

Horsham District Local Plan Hearings 2024/25

Statement by Paul Kornicky BSc (Hons), ACII Horsham District Resident

Matter 6 - Issue 1 - Question 6

Policy 28 remains inconsistent with NPPF para 99 which applies particular protection for 'open space, sports and recreational buildings'. These are a special subset of 'sites and premises used for the provision of community facilities' to which Policy 28 applies. The proposed wording in 3 (b) seeks to dilute this extra protection to the lowest common denominator.

Sport England also objected similarly at the R18 stage. HDC must have rejected these submissions as the policy appeared unchanged in the R19 plan despite Sport England proposing a revised wording.

Sport England and myself objected again at the R19 stage.

Finally some acceptance of our concerns appeared under HM043. However the proposed modification is woefully inadequate as:

- It only applies to open space – what about built facilities within the scope of NPPF para 99 ?
- The term 'surplus to requirements' does not specifically relate to being consequent upon a robust assessment of sporting need for the facility. It could mean surplus to any requirement.

But, even by suggesting the modification, it surely concedes that the existing unamended policy does not adequately reflect the requirements of NPPF para 99.

My previous R19 submission on this therefore stands.

I have now also seen the Sport England objection maintained at the R19 stage (response id 1191946) and do not believe that the proposed modification would satisfy its concerns. The supporting evidence is compelling.

The policy is unsound even with the modification proposed under HM043.

12th November 2024

END