

EIP Submission - R M CORDY – Billingshurst Tennis Club & BSRA

Thursday 16th January – 9.30am – 5pm

Matter 9 Issue 1 HA4

Q11. Is Strategic Policy HA4: Land East of Billingshurst sound?

██████████ as Chairman of Billingshurst Tennis Club, work closely with the Billingshurst Sport and Recreation Association, (BSRA) which includes the Billingshurst Football Club and Billingshurst Cricket Club based at Jubilee Fields and in total represent the views of over 1000 residents around Billingshurst and the local area.

As you may be aware, the Jubilee Fields sports facility in Billingshurst has long since reached capacity, and similarly, the tennis club on the Recreation Ground in Lower Station Rd. has no car park and needs more court space, as we are all struggling to meet the needs of our ever-growing Village.

Following the BSRA and Tennis Club working closely with both Billingshurst Parish Council (PC) and Arunway and Highwood (owners and joint promoters of the Newbridge Park - West of Billingshurst Option) there is now an agreed plan for a multi-million-pound, investment as part of Newbridge Park, that is legally binding between the Parish Council and the BSRA, subject to planning.

This includes a new clubhouse building, indoor and outdoor tennis courts, padel courts, a new 4G football pitch and numerous other improvements to the Jubilee Playing fields and a new country park of c.70 acres. In addition to providing new homes, jobs and a primary school, Newbridge Park would therefore also provide a state-of-art sporting hub for the community.

We do not believe Strategic Policy HA4: Land East of Billingshurst is sound - as there are general and specific concerns with Policy HA4 itself with the East site having been selected, and do not consider the selection of this site is justified, effective or consistent with national policy) along with concerns with the SA/Site Assessment process that led to this option being selected versus reasonable alternatives to this – particularly west of Billingshurst.

Concerns have been expressed with the process Horsham District Council (HDC) went through and assumptions they relied upon to ‘justify’ the allocation of the East Billingshurst development site (draft Policy HA4), versus reasonable alternatives like the West Billingshurst proposal, and these concerns include not only on the technical Sustainability Appraisal and Site Assessment process covered elsewhere but also on the weight HDC afforded the local communities views in shaping the plan in line with government guidance in the [National Planning Policy Framework](#) (NPPF, para. 16(c)).

We do not believe HDC has satisfied the ‘justified’ test of soundness, as it has not assessed the reasonable alternatives to Policy HA4 in an objective manner; and so it cannot be concluded that this, ‘is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence’. We do not consider the HDC has

undertaken a fair and objective assessment of the reasonable alternatives to East Billingshurst Policy HA4 allocation, based on proportionate evidence. The Site Assessment HDC undertook to choose the site to the east rather than the west was not undertaken in a balanced and fair or proportionate manner, and serves more to arrive at a pre-determined outcome than an objective assessment of the two options. A review of the Strategic Site Assessments) of the east and the west in HDC's sustainability Assessment reveals a number of inconsistencies in most categories and Education is one of the most obvious examples, and another is materially understating the significant enhanced Leisure/Recreation provision at Jubilee fields, by referring to provision of "a new leisure centre including a gym, indoor tennis court, padel court and new 3G playing field on the parcel at Hilland roundabout". This omits to include the new changing rooms, bar, two indoor courts, 4 outdoor courts, one padel court, and the additional grass pitch, with no mention of doubling the size of the car park.

We are concerned with *the weight HDC has afforded the local communities views in shaping the plan in line with government guidance in the [National Planning Policy Framework](#) (NPPF, para. 16(c)), as that the views of the community have been repeatedly ignored during the four year delay between Reg 18 consultation in 2020 and publication of Reg 19 in 2024.*

There was an important change in attitude during this time and increasing support towards growth expressed by the Billingshurst community with a focus on the right sort of growth to best benefit the community, underpinned by a growing realisation that there was a reasonable alternative option for growth West of Billingshurst versus East, not only by the PC but also by a range of community organisations.

During three main meetings with the PC, each attended by 65 to 100 people leading up to a meeting in February 2024 it was made increasingly clear to Horsham District Council (HDC) that the PC and many local organisations including the Tennis Club and the BSRA (representing some 1000 people in total) were fully behind the West Option at Newbridge Park.

We all know new homes are needed and believe this site to the West of Billingshurst provides the perfect opportunity to deliver housing for Billingshurst through a logical extension to the village.

Despite this substantial support for the Newbridge Park proposals from the significant number of local people that we represent, it has not been included in the draft Reg. 19 version of the Local Plan. Instead, the East of Billingshurst option, which offers no real benefits to local people, has been included.

So why has the East of Billingshurst site been included when it doesn't have this local support, won't offer these facilities nor would it meet HDC's own affordable housing requirements, or indeed meet HDC's requirements on carbon reduction, whereas Newbridge Park would on all counts?

This refusal by HDC to engage and listen runs contrary to their own stated policies on community engagement at a more local level.

HDC through their Statement of Community Involvement (HDC Sept 2020) assert at paragraph 2.19:

‘Horsham District Council wants our plan-making to fully consider and take account of community views.’

The remainder of the same paragraph sets out a range of means to gauge community views, beyond just the statutory consultation stages, recognising plan making is an iterative process. This is reinforced again at paragraph 1.10 of the Reg. 19 Plan.

Sadly, there is little evidence that HDC has considered or even accounted for the community's views on options for growth around Billingshurst, since these were last consulted upon in February 2020, and HDC seems to rely and focus solely on the responses made to that single 2020 consultation.

There were four years between the two consultation stages, and HDC were made fully aware of the materially significant shift in the PC and community's views well in advance of drafting and publishing the Reg. 19 stage consultation.

Surely it is reasonable to expect that such a significant shift by Billingshurst community to support a reasonable alternative growth option deserved acknowledgment and explanation in their consultation statement, and some weighting through the SA assessment of reasonable alternatives to Policy HA4 .

The Planning Advisory Service produced a Good Practice Note for LPA on how to produce a Consultation Statement under Regulation 22 (!) ©. At page 10, the PAS advises as part of good practice:

‘Short explanations should be given for significant matters that may have arisen, including periods of delay..’

Given all the above it is fair to conclude that HDC have failed to ‘take account of community views’ in a rush to progress to Reg 19 without delay, irrespective of the communities’ views, and in effect have ridden roughshod over the community's consistent views, it has been said due to unwillingness to allocate resource, funds and time, and as a result the Reg 19 as it stands should be considered unsound.

In terms of “Effectiveness” I have concentrated on Infrastructure Requirements below under section f)

Q11. Is Strategic Policy HA4: Land East of Billingshurst sound?

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

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

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

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

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

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

We don't believe HA4 as it stands is "Effective" as we don't believe the east site is deliverable in the plan period (particularly in the early plan period which was one of their reasons for allocating it.)

This is particularly due to a significant question mark over the required new bridge to cross the railway as very serious doubt has been raised by Network Rail as explained in the Transport section under walking and cycling of the East assessment, and the concern relates to increasing housing near an uncontrolled ground level crossing over the railway and a diversion of a public right of way or provision of a footbridge or underpass. The Council state "It is expected that land will be safeguarded to facilitate the provision of a bridge. This will need further exploration and could form a requirement within policy". It is unclear whether formal agreements are even in place to construct a new bridge across Network Rails land; and if not, how long this will take, the financial terms for doing so, and implications of this for the viability and deliverability of the Policy HA4 site.

As such, there is no guarantee this agreement would be forthcoming from Network Rail; and without this, one would question how 'effective' policy HA4 is.

Indeed the implications of such proposals to an existing Public Right of Way, may also cause further delays and consequences for the use of such routes. The implications of this and other omitted evidence will need to be taken into account; alongside the cost of construction, visual and heritage impacts all have bearing on the deliverability of the East Billingshurst site (Draft Policy HA4) and hence how 'effective' this policy is.

In conclusion we believe HDC's approach to their preferred HA4 East option was flawed and therefore unsound.