessibility

- **Accessibility by car to facilities by car in the whole Horsham and Crawley area is good – almost the whole population can access a golf facility within a 20-minute drive, and the majority within 10 minutes. There is also an element of choice for local residents to more than one course or facility, and overall accessibility would not be impaired if IGC were to close.**
- **It is evident that the majority of IGC members have easy access to other course within a 10 and 20-minute catchment.**
- **When analysing the breakdown of the membership provided by IGC it can be seen that approximately 165 members (circa 32%) are located outside of the core 20-minute catchment, meaning other courses outside the core catchment will also provide further opportunities for any displaced use.**

Availability

- **There is evidence of vacancies at many of the clubs in the core-catchment (5), and from consultation, websites and other sources clubs are generally keen, or need, to attract new players.**
- **There is an absence of waiting lists at most if not all courses, 2 clubs have waiting lists and 3 of the clubs have joining fees.**
- **Most if not all are seeking new members. Most clubs in the core catchment, including IGC are experiencing declining or static usage and membership.**
- **Whilst there are lots of flexible offers, IGC is not the cheapest course, so any loss would not be impacted by price.**
- **There appears to be capacity in the catchment to accommodate any displaced IGC members, price would not appear to be a barrier.**

1.120 It is, among other things, necessary to evidence that there is alternative provision or capacity elsewhere. It is also necessary to consider and understand demand and establish the number and type of courses required to meet the needs of golf. This is explored in the next section.

3.0 Demand Assessment

National Trends

- 1.121 Golf is the fifth largest participation sport in the country, with around 730,000 members belonging to one of 1,750 affiliated clubs. Research led by the R&A in 2020 together with the home nation golf unions found that there were 5.2 million on-course adult golfers, playing full-length courses (either 9 or 18-holes) in Great Britain.
- 1.122 The number of on-course golfers has risen from 2.5 million in 2017 to 3.0 million in 2019 and hit a peak during COVID of 5.2 million in 2020 based on figures by Sports Marketing Surveys. The latest figures showed that 4.8 million people played in 2021, down from the COVID peak. Of this the report found that 339,000 were avid golfers, playing more than 52 times a year or once a week.
- 1.123 In terms of trends up until the mid-1980s, the demand to play golf in the UK comfortably exceeded the supply of golf courses. This meant that most membership-based golf courses had long waiting lists for membership, and 'pay and play' municipal courses were very busy. In the 1990s the UK had a golf course construction boom. By around the year 2000, the UK's supply of golf courses had increased by over 30%. This reversed the mid-1980s supply/demand position to one where, on a national basis, there was generally supply/demand equilibrium but edging towards golf course oversupply.
- 1.124 From around the year 2003 the long term trend in the is a steady decline in golf club membership numbers. There were several reasons for this. In the expanding digital age, generally people have much busier lives, and a significant proportion felt that they did not have the time to play golf on a regular basis. An 18-hole round of golf typically take around 4 hours. Also, the rise in popularity in cycling and general health and fitness, which can be done in shorter time slots, put extra pressure on the golf sector. It is considered that the future growth will not occur in the traditional 18-hole market. Recent research has suggested that 61% of women are open to playing rounds with less than 18 holes, compared to 49% of men. If golf clubs offered to book less than 18-holes, 43% of women would play more often.
- 1.125 Furthermore, there has been an increase in the popularity of just paying a visitor green fee to play golf, as opposed to paying a full annual membership subscription at one course. If people do not have the time to justify paying a full annual subscription, then there is 'value for money' appeal in paying daily green fees in line with the level of play, and an added benefit of not being a member means the ability to play a variety of courses.
- 1.126 With an increased demand for more casual 'pay and play' golf, and with the emergence of third-party online tee time sellers, visitor green fee prices started to fall, as venues competed for this expanding market. As green fees started to fall, they made full annual membership subscriptions look even less value for money – unless one had the time to play a lot of golf.
- 1.127 These trends were confirmed in the 2023 BRS Golf participation survey, which concluded that registered member numbers at golf clubs has started to decline. This was further evidenced by Contemporary Club Leadership, who regularly survey golf club leaders, the most recent survey in 2023 found that membership resignation had risen, with the average rate tracking at 6%. Membership attrition rates and generally considered to be running at 7% per annum.
- 1.128 The Members' and Proprietary Golf Clubs Survey 2022/23 Report prepared by Hillier Hopkins LLP, chartered accountants and tax advisers, confirms the impact of COVID has now receded. The report produced in association with The Golf Club Secretary monthly journal and the UK Golf Federation, warns that the 'cost of living crisis' is now resulting in a downturn in golfer demand.

- 1.129 From a review of various reports from the 2023 IGC AGM2, it is also clear that the overall direction of travel and demand for membership is struggling both at IGC and more broadly across the golfing community is following these national trends.

'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...'

- 1.130 Reports at IGC go on to state that this trend is further demonstrated by both the continued move from fixed memberships to more flexible memberships³ 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 a single additional member. This shows that Membership at IGC (and therefore regular and consistent use) is becoming less valued.
- 1.131 Against this backdrop England Golf is focussed on sustainability and consolidating current clubs rather than expanding the market but also developing clubs to be more viable. Clubs who are proactive and keen to adapt to make themselves attractive to new markets and initiatives should survive and flourish.
- 1.132 The Course Planner, England Golf's Strategic Plan, sets out the strategic direction for England Golf (2021-25) and aims to re-focus priorities, energy and passion on key areas to help widen golf's appeal, highlighting the sport as more inclusive and accessible than ever.
- 1.133 Within the market, as set out in the previous section, it is therefore important to consider the distinct roles that clubs play, it is not a case of 'one size fits all'. In any balanced golf market there will be a need for 'starter clubs' to contrast with improver and more traditional courses. Former US Open champion, Graeme McDowell, summed up the current state of the game when he said that golf needs to be 'quicker, sexier and less elitist.' Future demand is therefore difficult to assess accurately but the nature of demand is likely to evolve.
- 1.134 There is undoubtedly a lot of good work and promotion around golf being done at the moment. Whether these initiatives can arrest the social and structural trends in the longer-term remains to be seen. What is clear is the trends are moving away from the traditional 18-hole offer, the focus of the golf offer at IGC, and within the core 20-minute catchment.

Local Demand

- 1.135 There are numerous different ways in which demand for golf can be analysed, using data from various sources to help present an overall picture of how many people are participating in the sport. There is a good deal of data available on current and likely future levels of demand for golf, from Sport England, England Golf, clubs and various commentators on the game in the UK, and in recent years in studies such as this, it has been refined and adapted to allow levels of demand for golf to be applied to existing supply to estimate current and future need for facilities. The assessment below considers the main sources of data.
- 1.136 Sport England's Active Lives Survey is a relatively new way of measuring sport and activity across England and replaced the previous Active People Survey, with data collection beginning in 2015, and last reviewed in 2021/22. Various frequencies of activity can be analysed, but the data below refers to participation at least twice in the last 28 days, which is said to provide an entry level view of participation overall, a useful measure of engagement in different sports and physical activities and an understanding of the contribution of activities to achievement of 150+ minutes of activity per week (which Sport England defines as being active). This is the measure of participation which is used in this assessment.
- 1.137 The data below refers to national, regional and countywide participation for golf, at least twice in the last twenty days. This is in line with the Sport England Active Lives (AL) definition, which

² [2023 agm - chairmans report 2023. final.pdf \(intelligentgolf.co.uk\)](#)

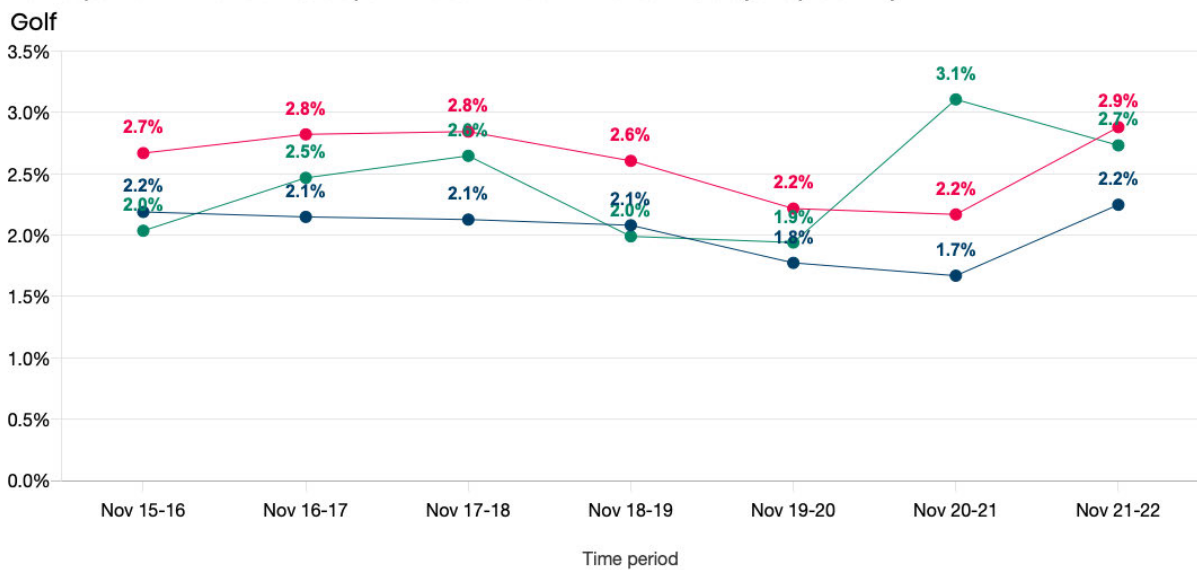
³ [agm 2023 - finance report.final.pdf \(intelligentgolf.co.uk\)](#)

states that, 'we count sport and leisure activity if it is done.....at least twice in 28 days.' This is the definition for all sports covered by AL, including golf.

1.138 Furthermore, Sport England Facilities Planning Model (FPM) for swimming, which is a supply and demand tool, also uses 2 x 28 as the participation benchmark for driving the FPM model and swimming pool need. Someone who plays 2 rounds of golf a month, could be classed as *regular* rather than somebody who plays golf twice a year, they are unlikely to class themselves as a regular golfer and planning golf needs on such infrequent participation is arguable.

1.139 The data below refers to national, regional and countywide participation – data is not available at the local authority level or for the 20-minute catchment of IGC, and in the absence of this, it is reasonable to assume that participation at these more local levels is consistent with the county figures.

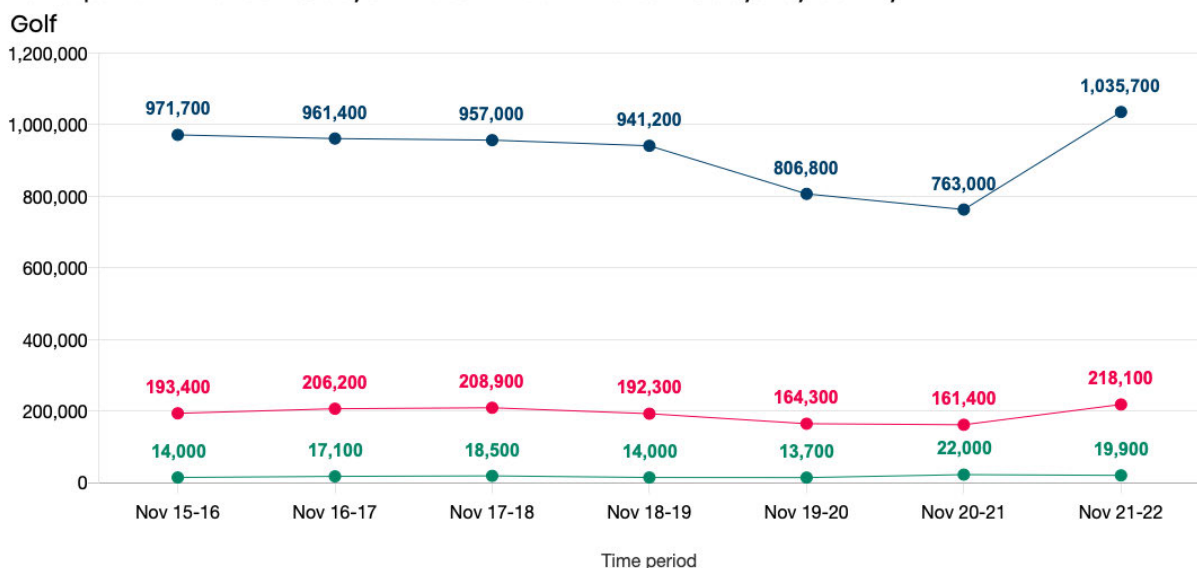
Participation in the last 28 days : At least twice in the last 28 days by activity



% Participation in the last 28 days by Where:

■ England (Nation) ■ South East Region ■ Crawley LA ■ Horsham LA ■ West Sussex CC

Participation in the last 28 days : At least twice in the last 28 days by activity



% Participation in the last 28 days by Where:

■ England (Nation) ■ South East Region ■ Crawley LA ■ Horsham LA ■ West Sussex CC

Participation in the last 28 days: At least twice in the last 28 days by activity (%)							
	Nov 15-16	Nov 16-17	Nov 17-18	Nov 18-19	Nov 19-20	Nov 20-21	Nov 21-22
England (Nation)	2.20%	2.10%	2.10%	2.10%	1.80%	1.70%	2.20%
South East Region	2.70%	2.80%	2.80%	2.60%	2.20%	2.20%	2.90%
West Sussex CC	2.00%	2.50%	2.60%	2.00%	1.90%	3.10%	2.70%

Participation in the last 28 days: At least twice in the last 28 days by activity (number)							
	Nov 15-16	Nov 16-17	Nov 17-18	Nov 18-19	Nov 19-20	Nov 20-21	Nov 21-22
England (Nation)	971,700	961,400	957,000	941,200	806,800	763,000	1,035,700
South East Region	193,400	206,200	208,900	192,300	164,300	161,400	218,100
West Sussex CC	14,000	17,100	18,500	14,000	13,700	22,000	19,900

- 1.140 Participation on a regular basis (2 x previous 28 days) in 21/22 in England levels is back to the same percentage rates as in 15/16, having suffered a significant reduction over the last 10 years, and particularly in the early days of the Covid pandemic. The latest data suggests that participation rates in West Sussex are higher than the national average, although slightly lower than the figure for the region. (not accounting for an apparent surge in 20/21). There are currently estimated to be 1.035m golfers playing twice monthly in England, and 19,900 in West Sussex, which if extrapolated for the more local areas, estimates 5,473 regular golfers in the 20-minute catchment of IGC, 3,323 in Horsham district and 2,667 in Crawley.
- 1.141 Using Active Lives England Golf (EG) has created a Regular Golfer Demand (RGD) index - a series of calculations used to determine an index indicating how the golfer demand per facility in a local authority compares to the national benchmark of demand per facility. Within the formula, EG calculates the participation number in an authority by establishing what proportion of the population are likely to be golfers, which can then be used to determine the number of participants per facility within the authority. Using this number and comparing to the national average of participants per facility, an index can be created.
- 1.142 The RGD index, provides a more balanced assessment of supply against demand and provides an understanding of the number of courses required to meet the estimated need for golf facilities within a locality. With 100 as the average, any index lower than this suggests an area that potentially has either low demand, or a high facility count, or both. A number above 100 suggests an area as having a high demand and/or a low provision, or both.
- 1.143 Participation twice in the previous 12 months is the criterion that England Golf (EG) uses to highlight regular demand.
- 1.144 Based on the England Golf regular participation measure of twice per year when assessing the RGD for Horsham it shows an index of 90, which is just below the national average which could suggest that the facilities available are adequate to meet the demand of those in the authority who play golf regularly. In Crawley the position is different with a RGD of 394. The RGD formula allows for different scenarios to be forecast, Taking Ifield out of the equation would reduce the RGD index for Horsham to 108. As stated previously however the critical assessment is for the 20-minute catchment.

Table 3.1 – Regular Golfer Demand utilising 2 x 28 days metric and 20-minute catchment

Area	No of GCs (equivalents)	2x28 days participation (no's of regular golfers)	= ratio	Divided by participation in England 1,035,700/1,683	=	x100 = ratio
20-minute catchment	9	5,512	5512/9 = 648	615	1.00	100

- 1.145 Based on the rationale set out above, and using the 'principles', the England Golf RGD methodology has been adapted, to demonstrate a scenario, to reflect the different measure of regular participation (2 x previous 28 days, consistent with the Active Lives data) and to also enable the 20-minute drivetime catchment area to be considered, which the EG analysis has not done.
- 1.146 The number of courses is the 18-hole equivalent, and participation at the more local level is extrapolated from the West Sussex average participation rate from Active Lives (AL) (2.7% 19,900 regular golfers) divided by proportion of the county population within each area (Crawley 13%, Horsham 17%, catchment 28%).
- 1.147 In the 20-minute core catchment using the 2 x 28 metric the catchment has an RGD index of 100, which suggests there is a balance of supply and demand, equal to the national average. Within this area, and at a more local level, Horsham has an index lower than 100, suggesting low demand compared with supply, and Crawley a high RGD index, where demand considerably exceeds supply.
- 1.148 If Ifield was removed from the 20-minute core catchment the RGD would change to 112 for the core 20-minute catchment. The inclusion of Slinfold would reestablish a balanced position without IGC.
- 1.149 Obviously, accessibility will largely depend on the facilities on offer and an individual's personal circumstances, so not all facilities will necessarily be viable options, but this is a useful index to compare demand with the national average. In general, the IGC 20-minute core catchment has adequate facilities to meet anticipated demand.

Future Demand

- 1.150 There is no evidence of latent, displaced or unmet demand, other than the 2 courses with waiting lists, however the capacity across the catchment area as a whole demonstrates availability within the catchment, with most clubs expressing vacancies, keen to attract new members and users. The national trends and latest membership indicators suggest a downward trend, which reflects the experience in the core catchment, including IGC.
- 1.151 Future growth 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 overall growth is unlikely to be significant. All clubs consulted reported either static or declining membership and usage.
- 1.152 Given the structural issues set out at the start of this section and the rising population of the catchment the most likely scenario is that over the next 10-15 years, some downward adjustment in the supply may be necessary based on golf trends. Any increases via growth is likely to be negated by downward trends and attrition.
- 1.153 Sport England has developed 19 Market Segments (MS) within the overall adult population to help understand the nation's attitudes towards sport and its motivation for taking part (or not).

It is based on the Active People's Survey, DCMS's 'Taking Part' Survey and Mosaic data from Experian.

- 1.154 The three main market segments in the IGC catchment (comprising 36% of the area's total population) are Tim (sporty male professional), Philip (mid-life professional sporty male) and Alison (stay at home mum). Philip is one of the two highest segments nationally participating in golf, and would like to play more, Tim is also active in golf, and Alison is active in general, but plays little or no golf. This assessment tends to confirm that participation in golf in this area is likely to be higher than the national average.
- 1.155 In terms of people within the catchment who (it is estimated by MS) do play golf, the data suggests that by far the major participants are Tim and Philip, well represented in the area and keen golfers. Other golfers include Ralph and Phyllis, and Roger and Joy, who traditionally play golf, but are less well-represented segments in the area. Alison, a main segments in the area, plays little golf. Two thirds of the golfers in the area are accounted for by the four main playing segments – there is very little golf played outside these groups. Potential demand for golf from the MS data confirms that it is the broadly the same groups that currently play that would like to participate more, totalling over 4,000 participants or about 1-2%. This represents a theoretical demand for golf and can be used alongside the population and growth projections to estimate future demand.
- 1.156 Population projections have been sourced from the Nomis, ONS website of subnational projections for England, 2018 based, the latest data available. The figures for the 20-minute catchment are estimated as a proportion of the combined figures overall, as follows:
- HDC 2021-2041 = 149,766-167,135 (11.5% increase)
 - CBC 2021-2041 = 114,600-118,761 (3.45% increase)
- Housing allocations take account of expected population increase, and are included in the above. Given the restrictions on housing supply over the Plan period, it is likely that the above population proposals can be considered a worst case assessment of future demand arising from new residents.
- 1.157 It is difficult to say how this will manifest across the catchment, also there is a limit on house building, which may well depress figures further. An average of 7.4% growth across the catchment is however considered to be reasonable as a measure of growth. The broad data therefore suggests that the overall population in the IGC catchment may well increase by 7.4% overall by 2041, or by about 0.5% per year. Most of this increase is projected to be in the Horsham district, where most of the golf facilities area are situated and where growth can be best accommodated.
- 1.158 This increase also masks changes in the age structure of the area, but unlike in many areas where there is normally major increase in the population over 65, smaller increases among 0-15, and relative stagnation in the main 16-64 age band, in this part of the south east, there may well be a greater increase in younger or middle-aged households. The population normally active in sport are those between 5 and 54, which is likely to increase steadily.
- 1.159 The estimated increases in population suggest that demand for golf in general could increase by say 0.5% pa (7.3% to 2041) over the next few years within the IGC catchment.
- 1.160 On the basis of the population information available, and current participation data for the area, there is likely to be an increase in participation in golf in the IGC area, and this might amount to up to an additional 400 regular golfers (i.e. 7.4% of estimated 5,500 golfers rounded) in the period to 2041, as the result of population change alone. This may be balanced and reduced by a reduction in participation trends and the current static position in the market. Furthermore these figures match the likely attrition rates of 6-7% over the same period, meaning the growth impacts are likely to even out in respect of membership numbers.

- 1.161 The trend set out previously at both national level and at IGC itself would suggest that overall growth is unlikely to be significant. All clubs consulted reported either static or declining membership and usage. Any increases via growth is therefore likely to be negated by downward trends and attrition.
- 1.162 The existing supply could therefore accommodate this increase in addition to the IGC loss, given 5 courses have availability and are looking to increase membership and usage. Furthermore mitigation proposals will improve the quality and capacity of courses to meet the needs of displaced users and new people seeking to take up the game. The mitigation strategy will set out how this will be achieved.

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Demand Summary

- Golf is the fifth largest participation sport in the country, with around 730,000 members belonging to one of 1,750 affiliated clubs. Research led by the R&A in 2020 together with the home nation golf unions found that there were 5.2 million on-course adult golfers, playing full-length courses (either 9 or 18-holes) in Great Britain. The latest figures showed that 4.8 million people played in 2021, down from the COVID peak.
- Sport England Active Lives Survey, measures regular participation in sport as twice in the last 28 days, the figure for golf in 2021/22 was 2.2%, which is the same as recorded in 2015/16. Participation would therefore appear to be static.
- Up until the mid-1980s, the demand to play golf in the UK comfortably exceeded the supply of golf courses. This reversed the mid-1980s supply/demand position to one where, on a national basis, there was generally supply/demand equilibrium but edging towards golf course oversupply. From around the year 2003, the UK experienced a steady decline in golf club membership numbers.
- These trends were confirmed in the 2023 BRS Golf participation survey, which concluded that registered member numbers at golf clubs has started to decline. This was further evidenced by Contemporary Club Leadership, who regularly survey golf club leaders, the most recent survey in 2023 found that membership resignation had risen, with the average rate tracking at 6%. Membership attrition rates and generally considered to be running at 7% per annum.
- Demand for membership is therefore struggling both at IGC and more broadly across the golfing community and is following these national trends in the core catchment and subject of this study.
- Against this backdrop England Golf is focussed on sustainability and consolidating current clubs rather than expanding the market but also developing clubs to be more viable.
- Based on the England Golf regular participation measure of twice per year when assessing the RGD for Horsham it shows an index of 90, which is just below the national average which could suggest that the facilities available are adequate to meet the demand of those in the authority who play golf regularly. Taking Ifield out of the equation would reduce the RGD index for Horsham to 108.
- In the 20-minute core catchment using the 2 x 28 metric the catchment has an RGD index of exactly 100, which suggests there is a balance of supply and demand, equal to the national average. If Ifield was removed from the 20-minute core catchment the RGD would change to 112 for the core 20-minute catchment. The inclusion of Slinfold would reestablish a balanced position without IGC in the 20-minute core catchment. .
- The trends at both national level and at IGC itself would suggest that overall growth is unlikely to be significant. All clubs consulted reported either static or declining membership and usage. Any increases via population growth is therefore likely to be negated by downward trends and attrition.
- Most additional future demand is likely to occur mainly from beginners, juniors and others new to the game, particularly women and girls, and this will have implications for the types of facility and offer that are required in the future, at least in the initial stages.

Introduction

- 1.163 The ANOG process requires the triangulation of evidence; taking account of all factors in terms of supply; *quantity, quality, access and availability* and set against national trends and local demand. The findings of this assessment have been set out in the proceeding sections.
- 1.164 There will be impacts of the potential closure of IGC, as it is a much loved and operational course, however in planning terms we conclude that there is a relatively balanced position in terms of current supply and demand. The closure of IGC would have an impact on this position, but any displaced golfers could travel to other courses, with good levels of provision remaining and which appear to be accessible and available, based on recent consultation. The existing supply could accommodate the loss of IGC, given 5 courses have availability and are looking to increase membership and usage, plus predicted growth. Growth will have limited impact given the trends and likely attrition over the period up to 2041.
- 1.165 We do not deem the IGC clearly surplus to requirements, however we conclude that the position is marginal and given the market characteristics, it does not require replacement on a *like for like* basis, given the supply and demand position set out and the nature of the existing provision. The deficiency in the 20-minute core catchment is considered marginal so a full replacement 18 hole golf course is not proportionate, instead alternative golf enhancements to provide a more varied offer, whilst protecting the needs of established members, would more appropriately mitigate for the loss of IGC. opportunities exist within the catchment to mitigate any impact through targeted investment in both qualitative and quantitative measures that are better aligned with golfing needs and addresses barriers to golfing for a greater percentage of the catchment population.
- 1.166 The member offer is well catered for, through various operational models. This is the clear role of IGC, consultation with the IGC club secretary confirmed the focus is on retaining members through flexible offers. The closure of IGC would not therefore have a significant impact on the mix of facilities or limit opportunities for newer golfers looking to take their first steps into the game. Tilgate, Rookwood, Horsham, and Cuckfield provide a good starting point, given the provision of ancillary facilities e.g., GDRs, practice and 9-hole provision, plus 'member' offerings to play this role, however investment is required to further enhance this, particularly in respect of the leisure and recreation offer.
- 1.167 Course improvements at both Tilgate and Rookwood could also enhance the offer for more traditional golfers seeking a member experience and potentially transferring in part from IGC. Both Tilgate and Rookwood offer a good test of golf for experienced members owing to the course construction and layout, broadly comparable with IGC, however quality improvements to the course will be required to attract members who may be interested in joining. There is clearly potential for improvement through directing mitigation contributions to course improvements to ensure any displaced members are catered for and the overall quality matches needs and expectations, alongside those starting the golfer journey
- 1.168 Mitigation for the closure of IGC, therefore needs to be delivered to alleviate the impacts and provide opportunities, which better meet the market needs. Given the findings of the needs assessment, the impacts of the closure can be mitigated for and the detail of this will be set out in the mitigation proposals, which will form a significant overall package for golf based on the following principles:
- Closing the marginal deficiency in standard golf course equivalents by investment and improvements to improve the quality and capacity of existing courses to increase the attractiveness to potentially displaced members. This could include course improvements, to bunkers, tees and greens and drainage, investing in areas that currently restrict playing opportunities over the golf season, making courses more attractive to prospective members.
 - Targeting gaps in the market to attract new people and grow the game at the start of the golfer journey. 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, which represents a significant proportion of future golf demand across the catchment area.

- 1.169 Mitigation proposals will improve the quality and capacity of courses to meet the needs of displaced users and new people seeking to take up the game. The mitigation strategy will set out how this will be achieved and the positive impacts on golf in the core 20-minute core catchment.
- 1.170 It is therefore evident that the gap within the market is at the *Leisure, Recreational and Golfer* end of the golf journey and investment should seek to support the delivery of this need, whilst at the same time recognising the role currently played by IGC and ensuring there remains capacity in the catchment for the current IGC member offering to also be delivered at alternative venues and ensure any displaced members have appropriate opportunities, thus also negating the impact of the closure on the more traditional offer.
- 1.171 It is evident that significant opportunities exist within the catchment to mitigate any impact through targeted investment in both qualitative and quantitative measures that is better aligned with golfing needs and addresses barriers to golfing for a greater percentage of the catchment population, whilst protecting traditional members displaced by the closure, seeking membership opportunities in the core catchment.
- 1.172 Analysis of the catchment and course characteristics clearly identify the potential of Tilgate, Rookwood and Goffs Park to deliver elements of the mitigation strategy. This is now being explored in detail.
- 1.173 Tilgate is operated by Glendale Leisure under contract to CBC. The course was established in 1982. The course is a par 71 with a yardage of 6,238. It also has a floodlit driving range. Locally it is known as being a well-designed course and a good test of golf, comparable with IGC, which is reflected in the slope index rating of 130. The basic course layout and test of golf can therefore provide an equivalent offer for the established golfer as IGC. The course is however in need of investment in order that it can realise its potential and become the good standard golf course it is capable of becoming, providing an appropriate qualitative alternative. Poor car parking arrangements, road access, poor clubhouse offering, buggy paths and course drainage issues are holding the course back from realising its potential as a good quality golf course. There is also potential to expand the offering, the current 9-hole par 3 course is currently out of use and the pitch and putt at Goffs Park also requires investment to extend the capacity.
- 1.174 Rookwood is operated by British Ensign, on behalf of HDC, who also manage Slinfold. The course was developed on farmland and opened in 1997, it is set in undulating parkland with several lakes. It is described as one of the best pay and play courses in Sussex. It was designed as a municipal public pay and play golf course and comprises an 18-hole golf course, of 6,261 yards with a par 72. Up until recently the course was not affiliated to EG, the course is however now affiliated to EG, which elevates it and enables the course to offer members traditional membership and competition opportunities. There are no barriers to membership and significant capacity exists for displaced IGC members. The pricing is comparable to IGC. There are no capacity issues at the course and given the proximity to IGC and EG affiliation, Rookwood therefore offers potential to address displaced member needs living within Horsham and wider golf priorities in the catchment. There is also potential to add to the Leisure offer with the potential development of Adventure Golf on-site.

DRAFT

Horsham District Council

2 September 2024

To Whom it Concerns

Sport England and England Golf Position on West of Ifield Draft Site Allocation in Horsham Reg. 19 Local Plan

Government guidance as set out in Planning Practice Guidance: Paragraph: 003 Reference ID: 37-003-20140306 advises local planning authorities to consult with Sport England as a non-statutory consultee in a range of circumstances including where development would result in a residential development of 300 dwellings or more or the creation of a site for one or more playing pitches. Sport England is not generally identified as either a statutory or non-statutory consultee where the loss of non-pitch sports to alternative development is proposed. In such circumstances, it is the Local Planning Authority's responsibility to determine whether a proposal resulting in the loss of land or buildings used for sport and recreation is acceptable assessed against paragraph 103 (formerly paragraph 99) of the National Planning Policy Framework (NPPF).

Notwithstanding the above the identification of land West of Ifield as a proposed strategic development allocation for residential / mixed use within the Regulation 19 draft Horsham Local Plan would result in the loss of the Ifield Golf Course. Sport England and England Golf wish to ensure that national and local policy is followed and that the loss of the golf course is either fully justified in accordance with paragraph 103 a) of the NPPF or alternatively, that the loss is suitably mitigated in accordance with paragraph 103 parts b) and / or c) of the NPPF.

To that end, Sport England and England Golf have engaged in discussions with Homes England over the past eighteen months to ensure that the proposed scheme meets paragraph 103 and the draft local plan policy requirements.

Policy HA2: Land West of Ifield of the Regulation 19 Local Plan for submission, requires at part g)

Formal and informal open space, sport and recreation provision is provided to meet the needs of the new community in accordance with standards and the respective recommendations in the Playing Pitch Strategy and Open Space, Sport & Recreation Review 2021. In addition, the provision of appropriate mitigation for

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.

Informal open space provision must be designed for all and shall include (but not be limited to):

- i. a network of nature paths throughout the development, integrating with existing public rights of way;*
- ii. accessible natural green space;*
- iii. 3G football pitches & Multi-Use Games Areas;*
- iv. equipped childrens play facilities;*
- v. social seating areas.*

Sport England considers that the policy satisfactorily identifies the need for any development proposal within the proposed site allocation boundary to address the requirements of paragraph 103 of the NPPF. The policy as drafted is therefore considered robust and appropriately defined for the plan making stage, with future details of a proposed mitigation package (if required) to be secured at the application stage as a result of the drafted policy.

At the planning application stage Sport England would expect a site-specific golf needs assessment and mitigation strategy to be submitted to the Local Planning Authority that demonstrates that either one part, or a combination of parts of paragraph 103 of the NPPF are met.

A Golf Needs Assessment to support a future planning application has been prepared on behalf of Homes England. Sport England and England Golf have been provided with an opportunity to comment on the draft and Sport England is satisfied that it has been undertaken in accordance with our Assessing Needs and Opportunities Guidance. Sport England and England Golf have also been in discussions with Homes England and its consultants, as to how the loss of the golf course, if it is permitted, might be satisfactorily mitigated.

Without prejudice to our final position that will be reached only when an application supported by the golf needs assessment is submitted and subject to further detailed discussions and negotiations regarding a satisfactory and comprehensive sports mitigation strategy, (including but not only related to golf provision) to be secured through a s.106 legal agreement, Sport England and England Golf are able to confirm the following:

Sport England and England Golf recognise that it is likely that Ifield Golf course will be lost. Sport England and England Golf have to take a pragmatic approach given

that the previous owner sold the land to Homes England for development and that it could be closed permanently at any point without any mitigation and without any link to any proposed development; and

Discussion to date with Homes England has sought to understand the impact of the loss of the golf course and potential options to mitigate that loss within the catchment.

When considering paragraph 103 part b) of the NPPF, we agree that consideration of the supply and demand in the catchment is necessary. From the assessment it is possible to say that a “like for like” replacement is not required and a more appropriate mitigation strategy should be focused on the betterment for golf in its broadest sense seeking to enhance both traditional provision within the catchment to meet the needs of existing members but also, to create opportunities for new market entrants / those earlier on the golfing journey.

A long list of options to improve facilities at Tilgate and Rookwood Golf Courses have been identified by their current operators that would be consistent with a betterment mitigation strategy and these are considered to be potentially credible mitigation options for Homes England to consider. They do however need further definition, costing and prioritisation to ensure that together, they would deliver an overall level of investment sufficient to meet the requirements of paragraph 103 part b) of the NPPF.

Sport England and England Golf will continue to work with Homes England to secure the best possible mitigation package for golf within the planning application process.

Homes England has set out that future engagement with Sport England ahead of submission of any planning application is also anticipated to cover the full extent of the sport and recreation facilities which are included in emerging proposals. Although subject to further review, Sport England understand Homes England’s proposed strategy includes additional facilities and assets to address both existing unmet need and also the needs generated by the proposed development. This will be relevant in considering the application of paragraph 103 part c) at the planning application stage.

Jo Edwards
Planning Manager, Sport England



Neutral Citation Number: [2018] EWHC 3529 (Admin)

Case No: CO/3744/2018

IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION
PLANNING COURT

Royal Courts of Justice
Strand, London, WC2A 2LL

Date: 18 December 2018

Before :

MRS JUSTICE LANG DBE

Between :

THE QUEEN

Claimant

on the application of

**MARTIN JOHN BROMMELL
ON BEHALF OF
MAPLEDURHAM PLAYING FIELDS
ACTION GROUP**

- and -

READING BOROUGH COUNCIL

Defendant

SECRETARY OF STATE FOR EDUCATION

Interested Party

Katherine Barnes (instructed by **Irwin Mitchell LLP**) for the **Claimant**
John Hobson QC and Matthew Dale-Harris (instructed by **Reading Brough Council**) for the
Defendant

Tim Buley (instructed by the **Government Legal Department**) for the **Interested Party**

Hearing dates: 20 & 21 November 2018

Approved Judgment

Mrs Justice Lang :

1. The Claimant applies for judicial review of the decision, made on 14 August 2018, by the Defendant (“the Council”) to grant planning permission for the erection of a primary school, with associated multi-use games area and parking facilities on part of Mapledurham Playing Fields (“MPF”), which is a recreational space in Caversham, Reading.
2. The Claimant is the chairman of the MPF Action Group (“MPFAG”), created in 2005 to protect MPF as a public green open space for future generations.
3. By consent, Supperstone J. ordered that the application should be heard as a rolled-up hearing.

Facts

4. MPF is an area of approximately 11 hectares. There is a children’s play area in the middle, a hard-surfaced basketball area towards the east and to the north of that is the location of Mapledurham Lawn Tennis Club, which has café facilities and a veranda on the eastern side of the Pavilion. In addition to this, MPF currently accommodates nine grassed playing pitches, mostly marked out for football. MPF is highly valued by local people and regularly used for a wide range of leisure and recreational pursuits. These include football, dog walking, picnics, basketball, tennis, environmental activities, jogging, walking, meeting friends etc.
5. Although MPF is managed by the Council’s Leisure and Recreation Service, the land and buildings are held for charitable purposes by the Recreation Ground Charity, which is governed by the Council as trustee.
6. The application for planning permission was made on 27 June 2017 by the Education and Skills Funding Agency (“ESFA”) which is an executive agency of the government, sponsored by the Department for Education. The application was for a new two-form entry primary school (with its own 20 space car park) to be constructed on the north-western part of MPF. The application site covered approximately 0.97 hectares which would result in a loss of around 1/11th of the existing public open space provision at MPF.
7. MPFAG opposed the construction of a school on MPF on the grounds that it would dominate the site, change its character, and reduce the amount of open space available for recreation and sports.
8. Sport England, a statutory consultee, also objected to the proposal, because of the loss of playing fields facilities.
9. The application was considered by the Council’s Planning Applications Committee (“the Committee”) at a meeting on 4 April 2018. The Committee resolved to notify the Secretary of State for Housing, Communities and Local Government to decide whether he wished to call in the application, and indicated that it was minded to grant permission. The application was not called in by the Secretary of State.

10. On 14 August 2018, following completion of a section 106 agreement, the Council's Head of Planning, Development & Regulatory Services granted planning permission.

Legal frame work

11. Section 70(2) of the Town and County Planning Act 1990 ("TCPA 1990") provides that, in deciding whether to grant or refuse planning permission, the decision-maker shall have regard to:

“(a) the provisions of the development plan, so far as material to the application...

(b) any local finance considerations so far as material to the application, and

(c) any other material considerations.”

12. Section 38(6) of the Planning and Compulsory Purchase Act 2004 ("PCPA 2004") provides:

“If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts, the determination must be made in accordance with the plan unless material considerations indicate otherwise.”

13. In *City of Edinburgh Council v. Secretary of State for Scotland* 1998 SC (HL) 33, [1997] 1 WLR 1447, Lord Clyde explained the effect of this provision, beginning at 1458B:

“Section 18A [the parallel provision in Scotland] has introduced a priority to be given to the development plan in the determination of planning matters.....

By virtue of section 18A the development plan is no longer simply one of the material considerations. Its provisions, provided that they are relevant to the particular application, are to govern the decision unless there are material considerations which indicate that in the particular case the provisions of the plan should not be followed. If it is helpful to talk of presumptions in this field, it can be said that there is now a presumption that the development plan is to govern the decision on an application for planning permission.... Thus the priority given to the development plan is not a mere mechanical preference for it. There remains a valuable element of flexibility. If there are material considerations indicating that it should not be followed then a decision contrary to its provisions can properly be given.

Moreover the section has not touched the well-established distinction in principle between those matters which are properly within the jurisdiction of the decision-maker and those

matters in which the court can properly intervene. It has introduced a requirement with which the decision-maker must comply, namely the recognition of the priority to be given to the development plan. It has thus introduced a potential ground on which the decision-maker could be faulted were he to fail to give effect to that requirement. But beyond that it still leaves the assessment of the facts and the weighing of the considerations in the hands of the decision-maker. It is for him to assess the relative weight to be given to all the material considerations. It is for him to decide what weight is to be given to the development plan, recognising the priority to be given to it. As Glidewell J observed in *Loup v Secretary of State for the Environment* (1995) 71 P & C.R. 175, 186:

“What section 54A does not do is to tell the decision-maker what weight to accord either to the development plan or to other material considerations.”

Those matters are left to the decision-maker to determine in the light of the whole material before him both in the factual circumstances and in any guidance in policy which is relevant to the particular issues.

.....

In the practical application of section 18A it will obviously be necessary for the decision-maker to consider the development plan, identify any provisions in it which are relevant to the question before him and make a proper interpretation of them. His decision will be open to challenge if he fails to have regard to a policy in the development plan which is relevant to the application or fails properly to interpret it. He will also have to consider whether the development proposed in the application before him does or does not accord with the development plan. There may be some points in the plan which support the proposal but there may be some considerations pointing in the opposite direction. He will be required to assess all of these and then decide whether in light of the whole plan the proposal does or does not accord with it. He will also have to identify all the other material considerations which are relevant to the application and to which he should have regard. He will then have to note which of them support the application and which of them do not, and he will have to assess the weight to be given to all of these considerations. He will have to decide whether there are considerations of such weight as to indicate that the development plan should not be accorded the priority which the statute has given to it. And having weighed these considerations and determined these matters he will require to form his opinion on the disposal of the application. If he fails to take account of some material consideration or takes account of

some consideration which is irrelevant to the application his decision will be open to challenge. But the assessment of the considerations can only be challenged on the ground that it is irrational or perverse.”

14. This statement of the law was approved by the Supreme Court in *Tesco Stores Limited v. Dundee City Council* [2012] UKSC 13, [2012] P.T.S.R. 983, per Lord Reed at [17].
15. It follows from the principles set out above that the Claimant’s challenge to the grant of planning permission can only succeed on public law grounds. The exercise of planning judgment and the weighing of the various issues are matters for the decision-maker and not for the Court: *Seddon Properties Ltd v. Secretary of State for the Environment* (1981) 42 P & CR 26.

National Planning Policy Framework

16. The National Planning Policy Framework (“the Framework”)¹ is a material consideration to be taken into account when applying section 38(6) PCPA 2004 in planning decision-making, but it is policy not statute, and does not displace the statutory presumption in favour of the development plan: *Hopkins Homes Ltd v. Secretary of State for Communities and Local Government* [2017] UKSC 37 [2017] 1 WLR 1865, per Lord Carnwath at [21].
17. In *Hopkins Homes Ltd*, Lord Carnwath warned against the excessive legalisation of planning decision-making, based on challenges to the interpretation of national and local policies, (at [23] – [26]). He said (at [26]) that recourse to the courts may sometimes be needed to resolve distinct issues of law, or to ensure consistency of interpretation in relation to specific policies. But issues of interpretation, which are appropriate for judicial analysis, should not be elided with issues of judgment in the application of that policy.
18. Paragraph 74 of the Framework, in the section headed ‘Promoting healthy communities’, is in issue in this claim. It provides:

“74. Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
- 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
- the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.”

¹ The parties agreed that the 2012 edition of the Framework should be applied in this case

Challenges to officer reports

19. In *R (Luton BC) v. Central Bedfordshire Council* [2014] EWHC 4325 (Admin), Holgate J. helpfully reviewed the authorities, as follows:

“90. A great many of LBC’s grounds involve criticisms of the officers’ reports to CBC’s committee. Accordingly, it is necessary to refer to the legal principles which govern challenges of this kind. I gratefully adopt the summary given by Mr Justice Hickinbottom in the case of *The Queen (Zurich Assurance Ltd trading as Threadneedle Property Investments) – v- North Lincolnshire Council* [2012] EWHC 3708 (Admin) at paragraphs 15-16:

“15. Each local planning authority delegates its planning functions to a planning committee, which acts on the basis of information provided by case officers in the form of a report. Such a report usually also includes a recommendation as to how the application should be dealt with. With regard to such reports:

(i) In the absence of contrary evidence, it is a reasonable inference that members of the planning committee follow the reasoning of the report, particularly where a recommendation is adopted.

(ii) When challenged, such reports are not to be subjected to the same exegesis that might be appropriate for the interpretation of a statute: what is required is a fair reading of the report as a whole. Consequently:

“[A]n application for judicial review based on criticisms of the planning officer’s report will not normally begin to merit consideration unless the overall effect of the report significantly misleads the committee about material matters which thereafter are left uncorrected at the meeting of the planning committee before the relevant decision is taken” (*Oxton Farms, Samuel Smiths Old Brewery (Tadcaster) v Selby District Council* (18 April 1997) 1997 WL 1106 106, per Judge LJ as he then was).

(iii) In construing reports, it has to be borne in mind that they are addressed to a “knowledgeable readership”, including council members “who, by virtue of that membership, may be expected to have

a substantial local and background knowledge” (*R v Mendip District Council ex parte Fabre* (2000) 80 P & CR 500, per Sullivan J as he then was). That background knowledge includes “a working knowledge of the statutory test” for determination of a planning application (*Oxton Farms*, per Pill LJ).

...”

91. I would also draw together some further citations:

“[The purpose of an officer’s report] is not to decide the issue, but to inform the members of the relevant considerations relating to the application. It is not addressed to the world at large but to council members, who, by virtue of that membership, may be expected to have substantial local and background knowledge. There would be no point in a planning officer’s report setting out in great detail background material, for example in respect of local topography, development plan policies or matters of planning history if the members were only too familiar with that material. Part of a planning officer’s expert function in reporting to the committee must be to make an assessment of how much information needs to be included in his or her report in order to avoid burdening a busy committee with excessive and unnecessary detail.” (per Sullivan J in *R v Mendip DC ex p Fabre* (2000) 80 P&CR 500 at 509).

92. In *R (Siraj) v Kirkless MBC* [2010] EWCA Civ 1286 Sullivan LJ stated at para. 19:

“It has been repeatedly emphasised that officers’ reports such as this should not be construed as though they were enactments. They should be read as a whole and in a common sense manner, bearing in mind the fact that they are addressed to an informed readership, in this case the respondent’s planning subcommittee”

93. In *R (Maxwell) v Wiltshire Council* [2011] EWHC 1840 (Admin) at paragraph 43 Sales J (as he then was) stated:

“The Court should focus on the substance of a report of officers given in the present sort of context, to see whether it has sufficiently drawn councillors’ attention to the proper approach required by the law and material considerations, rather than to insist upon an elaborate citation of underlying background materials. Otherwise, there will be a danger that officers will draft reports with excessive defensiveness, lengthening them and over-burdening them with quotations of material, which may have a

tendency to undermine the willingness and ability of busy council members to read and digest them effectively.””

20. These well-established principles were approved by the Court of Appeal in *R (Lee Valley RPA) v. Epping Forest DC* [2016] EWCA Civ 404, per Lindblom LJ, at [31]:

“31. It is well established that planning officers' reports to committee must be read not in an unduly critical way, but fairly and as a whole. Councillors on planning committees can be expected to be reasonably familiar with local circumstances and with relevant policies at national and local level, and to understand what statute requires of them when determining an application for planning permission. If criticism is directed at an officer's report as a means of attacking an authority's grant of planning permission, the question for the court will always be whether the officer has failed to guide the members sufficiently, or has actually misled them, on a matter essential to their decision. Where the officer's advice is founded on planning judgment it will be unassailable unless demonstrably bad as a matter of law. There is ample authority to this effect (see, for example, the judgments of Pill L.J. and Judge L.J., as he then was, in *Oxton Farms, Samuel Smith's Old Brewery (Tadcaster) v Selby District Council*, 18 April 1997, 1997 WL 1106106).”

21. In *St Modwen Developments Ltd v. Secretary of State for Communities and Local Government & Ors* [2017] EWCA Civ 1643, at [7], Lindblom LJ cautioned against “hypercritical scrutiny” of, *inter alia*, planning officer reports which should not be “laboriously dissected in an effort to find fault”.

The Claimant’s grounds for judicial review

22. The Claimant submitted that the grant of planning permission was unlawful because the Council:
- i) misinterpreted paragraph 74 of the Framework (**Ground 1**);
 - ii) failed to apply paragraph 216 of the Framework and therefore failed to determine lawfully the weight to be afforded to the emerging local plan, specifically draft policy EN7 (**Ground 2**);
 - iii) failed to consider alternative sites and/or misdirected members in advising them that alternative sites could not be considered (**Ground 3**);
 - iv) granted the permission in breach of delegated authority (**Ground 4**).

Ground 1

23. The Claimant submitted that the Officer's report ("OR") misinterpreted paragraph 74 of the Framework by advising that the quantitative loss of open space may be outweighed by qualitative improvements to the remaining space, and so failed to recognise the full extent of the protection afforded by the Framework. The correct interpretation of paragraph 74 was that equivalent or improved provision of both quantity and quality was required.
24. There were numerous objections to the proposal because of the loss of open space and playing fields. Sports England concluded that the proposal was "not considered to accord with any of the exceptions to Sport England's Playing Field's Policy or with paragraph 74 of the NPPF". Therefore the OR addressed this issue in detail.
25. In respect of the national and local policies, the OR stated:

"6.8 Open spaces and playing fields enjoy strong policy protection in the NPPF:

73. Access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities. Planning policies should be based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision. The assessments should identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities in the local area. Information gained from the assessments should be used to determine what open space, sports and recreational provision is required.

74. Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
- 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
- the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss."

6.9 The proposed school would be sited in the north-west corner of the playing fields which is covered by two main areas of policy protection from development in the Development Plan. The first is Policy CS28 (Loss of Open Space) in the Core Strategy, which states:

“Development proposals that will result in the loss of open space or jeopardise its use or enjoyment by the public will not be permitted. In exceptional circumstances, development may be permitted where it is clearly demonstrated that replacement open space, to a similar standard, can be provided at an accessible location close by, or that improvements to recreational facilities on remaining open space can be provided to a level sufficient to outweigh the loss of the open space.”

Secondly is Policy SA16 (Public and Strategic Open Space) as set out in the SDPD:

“Important areas of Public and Strategic Open Space, shown on the Proposals Map will be protected from development. Proposals that would result in the loss of any of these areas of open space, or jeopardise the use or enjoyment by the public, will not be permitted.”

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

26. Thus, members had the benefit of seeing both the Framework provisions and the local policies set out in full. The alleged misdirection is in paragraph 6.10, where the OR refers to “equivalent or better provision in terms of quantity or quality”.
27. A submission similar to the Claimant’s was considered, and rejected, by the High Court in *R (Turner) v. Secretary of State for Communities and Local Government* [2015] EWHC 375 (Admin). Collins J. held at [37]:

“The claimant submits that the natural and so correct meaning of paragraph 74 requires any development to provide open space which is at least equivalent to that lost both in quantity and quality. It is not a correct interpretation to allow a smaller quantity because of enhanced quality. The claimant has referred to observations of a MP who was making particular reference to allotments saying that it meant that open spaces were not to be lost. However, I think that that is an over mechanistic

approach. No doubt when spaces are fully used such as allotments or playing fields or entirely accessible recreation areas it will be difficult if not impossible to justify a loss of quantity. But it is in my view appropriate in a case such as this to consider the reality which is that the existing spaces were largely unused by the general public. The requirement in such circumstances for equivalent quantity is too restrictive and would, if applied to the letter, prevent sensible development when in reality there has been no overall loss. Accordingly, I do not think the inspector erred in dealing with open space.”

28. I agree with Collins J. that the Claimant’s interpretation of paragraph 74 is over-mechanistic. The correct interpretation was provided by Mr Buley, on behalf of the Secretary of State, in his skeleton argument as follows:

“Para 74 requires that, where open space land is to be built upon, the loss will be replaced by “equivalent or better provision”. Whether or not the provision is equivalent or better must be *judged* in terms of both quantity and quality. The word “and” simply makes clear that both quality and quantity are relevant parameters in judging whether provision is “equivalent or better”. So the overall requirement is that the open space land lost must be made up for, and whether or not that requirement is met is a matter of planning judgment, having regard to both the quantity of what is to be provided and the quality, but allowing (in an appropriate case) for one to be set off against the other.”

29. On my reading of the judgment in *Turner*, the Claimant’s submissions that *Turner* was decided on the basis of a departure from the general policy in paragraph 74, or introduced a presumption against any quantitative loss where spaces were fully-used, were ill-founded. Collins J. correctly interpreted the policy and then applied it to the facts of the particular case, which were very different to the facts of this case.
30. In this case, the pitch provision that would be lost as a result of the proposed development was described at paragraph 6.19 of the OR:

“The proposed school would result in the removal of two small football practice pitches and also the northern edge of one of the larger pitches to the immediate south. The practice pitches are important to minimise over-playing on the main pitches and to minimise disruption to match play.”

31. The pitch provision under the proposed development was described in the OR as follows:

“6.20 The applicant has submitted an indicative layout plan which proposed a complete reorganisation of all of the pitches within the Playing Fields and this has been devised [and] discussed with RBC Leisure and Recreation, with detailed information on the level of pitch use for matches by the football

club. The proposed plan reduces the overall number of pitches to eight, but in doing so, the usability of the pitches will more closely align with the age-demand requirements of the club....”

“6.21 Additionally, this plan is a layout which would represent a re-worked playing field, which would need to encompass the following associated improvement works:

- Releveling of the entirety of the playing pitch area, to improve the use of the pitches;
- Introducing sub-surface drainage improvements to the pitches, to allow the grass to dry and improve recovery times and maximise playability; and
- The above enhancements will need to be providing pitches to adopted FA/Sport England standards, including suitable run-off areas, etc.”

.....

“6.24 Subject to associated necessary mitigation works to provide landscaping..., the pitch works would result in a more intensive pitch layout, but still allow for the other functions associated with this District Park, such as improved children’s play, improved hard court areas, walking, running and dog-walking routes. The RBC Leisure and Recreation service advises that with the consolidation of playing areas allowing more effective use of space and improvement in pitch quality, the anticipated demand may be accommodated and potentially a greater carrying capacity than the current nine pitches provide.”

32. The OR’s final conclusions were as follows:

“7. CONCLUSION

7.1 In summary:

1. The principle that a new Primary is required is accepted and great weight has been attached to this in the assessment of this planning application, in accordance with Government guidance on school provision and the more general requirement for Local Planning Authorities to be positive and proactive;
2. This is an area of the Borough with an identified deficiency in Primary school provision, which is currently causing recognised issues of congestion, unsustainable journeying and disruption in areas beyond the application site and its environs;
3. The site offered is considered to be highly accessible and appropriate to the school catchment, fulfilling

locational/accessibility objectives to minimise, in particular, car journeys;

4. It has been demonstrated to your officers' satisfaction, that the loss of open space involved can be adequately compensated for by an increase in pitch carrying capacity (although this aspect is still at this time expected subject to referral to the Secretary of State);
5. A suitable commuted sum proposed, with an outline Heads of Terms (details to be advised/finalised in your Update Report) have been agreed in order to deliver all mitigating environmental, parking, community, landscaping and ecological objectives;
6. The design is considered to be suitable and there are no significant effects on residential amenity; and
7. The proposal is suitable in terms of traffic impact, road safety and parking.

7.2 Officers acknowledge that building a school on an open space results in some difficult choices, but taking all factors into consideration with this application, it is considered that the over-riding public benefits of providing the school have been demonstrated to outweigh the loss of open space [and] any residual negative aspects.”

33. Applying the legal principles which have been established in the case law on officer reports, I consider that the Claimant's criticisms are unjustified. The OR correctly advised on the development plan, and the material consideration of paragraph 74 of the Framework, in the context of this application.

Ground 2

34. The Claimant submitted that the Defendant failed to take into account paragraph 216 of the Framework and therefore did not determine correctly the weight to be accorded to the emerging local plan. This was important because the emerging local plan afforded greater protection to open spaces.
35. The material paragraphs in the Framework are as follows:

“Annex 1: Implementation

208. The policies in this Framework apply from the day of publication.

....

214. For 12 months from the day of publication, decision-takers may continue to give full weight to relevant policies adopted

since 2004 even if there is a limited degree of conflict with this Framework.

215. In other cases and following this 12-month period, due weight should be given to relevant policies in existing plans according to their degree of consistency with this framework (the closer the policies in the plan to the policies in the Framework, the greater the weight that may be given).

216. From the day of publication, decision-takers may also give weight to relevant policies in emerging plans according to:

- The stage of preparation of the emerging plan (the more advanced the preparation, the greater the weight that may be given);
- The extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and
- The degree of consistency of the relevant policies in the emerging plan to the policies in this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).”

36. The OR set out the correct legal test under section 38(6) of the PCPA 2004, and the relevant national and local policies from the current Local Plan. It then gave the following advice in respect of the emerging Local Plan:

“Pre-Submission Draft: Reading Borough Local Plan

The Council is preparing a new local plan (to cover the period up to 2036), which in time will supersede the present suite of Local Development Framework (LDF) documents. By the time that this application is reported *[sic]* your meeting, the Submission Draft version of the Local Plan shall have been submitted to the Secretary of State for consideration, therefore the draft policies therein are considered to be relevant for development control purposes. However, members are advised that the Government has not advised on the weight to be attached to any such emerging documents and officers advise that the adopted policies of the Core Strategy and the Sites and Detailed Policies Document shall continue to function as the Development Plan for the purposes of Section 38(6) of the Planning Act. Officers advise that the new Local Plan continues (rolls forward) many of the themes of the current LDF documents, but that little weight can be attached to it at this time.”

37. Applying the legal principles in respect of challenges to Officer Reports, I do not accept the Claimant's submission that the Committee must have overlooked paragraph 216 of the Framework because it was not expressly referred to in the list of relevant Framework provisions. In my judgment, it was appropriate for the OR to flag up the substantive policy provisions, but it was not necessary for the OR to set out every general provision in the Framework which applied to this application. Planning officers and members can be assumed to have a working knowledge of the Framework, in particular, Annex 1 on Implementation, which has, after all, applied to every application for planning permission submitted to the Defendant since 2012. Moreover, as the Defendant was engaged in the lengthy process of preparing a new local plan, it seems highly likely that paragraph 216 on emerging plans would have been drawn to the Committee's attention on many previous occasions.
38. In my view, the advice in the OR was both adequate and lawful. It indirectly referenced paragraph 216 of the Framework when it stated "the Submission Draft version of the Local Plan shall have been submitted to the Secretary of State for consideration, therefore the draft policies therein are considered to be relevant for development control purposes".
39. The Claimant criticised as inaccurate the sentence stating "members are advised that the Government has not advised on the weight to be attached to any such emerging documents". In my view, the Claimant misread this sentence. Paragraph 216 does not prescribe any particular weight to be given to an emerging policy at any particular stage. It is a matter of judgment, for the decision-maker, to decide how much weight should be accorded to it.
40. On this occasion, the OR advised that "the new Local Plan continues (rolls forward) many of the themes of the current LDF documents, but that little weight can be attached to it at this time". In the absence of irrationality (which the Claimant did not allege), the OR's exercise of planning judgment could not be challenged. The advice that the adopted policies of the Core Strategy and the Sites and Detailed Policies Document continued to function as the Development Plan for the purposes of Section 38(6) of the PCPA 2004 was plainly correct.

Ground 3

41. The Claimant submitted that the Council acted irrationally in failing to consider alternative sites; alternatively, that it was permissible for the Committee to consider alternative sites and so the OR misdirected members (at paragraph 6.6 of the OR) in stating "it is not the purpose of this planning appraisal to discuss the merits of any other sites which may or may not become available".

Factual background

42. In 2012 an application was made by a group of local parents to found a free school, called "The Heights", in Caversham. It was approved in 2013.
43. Mr Leech, regional planning adviser at the Department for Education, gave evidence about the search for a site, which I accepted. In the first half of 2014, a site search

was undertaken to identify a potential permanent and/or temporary site, applying criteria such as deliverability, cost, suitability etc. Many sites were considered. In June 2014, a site called “High Ridge” in Upper Warren Avenue, Caversham was selected as the preferred site. Although it was deliverable, it was recognised that the site was not ideal, as it was a small and undulating 0.4 hectare plot (the recommended size for a 350 place primary school is about 1.416 hectares). Children would have to use playing fields elsewhere. It was situated on a residential road which did not have a pavement running the length of the road, and the impact of increased traffic was a concern for local people.

44. Although MPF had been the original preference of the school’s proposers (see letter of 19 November 2014 from the Education Funding Agency to the local MP), MPF was discounted at the initial stage, on the basis of an assessment that it would be extremely difficult to acquire without support from a number of stakeholders, and it was unclear whether such support would be forthcoming.
45. Because of the urgent need to provide additional primary school places, the ESFA purchased the High Ridge site in June 2014, which enabled the new school to be opened in September 2014, in a temporary location, pending development of a new building.
46. However, because the choice of High Ridge proved to be highly controversial among local residents, the ESFA agreed, in November 2014, to reconsider the location of the school. It identified five possible sites for the school, all described as viable, on which a consultation was undertaken by the Council on behalf of the ESFA, from 30 March to 1 May 2015. The five sites consulted on were High Ridge, MPF, Albert Road Recreation Ground, Bugs Bottom (also known as Shipnells Farm) and Dysons Farm (Land at the junction of Shepherd’s Lane and Kidmore Road).
47. MPFAG was consulted, and explained that its preference was for the school to be located at Bugs Bottom because, amongst other reasons, it believed it would be the least disruptive to community clubs or groups because it had the least users of all sites.
48. On 17 August 2015 ESFA announced, by way of a letter to the MP, that it had chosen MPF as the proposed permanent site for the school, stating:

“4,376 people responded to the consultation....Overall, and for every sub group, development on the Mapledurham Playing Fields was the first choice for the majority of people and had the least opposition to it.

We have therefore decided to pursue this site for the school and will commence the work necessary to put forward a proposal to the site’s trustees.”

49. Mr Leech explained the decision further in his witness statement:

“Selection of Mapledurham Playing Fields site

13. The support that followed for the Mapledurham Playing Fields site meant that we considered this a better option for the school than the High Ridge site, subject to it being deliverable in planning terms. This was because the acquisition of the site was, with the support, now possible. The other aspects of delivery were always considered more straightforward than High Ridge – the Mapledurham Playing Fields is a flat site, in the heart of the catchment area, with good access. The school would benefit from being adjacent to approximately 10 hectares of playing fields that were accessible without crossing roads.
 14. In September 2014, our external consultants undertook a planning appraisal of the Mapledurham Playing Fields site. This, in conjunction with the thorough public consultation processes that had been undertaken, informed the decision as to proceeding with this site as the permanent school site. The Mapledurham Playing Fields site was subject to further public consultation in 2016 and 2017 (as summarised in both the June 2017 Planning Statement ... and the Report to the Planning Applications Committee....).
 15. The Planning Consultant (TP Bennett LLP) subsequently appointed in 2016 to prepare and submit the full planning application revisited the alternative sites search process as part of his policy – notable in relation to policy CS28. There is no specific requirement in that policy to demonstrate that there is no suitable or available site for the school, but the policy does refer to exceptional circumstances”. The Planning Consultant undertook an objective re-assessment of the alternative sites that had previously been the subject of consultation. The results of this re-assessment are summarised in the planning statement accompanying the full planning application. The five sites were considered in terms of their size and against the relevant guidance.
 16. This exercise concluded that the High Ridge site would be smaller than the Mapledurham Playing Fields site (being approximately 0.4 hectares, compared to approximately 0.97 hectares for the latter, including the shared car park and access road). This difference in size would limit the amount of built development possible on the site when compared to other sites being considered. The proximity of adjoining residential properties could further limit the feasible development area in the view of the planning consultant.”
50. The ESFA’s Planning Statement summarised the attributes of the sites in the following way:

“6.2.22 The attributes of these sites are summarised in the table below:

<i>Site</i>	<i>Area</i>	<i>Ownership</i>	<i>Comments</i>
1. Albert Road Recreation Ground	1.2ha	RBC in trust	Centrally located within catchment. Well-used recreation ground with children’s play area, tennis courts and bowling green. School would require removal of many of these facilities.
2. Bugs Bottom	15ha approx	RBC	Eastern edge of catchment close to Caversham and Emmer Green Primary Schools. Meadow grassland and woodland. Nature conservation designations. Steep access via residential roads.
3. The Mapledurham Playing Fields	11ha	RBC in trust	Centre of catchment. Sufficient size to accommodate school. Open space designation.
4. High Ridge, Upper Warren Avenue	0.4ha	EFA	Southern edge of catchment. Residential plot, steeply sloping. Poor access. Too small to accommodate school building satisfactorily. Reliant on access to MPF for sports provision.
5. Land at Shepherds Lane and Kidmore Road	9ha approx	Private	Outside catchment in South Oxfordshire. Risk of being needed for SODC educational needs. Outside urban area.

6.2.23 The consultation exercise also requested details of any other potential sites: none was forthcoming.

6.2.24 The Mapledurham Playing Fields site emerged from this process as the most suitable and potentially available site. Some 4,376 responses were received to the consultation, with all but a handful coming from within the area of RBC and some 2,935 from within THPS catchment area. Overall MPF commanded the greatest public support with 3,042 (70%) support; within the catchment this figure is 1,985 (68%). The full statistical summary of THPS survey is included in Appendix 3.”

Legal principles

51. The determination of an application for planning permission is to be made in accordance with the development plan, unless material considerations indicate otherwise: section 38(6) of the PCPA 2004, read together with section 70(2) of the TCPA 1990.
52. The task of the local planning authority is to consider the planning merits of the particular application for planning permission. Generally, land may be developed in any way which is acceptable for planning purposes and so planning law does not require the local planning authority to consider whether the proposed development would be more appropriately located at an alternative site. Exceptionally, the circumstances may be such that a potential alternative site is a material consideration which the local planning authority either must have regard to, or may have regard to, in the exercise of its planning judgment.
53. In *Trusthouse Forte Hotels Ltd v. Secretary of State for the Environment* (1987) 53 P. & C.R. 293 at 299 Simon Brown J. identified the following propositions from the authorities:

“(1) Land (irrespective of whether it is owned by the applicant for planning permission) may be developed in any way which is acceptable for planning purposes. The fact that other land exists (whether or not in the applicant's ownership) upon which the development would be yet more acceptable for planning purposes would not justify the refusal of planning permission upon the application site.

(2) Where, however, there are clear planning objections to development upon a particular site then it may well be relevant and indeed necessary to consider whether there is a more appropriate alternative site elsewhere. This is particularly so when the development is bound to have significant adverse effects and where the major argument advanced in support of the application is that the need for the development outweighs the planning disadvantages inherent in it.

(3) Instances of this type of case are developments, whether of national or regional importance, such as airports (see the *Rhodes* case), coalmining, petro-chemical plants, nuclear power

stations and gypsy encampments (see *Ynstawe, Ynysforgan and Glais Gypsy Site Action Group v. Secretary of State for Wales and West Glamorgan County Council*.) Oliver L.J.'s judgment in *Greater London Council v. Secretary of State for the Environment and London Docklands Development Corporation and Cablecross Projects Ltd.* suggests a helpful although expressly not exhaustive approach to the problem of determining whether consideration of the alternative sites is material:

“... comparability is appropriate generally to cases having the following characteristics: First of all, the presence of a clear public convenience, or advantage, in the proposal under consideration; secondly, the existence of inevitable adverse effects or disadvantages to the public or to some section of the public in the proposal; thirdly, the existence of an alternative site for the same project which would not have those effects, or would not have them to the same extent; and fourthly, a situation in which there can only be one permission granted for such development, or at least only a very limited number of permissions.”

(4) In contrast to the situations envisaged above are cases where development permission is being sought for dwelling houses, offices (see the *GLC* case itself) and superstores (at least in the circumstances of *R. v. Carlisle City Council and the Secretary of State for the Environment, ex parte Cumbrian Co-operative Society Ltd.*).

(5) There may be cases where, even although they contain the characteristics referred to above, nevertheless it could properly be regarded as unnecessary to go into questions of comparability. This would be so particularly if the environmental impact was relatively slight and the planning objections were not especially strong: See *Sir Brandon Meredith Rhys Williams v. Secretary of State for Wales and others* and *Vale of Glamorgan Borough Council v. Secretary of State for Wales and Sir Brandon Rhys-Williams*, both of which concerned the siting of the same sewage treatment works.

...”

54. In *Mount Cook Land Ltd v. Westminster City Council* [2004] JPL 470, Auld LJ, at [30], accepted the following to be correct statements of the law:

“(1) in the context of planning control, a person may do what he wants with his land provided use of it is acceptable in planning terms.

(2) there may be a number of alternative uses which he could choose, each of which would be acceptable in planning terms;

(3) whether any proposed use is acceptable in planning terms depends on whether it would cause planning harm judged according to relevant planning policies where there are any;

(4) in the absence of conflict with planning policy and/or other planning harm, the relative advantages of alternative uses on the application site or of the same use on alternative sites are normally irrelevant in planning terms;

(5) where... an application proposal does not conflict with policy, otherwise involves no planning harm and, as it happens, includes some enhancement, any alternative proposals would normally be irrelevant;

(6) even, in exceptional circumstances where alternative proposals might be relevant, inchoate or vague schemes and/or those which are unlikely or have no real possibility of coming about would not be relevant or, if they were, should be given little or no weight.”

55. In *Derbyshire Dales DC v. Secretary of State* [2009] EWHC 1729 (Admin), [2010] 1 P. & C.R. 19, Carnwarth LJ summarised the law on alternative sites as potential material considerations in planning decisions at [14] to [37]. That summary was endorsed by Sales LJ in *R (Luton BC) v. Central Bedfordshire Council* [2015] EWCA Civ 537, who summarised the principles at [71]:

“(i) There is an important distinction between (1) cases where a possible alternative site is *potentially* relevant so that a decision-maker does not err in law if he has regard to it and (2) cases where an alternative is *necessarily* relevant so that he errs in law by failing to have regard to it (paragraph 17).

(ii) Following [*CREEDNZ v. Governor-General* [1981] 1 NZLR 172], [*Re Findlay* [1985] AC 319] and *R (National Association of Health Stores) v. Secretary of State for Health* [2005] EWCA Civ 154, in the second category of cases the issue depends upon *statutory construction* or whether it can be shown that the decision-maker acted *irrationally* by failing to take alternative sites into account. As to the first point, it is necessary to show that planning legislation either expressly requires alternative sites to be taken into account, or impliedly does so because that is “so obviously material” to a decision on a particular project that a failure to consider alternative sites directly would not accord with the intention of the legislation (paragraphs 25-28).

(iii) Planning legislation does not expressly require alternative sites to be taken into account (paragraph 36), but a legal

obligation to consider alternatives may arise from the requirements of national or local policy (paragraph 37);

(iv) Otherwise the matter is one for the planning judgment of the decision-maker (paragraph 36). In assessing whether it was irrational for the decision-maker not to have had regard to alternative sites, a relevant factor is whether alternative sites have been identified before the decision-maker (paragraphs 21, 22 and 35 and see *Secretary of State v Edwards* [1995] 68 P. & C.R. 607 where that factor was treated as having “crucial” importance in the circumstances of that case).”

56. The Claimant relied particularly upon the earlier authority of *Greater London Council v. Secretary of State for the Environment & Ors* 52 P. & C.R. 158, where Oliver LJ said, at 172:

“The second submission, that the Secretary of State failed to have regard to a material consideration in failing to examine other comparable sites, there seems to me to be no substance in this at all. It is plain that there are, as the learned judge accepted, cases where a comparable site must be a material consideration; an obvious example is an airport. It is I think difficult to define where the dividing line is drawn. Without seeking to lay down a test for every case, because definition is I think always dangerous in these circumstances, I think it may be said, as Mr. Barnes has submitted, that comparability is appropriate generally to cases having the following characteristics: First of all, the presence of a clear public convenience, or advantage, in the proposal under consideration; secondly, the existence of inevitable adverse effects or disadvantages to the public or to some section of the public in the proposal; thirdly, the existence of an alternative site for the same project which would not have those effects, or would not have them to the same extent; and fourthly, a situation in which there can only be one permission granted for such development, or at least only a very limited number of permissions. None of these criteria seems to me to apply in this case. ...”

57. I agree with Mr Buley’s submission, on behalf of the Secretary of State, that this passage provides useful illustrations of the circumstances in which it may be legitimate for a decision-maker to conclude that consideration of alternatives are relevant, as a departure from the general principle that alternatives are not relevant. However, it would be wrong in law to hold that consideration of alternatives is mandatory wherever the criteria cited by Oliver LJ are met, as whether or not an alternative site is a material consideration will usually depend upon questions of planning judgment, based on the circumstances of the particular case. Indeed, Oliver LJ expressly said that it would be dangerous to seek to lay down a test for every case.
58. The Claimant relied in particular upon *R (Lucas) v. Oldham MBC* [2017] EWHC 349 (Admin), in which Kerr J. quashed a planning permission for development of a school

on the basis that the local authority had failed to comply with its obligation to take account of a material consideration, namely, the possibility of redeveloping the school at the existing site. The facts were clearly distinguishable from this case. I agree with the reservations expressed by Mr Hobson QC and Mr Buley about Kerr J.'s reformulation of the legal principles at paragraphs 88(3), 89 and 90, which is not entirely consistent with the authorities set out above.

Conclusions

59. Applying these principles to this case, I accept the Council's submission that it did not act unlawfully by not considering the merits of the possible alternative sites when deciding the application for planning permission.
60. This was not the type of exceptional case, described in the authorities, in which the Council should or could have departed from the general rule that alternative sites are irrelevant when determining an application for planning permission. There was no statutory or policy requirement, either express or implied, to consider alternative sites in this case. This was not the type of development described in *Trust House Forte* or the *Greater London Council* case which had such significant adverse effects that alternatives ought to have been considered. In the light of its findings that the loss of open space could be adequately compensated for, the Council was entitled to conclude that the application was acceptable in planning terms and did not conflict with the development plan.
61. Unlike *Lucas*, there was no obvious alternative which avoided the disadvantages of the proposed site. Although the High Ridge site was purchased, there were justifiable objections to that site, because of its small size and location and the school was never located there. It is notable that the Claimant and the MPFAG did not advocate High Ridge. Their preferred choice, Bug's Bottom, was also open space protected under the Local Plan policy CS28 and paragraph 74 of the Framework. There were advantages and disadvantages to each of the five short-listed sites. The ESFA had given the matter careful consideration and listened to the views of the local population in concluding that MPF was the preferred site.

Ground 4

62. Under ground 4, the Claimant made three complaints about the procedures adopted by the Defendant.
63. The OR included a draft resolution for the Committee's consideration, in the following terms:

“Subject to:

Notification of the application to the Secretary of State (via the National Planning Casework Unit) to decide if he wishes to “call-in” the application; and

The satisfactory completion of a s106 legal agreement/unilateral undertaking by 30 May 2018 [...]

Delegate to the Head of Planning, Development and Regulatory Services (DPDRS) to **GRANT** planning permission by 30 May 2018. If the s106 agreement/unilateral undertaking is not signed by 30 May 2018, delegate to officers to **REFUSE** planning permission, unless the HPDRS gives his agreement to any extension of time.”

64. The minutes of the meeting on 4 April 2018 recorded the Committee’s decision as follows:

“That the Head of Planning, Development and Regulatory Services be authorised to grant permission in the event that:

The Secretary of State decided not to call in the application for determination; or

The period in which the Secretary of State may respond under paragraph 11 of the Town and Country Planning (Consultation) (England) Direction 2009 expired.

The issue of planning permission to be dependent on the completion of a Section 106 legal agreement/unilateral undertaking by 30 May 2018 (unless a later date be agreed by the Head of Planning, Development and Regulator Services), to secure the Heads of Terms set out in the report, with the following amendments:

.....

That the Head of Planning, Development and Regulatory Services be authorised to make any further necessary small amendments to the details of the Heads of Terms.

In the event of the requirements set out not being met, the Head of Planning Development and Regulatory Services be authorised to refuse permission.”

65. The Claimant’s first complaint was that the recommended resolution was not formally put to the Committee at the meeting, and instead the Chair orally put a differently worded resolution to the Committee. There was no discussion about the merits of departing from the recommended resolution in the OR. On that basis, the Claimant submitted that “the minutes should only be treated as an informal precis of the position. It follows that in so far as the minutes depart from the draft resolution in the OR, it is the draft resolution which represents that which the Committee understood itself to have decided”.

66. In my judgment, this submission was entirely misconceived. The Committee was not bound to follow the wording or content of the resolutions proposed in the OR. As a matter of law, the minutes of the meeting which had been drawn up and then formally approved, stood as the record of the resolutions passed by the Committee at the meeting. It was impermissible to seek to go behind the resolutions recorded in the

minutes, and the resolutions which were passed, save in exceptional circumstances which did not arise here.

67. The Claimant's second complaint was that the Head of Planning, Development and Regulatory Services ("HPDRS") was only authorised to grant permission if the section 106 legal agreement/unilateral undertaking was completed by 30 May 2018, unless a later date was agreed by the HPDRS. The section 106 agreement was not completed by 30 May 2018, and no extension of time was obtained. Therefore the grant of permission was unlawful.
68. In the alternative, the Claimant's third complaint was that, if an extension of time was granted by Mr Richard Eatough, the Council's Principal Planning Officer, it was an unlawful decision as only the HPDRS had power to grant the extension.
69. Mr Eatough, who dealt with this planning application, made a witness statement explaining what had occurred, in the following terms.

"Terms of the Resolution

4. I understand that the Claimant has disputed the terms of the resolution made by the Committee on 4th April 2018. It is said that the terms of the recommendation set out in my report do not allow the HPDRS to extend time for granting planning permission but require him to either refuse the planning application after 30th May 2018. Or bring it back to the Committee.
5. In my view this is a strange interpretation as to me the power granted to the HPDRS to extend the time beyond 30th May 2018 can only sensibly be read as referring to the time for agreeing the Section 106 and granting the Planning Permission. In some 10+ years of operating this delegation no-one to my knowledge has ever sought to interpret this in any other way.
6. It is worth explaining that the reason for including a deadline for the completion of Section 106 agreements is primarily to increase the prospects of complying with the Government's target determination dates. The date is set to create pressure but the HPDRS has the power to extend the date to enable time to complete and issue if matters are proceeding well. In these circumstances the Planning Case Officer will seek agreement to an extension of time from the Applicant to determine the application (there being no value in an extension which is not agreed) or if that is not secured the application will be refused. I imagine this is standard practice. This flexibility was introduced into Committee reports over 10 years ago to ensure that applications could be dealt with within 8 and 13 week timescales where the use of extensions of time were then not available.

7. In my estimation/experience, over 80% of applications referred to our Committee subject to a Section 106 Agreement/Unilateral Undertaking need to then be subject to a further extension of time to allow negotiations to conclude and the planning obligation to be signed and a decision issued. This procedure meets performance indicators and avoids appeals against non-determination. With this complex Application, it was generally accepted that the target date (some 3½ weeks only after the Committee meeting) was unrealistic, particularly as in this case the matter of the referral to the Secretary of State caused an unknown time-delay as the Secretary of State can (and did) impose an Order (albeit temporary) on the LPA not to grant planning permission.
8. The court should also note that the practice of the Defendant is for the Committee to give a high degree of trust to officers in terms of finalising the terms of delegations. As was the case in this Application, reports to Members include only the outline heads of terms and lists of conditions “to include” (rather than exhaustive lists): giving officers flexibility in the drafting, grouping and ordering of conditions which they attach to any planning permission. This is as opposed to recommendations of refusal, where for clarity, the full reasons for refusal are presented. There is therefore a relatively high degree of autonomy delegated to officers in delivering planning permissions as a consequence of applications which have already been reported to the Committee.
9. It is clear that the minutes of the Committee held on 4th April 2018 are worded slightly differently but in essence they say the same thing. It is these minutes that should be relied on as the Members approved them as a correct record at the following meeting of the Committee.

Approval of an extension

10. As previously explained, is not unusual for Section 106 agreements to take a while to negotiate and, in this case, I needed to agree extensions a number of times. The last of these is set out in my e-mail to the Council’s Planning Solicitor, Steven Quayle dated 8th August 2018. In that email I advised him, as requested, that I was happy to extend time to complete Section 106 and issue the permission until 14th August 2018.
11. Although I refer to having an extension from the applicant’s agent, Mike Abbott, this should not be taken as meaning that I was relying on him to extend time. We

needed (and had previously obtained) Mr Abbott's agreement in order to comply with our targets but the decision was mine (on behalf of the HPDRS) and it was this which I was confirming to Mr Quayle. I therefore cannot accept the Claimant's suggestion that I had not agreed an extension. I had and this was clear from my email.

12. The Section 106 was then completed on 14th August 2018 on behalf of the HPDRS and the then Area Team Leader for the North and Central Area of Reading Lynette Baker (my predecessor) issued the planning permission in his name and on the same date. I can confirm that I viewed the Minutes as sufficiently clear to allow me to draft the draft planning permission and negotiate with the applicant in order to conclude the Section 106. There was no reason to refer this application back to the Committee.

Exercise of delegated authority

13. I understand that the Claimant argues that I did not have authority to extend time for the grant of planning permission on behalf of the HPDRS. This is unrealistic and does not take account of the Defendant's internal arrangements for the exercise of functions.
14. The Defendant's Scheme of Delegation delegates a large number of development control, enforcement and other planning matters to the HPDRS. Other matters, such as the current application, are delegated to him from the Committee on a case by case basis. Some of these can be taken on his own and others require consultation: for example many enforcement decisions have to be taken once he has consulted the Head of Legal and Democratic Services. It is common practice in local government generally and in Reading that the senior officers which have been given delegated powers generally do not personally have conduct of the matters delegated to them and that it is arranged that junior officers within their departments make those decisions on behalf of their seniors. This is, to a large degree, unavoidable as senior officers have corporate management and strategic matters to deal with on a day to day basis and would not have the capacity to take (or even directly check) all of the decisions taken on their behalf. The Planning Service in the Defendant LPA is no different. To give an example from a different function, where there is a breach of planning control and the Planning Case Officer considers that it is expedient to issue an Enforcement Notice under Section 172 of the TCPA 1990 the Planning Case Officer, working alongside a Planning Enforcement Officer, will

consult the Council's Planning Solicitor, not the Head of Legal and Democratic Services personally before taking a decision whether or not to issue such a notice. The HPDRS would only become personally involved if the delegated matter in question was controversial and or politically sensitive. If it were otherwise local government would soon grind to a halt.

15. In practice it is not the HPDRS himself who specifically authorises the issuing of the permission nor does he agree an extension of time, if one is required. Instead, it is the custom and practice of this Council (as I am sure it is of others) for such extensions to be agreed between the individual Planning Case Officer and the Applicant/Agent and for these extensions to be passed on to the relevant Council solicitor (rather than for instance, the Head of Legal and Democratic Services) to agree and conclude the Section 106 Agreement in a suitable timescale.”

70. I accepted Mr Eatough's evidence, which was supported by the emails disclosed. Mr Eatough did grant an extension of time to agree the section 106 agreement and to issue the planning permission, which was permitted under the terms of the resolution. Under the Council's constitution, a wide range of functions are formally delegated to the HPDRS; many more than a single officer could carry out alone or even directly supervise. Therefore it was the Council's standard practice for officers within the planning department to make decisions and agree minor matters, such as extensions of time, without reference to the HPDRS. This was a lawful “arrangement” for the exercise of functions pursuant to section 101 of the Local Government Act 1972 (see *Cheshire County Council v. Secretary of State for the Environment* [1988] J.P.L. 30).

71. Thus, the extension of time was lawful and planning permission was granted in accordance with the terms of the Committee's resolution.

Conclusions

72. I grant permission to apply for judicial review on all grounds, but the claim for judicial review is dismissed, for the reasons set out above.

Horsham District Council

2 September 2024

To Whom it Concerns

Sport England and England Golf Position on West of Ifield Draft Site Allocation in Horsham Reg. 19 Local Plan

Government guidance as set out in Planning Practice Guidance: Paragraph: 003 Reference ID: 37-003-20140306 advises local planning authorities to consult with Sport England as a non-statutory consultee in a range of circumstances including where development would result in a residential development of 300 dwellings or more or the creation of a site for one or more playing pitches. Sport England is not generally identified as either a statutory or non-statutory consultee where the loss of non-pitch sports to alternative development is proposed. In such circumstances, it is the Local Planning Authority's responsibility to determine whether a proposal resulting in the loss of land or buildings used for sport and recreation is acceptable assessed against paragraph 103 (formerly paragraph 99) of the National Planning Policy Framework (NPPF).

Notwithstanding the above the identification of land West of Ifield as a proposed strategic development allocation for residential / mixed use within the Regulation 19 draft Horsham Local Plan would result in the loss of the Ifield Golf Course. Sport England and England Golf wish to ensure that national and local policy is followed and that the loss of the golf course is either fully justified in accordance with paragraph 103 a) of the NPPF or alternatively, that the loss is suitably mitigated in accordance with paragraph 103 parts b) and / or c) of the NPPF.

To that end, Sport England and England Golf have engaged in discussions with Homes England over the past eighteen months to ensure that the proposed scheme meets paragraph 103 and the draft local plan policy requirements.

Policy HA2: Land West of Ifield of the Regulation 19 Local Plan for submission, requires at part g)

Formal and informal open space, sport and recreation provision is provided to meet the needs of the new community in accordance with standards and the respective recommendations in the Playing Pitch Strategy and Open Space, Sport & Recreation Review 2021. In addition, the provision of appropriate mitigation for

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.

Informal open space provision must be designed for all and shall include (but not be limited to):

- i. a network of nature paths throughout the development, integrating with existing public rights of way;*
- ii. accessible natural green space;*
- iii. 3G football pitches & Multi-Use Games Areas;*
- iv. equipped childrens play facilities;*
- v. social seating areas.*

Sport England considers that the policy satisfactorily identifies the need for any development proposal within the proposed site allocation boundary to address the requirements of paragraph 103 of the NPPF. The policy as drafted is therefore considered robust and appropriately defined for the plan making stage, with future details of a proposed mitigation package (if required) to be secured at the application stage as a result of the drafted policy.

At the planning application stage Sport England would expect a site-specific golf needs assessment and mitigation strategy to be submitted to the Local Planning Authority that demonstrates that either one part, or a combination of parts of paragraph 103 of the NPPF are met.

A Golf Needs Assessment to support a future planning application has been prepared on behalf of Homes England. Sport England and England Golf have been provided with an opportunity to comment on the draft and Sport England is satisfied that it has been undertaken in accordance with our Assessing Needs and Opportunities Guidance. Sport England and England Golf have also been in discussions with Homes England and its consultants, as to how the loss of the golf course, if it is permitted, might be satisfactorily mitigated.

Without prejudice to our final position that will be reached only when an application supported by the golf needs assessment is submitted and subject to further detailed discussions and negotiations regarding a satisfactory and comprehensive sports mitigation strategy, (including but not only related to golf provision) to be secured through a s.106 legal agreement, Sport England and England Golf are able to confirm the following:

Sport England and England Golf recognise that it is likely that Ifield Golf course will be lost. Sport England and England Golf have to take a pragmatic approach given

that the previous owner sold the land to Homes England for development and that it could be closed permanently at any point without any mitigation and without any link to any proposed development; and

Discussion to date with Homes England has sought to understand the impact of the loss of the golf course and potential options to mitigate that loss within the catchment.

When considering paragraph 103 part b) of the NPPF, we agree that consideration of the supply and demand in the catchment is necessary. From the assessment it is possible to say that a “like for like” replacement is not required and a more appropriate mitigation strategy should be focused on the betterment for golf in its broadest sense seeking to enhance both traditional provision within the catchment to meet the needs of existing members but also, to create opportunities for new market entrants / those earlier on the golfing journey.

A long list of options to improve facilities at Tilgate and Rookwood Golf Courses have been identified by their current operators that would be consistent with a betterment mitigation strategy and these are considered to be potentially credible mitigation options for Homes England to consider. They do however need further definition, costing and prioritisation to ensure that together, they would deliver an overall level of investment sufficient to meet the requirements of paragraph 103 part b) of the NPPF.

Sport England and England Golf will continue to work with Homes England to secure the best possible mitigation package for golf within the planning application process.

Homes England has set out that future engagement with Sport England ahead of submission of any planning application is also anticipated to cover the full extent of the sport and recreation facilities which are included in emerging proposals. Although subject to further review, Sport England understand Homes England’s proposed strategy includes additional facilities and assets to address both existing unmet need and also the needs generated by the proposed development. This will be relevant in considering the application of paragraph 103 part c) at the planning application stage.

Jo Edwards
Planning Manager, Sport England

Options for consideration to improve Golf provision

Tilgate Golf course improvements:

The 18-hole golf course at Tilgate has the potential to be one of the best in the region with its layout and design.

The current course condition would require investment, working within the ecological make-up of the site and retaining natural flora and fauna within the wider natural park environment.

Ifield Golf Course has a well established membership, coaching staff and shop plus benefits for hosting events and parties.

Improving the course at Tilgate would:

- Provide enhanced adult course experience
- Support improved access for women players
- Opportunities for events, tournaments and competitions
- Include as part of corporate events offer combining with other partners in the park
- Improved marketing and promotion of facilities linked with other partners in the park

Crawley Borough Council can seek advice, provide information from the former course architect on priority work and areas.

Reinstatement of the 9-hole course:

The former 9-hole course was used for footgolf, however this has not sustained interest locally. Glendale were initially proposing to create an Adventure Golf facility to work alongside the main course and driving range.

There are two options:

- Reinstating as a 9-hole course would provide a less challenging option to develop junior players – Academy
- Creating the adventure golf site as an alternative family / leisure facility



Options for consideration to improve Golf provision

Infrastructure improvements:

There is a main access road to the course which has an adjacent unsurfaced car park and overflow car park which are currently free of charge. A separate council run car park is close by which is chargeable.

- Tarmac the adjacent car park
- The main road to the course would benefit from resurfacing and widening where possible.
- Significantly reduce the vegetation around the overflow car park to give an improved sense of safety
- Install pay & display machines (golf course users to park free of charge when arriving at course)
- Pathways from the adjacent neighbourhood needs to be improved to encourage walkers around the perimeter
- Provide some dog friendly amenities away from the fairways to build relationships with the dog walkers. A dog wash / exercise space
- National cycle route across the course improved to direct away from fairways

- Culvert and waterways clearance

- Replacement park signage (contribution) currently single poor sign to the course
- Development of Tilgate Park Website hosting all partners (contribution)

- Enhance the biodiversity on non-golf land to create and preserve heathland habitat as part of the council's commitment to net gain

- The social space in the club house is underused and a small shop comparable to Ifield which could be enhanced. There is a limited café provision.



Options for consideration to improve Golf provision

Sponsorship opportunities:

The council approved the Tilgate Park 5 year Business Plan at Cabinet on 10th January 2024. Whilst the majority of the projects will look to be funded from revenue budgets or surplus income there are some sponsorship opportunities to provide improved facilities in the wider park from Partner Organisations.

Opportunities include:

- Adding an accessible swing to the children's play area
- Sponsorship of enclosures / exhibits within Tilgate Park Zoo

Goffs Park pitch & putt opportunities:

There is an 18-hole pitch and putt at Goffs Park which is very popular in the drier months and provides an additional site to generate interest for younger players. .

It provides an informal family provision which could encourage a wide range of player and opportunities for events linked to wider park facilities.

- Some course improvements including putting green and new tee markers
- Improved kiosk for rental of clubs and course fees
- Support for improved facilities for concession to sell drinks and food
- Improved pathways and park furniture around the course



Land West of Ifield Sports & Recreation Strategy DRAFT

Prepared on behalf of Homes England

By Sports Planning Consultants

July 2024

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DRAFT

1. Introduction

1.0 Located within the administrative boundary of Horsham District Council (HDC) and adjacent to Crawley Borough Council (CBC), the proposed West of Ifield allocation includes land owned by Homes England south of Rusper Road.

1.1 In January 2024, Land West of Ifield was identified as a Strategic Site Allocation in the Regulation 19 Horsham District Local Plan under policy HA2.

1.2 Policy HA2 notes that this seeks to ensure that:

'Issues such as flood risk, biodiversity net gain, carbon neutrality, air quality and noise impact and water neutrality are comprehensively addressed ahead of any development taking place. The masterplan will also ensure that the development is landscape-led, includes a Gypsy and Traveller residential site, and provides excellent green infrastructure and recreational links (including via public rights of way) to the wider countryside. The development should provide for a Community Land Trust (CLT) led scheme or similar housing delivery model, subject to necessary processes.'

1.3 Homes England has consequently advanced a masterplan for a scheme made up of circa 3,000 homes, associated employment and supporting infrastructure; including new sport, health and well-being facilities. The masterplan has been developed in consultation with Horsham, Crawley and West Sussex authorities through pre-application discussions and in consultation with the local community, statutory and non-statutory stakeholders. In particular, Homes England has benefitted from ongoing consultation with Sport England.

1.4 In relation to sport and recreation facilities, Policy HA2 in the Regulation 19 Local Plan requires that:

'Formal and informal open space, sport and recreation provision is provided to meet the needs of the new community in accordance with standards and the respective recommendations in the Playing Pitch Strategy and Open Space, Sport & Recreation Review 2021. In addition, the provision of appropriate mitigation for 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. Informal open space provision must be designed for all and shall include (but not be limited to):

- i. a network of nature paths throughout the development, integrating with existing public rights of way;*
- ii. accessible natural green space;*
- iii. 3G football pitches & Multi-Use Games Areas;*
- iv. equipped children's play facilities;*
- v. social seating areas.'*

1.5 To respond to this policy, it is therefore clear that there is a requirement for:

- Formal open space that responds to the needs identified in the Playing Pitch Strategy (PPS)
- Appropriate mitigation to offset the loss of Ifield Golf Course
- Informal spaces that improve the wider recreation offer and increase public access to the site.

1.6 To inform the creation of the masterplan and scheme parameters that are aligned with the Regulation 19 policy requirements, work has therefore been undertaken to understand the current and projected sport and recreation needs. This work undertaken has enabled us to prepare a *Sports Strategy* for the site.

1.7 This report sets out the work undertaken and the resulting sports and physical activity strategy. It evaluates how effectively the existing provision within the wider area meets current and

projected future demand and identifies where improvements are required in order to ensure that facility provision continues to meet need across the Local Plan period.

- 1.8 Importantly, Land West of Ifield provides an opportunity to address existing deficiencies within both Horsham District and Crawley Borough. This means that not only will proposals seek to ensure that the impact of the proposed new development can be accommodated, but also that opportunities to create a tailored development providing facilities to meet the needs of the current population are explored.
- 1.9 This report therefore seeks to set out a positive sport and recreation strategy for the proposed development. It drives a positive planning approach to the site, and linked with the principles of Active Design (set out in Active Design Guidance, May 2023, Sport England) that are embedded across the scheme, will create a sustainable new neighbourhood, improving access to sport, health, well-being and recreation more widely.
- 1.10 As set out in Policy HA2, it is recognised that the proposals will involve the loss of Ifield Golf Course. This policy issue, and the proposed mitigation to offset the loss, is dealt with under separate cover. Specifically;
- Draft Land West of Ifield Golf Needs Assessment (July 2024)
 - Draft Land West of Ifield NPPF Paragraph 99/103 Assessment (July 2024).

It should be noted however that the range of sports facilities that are provided as part of the masterplan seek to directly address the impact of the development but at the same time leverage the opportunity to also meet existing sporting needs of the existing population of Horsham and Crawley District.

- 1.11 Section 2 considers the policy context relating to sport and recreation facilities.

2. Policy Context

- 2.0 It should be noted that this report concerns itself with sports needs and planning policy considerations only. There are many other policy issues that should be taken into account but which are outside the scope of this report. As set out in Section 1, golf is dealt with in separate documents and is consequently also outside of the scope of this report.
- 2.1 For sports, the planning policy context is set by the National Planning Policy Framework (NPPF). The NPPF notes that sport and recreation plays a fundamental part in peoples' lives and the provision of the right facilities in the right place is a key component of this. For clarity, this document refers to paragraph numbers set out in the December 2023 version of the NPPF.
- 2.2 Paragraph 102 notes the importance of understanding the evidence base to determine what is required and then positively and proactively planning to ensure that the required infrastructure is provided. This principle is central to the approach taken at Land West of Ifield.
- 2.3 Directly referencing open space and sport, paragraph 102 of the NPPF states:
- 'Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities, and can deliver wider benefits for nature and support efforts to address climate change. Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate.'*
- 2.4 The inclusion of facilities to meet both current and projected future demand are therefore central to the development of masterplan for the proposed development.
- 2.5 Furthermore NPPF Paragraph 103 seeks to protect existing open space, sports and recreational buildings and land. Paragraph 103 states that:
- 'Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:*
- An assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or*
 - 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*
 - the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.'*
- 2.6 The use of the site as a golf course therefore means that it falls under the above policy and one or more of the above exception criteria should be met if development is to be acceptable in policy terms.
- 2.7 The compliance of proposals for the closure of the golf course with policy is set out under separate cover. This provides part of the evidence that informs that document, which illustrates how the proposed alternative sport and recreation provision outweighs the loss of the existing golf course.

Towards an Active Nation – Sport England

- 2.8 At a national level, Sport England's strategy 'Uniting the Movement' was published in January 2021. 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.

- 2.9 The new strategy seeks to ensure that sport and physical activity is to recognised as essential to help overcome national challenges. It highlights that before the Covid 19 pandemic, record levels of activity were being achieved in England. It is important to both get that momentum back, but also to reach people who have traditionally been excluded.
- 2.10 The strategy sets three objectives:
- Advocating for movement, sport and physical activity
 - Joining forces on five big issues
 - Creating the catalysts for change.
- 2.11 Within the Strategy, Sport England highlight five big issues that need to be addressed. These include:
- Recover and reinvent – responding to the short, medium and long term challenges of Covid 19 and supporting organisations and people to return to activity that's stronger, more relevant and more inclusive than before
 - Connecting communities – working in collaboration with communities - local people and organisations. This will include investing in clubs and charities and collaborating on local solutions, 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.
 - Connecting with health and wellbeing – ensuring that sport and physical activity is at the heart of health and well-being both in terms of stopping health problems arising in the first place, but also supporting people to manage problems when they do arise.
 - Active Environments – the strategy recognises a range of environments, from dedicated leisure facilities and playing fields, other community spaces (parks / open spaces / community centres and schools) through to the built environment (streets / housing estates etc). The strategy focuses upon making activity easier for everyone and focuses upon the protection and improvement of sport and leisure facilities (as well as the innovation of new designs and operational models), the creation of opportunities around community spaces and the creation of better places to live through an influence on design.
- 2.12 It is clear that traditional sports halls and swimming pools remain an important part of the provision jigsaw, but are no longer the panacea. There has been a trend for several years of individual based activities that require less organisation. Therefore, less team based indoor sports or individual sports and much more individual health and fitness activities, plus exercise and dance classes. This means the need to think differently and look at more flexible forms of local provision to meet new participation needs, as well as traditional facility types.
- 2.13 The provision of indoor space is also not the only solution to increase sports participation. National research identifies that only traditional leisure centres can often be perceived as inaccessible for the majority of the population, particularly those who are not regularly active. Flexible outdoor spaces therefore also provide significant opportunities and it is important that the role of outdoor and green spaces in increasing participation and encouraging healthy lifestyles amongst residents are considered.
- 2.14 To reflect these aims and objectives to promote the role of sport and physical activity in creating healthy and sustainable communities in 2015 Sport England published Active Design. The guidance has been recently updated and is a key guidance document intended to unify health, design and planning agendas by providing guidance to create the right conditions and environments for individuals and communities to lead active and healthy lifestyles.

- 2.15 Active Design takes a fresh look at the opportunities to encourage and promote sport and physical activity through the design and layout of our built environment to support a step change towards healthier and more active lifestyles.
- 2.16 The creation of healthy places, which promote and enable participation in sport and physical activity, is a key driver of Sport England and a key concept that they strive to see in all residential developments.
- 2.17 The masterplan for Land West of Ifield therefore embraces the concepts of Active Design, ensuring that that the key principles are embedded into site design.
- 2.18 Sport England is a non statutory consultee for planning applications involving loss of golf courses and also on developments of 300 houses or more. Sport England are therefore a non statutory consultee on any planning application for Land West of Ifield. It is understood that Sport England will wish to ensure that residents of the new development have access to 'traditional' sports facilities, but also that the development is designed in a way that promotes and facilitates physical activity, adopting Active Design and Active Travel principles

Active Travel England (ATE)

- 2.19 ATE's strategic aims are to increase levels of walking and cycling to 50% of journeys in towns and cities by 2030 by:
- Creating better streets and networks for cycling and walking that are built to the 'key design principles' as set out in Gear Change and Local Transport Note 1/20
 - Putting walking and cycling at the heart of transport, place-making, and health policy so travelling without a car is easy and accessible utilising a long-term walking and cycling programme and budget
 - Empowering and encouraging local authorities who manage their roads to incorporate active travel improvements into all aspects of their functions. This includes access to new powers to manage the highway effectively for active travel and training on all aspects of active travel best practice
 - Enabling people to cycle and protecting them when they do by reducing road danger through the creation of safe infrastructure based on the key design principles and working with the department and relevant bodies to ensure that the rules of the road work to protect people travelling actively
- 2.20 ATE are a statutory consultee on planning applications for major new developments and therefore these principles will be embedded into the masterplan process.
- 2.21 This Sport and Recreation Strategy addresses the formal sport elements, whilst the side masterplan sets out how the principles of Active Design and Active Travel will be embedded into the Land West of Ifield development.

Local Policy Framework

Horsham Borough Local Plan – Horsham District Planning Framework

- 2.22 The Horsham District Planning Framework was adopted in 2015. It sets out several policies relating to sports and recreation facilities.
- 2.23 Policy 43 represents the main policy relating to the provision of community, leisure and recreation facilities. This policy seeks to retain and enhance existing facilities and services, and ensure that new facilities are provided at an appropriate level where a need is identified. Policy 43 states that:

'1. The provision of new or improved community facilities or services will be supported, particularly where they meet the identified needs of local communities as indicated in the current Sport, Open Space and Recreation Study and other relevant studies, or contribute to the provision of Green Infrastructure.

2. In addition to supporting facilities or services located in accordance with the Development Hierarchy and Strategic Development locations, sites located outside built-up areas will be supported where this is the only practicable option and where a suitable site well-related to an existing settlement exists.

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

- a. an alternative facility of equivalent or better quality and scale to meet community needs is available, or will be provided at an equally accessible location within the vicinity; or*
- b. a significant enhancement to the nature and quality of an existing facility will result from the redevelopment for alternative uses on an appropriate proportion of the site.'*

2.24 Policy 43 therefore demonstrates support for proposals that create new and improved community facilities in line with need. If the planning application for Land West of Ifield is determined against this local plan, compliance with policy 43 (3) will also need to be considered.

2.25 In addition to the above sport specific policy, it should be noted that the Local Plan identifies key strategic housing allocations:

- *'Policy SD1 allocates Land North Of Horsham for 2500 homes. Part of this policy includes the requirement for this site to meet the needs of the new community and the wider area. Policy SD5 provides further detail, but emphasises that facilities should be provided in line with up to date evidence base documents, but requires that 3.2ha of playing fields are provided.*
- *Policy SD10, Land west of Southwater, requires replacement and enhancement of existing playing fields, as well as provision of new recreation pitches.'*

2.26 The emerging proposals for these sites in terms of the facilities that will be provided have been considered within this assessment, as proposals may impact on need at Land West of Ifield.

2.27 It is noted however that the new Horsham District Local Plan has recently been approved by the Council to proceed to consultation at Regulation 19 stage. Once adopted, this Local Plan will supersede the existing Horsham District Council Planning Framework.

2.28 Any planning application for Land West of Ifield will be determined against this new local plan.

New Horsham District Local Plan

2.29 As outlined in Section 1, Land West of Ifield is included as a Strategic Allocation for housing under policy HA2 in this consultation draft document. Requirements relating to sport and recreation documented in this policy include:

- Provision of a new neighbourhood centre to include a library, community centre and potentially café and /or public house and indoor sports facilities

- Formal sport and recreation provision to meet the needs of the new community in line with standards and recommendations in the Playing Pitch Strategy and Open Space and Sport and Recreation Review 2021
 - Mitigation for the loss of the golf course (unless specific evidence is provided that the surrounding area has capacity for its loss)
 - Informal open space, detailed as including 3G football pitches and Multi Use Games Areas.
- 2.30 Further attention is also given to sport and recreation facilities in Policy 28, which seeks to retain existing facilities and services and ensure new facilities are provided where required.
- 2.31 Policy 28 responds to needs set out in The Playing Pitch Strategy and Built Sports Facility Strategy which highlight a number of facility requirements around the Horsham area. It emphasises the expectation that these needs will be taken into account in the masterplanning process for strategic sites such as Land West of Ifield, noting that:
- ‘Strategic allocations will be expected to have regard to these priorities and should seek to accommodate them in a manner that complements the site’s newly generated needs and accords, where relevant, with the National Governing Body’s requirements, and subject to agreement from the Council.’*
- 2.32 The specific requirements of Policy 28 are:
- ‘1. The provision of new or improved community facilities or services will be supported, 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; and / or contribute to the provision of Green Infrastructure and nature recovery. Proposals for new or improved community facilities and services will be required to meet all of the following criteria:*
- a) be located within a defined built-up area boundary unless it can be demonstrated an alternative location is the only practicable option for the use proposed, and the site is suitable and well-related to an existing settlement;*
 - b) be of an appropriate scale and intensity of use for the location and not prejudice adjoining and nearby uses or habitats, unless it can be demonstrated any harmful impacts can be suitably mitigated;*
 - c) lighting proposals, including floodlighting, must minimise light pollution, help reduce crime, and must not cause significant nuisance to surrounding occupants or highway users, and not significantly harm habitats and species; and d) unless convincingly demonstrated to be impracticable: i. be accessible to the community it serves by walking, wheeling, cycling and public transport; ii. improve access to existing open space; and iii. provide accessible public toilets and drinking water refill facilities for the occupants / users and the general public.*
- 2. To facilitate community cohesion, integration, healthy and active living, all proposals for additional dwellings will be required to contribute to the provision and improvement of the quality, quantity, variety and accessibility of public open space and public indoor meeting and sports halls to meet the needs generated in accordance with the local minimum standards. All open space and indoor provision will be required to have an agreed funded maintenance and management plan. The community use of school facilities will be supported but should be additional to that required to meet generated needs.*

3. Proposals that would result in the total or partial loss of sites and premises currently or last used for the provision of community facilities or services will be resisted unless it has been demonstrated that one of the following applies: a) the proposal will secure replacement facilities or services of equivalent or better quality, with appropriate capacity, and in an equally accessible location within the vicinity; or, b) evidence is provided that demonstrates the continued use of the site as a community facility or service is no longer feasible, taking into account factors such as; appropriate active marketing, the demand for a community use within the site or premises, the quality, usability, viability and the identification of a potential future occupier.'

- 2.33 Policy 28 also includes a series of local standards which will need to be taken into account as part of the masterplanning process. The policy requires:
- Use of the Sport England Playing Field calculator to inform decision making in relation to grass pitches and artificial pitches
 - Use of Sports Facility Calculator to demonstrate need for indoor sports facilities
 - Use of a 0.12ha minimum size standard to determine need for tennis courts, with a 1.6km distance threshold applied
 - Use of a 0.16ha minimum size standard to determine need for bowling greens.
- 2.34 Policy at both national and local level therefore clearly require consideration of the needs and opportunities for sport and recreation facilities, including how any demand generated by new residents will be met, as part of the masterplanning process.
- 2.35 Policy necessitates that any facilities that are to be provided are proactively planned and that new developments are created in a manner that embraces the characteristics of active design and active travel.
- 2.36 Specifically, Policy HA2, Land West of Ifield emphasises the requirements to provide for the needs of the new community and this is therefore a key component of the masterplanning process.
- 2.37 This report seeks to deliver on these requirements and to use the existing evidence base documents to determine how the masterplan at Land West of Ifield can respond to the identified priorities.
- 2.38 Section 3 therefore briefly summarises the approach taken in the preparation of this report, including key consultees and evidence base documents. Sections 4 and 5 then explore the sport and recreation facility requirements in detail while Section 6 consider the implications for Land West of Ifield and the resulting sport and recreation strategy.

3. Methodology

Introduction

3.0 The preparation of this scheme specific sport and recreation strategy for Land West of Ifield seeks to respond to policy requirements specifically in relation to formal sports provision. It evaluates the sporting needs of both the existing and new community and has been prepared based on guidance and a meeting with Sport England and has comprised:

- Review of local and national policy to understand the status of the site
- Review of the existing evidence base for sport and leisure
- Update of the existing evidence base where relevant
- Interpretation of additional data provided during the process:
 - FA Local Football Facilities Plan
 - Sussex Cricket Board Facilities Strategy
- Use and application of Sport England Facilities Calculator and Playing Fields Calculator.

3.1 We have also benefitted from consultations with the following:

- Representatives of Horsham District Council
- Representative of Crawley Borough Council
- Sussex FA and the Football Foundation
- England Hockey
- The LTA
- The Sussex Cricket Board and the ECB
- The RFU
- Swim England
- Sport England
- Basketball England
- Badminton England
- England Netball.

3.2 The above consultations have helped to evaluate the existing evidence base as well as to understand the updated issues and priorities for each sport in 2024. Specifically therefore this report seeks to determine:

- The existing needs for each sport and the adequacy of provision to meet demand
- Opportunities that could be met through the creation of sports facilities at Land West of Ifield
- The additional demand for sports facilities that will arise as a result of the proposed development
- The adequacy of the existing infrastructure to meet the demand for sports facilities that will be generated by the new development.

3.3 This sports needs assessment and strategy draws on the responses to those key questions and seeks to outline the issues that need to be considered in the masterplan at Land West of Ifield. It seeks to provide evidence to support the masterplan for the site and to highlight where further off site investment may be required.

- 3.4 It represents a detailed process at a point in time to demonstrate the benefits of the strategic allocation as well as ensure that these are considered at the outset. It is scheme specific, considering the exact location of Land West of Ifield and the direct needs that arise from this. However, the sports strategy and masterplan may need to be evolved as evidence bases are updated in order to take account of any changing needs and priorities as part of future Reserved Matters applications.
- 3.5 This report draws upon the existing evidence base for sport and recreation across Horsham District. Specifically, this includes:
- Horsham District Council Built Sports Strategy (2017)
 - Horsham District Council Playing Pitch Assessment and Strategy (2019)
 - Horsham District Open Space, Sports and Recreation Review (2021)
 - Horsham District Draft Infrastructure Delivery Plan (December 2023).
- 3.6 The identified documents provide an overview of the key issues and priorities relating to sport and recreation facility provision and therefore represent an important consideration in the creation of the masterplan and identification of scheme parameters.
- 3.7 The location of Land West of Ifield on the border between Horsham District and Crawley Borough means that gaining an understanding of the position in Crawley is equally as important as determining the adequacy of facilities in Horsham. Residents of the proposed new development may use facilities in Crawley as well as Horsham, and equally any new facilities provided as part of the proposed new development may serve residents of Crawley.
- 3.8 This principle is reflected in Policy HA2 of the Regulation 19 Local Plan which notes that:
- 'Once completed, development to the West of Ifield will form part of the wider urban form of Crawley. Therefore, any development which takes place in this location will require close and ongoing discussions with Crawley Borough Council.'*
- 3.9 This assessment therefore also includes detailed consideration of the evidence base documents prepared by Crawley Borough Council, which include:
- Indoor Sports Facilities Assessment (January 2021)
 - Crawley Borough Council Playing Pitch Assessment and Strategy (2020).
- 3.10 The evidence bases for both authorities were developed following guidance prepared by Sport England and were agreed and approved by the Councils and as such, are considered robust representations of need. Consequently, it is important to ensure that the proposed masterplan for Land West of Ifield take into account the issues that are identified.
- 3.11 The age of the documents does however need to be highlighted. The typical and accepted lifespan of a Built / Indoor Facility strategy is five years. This means that the original Horsham District Council strategy is now out of date, although the sports and recreation review seeks to update this to a point. Created in 2021, the Crawley Built Facilities Strategy remains an up to date document at this point in time.
- 3.12 With Playing Pitch Strategies having a 3 year life span (unless monitoring can be demonstrated) a similar issue is evident for Horsham District, with the strategy now out of date. The strategy for Crawley Borough will also shortly require updating.
- 3.13 Although there are some concerns about the age of the documents therefore, these documents represent the most up to date evidence base that is available. We have therefore reviewed these documents in detail and then consulted with relevant National Governing Bodies of Sport in order to understand if anything has changed, and whether the findings remain representative

of the position today. The results of these consultations feed directly into the analysis that is presented.

- 3.14 The next sections of this report therefore review the implications of these evidence base documents for the emerging masterplan.
- 3.15 Section 4 evaluates the current position for indoor sport and leisure facilities, whilst section 5 reviews supply and demand for outdoor sports facilities. They draw upon the existing evidence bases of the two Councils, as well as additional information supplied and the findings of consultations.
- 3.16 Section 6 briefly considers the policy requirements for open space – informal opportunities for sport and recreation.
- 3.17 Section 7 considers the additional demand that will be generated by the proposed new development and then considers whether the likely increase in demand can be met by the existing infrastructure.
- 3.18 It brings together all analysis and summarises the key findings and the implications for the proposed development site. It sets out the sports strategy that underpins the masterplan.

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4. Indoor Sports Facilities

Introduction

- 4.0 This section considers the adequacy of indoor sports facilities across both Horsham and Crawley local authority areas to meet current needs. It draws upon the Indoor Built Facilities Strategies for both local authority areas.
- 4.1 Although located in Horsham District, the close proximity of the proposed development site to Crawley Borough, and the fact that users of leisure facilities are not bound by local authority boundaries, means that the key messages arising from the assessment of indoor leisure facilities in Crawley are as important as those highlighted in Horsham District. Indeed it is clear that for many facility types, the proposed development site is outside of the drivetime catchment of facilities in Horsham, but is within the catchment of facilities in Crawley Borough.
- 4.2 Reference to the Crawley Borough strategy is also important as this document was produced after the Horsham Built Facilities Strategy and consequently provides a slightly more updated view of facility issues, including some consideration of the position in Horsham District.
- 4.3 Most importantly however, this document does seek to provide some headline analysis on the potential impact of the proposed development at Land West of Ifield on demand for facilities in Crawley and the role that it is envisaged to play in meeting new demand.
- 4.4 As a starting point, Table 4.1 therefore summarises the key issues identified in each of the Indoor Facility Strategies and the key recommendations that were set for each sport.
- 4.5 In brief, the key issues emerging in Table 4.1 are:
- Whilst demand for sports halls in Horsham District can be met by the existing supply (although some halls are ageing and require refurbishment), there are greater pressures in Crawley and facilities are operating close to capacity. The strategy identifies a need for up to 10 additional courts in future years. In both authorities, basketball and cricket clubs in particular identify a need for access to more sports halls
 - Both strategies identify a need for additional swimming pool capacity, both to meet current demand but particularly to meet the additional demand that will be generated by new housing development. Land West of Ifield is located in an area highlighted as a priority for new provision in the strategies of both authorities
 - there are some localised deficiencies of health and fitness facilities in Horsham District, including areas towards the Crawley borders. Provision is however adequate in Crawley Borough to meet current and projected future demand
 - The quality of studios is good in both authorities and with no demand models to evaluate the adequacy of provision, it is concluded that access to such facilities is generally good. The Crawley Borough Strategy however identifies the importance of maintaining the supply of studios as the population increases
 - There is a theoretical need for an indoor bowls facility, but limited expressed demand, linked with low usage of existing facilities means that neither strategy document identifies a practical need for new provision
 - There is some evidence of unmet demand for specific sports, in particular gymnastics and basketball.
- 4.6 Both indoor facility strategies note that housing growth will be a key influencer on demand for sports facilities. The Horsham District assessment notes that significant housing development is planned through the 2015 Horsham District Planning Framework, with up to 16,000 homes to be provided up to 2031. There are no specific recommendations relating to Land West of Ifield in the Horsham Council Built Sports Facility Strategy. Crawley Borough Council

documents give some consideration to the potential impact of the growth that will be generated from the site.

4.7 It is also important to note that the strategy for Horsham District does not focus exclusively on built facilities. It looks at opportunities for increased use of informal places and spaces and highlights the important role that outdoor parks, open spaces and halls can play in increasing participation. The key non facility related priorities set out in this strategy document include:

- Need to invest in active environments
- Importance of accessibility at a local level
- Opportunity to extend and increase awareness of sports and physical activity, particularly activity in community halls
- Opportunity for investment in active infrastructure to facilitate increased provision for cycling, walking and jogging.

4.8 This emphasises the importance of incorporating active travel into the proposed masterplan as set out in Section 2.

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Table 4.1 – Summary of Evidence for Indoor Sports Facilities

Facility Type	Horsham District	Crawley Borough
Sports Halls	<ul style="list-style-type: none"> 18 halls identified with 3 or more courts – these include 8 halls accessible to the community on a pay and play basis. 15 halls are accessible by sports clubs (but do not necessarily allow pay and play) FPM modelling suggests that across the district, less than half of the available capacity is used. Capacity of halls is however reduced by a reliance on school facilities The Holbrook Club, Colyers Sixth Form College and Millais School are the nearest sports halls to the proposed development site. All three offer community use (either pay and play or sports club) There are 17 activity halls – the Holbrook Club, Millais School and Pavilions in The Park are the closest. Consultation reported some limited remaining space for new bookings, but there was a particular perception that there is insufficient provision in Horsham town centre area. Quality of facilities varies but is typically good The assessment notes a moderate need for investment at The Holbrook Club. The hall at Colyers School is the oldest in the Borough, although it was refurbished in 2015 Application of a 20 minute drivetime area demonstrates that Land West of Ifield is located outside of the catchment area for a facility (taking into account facilities located in Horsham District only). There are also limited community halls in this part of the Borough FPM analysis demonstrates that there is adequate capacity in existing sports halls to meet demand up to 2031 – modelling suggests that there is oversupply equivalent to 23 courts, with demand for an additional 4 courts by 2031, which would reduce this overcapacity to 19 Despite this, England Netball report a requirement for improved access for training and competition, The Cricket Board require new indoor facilities, Table Tennis require greater access to courts and Badminton England also require alternative venue to performance venue (now established) == these impact on demand for sports hall provision Key conclusion is there is no requirement for additional sports halls 	<ul style="list-style-type: none"> Six halls containing three or more courts, 3 of which are community pay and play facilities – K2, Healthy Balanced Generation @Oriel and Ifield Community College The hall at Ifield Community college is closest to the proposed development site – this is operated for community use as part of a school PFI contract Halls are in good condition, with the average age 13 years Existing sports halls are operating close to capacity, but 93% of demand is satisfied Application of the drivetime threshold demonstrates that the proposed development site is within the catchment of Ifield Community College sports hall. This hall is only open outside of school hours and access is therefore limited This is a common issue in Crawley, with many facilities only open during school hours. FPM modelling demonstrates that to meet current demand, new provision is not required, but existing facilities are operating above suggested capacity thresholds, meaning that facilities are busy. This is also reflected when analysing current programming These pressures mean that there is an identified need for up to 10 additional badminton courts by 2035 (depending upon which growth scenario is modelled). Particular pressures are identified for cricket, basketball and badminton. The additional demand generated by new housing growth is a key part of this. The strategy identifies a need to provide additional sports halls, and suggests facilities on education sites (in particular schools to accommodate housing to growth to the west of Crawley). The strategy also suggests that new sports hall should include opportunities for indoor cricket Opportunities should also be taken to provide new studio space when providing sports halls <p>Key Recommendations</p> <ul style="list-style-type: none"> Provide additional sports halls space – consider education facilities and / or a school that is built to cater for new population to west of Crawley Provide changing places facility



Facility Type	Horsham District	Crawley Borough
	<p>Key Recommendations</p> <ul style="list-style-type: none"> • Long term replacement / refurbishment of ageing facilities • Improved access for netball at peak times • Relocation of badminton Performance venue (achieved) • Additional time in sports halls to be scheduled for table tennis 	<ul style="list-style-type: none"> • Needs for badminton and basketball identified now and in the future – work with relevant clubs to identify appropriate provision • Any new sports halls should provide facilities for indoor cricket (meeting ECB TS3 guidance) • Given the issues with pay and play access during daytime hours (due to reliance on schools) ensure that any new facilities are designed with community use in mind
Swimming Pools	<ul style="list-style-type: none"> • 22 swimming pools (including 9 lidos) across 20 sites. • 15 of these pools are accessible to the community, of which 5 pools offer pay and play opportunities • One eight lane pool, two six lane pools and six four lane pools provided. • 68% of pools are accessible to the community, but only half of all education pools are available to the community • Cottesmore Park and Roffey Park Institute are nearest community facilities to the proposed development site – these do not provide pay and play access (club use) • Pavilions in the Park is located in central Horsham and is the only eight lane pool (a lido and learner pool also provided at this site) – this is a high quality facility • Although the quality of facilities provided by Horsham Borough Council is good, most swimming pools are ageing • Land West of Ifield is outside of the 20 minute drivetime catchment for pay and play swimming pools in Horsham. (it is however serviced by the 50m swimming pool provided in Crawley) • FPM modelling suggests unmet demand in Horsham District is equivalent to 110sqm and existing pools are close to capacity. Population growth will see unmet demand grow - future demand is perceived to equate to 260sqm (4 lane 25m pool) • The highest unmet demand is identified as around Horsham Town, in south of the district and on the borders with Crawley. The proposed development is therefore located in an area of unmet demand according to the Horsham District strategy <p>Key Recommendations</p> <ul style="list-style-type: none"> • Increased water space, potentially linked to redevelopment of Pavilions in Park 	<ul style="list-style-type: none"> • Overall 6 swimming pools are provided, three of which are located at the K2 Crawley Leisure Centre. One of these pools at K2 is a 50m pool (and therefore has a regional catchment area) • The proposed development site is in the catchment of K2 Leisure Centre (20 minutes drivetime), where the bulk of swimming water is located • This pool is in adequate condition, but may require refurbishment in the next 5 – 10 years. • The remaining pools are located at private facilities • Crawley and Horsham are recorded as having the lowest water space per person in 2025 across Sussex • The Sport England FPM modelling however suggests a slight surplus in capacity when including all water space. This document also notes that there is a small amount of surplus capacity in Horsham (an updated position from the Horsham document) • The assessment however concludes that once taking into account the population growth that is projected in Crawley, there is an additional need for up to 377m2 water space. In addition, the scenarios which consider Crawley housing needs that will be met outside the Borough (including the preferred development site) suggest that an additional 250m2 is required. • The strategy therefore recommends the provision of an additional swimming pool to accommodate new population growth and suggests that ideally, this should be within the Borough, or on the Borough boundaries to the west of the Borough. This should provide pay and play opportunities. • Consultation with Swim England documented in the Crawley Borough Strategy suggests that a smaller community pool may be the most appropriate facility type and that this would complement existing provision. <p>Key Recommendations</p> <p>Retain existing levels of community accessible and affordable pools as a minimum</p>



Facility Type	Horsham District	Crawley Borough
	<ul style="list-style-type: none"> • Refurbishment of Pavilions in Park • Increase access to education facilities that do not currently offer community use • Consider provision of additional swimming pools, in particular to meet the additional demands generated by population growth 	<ul style="list-style-type: none"> • Provide additional water space to meet demands of new population from housing development – key area identified is borough boundaries to west of borough
Health and Fitness	<ul style="list-style-type: none"> • 19 health and fitness suites and 15 studios, providing 698 stations • The closest health and fitness facility available to the public to the proposed development site is Ghyll Manor Hotel – this is a small facility with 12 stations. There are also publicly accessible facilities at Cottesmore Golf and Country Club and the Holbrook Club. The largest site is Pavilions in the Park, situated in central Horsham • The majority of sites are small, with no facility providing over 100 stations. The nearest pay and play facility is The Pavilions – this is a high quality facility, but outside of the catchment of Land West of Ifield • Much of the provision is provided by the commercial sector, but costs are similar to the Council facilities and therefore facilities are considered accessible • Land West of Ifield is outside of the catchment (20 minute drivetime) of health and fitness facilities in Horsham, but does benefit from use of facilities in Crawley, which are close to the border with Horsham • The assessment identifies a small undersupply of 30 stations (although the latent demand does not appear to be in the location of the proposed development site) • Future growth will result in an undersupply of 77 stations by 2031. These figures appear to exclude sites provided by commercial operators however, which were deemed on a par in terms of costing during the assessment. • Despite the relatively limited unmet demand, the strategy identifies the need for more facilities on the basis of latent demand in specific geographic areas. These include the Crawley borders. <p>Key Recommendations</p> <ul style="list-style-type: none"> • Retention of existing levels of provision • New provision in Horsham town, south of District, Crawley Borders • Extension of existing facilities 	<ul style="list-style-type: none"> • 16 health and fitness suits and 13 fitness studios provided • CBC provides 20% of supply • Facilities are typically large scale – 4 sites offer over 100 stations • Quality is varying, but there are few poor facilities • No areas in the Borough are outside of catchment of facilities. The map in the document is incorrect, but text suggests that Land West of Ifield is in the catchment of facilities in Crawley • Modelling suggests that there is a large oversupply of provision currently (391) and that the stock of facilities is also able to meet future demand. • No clear requirement for additional health and fitness facilities identified although there is latent demand in some areas <p>Key Recommendations</p> <ul style="list-style-type: none"> • Retention of existing facilities • Maintain provision at pay and play centres • Increase of fitness stations at Bewbush

Facility Type	Horsham District	Crawley Borough
	<ul style="list-style-type: none"> Increased provision by Horsham District Council (primarily at Broadbridge Leisure Centre) 	
Studios	<ul style="list-style-type: none"> Most studios are part of a health and fitness offer, and quality is typically good Horsham District Council is the only provider of pay and play studio provision The proposed development site is outside of the catchment of any existing studios <p>There are no clear recommendations relating to the provision of studios.</p>	<ul style="list-style-type: none"> 14 studios, the majority of which are provided as part of a health and fitness offer Quality of facilities is generally good, and all residents of Crawley Borough have access to such facilities within an appropriate catchment <p>Key Recommendations</p> <ul style="list-style-type: none"> Maintain current studio provision Provide new studios alongside swimming and sports hall space
Squash	<ul style="list-style-type: none"> 17 existing squash courts The Holbrook Club is the nearest site to the proposed development (2 courts) Court quality is adequate but facilities are ageing. There are moderate investment requirements at The Holbrook Centre No demand identified for additional courts. <p>Key Recommendations Protection and enhancement of existing facilities New provision to be demand led, additional need 1 – 2 courts</p>	<ul style="list-style-type: none"> The only squash courts in Crawley Borough are provided at K2. England squash highlight Crawley as a key area for future delivery, reporting that the demographic lends itself to squash participation. No demand for additional facilities has however been identified at the current time <p>Key Recommendations</p> <ul style="list-style-type: none"> Retain existing level of provision No requirement for additional provision
Indoor and Outdoor Bowls	<ul style="list-style-type: none"> Horsham District Indoor Bowls Club is located adjacent to Broadbridge Heath Leisure Centre. This is used by two key clubs. There is also strong participation in short mat bowls. The facility is in good condition No additional demand identified. Notably, membership of the existing club is falling. SE facility calculator identifies a need to provide additional 1.16 rinks, but demand in practice not evident 8 outdoor bowling greens – Horsham Bowling Club is the nearest All greens are in average to good condition All clubs are trying to increase their membership levels. 	<ul style="list-style-type: none"> Two indoor bowls facilities in Crawley, and residents also use facilities neighbouring authorities. Assessment concludes that when considering the spare capacity at existing sites in neighbouring authorities, as well as a space available in facilities in Crawley there is no requirement for further rinks in Crawley Reflecting the findings of the Horsham Strategy, the indoor bowls rink in Horsham is identified as having a particularly low membership and is therefore able to meet demand arising from future population growth (and this will also help its sustainability) <p>Key recommendations;</p> <ul style="list-style-type: none"> No requirement for additional facilities

Facility Type	Horsham District	Crawley Borough
	<p>Key Recommendations</p> <ul style="list-style-type: none"> Retention and maintenance of existing facility No clear additional facility requirements unless linked to increase of existing local demand 	<ul style="list-style-type: none"> Use funding from new development to maintain and improve existing indoor bowls facilities Monitor demand for indoor bowls facility.
Indoor Tennis	<ul style="list-style-type: none"> No purpose built indoor tennis courts in Horsham District Nearest indoor tennis facilities are located in Crawley Proposal for indoor tennis facilities identified within Horsham Crawley BC strategy identifies priority for indoor tennis in Horsham District 	<ul style="list-style-type: none"> one indoor air hall located at Crawley LTC, this facility is in good condition the assessment identifies further need for indoor tennis (potentially up to 11 indoor tennis courts) Whilst the strategy suggests that there is additional need in Crawley, it highlights that priorities is greater in neighbouring Horsham
Specialist Facilities	<ul style="list-style-type: none"> One purpose built gymnastics and trampolining venue at The Pavilions. The gymnastics hall is leased to the club (until 2028) and is good quality All existing gymnastic clubs have waiting lists – aspiration to increase facility provision so participation can grow. There are also waiting lists at venues in Crawley. Horsham Gymnastics Club were developing a facility project, seeking to create either an extended facility or a second site. Badminton England identified a need for a new permanent home for the performance sports centre (following redevelopment of the Broadbridge Heath Leisure Centre), as well as improved access to booking hours – the assessment suggests that this was addressed part way through the process England Netball identify the need for indoor space <p>Key Recommendations;</p> <p>Council work with the relevant National Governing Bodies (NGBs) to identify appropriate opportunities / solutions.</p>	<ul style="list-style-type: none"> Gymnastics – Hawth Gymnastics Club operate out of K2 Crawley Leisure Centre – they wish to expand due to a large waiting list. The strategy highlights the need for additional dedicated facilities to meet demand (either through the expansion of facilities at K2 Crawley Leisure Centre or development of an additional facility elsewhere) Two amateur boxing clubs based in ageing facilities – requirement to support and assist these clubs to maintain provision <p>Key Recommendations</p> <ul style="list-style-type: none"> Investigation of opportunities to create a mezzanine floor at K2 to improve existing gymnastics facilities Support for other specialist clubs

- 4.9 It is clear therefore from Table 4.1 that there is a requirement for some new facilities in both Horsham and Crawley to meet existing needs. The strategies both also identify issues that will be exacerbated as the population grows.
- 4.10 The location of Land West of Ifield means that it provides a potential solution to address, at least in part, issues in both Horsham and Crawley District and consequently, the issues in both authorities must be considered in the context of the proposed new development.
- 4.11 Analysis of the key strategy findings and recommendations for both authorities suggest that the potential facility requirements include:
- Demand for sports halls to meet both community and sport specific needs (deficiency in Crawley, land West of Ifield served by Crawley residents) – projected deficiency in Crawley equates to 10 courts.
 - New swimming provision (pressures on existing pools identified in both authorities) Western boundaries of Crawley identified in both strategies as potential location for new facility)
 - New health and fitness (deficiencies identified in Horsham District)
 - Aspirations for studios (need to ensure that studio provision keeps up with population growth is highlighted).
- 4.12 It is clear in both strategies that the proposed future population growth will generate demand for facilities, exacerbating any existing deficiencies and in some facility types, new facilities to meet growth will be required where there is clear need. Section 6 of this document will evaluate the specific contribution that the proposed development at Land West of Ifield will make to this additional demand.
- 4.13 Whilst the above facilities provide a strong understanding of the position relating to indoor sports facilities, the time that has passed since the completion of these strategies means that it is inevitable that some changes have taken place. We have therefore undertaken additional baseline research and consultation with a view to ensuring that the pictures presented remain both robust and representative of need.
- 4.14 The next section therefore considers the updated position across both Horsham and Crawley District and evaluates the impact that any identified changes will have for proposals at Land West of Ifield.

Updated Position

Sports Halls

- 4.15 Both the Horsham District and Crawley Borough Council Built Facilities Strategies indicate that sports halls are approaching capacity and identify a need for additional sports halls to support the growing population. The borders of Crawley are highlighted as one area where facility provision may be required.
- 4.16 Since the completion of the Horsham District Council Playing Pitch Strategy, Active Places Power indicates that an additional sports hall (4 courts) has been provided at The Bohunt School, Horsham. This site offers community access (evenings and weekends) on a pay as you go or block booking basis and is located on the northern edge of Horsham Town. Land West of Ifield is located circa 5 miles from this new facility and is therefore within the catchment area of its sports hall.
- 4.17 A new flagship facility has also been developed at The Bridge Leisure Centre (Broadbridge Heath, West Horsham). This 6 court hall opened in 2018 to replace Broadbridge Heath Leisure Centre (3 court hall) as the Horsham District Council Built Facilities Strategy was nearing completion. The strategy however highlights that this facility will address the deficit that was identified in sports halls, and will facilitate the relocation of the badminton performance centre.

- 4.18 Additional facilities have therefore eliminated the identified unmet demand identified in Horsham District. In contrast, there are no known changes to the stock of facilities in Crawley since the Built Facilities Strategy was produced and the identified future deficiency of up to 10 courts remains (although provision is broadly in line with demand currently). The location of Land West of Ifield means that this continues to represent an opportunity to provide additional capacity to meet some of this demand.
- 4.19 As well as reporting general deficiencies in sports hall provision, the Built Facilities Strategies for both Horsham and Crawley identify specific sports where access to halls was poor and in need of improvement. Updated consultation (with National Governing Bodies of Sport as well as the respective Councils) suggests that these issues have largely been addressed, but that some unmet current demand remains, specifically:
- England Netball identify five small clubs in Crawley, with 60 members in total. Participation is higher in Horsham, with 2 clubs, but 173 members. There are no leagues in Horsham, but two commercial netball leagues in Crawley. Correspondence with England Netball does not identify any specific unmet demand currently in either Borough
 - England Basketball identify two clubs- Horsham Hawks and Crawley Storm. Crawley Storm play at Holy Trinity C of E School, whilst Horsham Hawks are listed as being based at The Bridge Leisure Centre. Thomas Bennet Community College, The College of Richard Colyer and The Weald School all also offer facilities for basketball, but K2 Crawley is the largest site (3 courts). Supply and demand analysis run by Basketball England across the catchment area of the two authorities demonstrates that there is spare capacity equivalent to 0.15 courts now, but that supply will match demand in future years. England Basketball note that Horsham and Crawley is currently not a priority area for Basketball England, however, would be supportive of any facility developments that benefit basketball
 - In Horsham, insight by Badminton England calculates there to be a total unmet demand equivalent to 0.4 courts. This will rise to 0.6 courts by 2030. Badminton England highlight that there is fairly limited activity in Horsham District, with only 2 currently active affiliated clubs (one to the north and one south). There is however demand for casual badminton and Badminton England would look to use any new facility to increase pay and play opportunities and then channel new players into clubs from there. The location of facilities would however suggest that the south of Horsham District has a greater demand for additional sports halls.
 - Sussex Cricket Board identified a strong need for indoor cricket facilities across both Crawley and Horsham. They highlight that they wish to see cricket nets in any new sports hall facility, and that new facilities are a clear priority in this area.
- 4.20 Whilst the above suggest that other than cricket, there is no significant sport specific unmet demand relating to sports halls in the vicinity of Land West of Ifield, consultation with Horsham District Council does reveal some specific needs. Notably:
- The Council have been approached by Horsham Hawks Basketball Club who are seeking access to both indoor and outdoor sports facilities. The club have recently experienced exponential growth in demand and since the covid 19 pandemic (and the preparation of the facility strategy) have increased from 2 teams to 12 teams in total. The club currently use Tanbridge, Colyers School and the Bridge but identify a lack of appropriate sports hall facilities as the key barrier to growth. The club are keen to host high level fixtures on a purpose built court, as well as to facilitate further youth development. During recent visits to local schools the Council have also been made aware of a growth in interest in basketball. Horsham District Council therefore suggest that in the event of the development of a new sports hall, consideration is given to the designs required to accommodate basketball

- Similarly, a new volleyball club in Horsham (Horsham Hawks) has contacted the Council requiring access to dedicated sports hall space. The club currently run senior teams but are also looking to establish junior participation.

4.21 The above therefore suggests that despite the increase in provision that has taken place in the Horsham area, there remains evidence to suggest that there is demand for additional sports halls in both areas, particularly as the population grows. Overall therefore the existing facility strategies remain representative of the key priorities.

Swimming Pools

4.22 Consultation with the Councils highlighted that demand for swimming is now consistent, and swimming lessons etc have returned to normality following the disruptions occurred by the covid pandemic.

4.23 The facility strategies for both Horsham District and Crawley indicated that there was a need for additional swimming pools to meet both current and projected future demand. The Crawley Borders was identified as an area where this unmet demand was particularly evident.

4.24 Since the preparation of these strategies, a new swimming pool has been provided at Windlesham House School. This is a six lane 25m pool, predominantly for school use although it is understood that there is some use of the facility by Worthing Swimming Club (and swim school providers). This facility is located on the Southern borders of Horsham District Council with Brighton and Hove Council.

4.25 Consultation identified that planning permission has now also been granted for a new swimming pool at Christs Hospital School. This will create further additional water space in Horsham District. Together therefore, these facilities will eliminate the unmet demand for swimming that was identified in the Built Facilities Strategy for Horsham District. That said, both of these facilities are located to the south of Horsham, some way from Land West of Ifield. meaning that whilst they help to address quantitative deficiencies, they are less effective in addressing the issues identified in the north of the district, particularly given that much of the population growth will occur in this area.

4.26 Added to this, there are no known new facilities in Crawley Borough and the deficiencies identified in the Built Facilities Strategy therefore remain.

4.27 Consultation with Swim England confirms this position. To further understand the potential unmet demand in the immediate vicinity of Land West of Ifield, Swim England commissioned a specific water deprivation report in the catchment of Land West of Ifield. This represents a bespoke assessment of demand for swimming pools using Swim England parameters and concludes that:

- There are 2 facilities within catchment of the proposed development site, providing 4 pools
- Both facilities are publicly accessible (Only publicly accessible facilities contribute to modelling below)
- Swim England parameters would see target Water Space (to meet 12m² per 1000 population) of 1,447m²
- The total current supply is 1,127m²
- This means that there is a water provision deficit of 320m²*
- For comparison, a 6 lane x 25m pool would equate to 325m²
- Swim England note that the above represents the current position in the immediate vicinity of the site, and that growth arising from new housing development would create additional demand..

4.28 Analysis and additional modelling provided by Swim England therefore concludes that the position set out in the strategies for both Horsham District and Crawley Borough remains valid

– there is demand for additional swimming water in the area, particularly given the amount of population growth that is expected.

4.29 Swim England highlight the following considerations with regard to any new provision:

- Future water provision should offer open public access, ensuring water space remains accessible to local population.
- Facility mix in the future needs to consider the versatility of its water space with options for moveable floors/booms to offer greater flexibility in programming and facility mix.
- Involve Swim England business engagement team to help maximise operations.

4.30 Consultation with Horsham District Council endorses the above key points.

Health and Fitness Facilities

4.31 While the Horsham District Council identified some deficiencies in health and fitness provision towards the Crawley Borders, the Crawley Borough Council assessment reports that provision within Crawley itself is adequate to meet current and projected future demand.

4.32 There are no known changes to the stock of facilities in Crawley since the Built Facilities Strategy was produced, with Active Places Power recording the same facilities. An application for planning has recently been submitted on behalf of Pump Gym for a new facility at Sackville House, Gatwick Road – (close to Gatwick Airport, North Crawley). Should permission be granted, the resulting facility would be a large site housed over 2 floors, with circa 250 classes per week and access to health and fitness stations 24 hours per week.

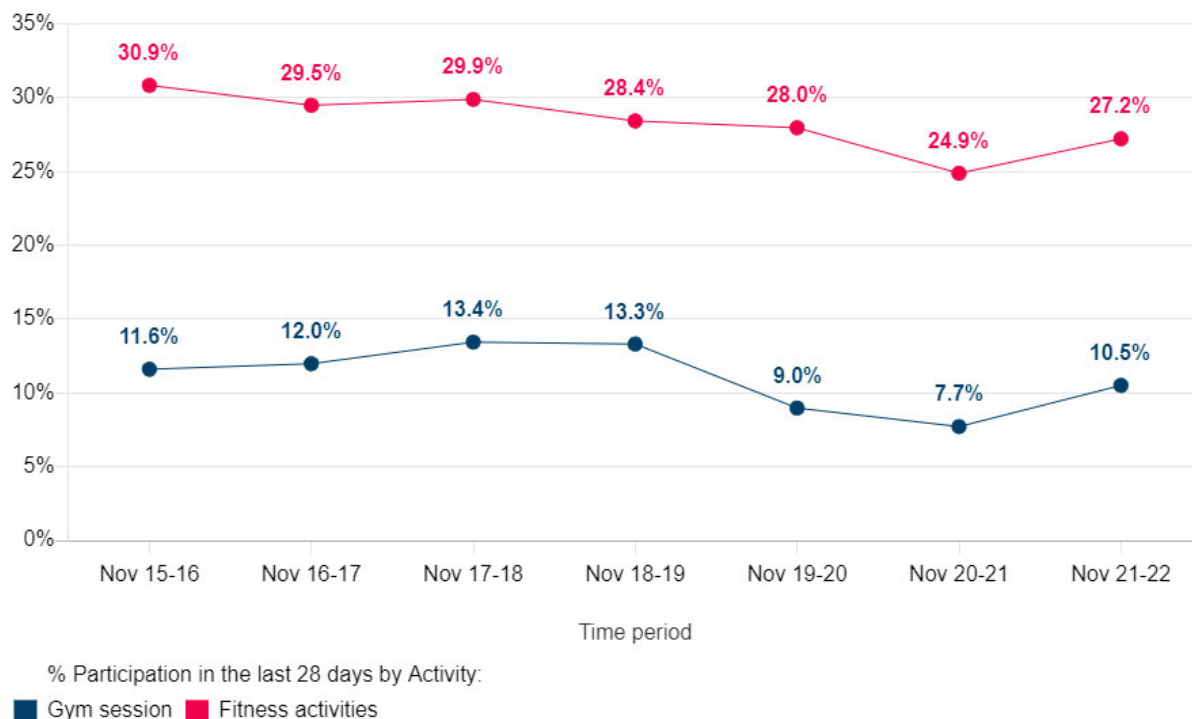
4.33 In Horsham District however, The Bridge Leisure Centre (Broadbridge Heath, West Horsham) opened in 2018 as the Horsham District Council Built Facilities Strategy was nearing completion. This facility includes a 70 station gym, and the Horsham District Leisure Strategy concluded that this would address the quantitative deficiencies that were identified. Active Places indicates that The Gym Group (Horsham) has also opened since the completion of the Strategy document. As a large facility, offering 120 stations (at budget gym prices), this ensures that the quantitative requirement for health and fitness facilities are now met.

4.34 There remains however a geographical gap in provision in north Horsham District, the area in which Land West of Ifield is located.

4.35 Sport England's Active Lives Survey demonstrates that since covid, health and fitness experienced a decline in participation. Levels of use of gyms are however now starting to return to pre – pandemic levels. Usage trends for both use of the gym and health and fitness activities are demonstrated in Figure 4.1

Figure 4.1 – Usage Trends for Gyms / Health and Fitness (extracted from Sport England Active Lives Surveys)

Participation in the last 28 days by activity
At least twice in the last 28 days



4.36 Analysis by Local Authority suggests that participation is much higher in Horsham than in Crawley (with 10% of residents using gyms in Horsham compared to 6% in Crawley, but that the same trends are evident in both areas). With participation starting to return to normal, demand may increase, however with a decline since the strategies were produced, there is no clear evidence of a requirement for additional facilities with unmet demand now met, outside of the need to provide access to facilities within the immediate locality of the site.

4.37 The provision of additional health and fitness facilities is therefore of lower priority than outlined in the two facility strategies, given the additional provision that is now evident. That said, consultation with Horsham District Council noted that there remain accessibility gaps, and that the inclusion of health and fitness facilities within the facility mix would improve the sustainability of any local leisure centre.

Studios

4.38 Although the Horsham District Council Built Facilities Strategy does not specifically identify a requirement for additional studios, the Crawley Borough Council Strategy recognises the increasing role that these facilities are playing in meeting demand for health and fitness, and highlights that opportunities to increase the supply of such facilities should be taken.

4.39 Consultation reported that the use of studios has increased in recent years, with activities held in studios and halls becoming more popular. This reflects the changes in the way that people participate in sport, with health and fitness and associated classes gaining in popularity.

4.40 As a result, the provision of studios within the public leisure centres has increased and these consultation demonstrates that facilities in both local authority areas are heavily used. Studios in all of the Council owned leisure centres are now very busy. At the Pavilions (Horsham District), where studio space is more limited, there are regular requests for access to such a facility.

- 4.41 Statements reflecting the need to provide additional facilities to meet the needs of the growing population therefore continue to reflect current priorities.

Indoor Tennis

- 4.42 Both Leisure Strategies highlighted the requirement for new indoor tennis courts, with Horsham District identified as a priority (in both documents). No additional bespoke facilities have been provided.
- 4.43 Consultation with the LTA therefore confirms that this need still exists, but that the priority area for the delivery of a new facility is Horsham Town or south of this. It is understood that discussions are at advanced stage for delivery of this facility in conjunction with alternative development sites and this will result in no unmet demand remaining. This was echoed during consultation with Horsham District Council.
- 4.44 The identified need within the strategy documents to provide indoor tennis facilities are therefore no longer considered relevant for Land West of Ifield.

Indoor Bowls and Squash

- 4.45 Both strategies indicated that there was no identified need for additional indoor bowling facilities, with focus instead on maintaining existing facilities.
- 4.46 Horsham and District Indoor Bowls facility is understood to remain fit for purpose. There are no known capacity issues at this site currently. The clubs website demonstrates that there are memberships available, as well as opportunities for public pay and play.
- 4.47 Similarly in Crawley, Gratton Indoor Bowls and K2 both continue to operate indoor bowling and also have spare capacity for new members and / or pay and play.
- 4.48 There is therefore no clear evidence of additional demand for indoor bowling and the position set out in the strategy documents, which requires no additional facilities, remains relevant.

Other Views of Horsham District Council on Indoor Sports Facilities

- 4.49 In addition to understanding the views of the Council on sport specific issues, consultation with Horsham District Council also raised other priority issues, specifically:
- There is also a need to ensure that the management and future maintenance of any facilities is planned effectively, to ensure that facilities are sustainable. The Council does not wish to take on management of any facilities, however there may be scope to consider inclusion within the Leisure Contractor portfolio (up for renewal by 2027) should appropriate facilities be provided
 - Facility mix of any new centre is also important. It is suggested that indoor health and fitness facilities should be a key component. Studio space is also the most popular of all facilities within existing Council leisure centres and additional studio space is therefore required / recommended
 - The provision of facilities outside of a school setting should be considered. Whilst there are nearby sports halls etc, it is notable that the majority of these are situated at school sites and therefore opening hours are limited. There are many benefits and significant demand for facilities that are accessible to the local community during the day.

District Wide Facilities Assessment

- 4.50 The Horsham District wide facilities assessment evaluates the adequacy of community facilities. Community facilities are defined as public buildings available for individuals or groups to hire on a regular basis, including leisure facilities, community centres, parish halls and sports clubhouses. Section 1.1 of this document notes that the identified needs are separate from those identified in the Indoor Built Facilities Strategy.
- 4.51 The assessment evaluates needs on a settlement by settlement basis, considering the role that larger sports halls can play as well as small facility requirements. It applies 1km to 3km catchments to these facilities.
- 4.52 It notes however that there are no definitive quantity standards as to what level of community facilities are expected or required. Quality also has a bearing on the adequacy of provision.
- 4.53 Whilst the assessment explores the adequacy of provision on a localised settlement by settlement basis, it also considers the future demand for facilities. With specific regards to Land West of Ifield, it notes that community facilities equivalent to 369.6m² are required.

Summary of Needs – Indoor Facilities Position Statement

- 4.54 Table 4.2 therefore summarises our interpretation of the facility needs drawing upon the existing leisure strategy, District Wide Facilities Strategy and the updated position statement. It outlines where deficiencies exist that still need to be addressed and highlights where capacity may remain insufficient to meet future demand.
- 4.55 The implications and options for Land West of Ifield are reviewed in Section 6, in the context of the specific impact of the proposed development. The key findings set out in Table 4.2 therefore directly inform the sports strategy.

Table 4.2 - Summary of Indoor Facility Position

Facility Type	Existing Position in Horsham / Crawley Strategy	Updated Consultation	Impact
Sports Halls	<ul style="list-style-type: none"> No further requirement in Horsham, although needs for netball, cricket, table tennis identified Additional provision required to meet needs of Crawley population, particularly given the growth anticipated (up to 10 courts) Land west of Ifield served by facilities in Crawley (outside of catchment for Horsham facilities) – where there is a deficiency IDP suggests two court hall is required 	<ul style="list-style-type: none"> Additional sports hall provision now provided in vicinity of Land West of Ifield ECB and Sussex Cricket Board confirm ongoing need for cricket facilities Some localised demand identified for basketball, volley ball also evident No identified requirement for badminton 	<ul style="list-style-type: none"> Potential requirement to provide new sports hall to address identified deficiencies
Swimming Pools	<ul style="list-style-type: none"> Both strategies identify deficiency in water space Up to 6 lane pool required 	<ul style="list-style-type: none"> Some additional provision since strategy documents produced in Horsham District. This negates quantitative shortfall in this district, but both pools are located in South Horsham and therefore limited impact in terms of catchment areas. 	<ul style="list-style-type: none"> Potential requirement for new swimming pool to meet identified deficiencies

Facility Type	Existing Position in Horsham / Crawley Strategy	Updated Consultation	Impact
		<ul style="list-style-type: none"> Swim England analysis demonstrates that there is a significant deficiency in the vicinity of Land West of Ifield No additional provision in Crawley suggests that projected deficiencies still exist in this area. Any new pool should be flexible to support leisure and recreational opportunities 	
Community Halls / Studios	<ul style="list-style-type: none"> Both strategies emphasise the importance of ensuring provision keeps pace with population growth 	<ul style="list-style-type: none"> Existing facilities at capacity and in high demand. Aspiration for additional provision 	<ul style="list-style-type: none"> Potential requirement for additional studio provision
Health and Fitness	<ul style="list-style-type: none"> No requirement for additional facilities in Crawley Small unmet demand in Horsham, but location identified to be Horsham Town / South 	<ul style="list-style-type: none"> Existing facilities well used, some new provision in Horsham District since strategy development means that quantitative deficiency is now addressed Consultation with Council highlights the potential benefits of including health and fitness facilities for commercial reasons Expectation that additional provision is also necessary to ensure that facilities keep up with population growth 	<ul style="list-style-type: none"> No clear demand for health and fitness provision based on current need Consultation with Council highlights benefits of providing additional facilities in terms of income at leisure hub
Squash	<ul style="list-style-type: none"> No additional demand identified 	<ul style="list-style-type: none"> Position in strategy understood to remain accurate 	<ul style="list-style-type: none"> No clear demand for new squash courts based on current need
Indoor Bowls	<ul style="list-style-type: none"> Some unmet demand based on modelling, but analysis of facilities in both areas suggests no additional requirement 	<ul style="list-style-type: none"> No update. Position in strategy understood to remain accurate 	<ul style="list-style-type: none"> No clear demand for new indoor bowls facilities based on current need
Indoor Tennis	<ul style="list-style-type: none"> Unmet demand in both Crawley Borough and Horsham District Strategy identifies deficiencies in Horsham as being of greater priority 	<ul style="list-style-type: none"> LTA confirm that requirement for indoor facilities continues to exist, but that this is likely to be delivered by an alternative developer in Horsham Town or to the south of the district Council also confirm that there are no additional requirements for indoor tennis 	<ul style="list-style-type: none"> No clear demand for evident demand to be met at Land West of Ifield
Specialist Facilities	<ul style="list-style-type: none"> Demand for gymnastics facilities identified in both authorities IDP suggests Horsham facility to be delivered in town or to south of district Facility for Badminton required (Horsham) Facilities for cricket (both authorities) 	<ul style="list-style-type: none"> Gymnastics facility to be delivered south of Horsham Town Centre No clear evidence of facility for badminton requirement. NGB indicate greater need to South of Borough. New sports hall at The Bridges also meets this need. 	<ul style="list-style-type: none"> Gymnastics facility for needs to be met in Crawley – no on site requirement Badminton facility now delivered – no clear on site requirement Cricket need remains in both authorities to be considered
Community Facilities	<ul style="list-style-type: none"> Assessment identifies requirement for 369m2 at specific development site 	<ul style="list-style-type: none"> No update 	<ul style="list-style-type: none"> Requirement to consider this (to be evaluated further in Section 6)

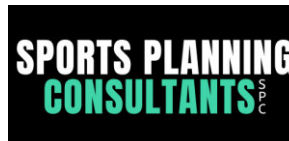
5. Outdoor Sports Facilities

Understanding the Current Position

- 5.0 This section considers the current position for outdoor sports facilities in the vicinity of Land West of Ifield. It draws upon the Playing Pitch and Outdoor sports strategies that have been prepared in both Horsham and Crawley.
- 5.1 As was the position with indoor sports, the location of the proposed site means that issues relating to both authorities are relevant, given the amount of cross boundary movement that takes place.
- 5.2 Table 5.1 therefore summarises the key issues identified in the two Playing Pitch Assessments and Strategy documents and the facility recommendations that were set for each sport.
- 5.3 In brief, the key issues emerging are:
- For football, a similar picture emerges in both Horsham and Crawley. Whilst there is significant overlap on youth football pitches, there is adequate capacity in the remaining pitch stock to meet current demand for football. Deficiencies are however projected in future years
 - Added to this, additional 3G AGPs are identified as being required to meet current as well as future demand (8 across Horsham District and 4 in Crawley in the life of the strategy). Overall for football, both strategies prioritise qualitative improvements and the provision of additional AGPs, but also highlight the pressures that the existing grass pitch stock is under
 - There is spare capacity for cricket in Horsham when taking into account both grass and NTP usage. In Crawley however supply is more tightly balanced with demand. Whilst there is no clear aspiration for new cricket provision in Horsham therefore (with recommendations focusing on qualitative improvements and non turf provision), there is requirement for new provision arising as a result of demand in Crawley
 - Overall there is adequate capacity for rugby union. When considering just club needs however, there is overplay on some club bases and on others supply is closely matched with demand. The strategies both identify a need to improve quality in order to increase capacity, and also highlight the role that 3G AGPs can play in supporting rugby as well as football
 - Whilst there is spare capacity for hockey, facilities are not necessarily in the right place to meet demand – a requirement for a new home base for Horsham HC is therefore identified within the Horsham District Council Strategy. There are also capacity pressures for hockey identified in Crawley.
- 5.4 It is clear therefore that there are some pressures on the existing infrastructure for outdoor sport. Both strategies clearly highlight that these issues will be exacerbated by the proposed new housing development and population growth that will occur. The specific impact of proposals at Land West of Ifield will be considered in Section 6.
- 5.5 As set out in Section 1, golf is dealt with in separate documents and is consequently also outside of the scope of this report. Analysis relating to golf is therefore not included in this section.

Table 5.1 – Understanding the Current Position - Outdoor Sports Facilities

Facility Type	Horsham District PPS – Key Findings	Crawley Borough PPS – Key Findings
Football	<ul style="list-style-type: none"> 81 sites and 283 teams, the majority of which are adult and youth football age groups Both supply and demand higher in Horsham Sub area than other parts of the District Pitch quality is standard overall Districtwide, there is spare capacity, although there are pressures on youth 11v11 and 5v5 pitches In Horsham sub area however, there is significant overplay on youth 11v11 pitches, with a deficit of 24.75 MES in future years. There is some spare capacity on other pitch types Demand for additional 3G AGPs also identified - 8 additional pitches needed by 2031. Modelling suggests that the largest deficits of 3G AGPs are in the north of the district Scenario testing demonstrates that even if all football sites are considered to have security of tenure, there will remain deficiencies in provision Some capacity within the existing pitch stock to reconfigure some adult football pitches. If this was done alongside securing all sites, there would be just enough football pitches <p>Key Recommendations</p> <ul style="list-style-type: none"> Protect existing facilities and develop further capacity through maintenance and new AGPs Ensure sites offer community use and secured access Reconfigure adult pitches to youth 11v11 and 7v7 to 5v5 pitches to address existing deficits Provision of additional 3G AGPs – the strategy overtly recommends two new pitches, including Chennells Brook (NE Horsham). Additional pitches however required to meet need Improve maintenance at key football sites to eliminate risk of reducing quality Engagement with FA / FF pitch maintenance programme <p>Site specific recommendations in the Horsham sub area include;</p>	<ul style="list-style-type: none"> 79 pitches on 36 sites. 31 sites available to the community 165 teams, the majority of which are youth football / mini soccer. Pitch quality is poor Overall, across the Borough there is a small amount of spare capacity (8 MES). There are however deficits of youth 11v11 football (11.5 MES) and mini football pitches. The assessment notes that the current surplus of adult pitches is sufficient to offset the deficit of youth pitches. There is projected to be a future deficit of 18.5 MES (youth) and a deficit of 3.5 (youth 9v9). There will also be inadequate pitches for mini football. The deficits are primarily attributed to a lack of pitches although poor quality also influences these figures. With just two existing 3G pitches, the strategy identifies a deficit of 3. Future demand will increase this deficit to 4. <p>The strategy therefore identifies insufficient provision.</p> <p>The key Recommendations</p> <ul style="list-style-type: none"> Provision is added in line with population growth Provide smaller mobile goals on adult pitches to maximise functionality Identify at least two new 3G AGPs – listed sites include Jubilee Field, Holy Trinity Church of England School, Tinsley Lane Improve maintenance Focus on reconfiguration of adult provision to offset current deficit of youth provision Improve pitch quality New developments must use PPC to determine contributions. Where demand is for more than 50% of pitch, land is required for full pitch.



Facility Type	Horsham District PPS – Key Findings	Crawley Borough PPS – Key Findings
	<ul style="list-style-type: none"> Poor pitches requiring improvement - Beech Road, Bennetts Field, Jubilee Fields, Millais School, Needles Recreation Ground Other pitches requiring improvement – Horsham Park, Sussex Football Academy Broadbridge Heath Leisure Centre – potential 3G, unsecured access 3G AGP – Chennels Brook, Horsham YMCA, Jubilee Fields, Overplayed – Hills Farm Lane (improve capacity) New provision – redundant pitches at Jubilees Field Secure community use – Leechpool Lane School, Richard Colyer School, Forest School Reconfigure – Redford Avenue, Rusper Recreation Ground <p>The majority of actions therefore focus on improving quality to increase capacity and providing new 3G AGPs. There are no specific recommendations in relation to Land West of Ifield, but new playing fields are required at two strategic housing sites in the adopted local plan – North Horsham and Kilnwood Vale.</p>	
Cricket	<ul style="list-style-type: none"> Large cricket presence in the District – 32 sites of which 29 are available to the community. Only one site has unsecured use Majority of pitches of standard quality (10 good) so scope for improvement High demand with numerous large clubs Spare capacity to meet current demand. Analysis of future supply shows that installation of NTP will create adequate spare capacity. If all cricket was played on grass wickets however there would be overplay of 112 matches by 2031. <p>Key Recommendations</p> <ul style="list-style-type: none"> Protect all designated cricket sites Improve security of tenure Invest in NTP Invest in ancillary facilities Work with Sussex Cricket Foundation to improve participation in women and girls cricket <p>Site specific recommendations in the Horsham area include;</p> <p>Roffey Cricket Club – address drainage issues</p>	<ul style="list-style-type: none"> 13 grass cricket squares on 11 sites. Eight of these sites are managed by the local authority 51 teams playing in the Borough spread across 9 clubs. Some exported demand to neighbouring areas Condition of facilities is adequate, but scope for improvement with high proportion of sites achieving standard scores No spare capacity at peak time. Ifield Green, Maidenbower Park, Three Bridges CC and Tilgate Playing Fields are overplayed. The assessment reports a seasonal deficit of 29 MES currently, rising to a future position of 310 MES shortfall. The assessment reported that Sussex Cricket Board projections suggest that shortfalls could grow up to 374 MES. The shortages in provision mean that opportunities to provide additional cricket facilities were explored at Gratton Park and Forge Wood. Scenario modelling demonstrated that provision at both of these sites would reduce deficits by 100 MES (to 210). There would therefore remain deficiencies <p>Key Recommendations</p> <ul style="list-style-type: none"> Protection of existing sites Improvement to ancillary facilities

Facility Type	Horsham District PPS – Key Findings	Crawley Borough PPS – Key Findings
		<ul style="list-style-type: none"> Investment into maintenance Improvement of NPT sites Identification of new sites for cricket
Rugby Union	<ul style="list-style-type: none"> 15 senior and 14 junior pitches, as well as 3G WR 22 Compliant 3G AGP Five rugby clubs operating in the Borough Calculations suggest provision is adequate, Taking into account just club sites, there are 7.5 MES available. Inclusion of all sites shows an overall surplus of 3.5 MES Pitches at Pulborough Rugby Club are overplayed (2.5), whilst The Holbrook Club, Barns Green RFC and Steyning RFC have a small amount of capacity. Horsham RFC play at the Coolbrook Ground and benefit from the 3G AGP. The Holbrook Club (Holbrook RFC) is the nearest site to the proposed development. <p>Priority Recommendations</p> <ul style="list-style-type: none"> Protect all rugby pitches Continue maintenance regimes at education sites Support Pulborough RFC with floodlighting Provide floodlighting at educational and Council sites to improve capacity Improve floodlighting, drainage and maintenance regimes Provide new 3G At Horsham RFC (now delivered) <p>Site specific recommendations include;</p> <ul style="list-style-type: none"> Protect the Holbrook Ground from development. Improve clubhouse. Support Horsham RFC in management of AGP Pulborough RUFC – install floodlights and extend changing rooms Secure access to Steyning Grammar School for rugby club 	<ul style="list-style-type: none"> 6 rugby union pitches accommodating the two rugby clubs – Crawley RFC and St Francis RFC. There are 2 other rugby pitches that aren't used for community activity. Both club sites have quality issues - drainage issues identified at Southgate Playing Fields and Willoughby Playing Fields, maintenance issues The assessment identifies that there is substantial overplay of pitches There is also a lack of floodlit capacity Scenario modelling demonstrates that improvements to maintenance and drainage would just address concerns at Willoughby Fields, but the future position at Southgate Playing Fields would still be one of shortfall even maintenance and drainage ratings were maximised. The potential creation of a 3G WR 22 Compliant AGP is highlighted as a key mechanism for increasing capacity. <p>Key Recommendations</p> <ul style="list-style-type: none"> New floodlit provision is required Facilities require upgrade Drainage is installed New 3G provision is provided, potentially in conjunction with football
Hockey	<ul style="list-style-type: none"> Seven existing full sized AGPs – 2 poor and 5 standard. Poor facilities are located at Millais School and Billingshurst Leisure Centre Three hockey Clubs in the District. Horsham HC are the largest club and have numerous teams. As a consequence they require access to more than one pitch 	<ul style="list-style-type: none"> There are three sand based AGPs all of which are suitable for hockey Crawley HC are based in the Borough, whilst Horley HC imports some demand into Crawley. Crawley HC also exports demand due to a lack of adequate capacity

Facility Type	Horsham District PPS – Key Findings	Crawley Borough PPS – Key Findings
	<ul style="list-style-type: none"> Club activity is spread across numerous pitches (with Horsham HC using 5 sites). – Tandridge House School is at capacity at peak times, Steyning Grammar School is reaching capacity Enough capacity if all provision is secured. <p>Key Recommendations</p> <ul style="list-style-type: none"> Refurbish Billingshurst Leisure Centre, Millais School, Steyning Grammar School, Tanbridge School Protect Bluecoats Improve ancillary facilities at Tanbridge School 	<ul style="list-style-type: none"> Only one pitch at Healthy Balanced Generation (Oriel) is secured for community use. There is overplay at Hazelwick School (caused in part by demand for football) and facilities at both Ifield College and Oriel School are in poor condition and require refurbishment. Scenario modelling infers a need for two pitches overall in the Borough. <p>Key Recommendations</p> <ul style="list-style-type: none"> Protect all sites for hockey Establish long term community use agreements Mitigate loss of any change of surface that takes place Provide appropriate ancillary facilities Ensure appropriate access to pitches for hockey clubs Direct football demand to 3G sites.
Bowls	<ul style="list-style-type: none"> Analysis of bowling greens included in Built Facilities Strategy There are eight greens, all of which are in average to good condition Facilities are well distributed except for North West and central area No clear requirement for additional greens identified 	<ul style="list-style-type: none"> There are four sites providing five greens, At least one green offers spare capacity. The assessment concludes that additional provision may be required to meet demand, but that further feasibility work is required to understand this.
Tennis	<ul style="list-style-type: none"> Analysis of tennis courts is included in Built Facilities Strategy 10 venues for outdoor tennis, all of which are club sites. Seven out of ten of these facilities offer pay and play as well as club membership All courts in good condition, with many having had recent investment Courts are well distributed No demand models for tennis – so no indication of capacity provided 	<ul style="list-style-type: none"> There is adequate accessible capacity for tennis in Crawley, with existing sites under capacity for registered members. The quality of provision is however poor Parks provision is of limited quality

- 5.6 Table 5.1 therefore indicates that there are many pressures on the existing infrastructure in relation to outdoor sports facilities. The strategies also clearly indicate that growth will exacerbate these issues (and the specific impact of the proposed development at Land West of Ifield will be considered later in this section).
- 5.7 The Horsham District Playing Pitch Strategy is however now considered out of date, and the Crawley Borough strategy is also nearing the end of its lifespan.
- 5.8 The remainder of this section therefore draws upon the findings of consultation as well as additional research to provide an updated picture for each of the outdoor sports facility types. We have then sought to determine the impact that this may have on the validity of the recommendations of the strategy document and the subsequent requirements for Land West of Ifield.

Football

- 5.9 Both Playing Pitch Strategies presented similar pictures for football, identifying pressures on youth football pitches (11v11) and a lack of capacity for 5v5 football.
- 5.10 Insight into recent participation trends provided by the Sussex FA reveal that:
- The number of teams in Horsham District has increased since the 2017 PPS – at this time 283 teams were recorded. Affiliation data available in 2023 suggests that there are now 330 teams playing in Horsham District. This represents a 14 % increase. The PPS does not break down the spread of play in different age groups, but does note that the majority of teams are senior / adult teams. In 2024, just 28% of teams play 7v7 or 5v5 football, suggesting that the high demand for youth and senior football pitches continues
 - The most up to date available affiliation data for Crawley Borough records a total of 175 teams – again this represents a 9% increase on the amount of teams that were evident at the time of the 2021 PPS
 - Participation is understood to be growing significantly in Horsham again, with increases in all forms of the game now taking place
 - Women and girls football is also a key growth area, and participation is expanding across Sussex, placing additional pressures on the existing infrastructure.
- 5.11 The above therefore suggests that demand has increased significantly since the PPS were produced, with an extra 57 teams playing across the two areas. This means that much of the future growth projected by the two strategies has already been realised. The demand for pitches is therefore higher now than it was at the time of the PPS and the issues presented relating to the adequacy of facilities to meet current demand are exacerbated.
- 5.12 Although participation is known to have increased (particularly in Horsham District), few changes are understood to have taken place to the facilities stock in terms of additional grass pitches. It is known that 2 new adult grass pitches will be provided as part of the North Horsham development (Mowbray) but these are not yet available.
- 5.13 Since the production of both strategies, The FA / FF have introduced the Grass Pitch Maintenance Fund, and this has been instrumental in improving pitch quality across the country, and consequently the capacity of grass pitches. Some clubs in Horsham and Crawley have received funding to support grass pitch maintenance since the PPS were developed, but there remain improvements that are required across many sites. Equally, consultation with the FA demonstrates that any improvements that have been undertaken are unlikely have such a substantial impact that the resulting capacity improvements they eliminate the shortfalls that were identified, particularly given the increased participation that has been identified.

- 5.14 Consultation with Horsham Council confirms this, noting that there are regular concerns about the quality of grass pitches during the summer months, particularly due to the presence of clay soils, which create poor pitch conditions resulting in multiple cancellations.
- 5.15 It is therefore considered that the identified pressures on grass pitches remain. As the population grows, there will remain insufficient grass pitches to meet demand in both Horsham and Crawley.
- 5.16 While both strategies seek to develop capacity to accommodate additional demand on grass pitches through investment into quality and 3G pitch provision, there are no clear recommendations for new grass pitches. Both assessments do however articulate the impact that population growth will have and the specific impact of the proposed development will therefore be considered in Section 6.
- 5.17 Instead 3G pitches are viewed as the key vehicle for addressing the deficiencies in the area, and as a consequence, both the Horsham and Crawley PPS identified the need for additional 3G AGPs to support both match play and training demand.
- 5.18 The Horsham District Local Football Facilities Plan reports gaps of 3G AGPs in the west, north and central of the authority and names 9 potential locations to deliver the PPS – Jubilee Field, Southwater Sports Club, Christs Hospital School, Roffey FC (Chennells Brook), Broadbridge Heath, Steyning Grammar School, Horsham YMCA FC. 3G AGPs are also earmarked for development sites at North Horsham and Kilnwood Vale. Both Kilnwood Vale and North Horsham are located in close proximity to the proposed development site.
- 5.19 The Crawley Borough Local Football Facilities Plan highlights proposals to create 3G AGPs at Three Bridges FC, as well as Crawley Town Foundation.
- 5.20 Since the strategies were developed:
- Two sand based AGPs at Oriel School and Ifield Community College have been converted to 3G AGPs. These have been added to the FA 3G pitch register and consequently are accredited for use for both match play and training. This has increased the availability of 3G pitches in Crawley and reduced the deficit from four (taking into account future demand) to two pitches. Three Bridges FC have applied to the Football Foundation to convert their stadium grass pitch to 3G and a decision is expected shortly on this. Oakwood FC have also achieved planning permission for a 3G, but the project has not progressed as yet. This suggests that there will remain limited unmet demand in Crawley for 3G AGPs.
 - No additional 3Gs have been developed in Horsham District since the production of the PPS, which identified a deficiency of 8 AGPs (although recommendations only explicitly sought to deliver 2 pitches, citing land availability). Consultation with the FA confirms that progress on the delivery of these pitches is now evident. Horsham YMCA FA have recently been granted planning permission and are now working on the delivery of the pitch (including funding). It is also anticipated that Land North of Horsham will provide a 3G AGP. This is anticipated to be in partnership with Roffey Football Club. The PPS identified a requirement for a new 3G AGP at Chennells Brook to support this club, however it is understood that this may now be delivered at Land North of Horsham instead.
- 5.21 There therefore clearly remains a requirement for additional AGP, particularly in Horsham District but also to meet needs in Crawley.
- 5.22 Further support in relation to the requirement for 3G pitches was given by the Football Foundation who used affiliation data to map the location of existing clubs, based on their home ground for matches.
- 5.23 This analysis is illustrated in map 5.1. It demonstrates that the majority of clubs are located in Horsham Town itself, or within Crawley Town. There are few existing clubs in close proximity

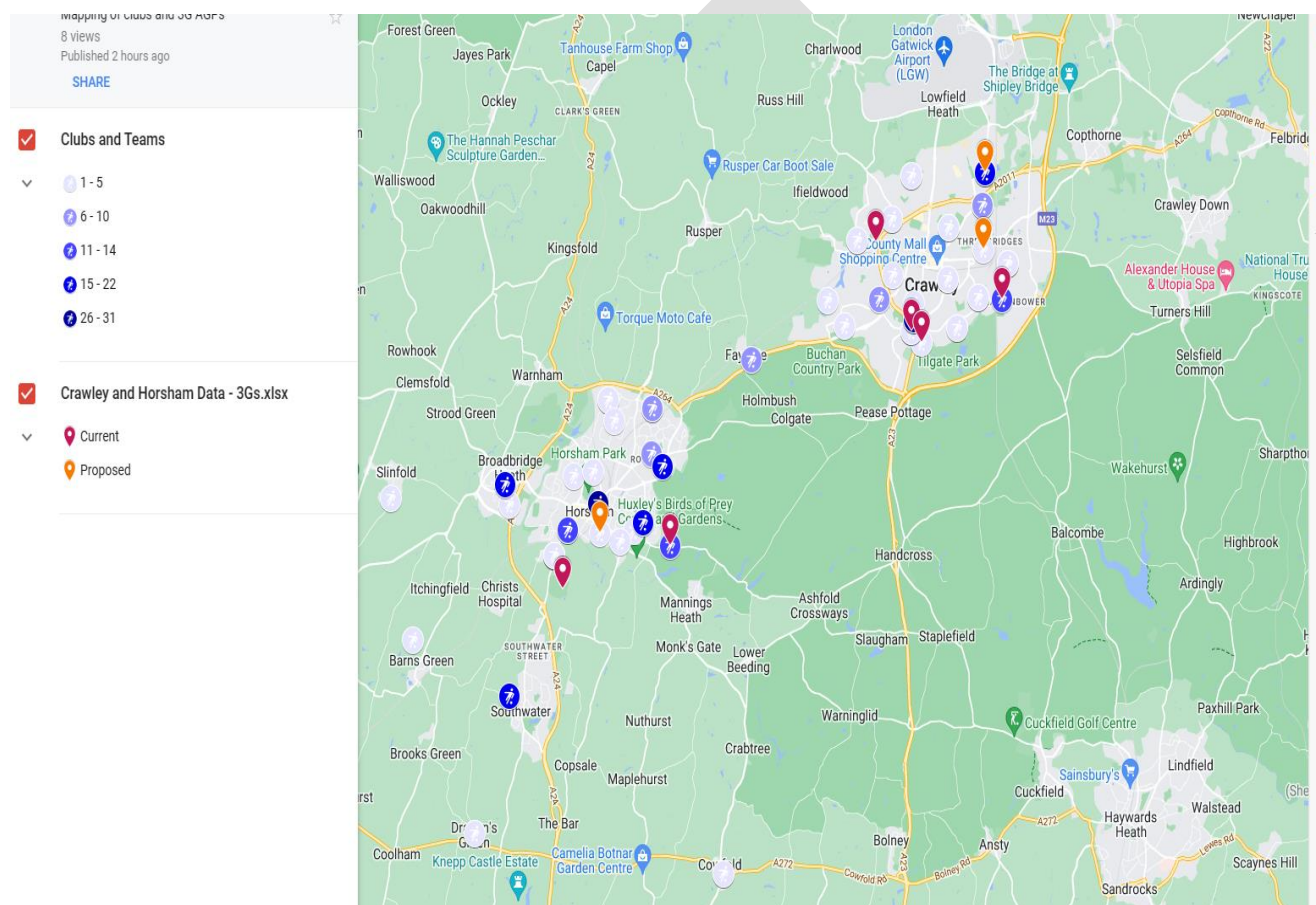
to Land West of Ifield. Clubs are however traditionally willing to travel to reach a 3G AGP and this is particularly the case in areas of deficiency.

5.24 The clubs that are located in the closest proximity to Land West of Ifield are predominantly single team clubs (or clubs with two teams). The nearest larger clubs, based upon this data, are:

- Ifield Sports Youth (4 teams)
- Faygate United (6 teams) – train at Faygate Playing Fields (grass)
- Haywards Heath Town Youth (3 teams) – club have 3G training facility at home ground.

5.25 Ifield Sports Youth and Faygate United therefore represent potential users of any new 3G AGP.

Map 5.1– Location of Existing Clubs



5.26 With two of the existing three AGPs in Crawley Borough located to the west of the town, including the pitch at Ifield Community College, which is in the immediate vicinity of the proposed development site, this suggests that Land West of Ifield may have a limited role to play in meeting the remaining unmet demand in Crawley.

5.27 There is more limited provision in Horsham District however and it is in this area where the highest existing deficiencies exist. The two existing AGPs are both to the South of the town, whilst the proposed facility at Horsham YMCA will be centrally located. There is therefore limited provision to the north, and consequently remaining unmet demand, although it is understood that a new 3G will be created as part of development proposals at Land North of Horsham.

- 5.28 It is clear therefore that across the two authorities, there remains unmet demand for 3G AGPs. Consultation with Horsham District Council confirms that the provision of additional 3G AGPs remains a strategic priority for the Council.
- 5.29 They indicate that despite the new provision in the vicinity of Land West of Ifield, particularly when taking into account the impact of the new development, further 3G pitches are still deemed to be required in the area. This will be considered alongside the specific impact of the proposed development in Section 6.
- 5.30 In the absence of detailed accurate recalculations, the picture presented in the PPS for football is therefore thought to remain accurate. There is a clear need to provide additional capacity to meet both current demand and population growth. It is expected that much of the additional capacity will be met through 3G pitches, but that further grass pitches will also be required to meet population growth. The continued increases experienced in football participation is likely to exacerbate demand further.
- 5.31 It should be noted that The FF / FA highlight the need for updates to the existing PPS documents to be undertaken in order to ensure that the position can be understood with some certainty.

Rugby Union

- 5.32 The PPS documents for both local authority areas identified some quality and quantitative issues. Consultation suggests that this picture is deemed to remain broadly accurate.
- 5.33 Across the two local authority areas as a whole, participation in senior rugby struggled after covid, and there has since been a flat recovery, with the smaller clubs continuing to struggle to regain participants. As such, the smaller clubs in both Horsham and Crawley continue to focus on player retention and growth. As larger clubs however, Crawley RUFC and Horsham RUFC are now seeing increasing player numbers.
- 5.34 At the time of the finalisation of the Horsham District strategy document, Horsham RUFC, partnership with the RFU created a WR 22 Compliant 3G AGP. This significantly improved the capacity in the Horsham area. Improvements were also made to the ancillary provision, with a new changing block (which was then extended again), improvements to social space and car parking. These improvements however generated significant increases in participation, and the club now run a full spectrum of both male and female participation. The high participation means that even with the additional capacity that the AGP provides, the club's facilities are at capacity, and indeed improvement works are needed to grass pitches to improve the playability of these pitches.
- 5.35 Whilst Horsham RUFC are now blessed with high quality facilities, Crawley RUFC continue to experience the capacity pressures at their site that were highlighted in the PPS. One of the floodlit pitches in particular is unusable for the majority of the season and the remainder of the pitches would all benefit from improvement. In addition, the condition of the ancillary facilities is also inhibiting club growth and development. The conversion of two sand based AGPs in Crawley to 3G (one of which includes a rugby shock pad) has helped to address some of the club's capacity issues, but the challenges remain. Improvements to facilities to improve capacity and to ancillary facilities to maximise the abilities of the club to accommodate a wide range of rugby activity therefore remain the RFU priorities.
- 5.36 The ethos of rugby clubs means that clubs would prefer to accommodate all activity at, or in close proximity to, their own base - and ensuring the ongoing adequacy of provision at the club bases therefore remains the ongoing key priority for rugby clubs. Whilst there are capacity pressures particularly at Crawley RUFC therefore, it is suggested that the direction of the two existing strategies remain accurate - works to increase the ability for rugby to be accommodated at current club bases are of greater priority than new provision.

5.37 It is clear therefore that whilst the picture for rugby improved since the PPS were developed, there remain improvements that are required if demand is to continue to be met.

Cricket

5.38 The evidence base documents reported capacity for cricket to be broadly adequate in quantitative terms in Horsham District. Whilst most cricket grounds were standard to good quality, the action plan focused predominantly on further qualitative improvements and the provision of NTP to address local capacity pressures. Pitch provision in Crawley was however under greater pressure, with a need for additional provision highlighted to meet short term demand, as well as to provide additional capacity for cricket in the longer term.

5.39 Although participation was strong in both authorities, since the PPS this has increased rapidly. To illustrate this, the Sussex Cricket Board highlight that:

- Cricket is thriving across Sussex as a whole, but the Crawley area is a particular hotbed for cricket. Participation is stronger south of Horsham in Horsham District, and there are more clubs. Residents north of Horsham tend to travel into Crawley to join teams due to a lack of facilities in this part of the district
- Senior cricket remains strong – 11 new teams entered the Sussex Senior Cricket League during season 2023, of which four were based in Crawley
- A new midweek cricket competition has been created – The Sussex Slam. There are circa 120 teams now entering this competition, a high percentage of which are in Crawley and Horsham
- The women and girls game has tripled, and this growth is anticipated to continue. There are now three clubs in Horsham offering cricket for women and girls and scope for many more. This reflects the picture for cricket at a national level, where participation by women and girls is exploding
- Disability cricket is also increasing in popularity across Sussex as a whole, but there is a lack of opportunity in both Horsham and Crawley due to constraints with facilities.

5.40 Participation data received from Sussex Cricket Foundation for the 2024 season suggests that:

- Participation in Crawley has reached 80 senior male teams, 2 female teams, 26 junior teams and 2 junior female teams – 110 teams in total. This represents a significant increase in participation that was evident at the time of the PPS, when 51 teams was recorded. Participation has therefore more than doubled in this area since 2019. Whilst some of these teams are midweek teams (i.e., not teams playing on a Saturday at peak time), the scale of the increase in participation is significant, and likely to have major implications for the adequacy of provision
- In Horsham, there are now 103 senior male teams, and 12 senior female teams. Cricket is also sustainable in the younger age groups, with 81 junior male teams and 17 junior female teams – overall therefore there are 213 cricket teams. The PPS identified 148 teams in 2017, meaning that demand has increased by 31%.

5.41 Clubs in the area are therefore strong and sustainable, but there are now greater pressures on the facility infrastructure due to the number of teams that they are sustaining. Since the two PPS were developed, an extra 124 teams have been created in the area, creating additional demand for both match play and training. In addition, there remain teams exported to other areas, particularly in the midweek league, due to a lack of provision and growth opportunities at some clubs are now becoming restricted.

- 5.42 Despite some improvements to the infrastructure since the PPS were produced, the strong growth in participation means that Sussex Cricket Foundation consider that provision is now inadequate in both Crawley and Horsham and that the PPS do not therefore accurately reflect the current position. The additional facilities provided and the enhanced quality is not enough to offset the growth in participation.
- 5.43 Since the PPS were developed:
- A new cricket ground was developed as part of new development at Kilnwood Vale
 - Sussex Cricket Foundation have invested in NTP in a bid to ensure that clubs that were displaced at the time of the PPS were able to play at grounds closer to home
 - A new cricket ground (with NTP) has been provided at Gratton Park (Crawley)
 - Aspirations to deliver a new ground as part of the Forge Wood development were not realised, however two new teams have already been developed from the new population.
- 5.44 The Sussex Cricket Foundation therefore confirm that the pressures that were apparent in the Crawley PPS are now exacerbated. Ifield Green Cricket Club, the club closest to the proposed development site continues to function at capacity. Whilst some sites in Horsham District do have capacity, the majority of clubs are situated to the South of Horsham, and therefore unlikely to attract players from the proposed development site. By way of example, the Sussex Cricket Foundation note that Roffey Cricket Club, to the north west of Horsham Town, are looking to create additional senior teams but do not have capacity to do so. Equally, the new pitch that was created at Kilnwood Vale is now also fully utilised, with the club entering the Sussex Cricket League in 2020. Unmet demand is therefore reported to exist in the area local to the proposed new development.
- 5.45 The Sussex Cricket Board Strategy, which will shortly be published, provides further detail on the cricket infrastructure. It sets out key recommendations to be actioned across the county. The main recommendations are:
- The provision of more and better quality facilities in urban areas
 - the strategy notes that Crawley is the priority, although there are issues in all urban areas
 - Increased usage of NTPs on local authority sites
 - Secure sites on asset transfer to meet the growing need for second grounds
 - Identify and implement sustainable management models
 - Improved access to indoor facilities
 - Indoor cricket venue identified as a priority in Crawley, as well as Brighton, Littlehampton and Eastbourne
 - Increase capacity and quality of existing club provision
 - Encourage and support provision of NGPs
 - Work with GMA to support role of grounds maintenance in improving capacity
 - Support investment into pavilions
 - Protection of existing sites.
- 5.46 Consultation with Horsham District Council suggests that they are not aware of significant unmet demand for cricket in Horsham District, particularly to the north of the District. It is acknowledged however that the majority of demand for cricket in the vicinity of Land West of Ifield is likely to come from Crawley Borough, where there are significant deficiencies as reflected in the Sussex Cricket Board Strategy above.
- 5.47 The significant and continuing increases that are evident in cricket, alongside the ongoing displaced demand and lack of capacity within the existing infrastructure therefore suggest that the priorities identified in the Crawley PPS (which identified a need for new provision) remain

relevant. The increasing demand since the Horsham PPS was completed means that there may also be a greater focus on new provision in Horsham District.

- 5.48 It should also be noted that reflecting the issues raised in the Built Facilities Strategy, Consultation with the Sussex Cricket Foundation, as well as the Cricket Board Facility Strategy suggests that unmet demand for cricket is not isolated to outdoor facilities and there remains a need for indoor cricket provision across both Crawley and Horsham. There has been little progress on the provision of additional facilities since the facility strategies were developed, and there remain no purpose built facilities and several sports halls of poor quality. The Cricket Board therefore emphasise the facility requirement set out in the two indoor / built facilities strategies to deliver opportunities for indoor cricket as well as grass cricket.

Hockey

- 5.49 The PPS for Horsham District reported hockey usage at several sites across the district, with Horsham HC, the largest club, spread across several sites. If sites that were unsecured for community use were lost, or more than one sand based AGP was converted to 3G, modelling demonstrated that provision would be inadequate. The dispersion of Horsham Hockey Club in particular was highlighted as a key issue and as well as protecting existing sites, the strategy identified improvement to the quality of existing facilities. Similarly, the PPS for Crawley identified a need to protect at least two of the sand based AGPs, and a need to enhance facility quality at the remaining sites.

- 5.50 Since these strategies were developed:

- There have been no changes the pitches that are available in Horsham District. All pitches that were available at the time of the 2017 PPS remain so. Consultation with England Hockey identifies that availability remains a key concern however, with many of the pitches located at independent schools who require access to their pitches on a Saturday, which is peak time for hockey club matchplay. Horsham HC require full access to at least 2 AGPs, but continue to be spread across several sites
- The pitch at Tandridge House School has been redeveloped., improving quality and ensuring ongoing use for hockey in this area
- The stock of facilities has diminished in Crawley - the pitches at Ifield Academy and Oriel High School been converted to a 3G surface. This resulted in the displacement of Horley Hockey Club, who were using the facility at Ifield Academy. The club are now using Worth School (East of Crawley) and Cophorne Preparatory School (north east Crawley) and continue to use their function room and ancillary facilities in Horley (North of Crawley)
- Crawley Hockey Club, in partnership with Hazlewick School, invested in order to improve the surface of the pitch at the school. The club remain based at this site and have a strong community access agreement.

- 5.51 Despite clear improvements for Crawley hockey club, the position for hockey is therefore more perilous than at the time of the PPS, with both Horsham HC and Horley HC struggling for facilities. Consultation with Horsham DC confirms that a new facility for Horsham HC is now a strategic priority.

- 5.52 Consultation with England Hockey confirms that they are currently working alongside alternative developers to provide a new facility for Horsham Hockey Club. It is anticipated that this will be a two pitch site located centrally in Horsham. If this aspiration is not realised however, there will remain unmet demand for hockey in the District. The location of Land West of Ifield to the north of Horsham (rather than central) means that it is not considered appropriate for the club to fully relocate to this site and create a two pitch venue (as they need to retain a presence in Horsham) and one pitch would therefore be sufficient in this eventuality.

- 5.53 The recently produced Reigate and Banstead Playing Pitch Strategy seeks to deliver a new sand based AGP to accommodate the needs of Horley HC. If achieved, this would mean that

there would be no demand from this club for additional provision. There is however currently no site identified and no clear mechanism for delivery of such a facility and consequently unmet demand in Crawley.

- 5.54 The above therefore suggests that there is potential that the needs of hockey clubs will be addressed through other schemes, but that at the current point in time, there are greater issues evident than those raised in the PPS.
- 5.55 Notably, Horsham District Council echo the views of England Hockey that there is a priority need to identify a new home for Horsham Hockey Club. It was agreed however that Land at West of Ifield does not necessarily represent the best location for the club. Provision of sand based AGPs are however considered an essential sports development tool and the Council would support any opportunities to provide a sand based AGP on a school site.
- 5.56 Added to this, consultation with England Hockey highlights an aspiration that any new school will be supported by a sand based AGP. This is a key part of England Hockey's new strategy, which seeks to promote hockey in primary schools and early secondary school years and facilities are therefore required to deliver this. England Hockey emphasise the multi-sport opportunities that are provided by sand based AGPs. They emphasise that the location of a sand based AGP as part of a community hub but outside of the school base would have more limited benefit for hockey and would raise questions around sustainability. England Hockey preference therefore is for a sand based AGP to be provided as part of the new secondary school. Again, early consultation with Horsham District Council expressed support for this approach.

Tennis

- 5.57 The Open Space, Sport and Recreation Review also provides updated analysis on tennis courts from the 2017 PPS. It notes that:
- There is a strong club based infrastructure in Horsham
 - The parks infrastructure is more limited, with just one park in the district. No specific facility related issues were identified, with provision appearing adequate.
 - There are no tennis courts in the Ruser Sub Area (the area in which the proposed development is located). The closest facilities are located in Horsham (4). Facilities in Horsham include Forest School, Horsham Sports Club, The Holbrook Club and Horsham Park.
 - A one mile walking distance catchment is recommended, with a 20 minute drivetime also considered. The proposed development site is outside of the walk time catchment, but within a 20 minute drivetime catchment.
- 5.58 The Crawley Borough Strategy emphasised the poor quality of facilities in the parks sector, and the low membership that was evident in clubs.
- 5.59 Consultation with the LTA demonstrates that since these strategies were produced, participation has increased, and affiliation data for all clubs in the vicinity of Land West of Ifield evidences that clubs are now experiencing growth in membership. Of the clubs in closest proximity to Land West of Ifield:
- Ifield LTC have two recently refurbished courts and run junior coaching as well as senior activity. There is a small amount of capacity but membership is growing. There is little scope for growth as the site is in the grounds of the community centre
 - Crawley LTC has growing membership that is now reaching capacity. The site is landlocked and has no space to expand
 - Ruser Tennis Club has only one playable tennis court that is in poor condition and limited scope to increase membership

- The Holbrook Club have 3 courts (not floodlit) but again limited scope to expand activity as membership is increasing.
- 5.60 It is clear therefore that demand has increased for tennis since the PPS were developed. In part this is due to population increases, but also due to greater engagement with tennis as a sport. To an extent, this is influenced by the investment that has been put into tennis in recent years, with:
- Refurbishment of tennis courts at Horsham Park in 2018
 - three parks in Crawley (except Worth Park- check this) receiving investment through the National Parks Investment Programme in the last two years
 - Ongoing improvement of club sites including refurbished courts at Ifield LTC.
- 5.61 Investment into parks courts provides opportunities for tennis at a grass roots level and then funnels people into clubs as they become engaged with the sport and is a key current priority of the LTA.
- 5.62 Whilst the LTA acknowledge therefore that the position has improved significantly since the PPS were produced, they emphasise that the increases in participation mean that these courts are now forced to accommodate more players. Reflecting the evidence set out in the 2021 Open Space, Sport and Recreation Facilities Review, mapping of existing facilities demonstrates that whilst there are good numbers of courts across both Crawley District and Horsham District as a whole, the supply of facilities in the immediate vicinity of Land West of Ifield is limited. This is illustrated in Map 5.2 and 5.3 (supplied by the LTA).

Figure 5.2 – Tennis facilities in Horsham

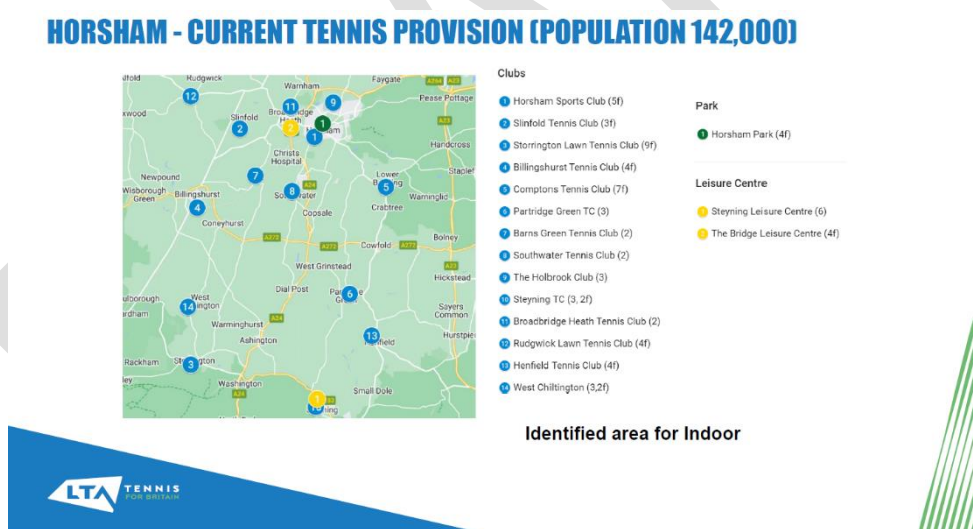
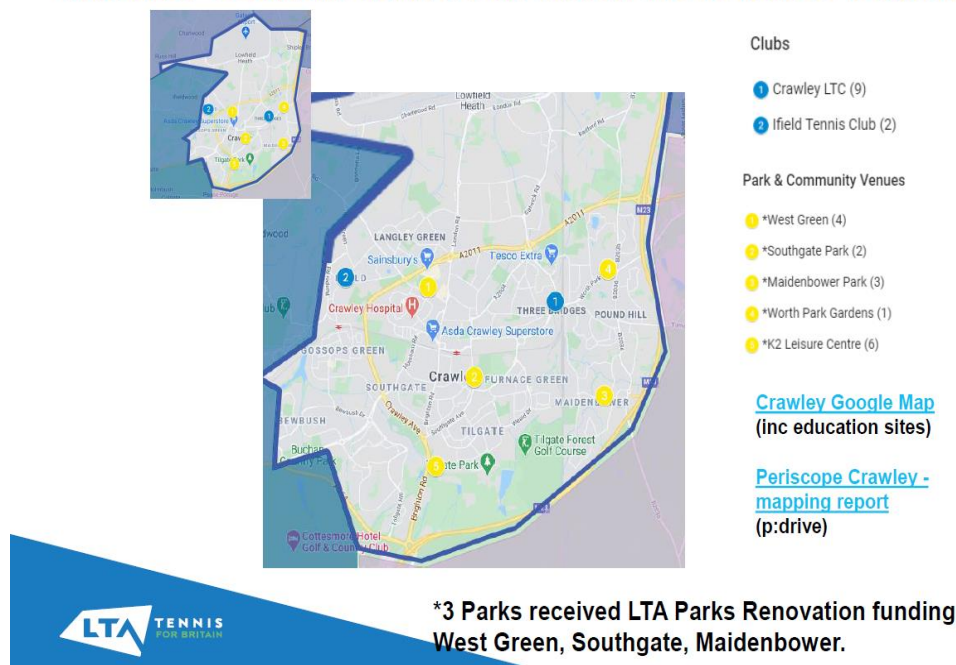


Figure 5.3 – Tennis Facilities in Crawley

CRAWLEY- CURRENT TENNIS PROVISION (POPULATION 120,000)



- 5.63 As a consequence of the above distribution of facilities, as well as the increases in participation that are evident since the PPS were completed, The LTA therefore suggest that there is a lack of provision and demand for new provision on the Horsham District / Crawley boundaries – i.e., in the location where Land West of Ifield is located.
- 5.64 Whilst the PPS therefore presented a picture of adequate capacity and a focus on quality, it is clear that improvements to the stock of facilities and sports development initiatives have positively impacted participation, resulting in less spare capacity in the existing infrastructure. The PPS therefore now do not accurately represent the needs for tennis – it is perceived that there is a need for new parks tennis courts as a priority, to serve the existing population but primarily new residents on the Crawley / Horsham Border.
- 5.65 Added to this, the requirement for indoor tennis courts in both Crawley and Horsham District was evident in both PPS and the LTA confirm that this need still exists. Horsham District remains the priority location for such a facility. That said, consultation with the LTA confirms that the preferred location for this is Horsham Town / South Horsham and that this facility is not considered a priority for the Horsham Crawley border. Indeed it is anticipated that this requirement will be delivered as part of a masterplan for a new development in this part of the district. The need for indoor tennis provision therefore remains, but is not a key consideration for the Land West of Ifield.
- 5.66 In 2020, and since the production of documents for both Horsham District and Crawley, the LTA was also confirmed as the national governing body for Padel. A development plan is in place to grow the sport and as such, there is a requirement for new facilities alongside tennis courts which is not reflected in the existing evidence base. There are no existing padel venues in either Horsham or Crawley, although there are planning applications / proposals for padel in the following locations:
- Christs Hospital School, Horsham (now passed)
 - Henfield.

- 5.67 The LTA therefore highlight that although it is excluded from existing documents, there is now demand for such a facility (to meet current demand) and that to maximise usage, padel courts should be covered. Any new proposed new development is envisaged to increase the demand for such a facility and this should be taken into account in any masterplanning process.
- 5.68 The provision of padel facilities is considered complementary to tennis and they can be collocated. To maximise sustainability, LTA guidance is that at least 3 tennis courts are required to create a sustainable facility alongside at two padel courts.
- 5.69 Consultation with Horsham District Council suggests that the views of the Council reflect those of The LTA. It is acknowledged that the proposed site is outside of the catchment area for tennis and there is potential demand for new provision, particularly when taking into account the impact of the new residents. Representatives of the Council also however highlighted that although outside the scope of the current evidence bases, padel is becoming an increasing priority in the area and is deemed to be well suited to new developments. The Council have been approached on several occasions about opportunities to develop padel in the local area.

Bowls

- 5.70 The Open Space, Sport and Recreation Review also provides updated analysis on bowling greens. It notes that:
- There are no bowling greens in the Rusper Sub Area (the area in which the proposed development is located). The closest facilities are located in Horsham (2)
 - A one mile walking distance catchment is recommended, with a 20 minute drivetime also considered. The proposed development site is outside of the walk time catchment, but within a 20 minute drivetime catchment.

Summary of Outdoor Facility Provision

- 5.71 Table 5.2 therefore summarises the outdoor sports facility needs based upon the existing PPS and the updated position statement. It outlines the key deficiencies identified and highlights where provision is considered unable to meet current and / or future needs.
- 5.72 The implications for Land West of Ifield are reviewed in Section 6.

Table 5.2 - Summary of Needs – Outdoor Sports Provision

Facility Type	Identified Existing Deficiency	Updated Position	Impact
Football	<ul style="list-style-type: none"> • Deficiencies identified in both authorities in youth football • Adequate capacity in remaining pitch types • Quality issues also identified • Strategy focuses primarily on qualitative improvements • Future deficiencies in provision identified in both authorities • Lack of 3G AGPs – 8 additional required in Horsham, 4 in Crawley 	<ul style="list-style-type: none"> • Significant growth in football since PPS • Limited additional provision and therefore position in PPS underestimates levels of unmet demand • Some grass pitch improvements, but not thought to be sufficient to eliminate capacity pressures • Deficiencies therefore understood to remain • This position is exacerbated by the lack of progress on 3G AGPs in Horsham – significant deficiency still remains 	<ul style="list-style-type: none"> • Pressures on existing grass pitches and future deficiencies identified mean that additional provision is to be considered • Strategic priority for more 3G AGPs. • The location of Land West of Ifield means that any new 3G may need to be carefully planned, but it is anticipated that there the substantial unmet demand in the Horsham area means that there is demand for this type of facility

Facility Type	Identified Existing Deficiency	Updated Position	Impact
		<ul style="list-style-type: none"> In Crawley, 3G provision has significantly improved although some unmet demand remains Provision in Crawley located in close proximity to development site. Few existing clubs in close proximity to the area 	
Rugby Union	<ul style="list-style-type: none"> adequate capacity for rugby union overall. When considering just club needs however, there is overplay on some club bases and on others supply is closely matched with demand. Need to improve quality to increase capacity Potential for 3G AGPs to support rugby union 	<ul style="list-style-type: none"> Participation has fluctuated but larger clubs are now experiencing growth Quality improved at key large sites in Horsham Significant quality issues remain in Crawley (particularly Crawley RUFC) which are impacting club growth and participation No clear evidence for new provision, due to focus on club base. 	<ul style="list-style-type: none"> Whilst additional capacity may still be required, improvements to maximise the capacity at the club base is the key priority Issues in Crawley are of particular significance, given recent enhancements in Horsham No evidence therefore that provision for rugby needs to be considered on site, potential requirement for qualitative contributions as issues remain.
Cricket	<ul style="list-style-type: none"> Spare capacity for cricket in Horsham when taking into account both grass and NTP usage. In Crawley supply is more tightly balanced with demand. no clear aspiration for new cricket provision in Horsham therefore (with recommendations focus on qualitative improvements and non turf provision) similar quality issues in Crawley, but also recommendations for new provision arising as a result of demand in Crawley. 	<ul style="list-style-type: none"> Significant additional participation in both authorities since previous PPS Some additional pitches created, but not enough to offset participation growth New provision represents an ongoing priority 	<ul style="list-style-type: none"> Additional capacity required in both authorities to meet current demand Future population growth likely to exacerbate this further Grass pitches for cricket to be considered as part of new development
Hockey	<ul style="list-style-type: none"> Adequate facilities provided in both authorities Some quality issues identified Issues with access to existing sites and clubs spread across a variety of facilities 	<ul style="list-style-type: none"> Improvements to Hazlewick School secured future of Crawley HC Conversion of sand based AGPs in Crawley to 3G has caused displacement of Horley HC. Delivery of new pitch not considered key priority for this club as documented as a requirement in Reigate and Bansted PPS Horsham HC continue to be spread across multiple sites. Ongoing issues means new home facility is a key priority Consultation suggests location of site, plus other developments, means that 	<ul style="list-style-type: none"> Unmet demand for hockey, but not considered a priority requirement for Land West of Ifield Expressed demand for sand based AGP, potentially at school site

Facility Type	Identified Existing Deficiency	Updated Position	Impact
		provision of new home base is not a priority at Land West of Ifield <ul style="list-style-type: none"> That said, aspirations to secure sand based AGP to further secure hockey in the district remain 	
Tennis	<ul style="list-style-type: none"> Strategy identifies that existing provision is adequate to meet demand, although some qualitative issues are identified 	<ul style="list-style-type: none"> increasing participation means clubs are now nearing capacity lack of parks facilities in general, and in vicinity of proposed development based on catchment modelling increasing importance of Padel means that there is also unmet demand for this sport 	<ul style="list-style-type: none"> lack of parks courts - proposed development site identified as potentially appropriate location unmet demand for padel – proposed development site identified as potentially appropriate location
Bowls	<ul style="list-style-type: none"> Existing facilities adequate to meet current demand, although there are no bowling greens within a walk time catchment 	<ul style="list-style-type: none"> No updates suggest that this position has changed 	<ul style="list-style-type: none"> No clear quantitative requirement for bowls to address current position Potential requirement for contribution towards qualitative improvements

6. Open Space and Informal Recreation

Introduction

- 6.0 In addition to the provision of formal indoor and outdoor sports facilities, the effective provision of open space is a key part of providing opportunities for formal and informal recreation.
- 6.1 This section briefly reviews the current position relating to open space across both Horsham and Crawley local authority areas to meet current needs. It draws upon the open space, sport and recreation assessments for both areas, specifically:
- Horsham District – Open Space, Sport and Recreation Review (2021)
 - Crawley Borough Council – Open space, sport and recreation assessment (2021)
- 6.2 Table 6.1 summarises the key issues identified in each of the assessments and the key recommendations.
- 6.3 It should be noted that from a quantitative perspective, the Horsham District Council Open Space review assessment applies standards at a local level. Land West of Ifield is located in the Rusper area, and we therefore refer to the figures provided for this area.
- 6.4 In Crawley, provision is also considered at a local level. Ifield ward is the closest location to the proposed development site, and so the adequacy of provision in this area is considered.

Table 6.1 – Open Space

Open Space Type	Key Messages – Horsham District Council Open Space Study	Key Messages – Crawley Borough Council Open Space Study
Parks	<ul style="list-style-type: none"> 52 parks and gardens overall in Horsham District, covering over 126 ha All existing parks and gardens rate as high value One site available in Rusper – Rusper Recreation Ground Current provision equates to 5.7sqm per resident. Recommended quantity standard of 13.7sqm per resident. Deficiency in Rusper equates to -8 sqm per resident Recommended standard is above current provision (9.1sqm per resident), confirming that additional provision is deemed to be required Recommended accessibility standard – 1km Accessibility mapping demonstrates that the proposed development site is outside the catchment of the existing park 	<ul style="list-style-type: none"> 239ha parks and gardens 6.95ha in Ifield ward Accessibility standard set requires access within 600m Analysis demonstrates that Land West of Ifield falls at the edge of the catchment for parks within Crawley
Natural and semi natural greenspace	<ul style="list-style-type: none"> 59 natural and semi natural open spaces across the district, equating to over 339 ha No existing provision in Rusper and therefore Land West of Ifield is outside of the recommended catchment of natural open space Recommended quantity standard of 24.3sqm per resident means that there is a large deficiency Recommended accessibility standard – 1km (strategic) and 300m (local) 	<ul style="list-style-type: none"> 296 ha dedicated to natural green space 32ha of land is located in Ifield ward Recommended accessibility standard – 720m walk Land West of Ifield is not within the catchment of any natural and semi natural greenspace in Crawley
Amenity Greenspace	<ul style="list-style-type: none"> One amenity greenspace located in Rusper Current provision equates to 1.9 sqm per resident. Overall deficiency of 3.9sqm per resident in Rusper Recommended accessibility standard – 480m. 	<ul style="list-style-type: none"> 91.47ha amenity green space – 552 sites in total, 9.96 ha in Ifield ward Recommended accessibility standard – 480m walk Land West of Ifield is not within the catchment of any amenity greenspace in Crawley
Provision for children and young people	<ul style="list-style-type: none"> 129 childrens play areas and 59 youth / strategic sites One play area and one strategic / youth facility in the Rusper area Overall deficiencies in provision for children and young people (-0.3sqm), but adequate strategic / youth provision (0.5sqm) Recommended accessibility standard – 400m (children), up to 1km for strategic / youth provision 	<ul style="list-style-type: none"> 0.51ha provision for children in Ifield ward Recommended accessibility standard – 480m walk Land West of Ifield is not within the catchment of any natural and semi natural greenspace in Crawley

Open Space Type	Key Messages – Horsham District Council Open Space Study	Key Messages – Crawley Borough Council Open Space Study
	<ul style="list-style-type: none"> Land West of Ifield is outside of the recommended catchment 	
Allotments	<ul style="list-style-type: none"> 28 allotments across Horsham District No existing allotment provision in Rusper – quantitative shortfall of 1.8sqm per resident Recommended accessibility standard – 1km Land West of Ifield is outside of the recommended catchment 	<ul style="list-style-type: none"> 20 allotments totalling 11.08ha in Crawley 1.68ha allotments in Ifield Ward Land West of Ifield is not within the catchment of any natural and semi natural greenspace in Crawley

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- 6.5 The assessment notes that quantity standards are used to determine the requirements for new housing developments.
- 6.6 The assessment therefore clearly demonstrates that for almost all types of open space, provision is expected local to the home, with all open spaces deemed to serve a catchment of 1km or less. As a consequence, Land West of Ifield is not served by any existing open spaces.
- 6.7 This means that linking with policy set out in Section 2, there will be a clear need to consider the provision of on-site open space as part of the masterplan for Land West of Ifield.

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7. Implications for Land West of Ifield – Development of Sport and Recreation Strategy

Introduction

- 7.0 Sections 4 and 5 have considered the adequacy of current provision drawing on the existing evidence base, as well as the views of National Governing Bodies of Sport. They have provided an updated position statement, outlining whether provision is adequate to meet existing demand, and whether it is able to sustain future growth arising from sports development initiatives and housing development.
- 7.1 The location of Land West of Ifield means that the analysis has included both the position in Horsham District and Crawley Borough to ensure that the full picture is understood. It is recognised that sports participation is not dictated by local authority boundaries and instead, that users will travel to available facilities within a catchment of their home.
- 7.2 Section 6 has briefly outlined the requirements for open space.
- 7.3 It is not the responsibility of new development to mitigate existing deficiencies, but it should be ensured that shortages in provision are not exacerbated, by providing appropriate facilities where this is identified to be required.
- 7.4 Policy HA2 which allocates Land West of Ifield as a proposed housing site, also recognises that large new development sites (such as this) may provide the opportunity to address some existing deficiencies as well as ensuring that the needs of residents of the proposed new development are met. This sentiment is also evident across the suite of evidence base documents relating to sport and recreation in Horsham District. This adds sporting value, and is a key feature of the strategy for Land West of Ifield.
- 7.5 This section explores the specific impact that the proposed new development at Land West of Ifield will have in relation to demand for indoor and outdoor sports facilities and open space. Drawing upon the evidence base in Sections 4, 5 and 6, it seeks to understand whether the demand that will be generated by the new population can be accommodated within the existing infrastructure, and where additional facilities over and above the demand generated by the development may be of benefit to create a positive sports strategy (as well as to form part of the mitigation strategy for the loss of Ifield Golf Course).
- 7.6 Section 7 concludes by identifying where opportunities to provide facilities should be considered on site, and where off site contributions may be required.
- 7.7 It is emphasised that the proposed loss of Ifield Golf Course, as well the proposed mitigation to offset the loss, is dealt with under separate cover. Specifically;
- Draft Land West of Ifield Golf Needs Assessment (July 2024)
 - Draft Land West of Ifield NPPF Paragraph 99/103 Assessment (July 2024).
- 7.8 This paper therefore focuses on the strategy for other sports and open space.

Horsham Infrastructure Delivery Plan 2023

7.9 The Horsham District Council Infrastructure Delivery Plan 2023 has recently been released to support the draft Regulation 19 Local Plan and provides an indication of the expectations from new developments.. Crucially, it states that:

‘Any strategic scale sites will be expected to provide on-site community and sports facilities. The above requirements will need to be taken into account, both in terms of ensuring that the facilities required at West of Ifield are accommodated, but also taking into account the proposals at other development sites to ensure that facility requirements are not duplicated.’

7.10 The document is stated to be based upon the existing Built Facility and PPS Strategies and states specific requirements from new development. It expects that:

- Land North of Horsham will deliver a sports hub, playing fields, leisure facilities and outdoor sports facilities associated with the school
- A new 3G AGP will provided at Ghyll Leisure Centre
- A two court badminton hall will be required as part of Land West of Ifield (subject to Crawley)
- New community facilities or enhancements to on-site community facilities will be required on all strategic sites – IDP suggests a new facility will be required on Land West of Ifield, subject to a review of available facilities in Crawley
- A new gymnastics facility is required – the most appropriate location would be Horsham Town Centre or South East of the District.

7.11 The requirements of this document will therefore also be taken into account in the analysis that follows.

Impact of Proposed New Development

7.12 The Horsham District Council Open Space, Sport and Recreation Review sets out the mechanisms that should be used to determine the impact of demand for different types of indoor and outdoor sports facilities.

7.13 It recommends that for large strategic housing sites, the specific impact of the proposed development in terms of demand for sports facilities is calculated using tools provided by Sport England, specifically:

- The Sports Facility Calculator
- The Playing Pitch Calculator.

7.14 These tools estimate the amount of demand generated for sports facilities generated by a given population and together, provide an insight into the demand created for the majority of sports covered across the suite of documents. The use of these tools enable us to understand the impact of the specific housing development, rather than the projected growth across the two areas as a whole.

7.15 For tennis and bowls, which are not covered by the above tools, the Open Space, Sport and Recreation Review (2021) recommends alternative parameters that are used to determine whether facilities are required.

7.16 Once the impact of the development is understood, this is then considered in the context of the adequacy of current and future provision (Sections 4 and 5) in order to determine:

- Whether on site provision should be considered
- Whether contributions towards off site provision are required.

- 7.17 For the purposes of analysis, it has been assumed that the new development will generate a population of 6723 people. This is in line with all other documentation prepared to support the planning application process for the site.
- 7.18 It should also be noted that the Sport England tools consider demand taking into account specific characteristics of the local demographics, and as a consequence are therefore used at a local authority level. Whilst to date, this assessment has considered the sporting context across both Horsham District and Crawley Borough, the location of the proposed development site within Horsham District means that we have used the calculators for Horsham District.
- 7.19 The text that follows considers the outputs of relevant calculators for all sports. Table 7.4 considers whether on site provision / off site contributions are required in the context of Land West of Ifield.

Sports Facility Calculator (SFC)

- 7.20 The SFC covers Swimming pools, Sports halls, Artificial Grass Pitches (AGPs) and Indoor bowls centres.
- 7.21 It helps to quantify the demand for these facilities, providing an understanding of the additional demand that the population is likely to generate. It does not however take into account the existing supply of facilities – this means that the results must then be considered in the context of the findings of Section 4 (adequacy of current provision).
- 7.22 The calculator can also be used to inform decision making in relation to the cost of off-site contributions (where these are identified as being required). This will be part of the negotiation process in relation to S106 agreements.
- 7.23 Table 7.1 sets out the application of the Sports Facility Calculator for the proposed new development and demonstrates that the new development will generate significant additional demand for indoor sports facilities.

Table 7.1 – Demand Generated by New Development

Facility Type	Demand Generated by New Development (2875 People) – Visits Per Week	Demand Generated by New Development (2875 People) – Facility Requirements	Cost
Swimming Pools	433	71.14m ² – equivalent to 0.33 swimming pools	£1,635,925
Sports Halls	542	1.84 courts – equivalent to 0.46 halls	£1,474,320
Indoor Bowls	21	0.13 rinks, 0.02 centres	£64,020
AGP	125	0.17 pitches.	£215,973 (3G) or £195,134 (sand)

Playing Pitch Calculator

- 7.24 The Playing Pitch Calculator considers the demand that will be generated for pitch sports. The application of this calculator is set out in Table 6.2.
- 7.25 It should be noted that this calculator requires detailed data to be input, including the balance of teams for each sport and across a variety of age groups. Typically, this information is extracted directly from the PPS.
- 7.26 Given the age of the Horsham District PPS however, as well as the consultation undertaken with NGBs as part of this process which suggests that participation has typically increased

across all sports, we have used data from the 2022 – 2023 season for each sport where available. This not only brings the requirements up to date, but provides a closer indication of the likely position that any refreshed strategy produced in the period between this strategy and any confirmed planning application.

- 7.27 Where provided therefore, affiliation data provided by the relevant National Governing Bodies of Sport has been used. For all sports, the affiliation data presents a stronger picture of participation than that that was evident in 2023. Figures for hockey and rugby union are indicative only (based on available information in the 2017 PPS), as updated affiliation data was not available.
- 7.28 As with the Sports Facility Calculator, the Playing Pitch Calculator provides only an indication of demand that will be generated. It is then necessary to balance this with an understanding of the adequacy of current provision (Section 5), and whether this existing demand can be accommodated within the existing infrastructure.
- 7.29 The impact of developing 3000 dwellings at Land West of Ifield is therefore set out in Table 7.2

Table 7.2 – Impact of New Development on Demand for Pitch Sports

Facility Type	Number of pitches required to meet the estimated demand
Adult Football	1.97
Youth Football	3.14
Mini Soccer	2.04
Rugby Union	0.91 (estimate only based due to lack of updated affiliation data).
Cricket	1.94
Artificial Grass Pitches	
Sand Based	0.15 (estimate only based due to lack of updated affiliation data).
3G	0.38

- 7.30 The above calculators therefore confirm that in addition to the existing needs, highlighted previously, the new development will generate significant additional demand for outdoor sports facilities.

Tennis and Bowls

- 7.31 The above calculators do not provide any information for bowls and tennis, however quantitative standards for these facility types are set in the Outdoor Sports and Recreation Assessment, which requires:
- On site bowling green when 6,667 new dwellings are developed
 - On site tennis courts when 1667 new dwellings are developed.
- 7.32 With the creation of 3000 new dwellings, this means that there is insufficient demand to justify a bowling green on site, but the additional population generates a requirement for 2 on site tennis courts.

Open Space

- 7.33 The Horsham District Council Open Space Review set quantity standards that should be used to determine the requirements for all types of open space within a development. As Land West of Ifield is not within the catchment area of any existing open space (in Horsham or Crawley) and there are also quantitative deficiencies evident, it is clear that new provision will therefore be required.
- 7.34 Table 7.3 presents the amount of open space that is required to meet the proposed local standards. As with other facilities, it evaluates the impact of creating 3000 new dwellings.

Table 7.3 – Open Space Requirements

Typology	Sub-typology	Local Standard - Area per resident (sqm)	Estimated requirement (based on population of 6,724) in ha
TOTAL MINIMUM OPEN SPACE STANDARD		46.6	31.33
Sub Categories			
Allotments		1.8	1.21
Multi-Functional Greenspace		43.9	29.55
	<i>Natural & Semi-natural Greenspace</i>	24.3	16.34
	<i>Amenity greenspace</i>	5.8	3.90
	<i>Parks & gardens (includes outdoor sports*)</i>	13.7	9.28
Children and Young People		0.9	0.61
	<i>Children (playgrounds / landscaped areas of play)</i>	0.5	0.34
	<i>Youth areas and facilities (skate parks / bike tracks / open access ball courts – delivering appropriate provision for all genders)</i>	0.4	0.27

Implications for Land West of Ifield

- 7.35 Table 7.4 therefore draws upon the information presented in Sections 4 and 5, as well as the results of the SFC and PPC (Tables 6.1 and 6.2) and summarises whether the existing infrastructure is able to accommodate the increase in demand that will be generated by the proposed development at Land West of Ifield in terms of sports facilities.
- 7.36 It considers whether on site provision is required **as a direct consequence of the demand generated by the proposed development only**. Opportunities to provide additional provision to address wider deficiencies will be considered in Table 7.5.

Table 7.4 – Implications for Land West of Ifield

Facility Type	Is existing infrastructure adequate?	Requirement Generated by New Development	Demand sufficient to justify on site provision?	Off Site Contribution justified?	Justification comment /	Evidence
Sports Halls	No – unmet demand identified in several sports, plus overall in	1.84 courts – equivalent to 0.46 halls	Yes – demand for 2 courts generated	No	Supply inadequate. Demand generated by new development is sufficient to justify small new facility t	- SFC identified need - IDP requirement - Consultation

Facility Type	Is existing infrastructure adequate?	Requirement Generated by New Development	Demand sufficient to justify on site provision?	Off Site Contribution justified?	Justification comment /	Evidence
	Crawley Borough, facilities in this area are likely to serve the new development. IDP requirement of 2 court hall				New development creates demand for 2 court hall which corresponds to the IDP requirement and is necessary. Table 6.4 will consider should be given as to whether a larger hall should be delivered which offers improved functionality in terms of meeting sport specific unmet demand (cricket / basketball in particular).	<ul style="list-style-type: none"> - Crawley BC strategy - Catchment modelling - NGB sport specific consultation
Swimming Pools	Provision now adequate in Horsham District, but insufficient supply in Crawley	71.14m ² – equivalent to 0.33 swimming pools	Existing provision cannot meet demand but demand generated by this development alone (0.33 pools) does not necessarily require on site provision.	If no on site provision delivered	New provision in Horsham District means that supply meets demand in this area. Local analysis however demonstrates that there is a deficiency in the vicinity of the proposed development, and deficiencies in Crawley Borough. With the new development identified as generating demand for 0.33 pools, although demand cannot be met, the impact of the new development is not sufficiently substantial to dictate that provision must be on site.	<ul style="list-style-type: none"> - SFC identified need - Facility strategies in both authorities, but need now only remains in Crawley - Swim England demand modelling
Studios	No. Strategies note that provision is to increase in line with population. Demand for additional facilities identified due to capacity of existing.	Not quantified by calculator	Yes	No	Both strategies note that this should increase in line with demand – demand not quantified, but development clearly generates additional need. No clear mechanism for securing contributions if not provided on site.	<ul style="list-style-type: none"> - Both facility strategies - Capacity of existing facilities - consultation

Facility Type	Is existing infrastructure adequate?	Requirement Generated by New Development	Demand sufficient to justify on site provision?	Off Site Contribution justified?	Justification comment /	Evidence
Health and Fitness	Additional health and fitness facilities provided in Horsham District suggest that provision is now adequate. No unmet demand in Crawley.	Not quantified by calculator	No	No	No evidence that additional demand generated cannot be met by existing facilities in quantitative terms. That said, again there are localised deficiencies and potential for inclusion of such a facility as part of the wider offer and in order to drive sustainability.	
Squash	Yes. Neither strategy identifies need for additional facilities	Not quantified by calculator	No	No	No on site squash required and no mechanism for securing contributions.	- Facility Strategies
Indoor Bowls	Yes, some unmet demand but not evident on the ground	0.13 rinks, 0.02 centres	No	Potential need	Impact of new development very small, any additional provision required to be linked to existing centre therefore no on site facilities required. There is an argument to suggest that contributions will be required to facilitate improvements to existing facilities.	- Facility Strategies
Indoor Tennis	No, but consultation confirms that proposed development site is not preferred area. New facility likely to be delivered prior to this site coming to fruition	Not quantified by calculator	No	No	No evidence to justify requirement for onsite provision.	- Facility Strategies - LTA consultation - Horsham District Consultation
Football	No - pressures on grass pitches (junior and 3G AGPs. Whilst evidence base suggests that this can be accommodated to some degree	2 AF, 3 JF and 2 MS 0.38 3G AGP	Yes	Yes	Existing provision inadequate and therefore increase in demand cannot be met. Demand over 1 – 2 pitches and therefore sufficient to justify requirement	- PPS - PPC - FA consultation - Horsham District Consultation

Facility Type	Is existing infrastructure adequate?	Requirement Generated by New Development	Demand sufficient to justify on site provision?	Off Site Contribution justified?	Justification comment /	Evidence
	by redesignation, there are future deficiencies				for on site grass pitches. Demand for 3G cannot be met by existing infrastructure. Additional demand generated however equates to less than half a pitch. No clear requirement for on site 3G therefore, but potential to consider 3G AGP as part of creation of exemplar sporting hub (see Table 6.4)	
Rugby Union	No. Issues with quality and capacity, particularly in Crawley	0.91 pitches (estimate only as updated affiliation information not available)	No	Yes	Demand generated insufficient to warrant on site provision. On site provision also does not meet needs of rugby clubs who wish to focus all activity at club base. Existing deficiencies mean that increased demand cannot be accommodated and contributions therefore required to support capacity increases offsite.	- PPS - RFU consultation
Cricket	No. Existing clubs are at capacity and picture of deficiency now presented.	1.94 pitches	Yes	No	Existing provision unable to accommodate increased demand. Demand generated over one pitch – therefore sufficient to justify on site requirement. New provision therefore required to meet needs of residents of proposed new development.	- PPS - PPC Sussex Cricket Board Consultation
Hockey	No, Horsham DC require new double pitch home.	0.15 sand based AGPs (estimate only as updated affiliation information not available)	No	Yes	Demand generated by new development not significant enough to warrant on site provision.	- PPS - England Hockey Consultation - Horsham DC Consultation

Facility Type	Is existing infrastructure adequate?	Requirement Generated by New Development	Demand sufficient to justify on site provision?	Off Site Contribution justified?	Justification comment /	Evidence
					Proposed location of development does not fit with preferred location for new pitch site. Contributions required towards off site improvements (although not required if AGP to deliver on wider priorities through delivery of sand based AGP at school site.	
Tennis	No, additional parks courts are required. Localised deficiency in vicinity of Land West of Ifield	2 courts	Yes	No	Demand generated is sufficient to warrant on site provision based on minimum size criteria. On site provision needed to meet needs of residents of new development (2 courts).	<ul style="list-style-type: none"> - Facility Strategies - LTA consultation - Horsham District Council consultation
Bowls	Yes – existing facilities can meet current and projected future demand	0.5 greens	No	Potentially	No on site provision required. There is an argument to suggest that contributions will be required to facilitate improvements to existing facilities.	<ul style="list-style-type: none"> - Built Facilities Strategies - Outdoor Sport and Recreation Assessment

7.37 Table 7.4 therefore suggests that based upon the evidence presented in Sections 4 and 5, the existing infrastructure is not able to meet demand that will be generated by residents of the new development in several facility types. For some facility types, the level of demand that will be generated by residents of the new development alone is sufficient to require on site provision.

7.38 Based on the impact of the development alone therefore, as a minimum, provision of the following facility types will need to be included on site:

- Sports halls (2 courts)
- Outdoor tennis courts (2 courts)
- Grass football pitches (2 senior pitches, 3 youth / 9v9 pitches, 2 Mini football pitches)
- 2 cricket pitches
- Studios.

7.39 The sport and recreation assessment suggests that the 2 court requirement for ‘community facilities’ exists in addition to the above (as it indicates that it is a separate assessment from the built sports facilities). The inclusion of sports halls within the analysis for this document

however suggests that the presence of a hall on site would override the need for an additional community hall.

7.40 The above facilities represent the impact of the new development alone.

7.41 For several other facilities, demand generated by the new development cannot be met by the existing infrastructure, however the additional demand generated by the development alone is not high enough to directly require the provision of a new facility on site. For these facilities, where no on site provision is included, contributions towards off site provision will be necessary.

7.42 As outlined at the beginning of this report however, there is an aspiration for the site to not only meet the needs of the new residents, but also to leverage the opportunity to contribute to the delivery of the wider strategic sport and recreation priorities of Horsham District and Crawley Borough. This means that there may be facility types where although the demand generated from the development does not require on site provision, there is enough demand in the surrounding area to require the creation of a new facility. Provision of such facilities on Land West of Ifield would therefore achieve the overall goal of providing a high quality exemplar development that delivers significant benefit to the area as a whole. The inclusion of added value facilities that directly respond to local need ensures that the facilities provided outweigh the loss of the existing golf course.

7.43 The next section therefore considers where these opportunities exist.

Additional Opportunities – Creating sports facilities that are of significant benefit.

7.44 Analysis of the evidence base suggests that the key opportunities to deliver added value over and above the direct requirements of the new development are:

- Provision of a swimming pool – although the demand generated by the new development itself equates to 71m² (0.38 pools), and is therefore not of sufficient scale to directly require a full size swimming pool, the existing and projected boroughwide deficiencies in Crawley Borough in particular are high (circa 350m² - over 1 pool). This means that the demand generated by the new development cannot be met. Swim England analysis confirms that Land West of Ifield is located in an area where there is not enough swimming pool water, and is therefore well located to provide additional water to reduce existing deficiencies as well as to meet the needs of residents of the new development. . The provision of a community swimming pool (potentially with moveable floors to improve functionality) with a leisure / recreational function would therefore add significant value to the proposals. This may be a local leisure facility rather than a traditional swimming pool, it is the recreational function that is particularly important
- The new development alone will generate demand for 2 badminton courts in a sports hall – this is enough to require on site provision (and this need is documented in the IDP). Current and projected deficiencies across the area however extend wider than this (up to 10 courts) and consultation revealed that the main existing gaps in provision are access to sports hall facilities for cricket / basketball clubs. A 2 court hall would not meet these needs. Extension of the required 2 court sports hall to 4 or more courts would ensure the facility could meet the demand identified for cricket and / or basketball
- The on-site requirement generated by the new development for outdoor tennis is 2 courts. This represents a small local facility. With wider deficiencies for tennis in the parks environment there is demand to extend the appeal of this small tennis facility to serve a wider catchment area and provide a small parks tennis hub, which would improve viability. Evidence suggests that there is unmet demand for padel in the north of Horsham District and in Crawley but as a new facility type, this is not currently identified in the evidence base. Creation of a padel facility, linking with the required tennis courts would however provide a high quality modern tennis facility and meet the identified unmet demand.. To maximise

sustainability, functionality and longevity of any tennis hub, although the development only generates demand for 2 on site courts, LTA research would suggest that any tennis facility that is provided is extended to three courts, with two adjacent padel courts.

- The provision of a 3G AGP is identified as a strategic priority by Horsham District Council and there are significant deficiencies of these facilities across the Borough. With the new development generating demand for 0.38 3G AGPs, this additional demand alone does not provide sufficient justification for the creation of a new facility on site. The significant unmet demand however means that the provision of a facility on this site would be of benefit to the district as a whole. In addition to teams generated by the new development, Section 5 identified some key clubs in the local area that may also benefit from the use of a facility. The deficit in provision means that it is also likely that additional teams will travel from Horsham town to use a 3G pitch. Collocation of such a facility alongside grass pitches would enable the creation of a new strategic football hub as well as support the development of new teams associated with the development
- Horsham District Council and England Hockey highlight an aspiration for a sand based AGP to be provided at a school site, to support both multi-use curriculum and club recreational hockey needs.

7.45 It is important to note that if any of the above facility needs are not delivered on site, demand generated by the new development will remain unmet and off site contributions would therefore be required (in line with the impact of the proposed development).

Potential Facility Location

7.46 The proposed location of any on site facilities is as important as the facility type. The masterplan has therefore been developed with a view to maximising the benefits of the sports facilities for the local community.

7.47 The masterplan includes both a secondary school and a primary school on site. These facilities also provide an opportunity to provide facilities for the community, either by meeting or exceeding DFE requirements for schools. An Education Trust has already been identified to run the proposed schools and this Trust has confirmed a willingness to support a formal Community Use Agreement (CUA).

7.48 DFE's Output Specification provides details of the requirements for sports facilities in mainstream schools. The key points of the Specification are:

Indoor Facilities

- **Secondary School** - In any Whole School Project for a Secondary School, a sports hall shall be provided, along with other indoor PE spaces, such as an activity studio, as required in School-specific Annex SS1. [PM_10_20_90] 2.3.13.2 Any sports hall suite shall include changing facilities with showers for half a year group with equal and separate facilities for boys and girls in co-educational schools, located for easy access to internal and external sports spaces
- The sports facilities shall be designed to be accessed and used safely and easily by members of the community outside the school day
- Storage in PE and sport areas shall be designed to ensure that storage adjacent to the sports hall is easily accessible for storing large items of equipment. [SL_90_50_82]
- **Primary School** - Where a music and drama classroom (studio) is provided in a Primary School, it shall be designed as a flexible space that can accommodate music and drama. Where an activity studio (small hall), as defined in Technical Annex 1A, is listed in School-

specific Annex SS1, it shall be able to accommodate PE without apparatus and any other activities required by the SSB. [SL_25_10_01

Outdoor Facilities

- **Secondary Schools** - Hard-surfaced areas for games courts, and adjacent or overlapping skills practice areas, shall accord with any requirements identified in Technical Annex 1C and the SSB. [SL_42_15_59] 60 2.4.3.2 Where several courts are provided, these shall be combined, wherever possible, into multi-use games courts. These shall have appropriate dimensions to suit a wide range of sports, as set out in Technical Annex 1C. [SL_42_15_55] Where the SSB requires some sports to have a higher priority, this shall affect the markings and dimensions required
- Grass areas for pitches, athletics and multi-purpose PE shall meet the requirements in Technical Annex 1C and the SSB, and:
 - a) have sufficient pitch margins built into the design to ensure pupil safety and allow for some pitch locations to be moved annually to reduce wear
 - b) be designed and constructed to a standard that allows the use specified in the SSB for the School's year-round curriculum needs
 - c) be economic to maintain, with easy access for maintenance equipment (and for irrigation if needed) d) be located and orientated to suit the activities.
- Artificial grass pitch surfaces shall be as specified in Technical Annex 1C and selected for ease of maintenance
- Any grassed areas provided for PE shall be capable of sustaining both summer and winter pitches and overlapping Summer pitches, such as cricket and rounders, and athletics facilities such as running tracks
- Pitches and courts that are going to be used by the community shall be sized in accordance with the relevant parameters detailed within Sport England 'Comparative Sizes of sports Pitches and Courts (Outdoor)
- Pitches and courts that are going to be used by the community shall allow after-hours access in accordance with any requirements in the SSB and any Planning requirements
- Where any existing outdoor PE facilities are used by the community, the existing support facilities shall be retained, such as parking, access routes and lighting. New or additional facilities including floodlighting shall be provided where required in the SSB.

7.49 It is clear therefore that the new schools will need to offer some sports facilities in order to meet with DfE specification and that there is potential for these to make up *some* of the community use offer. This has been taken into account in the masterplanning process.

7.50 In determining the best location for each facility however, it is also important to take account of the following issues that were raised during the consultation process:

- Council aspirations for sports hall to offer day time community access
- Council aspirations for swimming pool to offer day time access
- Potential benefits of including gym in any facility mix (on a local catchment area basis, despite the quantity of existing provision being adequate) to improve viability
- Importance of design to support community use of any school facilities
- Economies of scale in terms of management and maintenance of facilities where facilities are collocated.

7.51 Final decisions relating to the facilities that are provided at the school sites will be made by the DfE and identified Trust. Homes England should therefore work with these key partners to consider the above.

Sports Strategy for Land West of Ifield

7.52 Table 7.5 therefore summarises the needs identified and options for location of the facilities on the masterplan. **It outlines where facilities are provided over and above the baseline requirements for on-site provision to meet demand generated by the new development.**

Table 7.5 – Facilities to be provided on site

Facility Type	Summary Requirements	Facility to be Provided on Masterplan	Comment (location / other issues to be considered as part of masterplan)
Sports Halls	2 court hall to meet demand from new development Potential extension of sports hall to meet identified wider deficiencies and improve functionality for sports where deficiencies have been identified	4 – 6 court hall (therefore delivering 2 – 4 courts more than baseline requirements to address wider needs)	<ul style="list-style-type: none"> - Could be provided at school or community hub - School likely to require additional facility if provided at hub - Full daytime access considered to be of benefit by Council, but may result in duplication of facilities if provided at hub - If provided at school site, CUA will be essential and site to be designed to support community access - Duplication is not necessarily overprovision in terms of wider deficiencies so there could be a standard 4-court hall as part of the school meeting DfE standards and an enhanced 4-court hall as part of the community hub to deliver specialist sport requirements.
Swimming Pools	0.33 pools to meet demand from new development insufficient to require on site provision Wider deficiencies in pools (equivalent to 1 pool), land West of Ifield located in area of deficiency On site pool represents added value and meets identified need	Swimming pool (therefore delivering pool water above baseline requirements to address wider need)	<ul style="list-style-type: none"> - Suggest located at community hub - Potential Leisure Local (larger size) and with movable floor – but could be different shape etc, standard tank not necessarily required as performance and spectating needs are met at KS2 - Pool creates added value – existing deficiencies mean that additional demand cannot be met, but scale of demand from new development means that larger facility adds additional value. The facility will contribute to meeting significant existing and projected unmet need (particularly in Crawley).
Studios	No clear quantitative guidance Studios required in line with population growth.	2 – 3 studios	<ul style="list-style-type: none"> - Located at community hub - Suggest at least two studios included - These should offer day time access if located in the community hub and drive sustainability.
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	<ul style="list-style-type: none"> - Suggest community hub - Key part of local leisure model to drive sustainability therefore important to include as part of facility mix.

Facility Type	Summary Requirements	Facility to be Provided on Masterplan	Comment (location / other issues to be considered as part of masterplan)
Grass football	2 Adult Football 3, Youth Football and 2 Mini Soccer pitches will be generated by the new development Wider unmet demand is also evident, but capacity increases to be met through 3G and qualitative improvements	2 AF, 3 YF and 2 MS	<ul style="list-style-type: none"> - Potential to split between school and community outdoor sports hub (or provide all at community hub and additional at school site) - Playing fields to be designed for public access if situated at school site - Suggest at least 2 larger pitches at community hub adjacent to any 3G - Less benefit in providing all at school site if 3G is situated at the community hub – 3G needs to be with grass pitches - See cricket below. Land area could be provided in total, but cricket overlaid with football pitches at hub site leaving land for playing field at school site.
3G AGP	0.38 AGP required by new development. Wider deficiency suggests that 3G onsite would significantly reduce existing widespread deficiencies	3G AGP – delivers above baseline requirements to address wider need	<ul style="list-style-type: none"> - Community hub / outdoor hub - Could be considered at school site with grass pitches, but Council would prefer sand based AGP at this location.
Cricket	New development generates demand for 1.94 cricket pitches Significant deficiencies in cricket provision in wider area emphasise the importance of this on site provision.	2 grass cricket squares	<ul style="list-style-type: none"> - Community outdoor sports hub / outdoor sports hub - Cricket pitches likely to be difficult to manage if at school site - Cricket could potentially be overlaid with football (although there may be some concerns raised about this by the ECB) - Potential to create flexible space with football - Potentially club managed on a lease basis.
Tennis	On site requirement for 2 courts generated by new development. Wider deficiencies suggest sustainable hub of 3 courts and 2 padel courts should be provided to meet need	3 tennis courts and 2 padel courts –addresses wider need and improves viability.	<ul style="list-style-type: none"> - Potential to provide at school site as part of required facilities but this moves away from concept of providing publicly accessible courts - Potential requirement for school MUGA on top of these requirements - Suggested location is community sports hub / outdoor sports hub - Potential parks location as an alternative option (within green space) but this could potentially bring with it toilet / pavilion requirements longer term.
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	<ul style="list-style-type: none"> - School site to provide multi-sport with hockey function to increase hockey capacity in the area - If not provided on school site, there is no benefit of including this on the community hub.

7.53 Based upon the above specification, offsite contributions would be required towards rugby union and potentially indoor and outdoor bowls. If the on-site sand based AGP was not delivered, it is likely that a contribution would also be needed towards hockey.

7.54 The above table has therefore been used to determine the facilities that are proposed on site and their location within the draft masterplan.

Ancillary Provision

- 7.55 Ancillary provision will be a necessary component of any on site sports facilities, with appropriate changing accommodation required in any wet / dry indoor facility.
- 7.56 Ancillary provision will also be required to service outdoor facilities although whether this is separately provided (or part of the indoor hub) will be dependent on the agreed location of facilities. It should be noted that changing rooms will not necessarily be required to service pitches where users are U16, but adult changing accommodation would be needed for adult pitches. Toilet and handwash facilities will however be required to service all pitches. It is likely that separate changing rooms would be expected for a 3G pitch and grass pitches.
- 7.57 The masterplan should therefore take into account ancillary facilities to serve the facilities that are proposed and ensure that they are located appropriately.
- 7.58 For information at this stage, the SE calculator suggests that a requirement for investment into changing provision of at least £2,520,288 is generated by the new development.

Management and Maintenance of Sports Facilities

- 7.59 Management and maintenance options are in part, dependent upon the location of facilities. Different models are likely for different facilities.
- 7.60 Further discussions are required to determine the most appropriate management of the facilities and this should form the next stage of work following finalisation of the masterplan. Options that should be considered include;
- Independent commercial procurement route / developer management company
 - There may be opportunity to incorporate the new facilities into the next round of Horsham DC Leisure procurement for facility management, which will commence in 2025 and / or Crawley Borough procurement (anticipated later). This could apply to any community hub and / or facilities located at the school site
 - In house management of community facilities by the school
 - Club based management (potentially with support from ECB / FA).

Open Space Strategy for Land West of Ifield

- 7.61 Calculations in Table 7.3 clearly demonstrate that new open space will be required to meet the needs of residents of the proposed development. Land West of Ifield does not benefit from being in the catchment of any existing open spaces.
- 7.62 Land West of Ifield is being developed as a landscape led masterplan. The masterplan seeks to create a development that is guided by the sites existing valuable character and ecological features. To this end, the open spaces provided will seek to meet recreation and amenity needs of residents, with access provided to local community green spaces, neighbourhood parks and local open spaces. Within these spaces play and activity spaces are provided for all ages.
- 7.63 Table 7.6 therefore sets out the open space that will be provided as part of the development and demonstrates that for each type of open space, standards will be met or exceeded. The spaces will be set out around the masterplan so that all residents are within local policy compliant distances of each amenity type.

Table 7.6 Open space proposed on-site

Typology	Sub-typology	Estimated requirement (based on population of 6,724) in ha	Land Provided (ha)	Details
Allotments		1.21 ha	Minimum of 2.18ga	Distributed across the site to maximise walking distance.
Multi-Functional Greenspace				
	<i>Natural & Semi-natural Greenspace</i>	16.34	66.25ha	Includes creation of River Valley Country Park to north of site. Will also contain walking and cycling routes. Other smaller linked natural spaces also provided.
	<i>Amenity greenspace</i>	3.90		Array of smaller, managed open spaces close to the home
	<i>Parks & gardens (includes outdoor sports*)</i>	9.28	19ha	Three neighbourhood parks proposed in strategic locations, each with a unique character
Children and Young People				
	<i>Children (playgrounds / landscaped areas of play)</i>	0.34	Minimum of 0.34ha	To include both local and destination spaces. Masterplan will also provide spaces for young people, including dedicated activity areas, such as ball courts, MUGAs, skate parks, mountain bike track and pump tracks.
	<i>Youth areas and facilities (skate parks / bike tracks / open access ball courts – delivering appropriate provision for all genders)</i>	0.27	Minimum 0.27ha	

Active Design and Active Travel

- 7.64 Tables 7.4, 7.5 and 7.6 confirm that there are a mix of on and off site facility requirements. Whilst many facilities will be on site, residents will use some facilities off site. Added to this, the added value that will be generated by including some facilities to support the existing infrastructure and address existing deficiencies means that residents of existing neighbourhoods will also travel to the new development. This emphasises the importance of strong, sustainable connections with nearby neighbourhoods and with existing sports facilities.
- 7.65 Links to and from nearby neighbourhood centres with active travel in mind will be a key component of the site design.
- 7.66 Building on this, Active Design takes a fresh look at the opportunities to encourage and promote sport and physical activity through the design and layout of the built environment to support a step change towards healthier and more active lifestyles.
- 7.67 Strategically, all open space within the masterplan is connected to create a network of spaces linked by green corridors. 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. This will help to encourage healthy lifestyles.

- 7.68 A separate transport strategy has been prepared which takes into account the Active Travel England design code. This document provides the detail of how the principles of Active Travel will be delivered.

Summary

- 7.69 This report has evaluated the sport and recreation needs for the proposed development at Land West of Ifield. It considers both the adequacy of current provision, and the ability of the existing infrastructure to sustain the growth that is proposed in the context of the existing provision. It also takes into account the aspirations to create an exemplar development at the site, that addresses some of the existing deficiencies in facilities as well as meeting the needs of new residents. Overall, it seeks to set out a potential sports and recreation strategy for Land West of Ifield.
- 7.70 In order to arrive at the proposed sport and recreation strategy, we have used the existing evidence bases and checked and challenged these through consultation with the respective Councils and the relevant National Governing Bodies of Sport. The impact of the proposed development has been determined through the application of both the Sports Facilities Calculator (SFC) and Playing Pitch Calculator (PPC).
- 7.71 This report therefore identifies sporting needs and sets out how these could be considered within the masterplanning process for Land West of Ifield.

Appendix 4

Minutes of meeting

Project name **Land West of Ifield**
 Project no. **1620016174-002**
 Subject **Development masterplan and effects on Bechstein’s Bats**
 Meeting date **19th September 2024**
 Location **Teams**
 Participants **Claire Howe, (Natural England - NE); Nick Downs (NE); Annabel Widdop (NE); Rebecca Fry, (Horsham District Council - HDC); Linsey King (HDC); Catherine Howe (HDC); Adrian Smith (HDC); Jason Hawkes (HDC); Rebecca Horrocks (Homes England – HE); Chris Bearton (HE); Charlotte O’Mahony (HE); Malcolm Turner (Turner & Townsend); Sheena Bell (Gillespies); Ian Davidson-Watts (Davidson-Watts Ecology (DWE)); Ellie Frew (Ramboll); Zoe Woodland (Ramboll); and Matt Royall (Ramboll)**
 Next meeting **Tbc**
 Version **3 – Minutes updated in light of comments from NE (updated / amended sections highlighted in yellow). Subsequently minutes further updated in light of comments from HDC (highlighted in green)**

- Agenda
1. Introductions
 2. Update (previous discussions / actions from previous meetings)
 3. Latest survey information
 4. AVOID / MINIMISE - Options to reduce development capacity south of Ridgeway Park
 5. MITIGATE – enhanced planting / other mitigation within site boundary
 6. Feedback / Discussion on revised proposals
 7. Discuss paragraphs 4.5 of the 24th July '24 Statement of Common Ground (SoCG) between HDC and NE
 8. Next steps

Date 24/10/2024

<https://uk.ramboll.com/environment-and-health>

Item	Comments	Action	Action Owner(s)
1.	Introductions		
	Those present on the Teams meeting who hadn’t participated in previous meetings were introduced to the different parties present.	--	--
2.	Update (previous discussions / actions from previous meetings)		
	No actions.	--	--

Item	Comments	Action	Action Owner(s)
3.	<p>Latest Survey Information</p> <p>The latest bat survey data was outlined as follows:</p> <ul style="list-style-type: none"> • A total of 6 further Bechstein’s bats including four juveniles, one adult male and one adult female were captured and tagged in July/August 2024. • One juvenile Bechstein’s bat was captured in Hyde Hill Wood, and a further two juveniles and an adult male were captured in woodland strips on the golf course. Tracking of these bats revealed maternity roosts in Hyde Hill Wood, and south Hyde Hill wood near Kilnwood Lane. Roost counts exceed 30 bats in each tree roost. The adult male roosted in woodlands forming part of Ifield Brook Meadows bordering the east of the site. The male adult travelled between the golf course and this roosting area via mature large residential gardens and hedgerows north of Rhodes Drive. • The majority of bat movements remained in and around Ifield Wood, parts of the Golf Course, especially areas supporting mature tree belts/copses. • A female adult Bechstein’s bat was captured in a small copse on the northern part of the site and a juvenile Bechstein’s was captured near Ifield Wood. Both bats used roosts in and around the Ifield Wood Complex. <p>NE had the opportunity to ask Ian Davidson-Watts queries about the latest 2024 survey data. However, NE asked for the full survey report as soon as possible to help inform decision making.</p> <p>NE asked for details of roost features in the golf course area, especially any woodpecker holes.</p>	<p>Details of potential roost features to be issued to NE (<i>Note: details included in documents emailed on 4th October 2024</i>).</p>	<p>Ramboll</p>
4.	<p>AVOID / MINIMISE - Options to reduce development capacity south of Ridgeway Park</p>		
	<p>In advance of the meeting an options pack was shared with participants. This pack illustrated Option 1 (previously shared with participants), Option 2a (preferred by HE), Option 2b, Option 3, Option 4 and Option 5.</p> <p>NE noted the difference between option 2a and 2b included an internal road in the south-west of the site (golf course area).</p>	<p>--</p>	<p>--</p>

Item	Comments	Action	Action Owner(s)
	<p>The options were outlined during the meeting and HE explained that any reduction in the quantum of development will impact on viability / scheme mix – impacting on deliverability and ability to respond to identified housing needs. The impacts are not limited to the reduction in number of homes, but also the impact on housing mix to meet local policy and address Homes England’s objectives in terms of diversification of the local housing market.</p> <p>Any reduction in development capacity will require mitigation (i.e. trade offs) elsewhere in the masterplan and these would need to be agreed between Homes England and HDC. An initial list of options for mitigating the impact beyond Option 2b presents significant viability challenges to the scheme, as a result of reduced family housing and higher mitigation costs and limitation to offsetting these impacts elsewhere in the masterplan. On this basis Option 2a is preferred as it seeks to balance avoiding / mitigating impacts on Bechstein’s bats vs deliverability risks.</p>		
5.	<p>MITIGATE – enhanced planting / other mitigation within site boundary</p>		
	<p>The option pack also included landscaping principles illustrating more detailed landscaping information for Option 2b. NE requested similar detail for option 2a.</p> <p>There was general discussion regarding the landscaping / ecological mitigation proposed, including:</p> <ul style="list-style-type: none"> • reduction of recreational pressure for the new development by use of fencing and ‘prickly’ planting to deter entry to Hyde Hill Wood. • use of buffers, including the 35m buffer to Hyde Hill Wood. • planting of new woodland in the south-west of the site to ‘strengthen’ the core habitat area of Hyde Hill Wood. • Minimising lighting, especially within key foraging areas. Lighting proposals to take account of latest Bat Conservation Trust guidance. <p>Gillespies outlined that the proposed MUGA in the Ridgeway park could be as far away from Hyde Hill Wood as possible. Some play</p>	<p>Provide indicative landscaping details for option 2a (<i>Note: details included in documents emailed on 4th October 2024</i>).</p> <p>Outline indicative location of play provision in Ridgeway Park (<i>Note:</i></p>	<p>Gillespies</p> <p>Gillespies</p>

Item	Comments	Action	Action Owner(s)
	<p>element would need to be included in the golf course area in the eastern end of the Ridgeway park, exact quantum to be confirmed following confirmation of housing numbers. The MUGA location in the Ridgeway Park would be considered further.</p> <p>There was discussion regarding lighting for proposed sports pitches within the north-west of the golf course. Gillespies outlined that at present it is proposed that all but one of the pitches would be unlit. One pitch, the furthest east in this area, closest to the proposed secondary school, would be lit for community uses. Requirements for the pitches and associated measures to minimise light spill can be included in Design Codes as part of the planning application.</p>	<p><i>details included in documents emailed on 4th October 2024).</i></p>	
6.	Feedback / Discussion on revised proposals		
	<p>There was general discussion regarding the proposals.</p> <p>DWE confirmed there was minimum of two social breeding groups. Bechstein's are predominantly woodland bats and that the tracking did not show the bats moved through built up / residential areas, whilst they can use corridors they usually go around built up areas. They can move through more open areas but this is likely to be commuting behaviour, however you cannot tell from tracking if it is foraging behaviour. Bechstein's are known to spend the majority of their time in woodland/tree canopies when foraging.</p> <p>Rebecca Fry asked that if the housing / flat mix was changed to proportionately more flats would this increase the heights of the development. HE confirmed that overall heights would be as previously proposed – there would just be a higher number of flats compared to houses.</p> <p>NE stated that the proposals were a 'step in the right direction' and welcomed the work undertaken by the design team. NE would like some further details regarding landscaping for option 2a and also ecological mitigation associated with this option in order to reach a position on whether potential impacts on Bechstein's populations can be effectively managed.</p>	<p>Prepare further details regarding option 2a, this should indicate roost features with woodpecker holes, note connectivity from the golf course to Ifield Brook Meadows (<i>Note: details included in documents emailed on 4th October 2024).</i></p>	<p>Gillespies / Ramboll</p>

Item	Comments	Action	Action Owner(s)
	Catherine Howe noted there was more reassurance now regarding a potential agreement between respective parties. Also Catherine noted that proportionality was key as part of considering all relevant issues.		
7.	Discuss paragraphs 4.5 of the 24th July '24 Statement of Common Ground (SoCG) between HDC and NE		
	<p>The above referenced SoCG includes the following under paragraph 4.5: "NE also recognise that the Hyde Hill Wood and immediate surrounding area supports a notable population of Bechstein's bats which would satisfy designation criteria as a site of special scientific interest."</p> <p>There was discussion regarding this point and Claire Howe reiterated that, although the Bechstein's colony at Hyde Hill Wood would satisfy SSSI designation criteria, they do not currently fall into the highest category of importance and Natural England would not be looking to designate the site at this time due to prioritisation needs internally. (Ramboll post meeting note – based on the above comments from NE the original wording in the SoCG referring to 'surrounding area' is ambiguous and should be removed, the comment should solely relate to Hyde Hill Wood itself).</p> <p>HE asked if the SoCG could be updated to reflect this view and also be more positively worded to reflect ongoing and constructive discussions regarding changes to the scheme and mitigation proposals.</p> <p>HDC confirmed they would consider any alternative wording put forwarded by NE for the SoCG.</p>	<p>NE to consider and either propose an update to the SoCG or to make clear in a submission statement that the reference to SSSI designation criteria is not an issue.</p>	NE
8.	Next Steps		
	<p>Address actions outlined above by w/c 30th Sept '24.</p> <p>The full bat radiotracking 2024 survey report will be issued to NE and HDC as soon as possible.</p>	<p>As stated above (Note: details included in documents emailed on 4th October 2024).</p> <p>Issue radiotracking report. (Note: 2024 survey report issued on 18th October 2024).</p>	<p>As stated above</p> <p>Ramboll</p>

Item	Comments	Action	Action Owner(s)
	HDC Local Plan Inspector's Matters, Issues and Questions (MIQs) are anticipated by mid October. An agreed way forward with NE, HDC and HE will be necessary to be able to positively respond to the Inspector in Hearing Statements.	Further engagement on this issue.	NE, HDC and HE

Appendix 5

STATEMENT OF COMMON GROUND BETWEEN HOMES ENGLAND, WEST SUSSEX COUNTY COUNCIL AND HORSHAM DISTRICT COUNCIL

20TH NOVEMBER 2024

1. INTRODUCTION:

- 1.1 This is a Statement of Common Ground (SoCG) between Homes England, West Sussex County Council (WSCC) and Horsham District Council (HDC) which sets out the details of the current and future cooperation and the joint working relationships of the parties.
- 1.2 This statement specifically relates to the school provision outlined within the Horsham District Council Local Plan in relation to the Policy HA2 “Land West of Ifield” that Homes England are promoting. Homes England, WSCC and HDC have been working proactively together through pre-application discussions, supported by a Planning Performance Agreement, to ensure that the school provision within the West of Ifield development meet the requirements identified by the Local Education Authority - WSCC.

2. PARTIES:

- 2.1 The relevant parties for the purpose of this SoCG are Homes England, WSCC and HDC.

3. KEY MATTERS – SCHOOL PROVISION

- 3.1 Pre-application discussions have established the school provision requirement for the West of Ifield Development, informed by a blended housing mix devised to meet the needs of Horsham and Crawley at the time the planning application has been prepared. This also reflects the site’s position “At Crawley”.
- 3.2 This approach has subsequently been incorporated into Strategic Policy HA2 through the Suggested Modifications to the Horsham District Council Local Plan as summarised below:
- “Approximately 3,000 homes (C2 and C3 Use Class), a minimum 40% of which will be affordable homes, ~~together with~~ and to include provision for young families, older people, land for Community Land Trust (or similar community led scheme) housing ~~and, together with~~ the provision of a permanent Gypsy and Traveller site of 15 pitches. A blended mix of housing sizes will apply, to take into account both Horsham’s and Crawley’s strategic mixes for affordable and market housing, as expressed in respective local plans.”
- 3.3 Through the pre-application process, it has been agreed that based on the proposed quantum of development of 3,000 homes, the detailed housing mix for the proposal and the current methodologies for education places, the education requirements comprise a 2 form (expandable to 3 form) entry primary school, with an onsite early years facility and provision for children with Special Educational Needs and Disabilities (SEND), accompanied by a separate, privately run early years facility in the neighbourhood centre, and a 6 form entry secondary school (expandable to 8 form) with provision for children with SEND.
- 3.4 The Suggested Modifications to the Local Plan policy reflect representations from WSCC and amend the school provision for the West of Ifield site allocation which is set out below for ease:
- e) Land and contributions to meet the education provision standards advised by the Local Education Authority, (or any future updates based on refinement of needs evidence) as follows:

- i. ~~“two~~ one 2-form entry primary school and one 2-form entry expandable to 3-form entry primary school, both to incorporate support centres for special educational needs,”
- ii. an 8-form entry expandable to 10-form entry secondary school, to incorporate...”

3.5 The Suggested Modifications reflect a strategic policy position of educational needs evidenced by WSCC to align the policy with requirements in the Infrastructure Delivery Plan, which are based on the allocation quantum of housing.

3.6 It is agreed between the respective parties that the Suggested Modifications do not reflect the provision that has been agreed in pre-application discussions between Homes England and WSCC, based on the blended housing mix specific to Land West of Ifield proposed planning application, which is yet to be submitted for determination. The suggested modifications will ensure that, if an alternative masterplan were prepared with a different housing mix, appropriate land and contributions could be secured to suitably mitigate the planned development in educational terms. It will also enable suitable mitigation to be secured if circumstances change as WSCC continue to monitor forecasts, the impact of migration and local plan developments.

3.7 Modifications to Policy HA2 section e) (modification HM065) and Paragraph 10.94 in the supporting text to policy HA2 (modification 10.94), enable changes such as housing mix that may lead to a refinement of needs evidence, can be taken into account at the planning application stage.

3.8 In determining a future planning application for Land West of Ifield, the education needs will be determined by the proposed housing mix. This may result in alternative school provision being required to meet the needs of the development to the criteria currently set out in Policy HA2. Based on the pre-application discussions to date, it is anticipated by Homes England, that the actual needs for education provision will be reflective of that set out in paragraph 3.3 of this statement.

4. SIGNATORIES

4.1 The parties agree that this SoCG accurately reflects the matters discussed and the issues that are agreed upon.

4.2 The parties will strive to maintain their cooperation and joint working efforts and their obligations to provide transparency and fairness. The parties will actively address any issues outlined in this SoCG.

Organisation	Name	Position	Signature	Date
Homes England	Kate McBride	Regional Development Director		
West Sussex County Council				

DRAFT

Appendix 6

Kate McBride
Strategic Land,
Homes England
50 Victoria Street London SW1H 0TL

1 November 2024

Dear Kate,

FS0798 Forge Wood High, West of Ifield: DfE and Homes England (HE) joint working

Thank you for working with the Department for Education (the Department) to support land allocation for the Department's Forge Wood High project (the Project) which will form part of the Homes England (HE) West of Ifield development. This letter is to be read in conjunction with the Heads of Terms (HoTs) between the Department and HE, finalised 6 August 2021. The contents of this letter are not intended to be legally binding.

As part of a joint working exercise with HE in relation to the Project,

- 1) The Department recognises the following:
 - a) The Horsham Local Plan is forecast for adoption by Horsham District Council in Spring/Summer 2025. The Department and HE have no control on the actual achievement of this milestone.
 - b) The adoption of the Horsham Local Plan by Horsham District Council is key to the timely determination of the HE planning applications for West of Ifield (Outline Master plan and detailed enabling works package).
 - c) A positive determination on HE's planning applications by the Local Planning Authority is required to allow HE to then deliver the enabling works package (temporary and permanent facilities).
- 2) In anticipation of both the adoption of the Horsham Local Plan by Horsham District Council and a positive determination of HE's planning applications by the Local Planning Authority the Department will endeavour to:

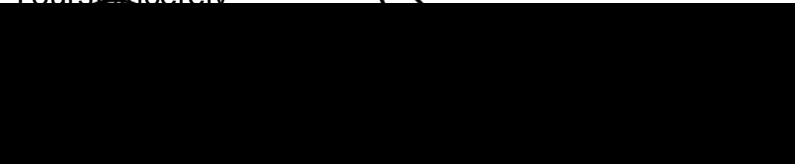
- a) work towards a year of opening that responds to the need for school spaces having regard to the typical design, approval, contract award and construction delivery lead time.
 - b) submit a detailed planning application for the Project at the appropriate time.
 - c) work collaboratively with HE, wherever possible and appropriate, to align the Project timescales, subject to planning and procurement, and the need for school spaces, and HE's implementation timescales for the temporary and permanent enabling works package.
- 3) The Department will endeavour to:
- a) liaise with HE officials to align activities between the Project and HE West of Ifield masterplan activities where it is appropriate to do so.
 - b) liaise with HE to explore a 2 Form Entry (FE) expansion over the base project scope of 6 FE secondary school and 280 place Sixth Form, and to incorporate 16 COIN (Communication and Interaction Difficulties) covering speech and language/communication needs and autism places. If this expansion is to take place, the final capacity of Forge Wood High will be 8FE + 16 COIN places and a 400 place Sixth Form at a future date.
 - c) at feasibility review stage, if appropriate and required, review the baseline project scope for Forge Wood High to include 8FE core + 16 COIN places in relevant spaces.
 - d) provide costings to HE, when available and as appropriate, on the costs of design fees and capital costs associated with implementation of the 8FE core option including Sixth Form impacts, if this option is ultimately agreed upon by the Department and HE. All costs will be based on settled Department procurement frameworks and the Department's established routes to market, HE will be responsible for all costs relating to the 2FE expansion element of the Project on this basis, including without limitation, all pre-contract design development costs as well as the capital costs associated with the 2FE core expansion.
 - e) at planning stage and if agreed in advance with HE, will include the expansion elements as 8FE core + 16 COIN places and with associated Sixth Form impacts in the project planning application to be submitted to the Local Planning Authority.
 - f) reflect expansion requirements at procurement stage, if an agreed expansion strategy is in place between the Department and HE
 - g) review the requirement for an COIN provision to be included in the possible expansion zone of the site, if an agreement is reached between the Department and the LPA.

- 4) The Department acknowledges that HE may require the Department's personnel to participate in consultation events with Local Authorities and stakeholders. If appropriate and relevant, the Department's project team members will endeavour to support HE with Department representation.
- 5) The Department acknowledges that HE may require the Department's advisory services to deliver future education need as part of the wider West of Ifield masterplan, outside the delivery of the Project. If appropriate and relevant, the Department will endeavour to liaise with HE to discuss and agree a practical strategy for support, in advance of any resource commitment by either the Department or HE.

For detailed discussions on the project, please contact the Department's Project Director Stephen Hyland (e: Stephen.Hyland@education.gov.uk)

We look forward to working with HE.

Yours sincerely



Mark Sarjant, Regional Head Construction Delivery South East & South London,
Cc (by email):

Stephen Hyland, Project Director, DfE
Chris Bearton, Project Lead, West of Ifield, Homes England

Appendix 7

Wood, Michael

From: CLAVELL-BATE, Simon (NHS SUSSEX INTEGRATED CARE BOARD) [REDACTED]
Sent: 08 September 2022 11:37
To: Nicholas Milner; Rebecca Horrocks
Cc: HARRINGTON, Fouzia (NHS SUSSEX INTEGRATED CARE BOARD); SALLIS, Karen (NHS SUSSEX INTEGRATED CARE BOARD); HENLEY, Sarah (NHS SUSSEX INTEGRATED CARE BOARD); HILL, Andrea (NHS SUSSEX INTEGRATED CARE BOARD); LUXTON, Liz (NHS ENGLAND – X24); LUCK, Hugo (NHS SUSSEX INTEGRATED CARE BOARD); RENSHAW, Rachael (NHS SUSSEX INTEGRATED CARE BOARD)
Subject: West of Ifield- meeting feedback
Attachments: 2022-01-16 West of Ifield 3k to 10k of homes.xlsx
Follow Up Flag: Follow up
Flag Status: Flagged

Nicholas & Rebecca

[Thank you again for a really positive meeting \(one of many\).](#)

Since our initial meetings, there has been a Crawley NHS programme (thus looping in key colleagues) I hope the below and attached help update on previous workings (I've used the same info as January 2022)

[** We recognise the site is in Horsham District Council area, but there is Crawley town as the closer urban area](#)

I'm looping in

- Sarah Henley – Director of Primary Care and a lead for Crawley health planning (primary care element)
- Fouzia Harrington – our programme director for the Crawley planning overall
- Karen Sallis – Head of Primary Care (West Sussex)
- Hugo Luck – Associate Director Primary Care (West Sussex)
- Andrea Hill – Primary Care Delivery Manager Crawley (working with Sarah Henley, supporting Fouzia's planning)
- Liz Luxton – Associate Director of Estates for the Sussex ICB
- Rachael Renshaw – Primary Care Delivery Manager with Estate as part of portfolio

Reason for this letter:

1. Homes England have and are a very committed team – with understanding of community working and for the purpose of this, a very strong partner.
2. The West of Ifield project – was shared some time ago and we have noted that the 3,000 home now (growth to 10,000 in circa 30 years) does require strategic work.
3. Our response remains consistent. We can substantiate the need for a site and have aligned planning metrics to share broad direct need. The attached has high level metrics.
4. Wider joined up communication – just to feed into the work of Primary Care (looking at Crawley need). This is looking at need in Crawley and feeding in elements that need to be considered. Such as new homes. This is just to link in Sarah and Andrea directly (Fouzia meets regular and I meet Andrea weekly)
5. Shared vision for West if Ifield need – being the direct link of the GP premises (a shell, core and fit out developer gift). These will support the infrastructure needed and may well help with beneficial additional community additions – such as the potential for a health club or leisure centre. This in turn indirectly to a degree promotes health planning and self-care (health and fitness wise).

Access - Homes England note the access routes into Crawley are being reviewed and aimed at providing good access (bus route ideal). The hospital site is part of our Crawley work. Population growth overall is

already part of that service need review and the Crawley community needs are being addressed through the NHS project Fouzia is leading.
For West of Ifield, the housing / community plan is sound and includes the NHS need currently needed (metrics for broad need attached).

Governance / process

Just to re-confirm the commissioner and GP role.
As a commissioner, we recognise the need and the 'premises strategy'.
We will work with the providers with regard to site ownership and taking a project (the premises development) forward with Homes England.
Homes England would support the "build detail" (BREEAM excellent standard) with the NHS team advising on layout...
The NHS will be the body to provide the workforce and running of the site.

Summary

I believe we are all on the same page
Homes England – planning for West of Ifield
Crawley Health project - led by Fouzia with a discreet Primary Care sub group (led by Sarah Henley and Andrea Hill)
Primary Care strategy planning – led by Simon Clavell-Bate and broad aspect in the attached

The joint stakeholder agreement is to bring in any exception needs – so these can be reviewed. These should be brought into the key leads:

- Nicholas Milner (Home England)
- Fouzia Harrington (Crawley NHS project plan)

I'll continue to cover the West of Ifield Primary Care need (the direct need)

Please take this email as support for your development plans Nicholas. I do believe you are a committed team with regard to community planning.

Simon Clavell-Bate
Head of Estates
West Sussex Place

NHS Sussex

[Redacted contact information]

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Appendix 8

To Homes England

Transport Note

From Steer

Date 10 June 2024

Project Land West of Ifield – Hybrid Application

Project No. 23747303

Introduction

1. This Transport Note (TN) has been prepared by Steer on behalf of Homes England (the "Applicant") to provide a non-executive summary of the overarching transport principles that are being used to support the hybrid planning application for the proposed development at West of Ifield (Wol), Crawley (the "Site"). For the purposes of this note the proposed development relates to 3,000 new homes, education (Primary and secondary) neighbourhood centre and employment as well as the delivery of multi modal corridor between Ifield Avenue and Rusper Road.

Proposed Transport Strategy

2. The Transport Strategy for the Site has a focus on sustainable transport and draws upon best practice and government guidance to promote active travel and reduce dependency on private vehicles. This is complementary to the wider Horsham District Council (HDC), Crawley Borough Council (CBC) and West Sussex County Council (WSCC) Transport Plan. This accords with the new Active Design guidelines by Active Travel England (ATE) (2023).
3. The masterplan layout has been designed to prioritise and enable active travel first and then public transport. As well as ensuring the physical layout and provision of facilities (e.g. cycle parking) and encouraging active travel, Homes England are committed to delivering a package of sustainable transport measures that further encourage non-car travel. The strategy supports active travel, creates active high-quality places and spaces and it ensures these spaces are activated through their design and the networks created to connect them.
4. The Transport Strategy also promotes flexible design approaches which are integrated into the emerging masterplan to future proof for changing travel behaviours and advances in technology to realise a sustainable community which could form the first phase of a wider strategic development opportunity west of Crawley.
5. The Transport Strategy for the Site development can be summarised as follows:
 - **A development which reduces the need to travel by car off site** – A vision led development, providing a good mix of land uses of appropriate scale and range of amenities which residents use on a daily basis to reduce requirements for external travel. A multi modal corridor with high quality bus infrastructure, including bus lanes and real time bus information, as well as pedestrian and cycle facilities designed in line with best practice.
 - **A people neighbourhood** – a highly connected and accessible network of neighbourhood and local centres providing access for residents to the range of amenities such as shops, offices, parks, and other community infrastructure using active modes as the primary choice of travel. Also providing arterial mobility corridors connecting into surrounding neighbourhoods and the existing and future network of off-site routes towards key transport nodes and employment destinations.
 - **Preferential permeability** – ease of access to all destinations for micro mobility modes such as walking and cycling and road designs informed by Travel Demand Management (TDM) best practice for private vehicles,

thereby reducing propensity for short distance car trips. Combined with the hierarchical mobility corridors will mean most journeys of sub 15 minutes will be easier by active travel measures.

- **Providing for new and active forms of transport** – Exemplar cycle infrastructure, with high levels of cycle parking for residents and accessible bike storage with battery charging provision to encourage cycling as a primary mode. Positively providing for new technologies including e-scooters and anticipating the onset of ‘mobility as a service’ Maas).
- **Mobility hubs** – designed to facilitate access between various transport modes and strategically situated to provide first and last mile personal transport solutions and raise the profile of public transport and shared mobility. These will be integrated at high quality bus stops with high frequency services which are within 400m (5-minute walk) of around 90% of homes.
- **High frequency bus services** – a high frequency (up to 10 minute) bus route connecting Wol with Crawley Town Centre, Three Bridges station, Manor Royal and Gatwick Airport. A bus (and cycle) gate and segregated infrastructure within the development and targeted bus priority measures on congested parts of the route to enhance journey times over private vehicle use. Gradual phasing of a second route (10-minute frequency) along the new multi-modal link road when commercially viable providing further connections to Manor Royal and Gatwick with benefits for existing Ifield West residents.
- **Encouraging rail use** – working with Network Rail (Great British Railways (GBR)) and CBC to identify potential improvements at Ifield Station and facilitating sustainable connections from the development. Also facilitating fast and frequency bus access to Crawley and Three Bridges rail stations for enhanced rail services.
- **Reduced car reliance** – a car parking strategy which acknowledges current and future demand but coupled with provision of infrastructure / other support for alternative modes, provides the flexibility and mechanism to reduce or repurpose parking over time with behavioural changes and advances in technology. Significant car club provision to reduce car ownership, particularly for less frequently used cars. Streets designed for people and potential for modal restrictions on Rusper Road to alleviate residents existing and future congestion concerns and provide an enhanced mobility and bus corridor.
- **Residential, Commercial and School Travel Plans** – In addition to the delivery of hard infrastructure, a package of measures and incentives available to residents and commercial users will be prompted to enable sustainable travel behaviour and a mechanism to review and monitor the effectiveness of the measures in place with clear time commitments. A summary of the measures included in the Travel Plan are as follows:
 - Appoint site-wide Travel Plan Co-ordinator.
 - Appoint individual Workplace Travel Plans for tenants that meet the threshold requirements.
 - Provision of information to ensure people know what opportunities are available to travel sustainably from the site to key locations.
 - A range of incentives, such as bus taster tickets, and discounts on sustainable travel initiatives.
 - TPC Launch Event.
 - Regular promotional events.
 - Promote the use of teleconferencing in place of face-to-face meetings.
 - Flexible working hours/co-ordinated shift patterns.
 - Cycle training and bike maintenance.
 - Bicycle user group.
- **Sustainable Transport Package of Mitigation measures**- Any permission will be supported by a Section 106 agreement which will include a package of transport related improvements aimed at mitigating the impacts of the development. The package will follow a ‘decide and provide’ approach, aimed at

promoting active travel and public transport first, and mitigation measures aimed at modal change rather than providing network capacity interventions. In addition to the on-site measures, the package would include:

- Strategic local walking and cycling improvements as identified in the Crawley LCWIP
- Localised walking and cycling improvements.
- A contribution toward bus services, public transport and
- A Level of Service agreement related to bus provision.
- A contribution towards junction improvements
- A commitment to a 'Monitor and Manage' approach.

Crawley Western Link Road (CWLR)

6. The Crawley Western Link Road (CWLR) has been designed as a multi modal route with the following principles established:

- Single carriageway with a continuous bus lane in each direction.
- Segregated 3.5m wide cycleways separate from footways with priority at junctions.
- Segregated footways, minimum 2.6m and widening in the neighbourhood centre.
- Varying speeds, including 20mph through the neighbourhood centre and 30mph elsewhere where appropriate.
- Bus priority measures at junctions, to be explored further alongside highway modelling.

Site Access

7. The principle of site access arrangements has been discussed and agreed with WSCC, and will be fully modelled, and detailed within the Transport Assessment.
8. The primary vehicular access is to / from the northeast via signalised junction with Ifield Avenue / Ifield Green. Access into the site from the south will only be available to pedestrians, cyclists and buses, through the proposed bus gate at the entry to the existing Ifield Golf Course.
9. Internally, the northern access point has been designed as a priority junction and has taken on board feedback from the local authorities. This access point redefines the main route as turning into the neighbourhood centre rather than continuing on the stopped up Rusper Road. The access will be a single carriageway in each direction, plus footway and cycle way on each side of the road.

Rusper Road

10. It is proposed to stop up Rusper Road where it crosses the CWL for all vehicular traffic. Pedestrian and cycle access will be maintained in a north/south direction. This is proposed to provide a number of benefits. Firstly, the Rusper Road environment to the north / south of this point will be quieter and will be 'access only' to existing premises. This will significantly enhance the cycling facilities to the south, providing a much lower trafficked route towards Ifield Station for example. Secondly, it will enable the southern part of Rusper Road (between the existing golf course and Hyde Drive) to become a cycle street, with access only for residents, buses, pedestrians and cyclists.

Pedestrian and Cycle Access

Internal

11. The site has been designed to put active travel modes first and be the top choice for residents. There will be a comprehensive, permeable network of walking and cycling routes throughout the development.

External – LCWIP Contributions

12. Equally as important as the on-site provision are the off-site mobility corridors and how the proposed network integrates with the existing and future network. There is significant potential for using active modes as a primary choice of travel from WoI for external trips given its proximity to key transport nodes, employment centres and surrounding amenities.
13. CBC and HDC have each developed a Local Cycling and Walking Infrastructure Plan (LCWIP), a costed plan which identifies and prioritises physical infrastructure schemes along specific corridors to enable a significant increase in cycling and walking.
14. Key elements of the improvements identified in the Crawley LCWIP include the widening of routes where possible, traffic calming and cycle priority at junctions and better crossings. Routes L, part of M and P in particular are of significant strategic importance to WoI in providing direct connections to Crawley Town Centre and Manor Royal. Indicative costs to deliver routes L, M and P have been identified by CBC at £853k, £480k and £1.21m respectively.

Public Transport Strategy

15. Homes England are committed to delivering a sustainable development and as part of that are funding a significant bus service from the delivery of the first homes. This will provide a high frequency bus service to Ifield Station, Crawley, Manor Royal Business District and Gatwick Airport, linking residents of WoI with both employment and onward public transport options by rail / bus interchange. A second bus route delivered later in the scheme will deliver faster connections to Manor Royal and Gatwick Airport, as well as County Oak retail park. By providing bus links (and cycle links) from mobility hubs within WoI to key facilities and interchanges such as the rail stations at Ifield, Crawley, Three Bridges and Gatwick Airport, there are a huge range of options available to residents / employees of WoI to travel by public transport.
16. Homes England are discussing, with Network Rail, interventions to improve the interchange at Ifield Rail Station.

Cycle Parking

17. The minimum cycle parking standards as set out by WSCC will be met through personal and secure type of cycle parking provision, with provision for electric bikes within this. The wider ambition to provide a higher provision of one cycle parking space per bedroom will be met either by integrated parking within the individual plots or by the addition of shared storage solutions, either as courtyard cycle parking facilities or other shared cycle parking solutions.

Car Parking

18. Minimum car parking requirements have been applied to the development, however at the same time, the urban design of the development has been done to ensure that the Site is future proofed and flexible in its ability to adapt to changes in car and associated parking demand over time.

Local Plan Modelling

19. With West Sussex County Council (WSSCC) (as highway authority) both HDC and CBC have each developed their own SATURN highway model to support their Local Plans. A summary of each alongside their relevance to the proposed development at Wol is provided below.

Horsham District Council

20. Stantec were commissioned by Horsham District Council (HDC) to produce a modelling Transport Assessment to support the emerging Local Plan 2039. The assessment was undertaken using a SATURN highway model, which assesses the impact of a number of development scenarios on the local highway network managed by WSSCC, along with impacts on the Strategic Road Network, managed by National Highways.
21. A number of scenarios have been taken through the modelling process and outputs of these have been used to inform the development of a preferred development scenario. It has been assumed that the proposed development at Wol would be associated with the following land use quantum's during the Local Plan period:
 - Local Plan Period (Dwellings) = 1,600
 - Overall (Dwellings) = 3,000
 - Employment B1 (Plan Period, sqm) = 2,700sqm and
 - Employment B2 and B8 (Plan Period, sqm) = 6,300sqm.
22. Sustainable transport measures have been proposed to promote and encourage sustainable active transport modes as part of the development sites included in the emerging Local Plan 2039. Where it has been demonstrated that sustainable travel measures would not be enough to fully mitigate the impacts of the Local Plan, further mitigation measures have been developed and assessed. The following junctions are shown to require physical mitigation within Horsham District:
 - A24 / A272 Buck Barn.
 - A24 / B2237 Hop Oast Roundabout; and
 - A24 / A283 Washing Roundabout.
23. None of these junctions are located within close proximity of the Wol development site. Therefore, it can be concluded that the transport modelling completed for the emerging Local Plan 2039 in the Horsham District outlines that the Wol development will not result in a residual negative impact on the operation of local junctions to the Site.

Crawley Borough Council

24. Stantec were commissioned by CBC to undertake a transport study to inform the Draft Crawley Local Plan Review for the Crawley Borough Area. The Draft Crawley Local Plan 2021-2037 sets out the spatial strategy and vision for the Borough, and the policies to achieve this for the 17-year period up to 2037. It identifies the overall amount of new development needed over this period of time and indicates the broad locations for new development including the location of major sites. The Transport Study covers the anticipated development levels created by the draft Local Plan within Crawley Borough.
25. The transport modelling for this study has been undertaken using a Saturn Highway Assignment Model (HAM) for Crawley, known as the Crawley Town Model (CTM).
26. The Draft Crawley Local Plan is a review of the adopted Local Plan Crawley 2030, extending of the term of the Plan to 2037. Developments have therefore already been identified up to 2030 along with transport mitigation.

27. Three Draft Crawley Local Plan scenarios have been tested and are identified as Scenarios 1, 2 and 3. The third scenario includes the assumptions for the proposed development at Wol:
- Scenario 1 – 6,720 dwellings within Crawley Borough at 420 dwellings per annum and Employment Land Trajectories.
 - Scenario 2 – As Scenario 1 plus Gatwick Green Employment Allocation; and
 - Scenario 3 – As Scenario 2 plus Wol (3,750 Dwellings) and West of Kilnwood Vale (1,546 dwellings) and 50,000 square metres of employment leading to 12,016 dwellings at 751 dwellings per annum in this scenario. It is of note that these numbers are far greater than now being planned for, i.e. Wol is now 3,000 homes rather than 3,500 and West of Kilnwood Vale scheme is unlikely to come forward as envisaged. The scenario, which is already shown as being manageable, is therefore a worse case in terms of traffic impacts.
28. The future year traffic modelling is based on a ‘decide and provide’ approach, encouraging modal shift as far as possible, while only including limited network capacity improvements, some of which would be partially funded by Wol.
29. Additional sensitivity tests and modelling reviews have been undertaken including:
- A sensitivity test has been included in Scenario 3 that includes a full link road running from the A264 to the west to A23 London Road to access junctions for the Wol development. The transport Assessment concluded that the full link road was not necessary to address traffic impacts in Crawley / Horsham or support the Crawley Local Plan (and the proposed development at Wol), however if further development beyond Scenario 3 comes forward, then a full link road would help to relieve the impacts on the local highway network in Crawley.
 - A test of additional traffic associated with the Gatwick Airport DCO. This also concluded that the additional traffic associated with Gatwick airport could be accommodated on the network, alongside proposed strategic interventions.
 - Future year assessment – a review was undertaken of the Local Plan end year against modelling. It was identified that the most recent predicted growth rates show a slower growth and increase in sustainable travel habits which mean that growth rates included within the strategic modelling are robust.
30. The Crawley traffic modelling has been subject to review through the Local Plan Examination in Public and found to be sound.

Development Impact Assessment

31. The Transport Assessment for Wol is still being progressed, however it includes a further run of the Crawley Highway Assignment Model has provided more detailed use class quantum’s for the Wol development than what has been included in Scenario 3, in addition to infrastructure improvements and the CWLR. Therefore, the Transport Assessment predicts with greater accuracy the impacts on the highway network and any junctions that are over capacity and specific mitigation measures required to alleviate this, and to facilitate modal shift.

Highways Impact

32. The strategic modelling has been used to demonstrate where the flows might have impacted local junctions within the vicinity of the development, as agreed with WSCC. Full capacity assessments have been carried out at the following junctions, as agreed with the local authorities during pre-application discussions:
- CWL / North Access – Signalised 4-arm Junction.
 - CWL / South Access – Signalised 4-arm Junction.

- CWL / Charwood Road / Bonnetts Lane / Ifield Avenue / Ifield Green – Signalised 3-arm junction and 4-arm junction treated as one within LinSig model due to close proximity.
 - Ifield Avenue / Warren Drive – Priority junction.
 - Ifield Avenue / Stagelands – Priority junction.
 - Ifield Avenue / Ifield Drive – 3 arm roundabouts (signalised).
 - Ifield Avenue / A23 Crawley Avenue – 4 arm roundabout.
 - A264 / Faygate Lane – 4 arm roundabouts; and
 - A264 / Horsham Road – 4 arm roundabout.
33. In summary, mitigation is proposed at Ifield Avenue / Warren Drive and at Ifield Avenue / Stagelands junctions within the adopted highway boundary) to help improve the efficiency of these locations, but no other junctions tested require additional mitigation because of the Wol development. No junctions were identified as requiring any improvements in Horsham.

Walking & Cycling Assessment

34. A multi-modal trip generation assessment has been completed to assess the impact of the proposed development on sustainable modes, including walk and cycle infrastructure. A full Active Travel England (ATE) Assessment will be completed as part of the hybrid planning application to determine links/routes between the site and key destinations that require improvements.

Public Transport Impacts

35. The proposed trips by public transport beyond the masterplan can be accommodated within the existing and proposed provision. The provision of additional Fastway services and improvements at Ifield Station will provide a significant step change in provision locally and will benefit the existing local community as well as the new.
36. Although the existing bus services do provide greater flexibility in route, for the majority of journeys the additional new routes will provide an excellent level of service with high quality interchange possibilities within Crawley Bus Station or further north at Gatwick Airport, to East Surrey Hospital for example.
37. Home England has been discussing with Network Rail and Govia Thameslink the potential for making improvements to Ifield Station to create a greater sense of arrival and prominence of the station, increase the cycle parking provision and improve the waiting area for London bound passengers in particular.

Package of Mitigation Measures

38. The Transport Strategy for Wol is to create a sustainable community which supports residents, employees and visitors to prioritise sustainable modes. Homes England are committing to a significant sustainable transport contribution to deliver the Travel Plan measures (including new bus routes and station improvements at Ifield) to reduce the reliance on the private car. The Transport Strategy for Wol moves away from the traditional approach to transport planning using the “predict and provide” process.
39. It is proposed that contributions towards targeted highway and junction improvements, are on a ‘decide and provide’ approach to highway capacity rather than ‘predict and provide’ to ensure that investment is targeted at improving conditions for all users. This will avoid the provision of highway capacity improvement schemes which have typically been implemented at the expense of public transport, walking, and cycling.
40. the need to ensure that traffic mitigation is only put in place when absolutely required with funds prioritised to support more non-car modes is increasingly important.

41. The bullet points below set out the proposed measures for Woi that could be implemented, based on the decide and provide approach:
- Crawley Western Link multi-modal corridor.
 - Contribution to bus services.
 - Ifield Station Interchange Improvements.
 - LCWIP Route L improvements.
 - LCWIP Route M improvements between CWL junction and Langley Drive.
 - LCWIP Route P improvements between Ifield Avenue and A23.
 - Junction improvements; and
 - Framework Travel Plan, and further detailed Residential and Workplace Travel Plans to be secured as part of S106.
42. It is proposed that these are secured through the S106 and then reviewed as part of the Travel Plan monitoring.

Summary

43. The transport strategy for WOI is forward thinking and aligns with the 'decide and provide' approach, with mitigation suggested but detailed monitoring will be put in place in order to ensure that this is only implemented if needed and doesn't drive less sustainable behaviours.

Off-site Mitigation Proposed

44. In addition to the substantial measures set out in the Travel Plan to support the uptake of non-car modes, the following mitigation is proposed to ensure that the Woi development is sustainable and the impact on the surrounding neighbourhoods is minimised.

Walking & Cycling

- Provision of funding, secured by S106, for LCWIP route L, part of routes M and P.
- Additional cycle parking at Ifield Station.

Public Transport

- Provision of two Fastway bus services across the site, with the first operational prior to the first residential property being occupied.
- Funding of improvements at Ifield Station to improve interchange, including additional cycle parking (exact improvements subject to GBR feasibility study).

Junction improvements

45. It is proposed that highway junctions will be improved.

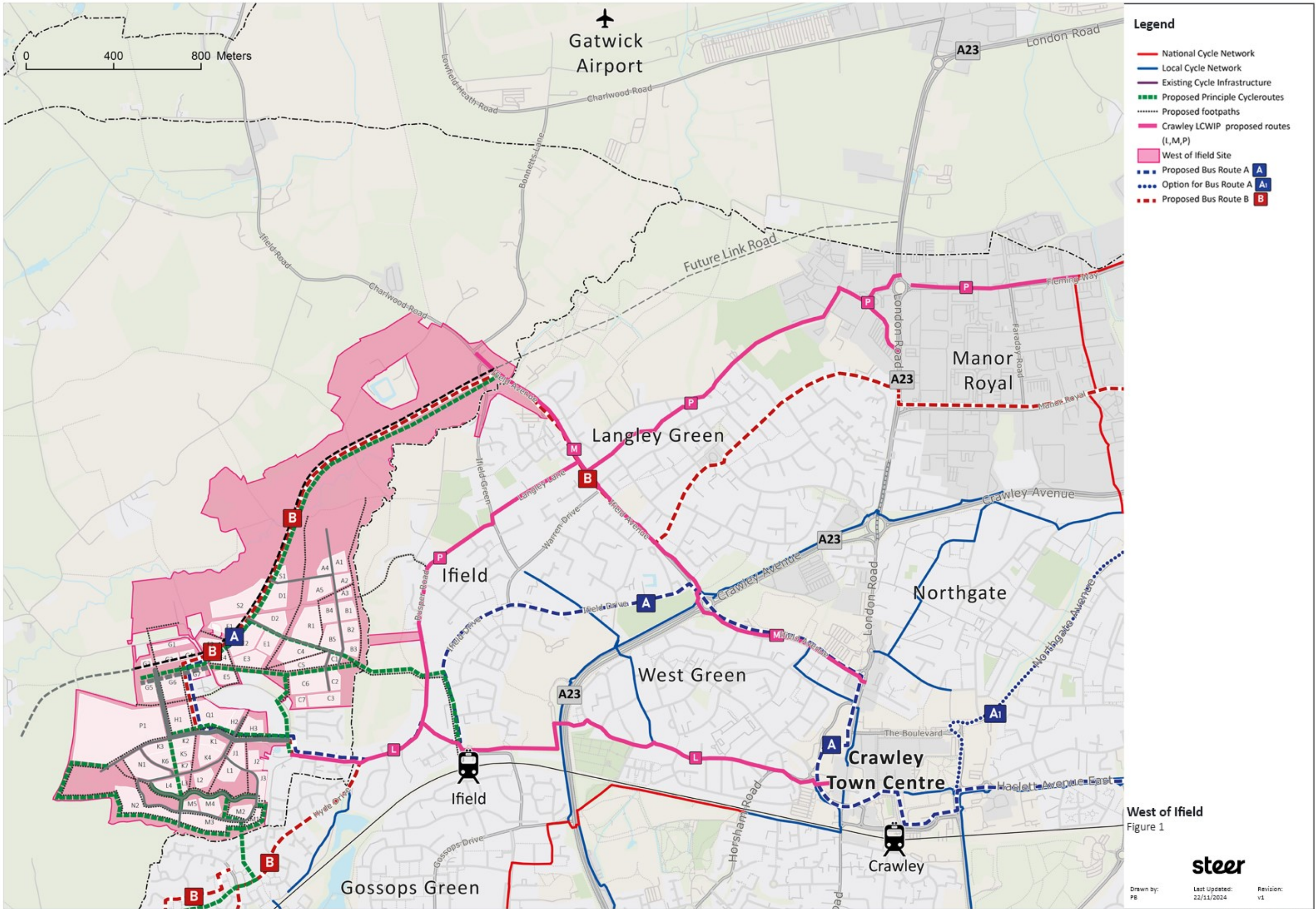
Conclusion

46. The Transport Assessment which will accompany the application will show that the Site is in full compliance with Local Plan Policy, i.e that:
- A comprehensive transport strategy will accompany the application.
 - The site will be supported by a comprehensive masterplan.
 - A walking and cycling strategy will be provided that demonstrates how attractive, direct, and legible routes have priority over motorised traffic.
 - Pedestrian and cycle infrastructure will be integrated with the existing and wider network.

- A multi-modal route with segregated Fastway bus lanes connecting Charlwood Road to the north with Rusper Road to the south will be provided.
- Improvements will be made to the Crawley Fastway bus rapid transit network.
- Electric vehicle use for private car travel and, as far as possible, for public transport are embedded in the strategy from the first phases of development; and
- A comprehensive Travel Plan and Construction Travel Plan will be agreed between the Site promoters the Council and Local Highway Authority.

Working Draft

Appendix 9



Appendix 10

Horsham District Council
Planning Policy
Parkside
Chart Way
Horsham
West Sussex
RH12 1RL

BY EMAIL

22 November 2024

Dear Catherine

HORSHAM DISTRICT COUNCIL DRAFT LOCAL PLAN – VIABILITY APPRAISAL ADDENDUM (NOVEMBER 2024)

I write in respect of the above document.

Homes England (HE) have reviewed the updated viability outputs for Land West of Ifield undertaken as part of the strategic site testing for Horsham Local Plan, as set out in the letter prepared by Aspinall Verdi (19th November 2024) (the Addendum). While we agree the allocation is viable, we still have some concern the assumptions of the Viability Appraisal do not adequately address our previous concerns and therefore the requirement for 40% affordable housing at West of Ifield is not fully justified.

Aspinall Verdi state that previous assumptions have not been revisited. Those assumptions are therefore now over a year old and will therefore not take account of any changes in inflation, interest rates, house prices or site-specific infrastructure matters or mitigation which HE will naturally be informed on.

In HE's representations to the Regulation 19 Local Plan consultation, we made a number of comments in relation to the Aspinall Verdi Viability Study (2023) and its direct relationship with draft Policy HA2: West of Ifield. These comments included the following:

- i. There needs to be sufficient justification for applying a site-specific Affordable Housing policy to West of Ifield. Clarification needs to be provided as to how this should be considered when taking account of unmet needs from Crawley – which the Local Plan states cannot be accommodated by Horsham District Council (HDC). This will ensure the Plan is justified in line with Paragraph 16 of the NPPF.
- ii. As recognised in HDC suggested modification HA063, a blended housing mix has now been agreed for West of Ifield as part of the pre-application process. This reflects the site's location 'At Crawley'. Neither the Viability Study or the Addendum included this mix as an assumption.
- iii. The Viability Study (November 2023) has only tested the viability of West of Ifield with the inclusion of one primary school, which is not aligned to the requirements in Policy HA2 and suggested modification HA065 for primary education, which references two. Whilst Homes England, West Sussex County Council and HDC have undertaken pre-application discussions which indicate that, based on the above referenced blended mix, only one primary school is presently anticipated at West of Ifield, the assumptions in the

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Viability Study, Policy wording and Infrastructure Delivery Plan need to align. Indeed, the Site Assessments Report (December 2023) only refers to the provision of one primary school within the site allocation.

- iv. The Infrastructure Delivery Plan and Policy HA2 require provision of primary health care (or financial contributions) at West of Ifield. Homes England have had positive dialogue with NHS Sussex in this regard and this use will form part of a future planning application. However, neither the Viability Study or Addendum takes this into consideration. This matter has been raised in other third party representations in response to the Regulation 19 Local Plan consultation.
- v. Policy wording in HA2, and to a lesser specific extent, paragraph 99/103 of the NPPF require offsite mitigation for the loss of facilities at Ifield Golf Club **“in the absence of site-specific evidence demonstrating the surrounding area has capacity to accommodate its loss”**. Homes England has been engaging with HDC, England Golf and Sport England as part of the pre-application process and having published evidence in respect of this matter on our website [Keep in Touch with Latest News - West Of Ifield - Commonplace](#) in September 2024, is progressing options for offsite mitigation, if it is required. Neither the Viability Study or the Addendum takes this into consideration. This matter has also been raised in other third party representations in response to the Regulation 19 Local Plan consultation.
- vi. Homes England have confirmed that we have 100% control of the land required to deliver development at West of Ifield. Of this, 97% of the land is owned by Homes England with the remainder in our control through executed land agreements. As has been raised in other responses to the Regulation 19 consultation, there will be further acquisition costs to be expended as part of the delivery of the scheme. Homes England have taken account of these costs within our build cost assumptions. However, this is not recognised in the Viability Study (2023) or the Addendum (2024).

We wish to highlight, again, that the infrastructure cost information for West of Ifield - as submitted by Homes England to inform the Local Plan viability work (November 2023) - is at a considerable variance to those assumed by Aspinall Verdi in their *Local Plan Viability Study 2023*. It is clear from the Addendum that the cost assumptions that underpin the outputs remain unchanged from their Viability Study (2023).

As matters currently stand we note the Council's expectation is that CIL is also to be paid in addition to appropriate s106 contributions. We appreciate that a review of the CIL Charging Schedule is due to take place to determine whether CIL should be levied on Strategic Sites however, this review has not concluded yet.

Homes England are keen to work with HDC to ensure no 'double counting' occurs as acknowledged in the Viability Study (2023) as a risk to be managed. You will of course be aware that PPG requires CIL to be assessed on a 'policy-on' basis to avoid precisely this concern. This is particularly relevant to West of Ifield, where a number of planning obligations will relate to cross boundary issues. Securing this via a Section 106 Agreement will allow planning obligations to be much more tailored and specific to the impacts of the development. Homes England will be making further representations to the consultation on the review of the CIL Charging Schedule in due course.

HE wish to reiterate that, in principle, it very much wishes to support HDC in achieving a sound Local Plan that includes West of Ifield as an allocated strategic site. However, for the reasons outlined above, HE have concerns that some of the inputs relied upon by the Council are erroneous.

We are committed to delivering a sustainable development at West of Ifield which embodies high quality placemaking and, first and foremost, mitigates the impact of the development. HDC will recall that Homes England have previously committed to 35% affordable housing in previous iterations of the draft Local Plan. In addition, we have acknowledged the potential opportunity to uplift affordable housing through Affordable Housing Programmes (post planning), as we have done at Brookleigh (Burgess Hill) and many other sites nationwide. It is in the interests of all parties to ensure that the evidence base for the draft Local Plan is robust and so we would welcome the

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opportunity to engage further with Aspinall Verdi, to ensure that the proposed planning application for West of Ifield (which is in an advanced stage of preparation) remains deliverable and viable.

Yours sincerely,



Kate McBride

Regional Development Director

Homes England