

EIP Submission [REDACTED] – Billingshurst Tennis Club & BSRA

10th December Afternoon Session - 2pm – 5pm

Matter 1 – Issue 2 – Whether the Council has complied with other relevant procedural and legal requirements?

Plan Preparation

Q2. In overall terms, has the preparation of the Plan complied with the statement of Community Involvement?

[REDACTED] 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 are concerned 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 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.

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Sustainability Appraisal

Q5. Is the SA adequate and have the legal requirements of the 2004 Act and the Town and Country Planning (Local Planning) (England) Regulations 2012 (2012 Regulations) been met?

Having reviewed the strategic assessment of both the east and west of Billingshurst it is very clear that the sites have not been appraised in a fair, consistent or proportionate manner.

It is worth highlighting that the SA approach to reasonable alternatives to Policy HA4, shows fundamental flaws with assessment process, inconsistent application of weightings between the HA4 option and reasonable alternative West of Billingshurst; including affording insufficient weight to community support for the reasonable west Billingshurst alternative through the SA process, and relying on out of date assumptions and data carried forward from the earlier Reg 18 submissions, rather than the up to date correct data provided .

This again indicates a pre-determined outcome was in mind during the SA drafting stages, as opposed to an objective assessment of each reasonable alternative. To have done so would have likely resulted in West as opposed to East being favoured, as the preferred options for growth at Billingshurst.

Unfortunately, the delays this would have caused to progression and submission of the Reg 19 stage appear to have been a key factor for HDC

Other examples include a particularly biased assessments on the education provision, and 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”. Omitting to include the new changing rooms, bar, two indoor courts, 4 outdoor courts, one padel court, and the additional grass pitch and no mention of doubling the size of the car park.

This section contains many such errors and what comes over as biased commentary, so can hardly be called proportionate and therefore not sound.