

## Policy SDG1 Community Facilities (previously Policy SD43)

Number of comments on policy: 35

Number of additional responses to technical questions: 8

### Reaction to Regulation 18 Consultation

Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Not stated
3	16	8	4	0	32

### Summary of issues and key themes raised

Respondents suggest that the policy's criteria and marketing requirements do not align with wider strategic approaches and have not been consistently implemented. Respondents recommend clearly defining "community facilities", clarifying phrases such as "or an equivalent community use", and addressing the separation between commercial and community sports facilities. Respondents advise that development should promote environmental sustainability through multifunctional uses, integrated green and blue infrastructure, and improved non-motorised connectivity. In addition, community facilities should be accessible, inclusive, and close to the community, with calls for design features that support residents without car access. There are also calls for updated evidence, recognition for assets of community value, and exemptions for surplus NHS sites from marketing requirements and community use obligations.

#### Key themes raised:

- Policy effectiveness and implementation
- Definition and scope of community facilities
- Environmental sustainability and multifunctional spaces
- Accessible and inclusive design
- Development impacts and community infrastructure contributions
- Location and spatial considerations
- Connectivity and active travel infrastructure

### Overview of SDNPA response and way forward for the Local Plan

The Development Plan must be read as a whole. A number of issues are addressed in other policies and do not need to be repeated in Policy SDG1. The reference to "sports pitches, pavilions and leisure centres" in the supporting text of SD43 of the adopted South Downs Local Plan has been removed from SDG1 to avoid duplication, overlap and confusion about when to implement SDG1 and/or SDG3. Otherwise:

- SDA1 addresses development at North Street Quarter / Phoenix, Lewes.
- SDG2 addresses green and blue infrastructure.
- SDG3 addresses public open space, sports and recreational facilities.
- SDN9 addresses embodied carbon.
- SDT2 addresses active travel routes.
- SDT4 addresses parking provision.
- SDT5 addresses infrastructure capacity, delivery and phasing – this includes primary healthcare infrastructure.

The policy wording of Policy SDG1 has been amended as listed below. The below is either in response to comments, or as a result of wider officer reflection.

- SDG1.1 added to support enhancements to existing community facilities subject to material considerations.
- SDG1.2c now explains that proposals for new community facilities will be supported where proposals have been informed by community engagement.
- SDG1.3 now refers to equivalent and alternative community uses and clarification of what constitutes community use is in the supporting text.
- SDG1.3a amended to reduce marketing period to 12 months to align with other policies and NPPF, and Appendix A1 sets out marketing requirements.
- SDG1.3d added to address proposals for partial losses in order to support the viability of an existing community facility.

The supporting text of Policy SDG1 has been added. As a summary, it includes:

- Clarification that facilities in the National Park may serve communities both inside and outside the National Park.
- Clarification that facilities should be retained or replaced with proposals of at least an equivalent quality which are accessible, available, inclusive and well located to the communities that they are intended to serve.
- Clarification that the above is so that individuals can utilise community facilities via active travel and other sustainable transport measures.
- Clarification that the Authority will support proposals with shared spaces, Changing Places, and gender-neutral facilities in accessible locations.
- Clarification over what constitutes a community facility / use for the purposes of implementing Policy SDG1.
- Clarification that new facilities should be located in a defined settlement boundary unless an exception criteria of the development strategy is met.
- Clarification that published NHS Estates Strategies & Service Transformation Plans can be submitted in lieu of Local Needs Assessments.
- Clarification that NHS sites which are formally declared surplus are not required to retain any part of the site in an alternative community use.
- In combination with the Glossary, a definition of Assets of Community Value (ACV) and how they relate to planning policy.

Comments about community provisions in areas outside of the National Park, and about community provisions in made or emerging neighbourhood plans, should be directed to the relevant local planning authority and qualifying body, respectively.

#### Additional Technical Question

**Is the policy sufficient and proportionate for supporting the delivery of new community facilities and protecting against loss of existing community facilities?**

Of the 8 comments, 2 said “yes”, 4 said “no”, and 2 did not provide a reaction. All comments received have been considered and addressed in the above response.

## Policy SDG2 Green and Blue Infrastructure (previously Policy SD45)

Number of comments on policy: 33

Number of additional responses to technical questions: 17

### Reaction to Regulation 18 Consultation

Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Not stated
7	20	9	2	0	81

### Summary of issues and key themes raised

Respondents feel that the policy should be amended to both explicitly include blue infrastructure, and better integrate the policy's objectives with design, water, and climate frameworks. Respondents suggest connections, enhancements and guidance for active travel, and emphasise the need for green and blue areas to be accessible, inclusive, and safe. Clearer implementation guidance - including the use of existing mapping frameworks, refined terminology, and measurable criteria - is advised, along with the introduction of a mandatory urban greening factor for new development. Additional comments call for addressing long-term maintenance and funding, recognising local community initiatives, and making minor text amendments for clarity.

#### Key themes raised:

- Blue infrastructure
- Integrated policy framework (design, water and climate)
- Enhanced connectivity and active travel
- Safety and inclusivity

### Overview of SDNPA response and way forward for the Local Plan

The Development Plan must be read as a whole. A number of issues are addressed in other policies and do not need to be repeated in Policy SDG2. For example:

- SDG2.2d maximises opportunities for connections to active travel routes (incl. circular routes), while SDT2 addresses all other active travel considerations.
- SDT1 addresses a vision-led transport approach.
- SDT3 addresses highway and public realm design.
- SDL1-2 address landscape character and design.
- SDL5 addresses dark night skies and lighting.
- SDN1-10 address nature and climate, incl. nature recovery and Sussex bats.

The Natural England Green Infrastructure Principles have been used to inform the review of this policy. In terms of specific wording suggestions:

- SDG2.2 – “high quality” has been added.
- SDG2.2c – “flood risk” and “for both people and nature” have been added.
- SDG2.2d – “where” has been changed to “wherever”.
- SDG2.2e – “access to” has been changed to “accessible, inclusive and safe”.

- SDG2.3 – Amended to state that proposals that harm the network will not be permitted unless, where it is demonstrated that harm cannot be avoided, satisfactory measures are incorporated to mitigate or offset negative effects.
- SDG2.4 – Addresses future management and/or maintenance as appropriate.
- The supporting text explains that the green and blue infrastructure network extends across and beyond the boundaries of the National Park.
- The supporting text explains it is important that green and blue infrastructure is considered and integrated at the earliest stage of concept and design.
- The supporting text explains that consideration should be given to the safety and security of human users, especially more vulnerable groups. However, the text does not list any vulnerable groups to avoid indirect exclusion.

The green and blue infrastructure network is mapped over a series of online publications. These include, but are not limited to, DEFRA Magic Map, Natural England Green Infrastructure Framework, Local Nature Recovery Strategies (LNRS), South Downs People and Nature Network (PANN), and local plan and neighbourhood development plan policies maps.

The measurable criteria suggested by respondents – including urban greening factor – have not been included in the policy or its supporting text. This is because the Authority supports a landscape-led, regenerative, and ecosystem services approach to development. This means that development is considered on a case-by-case basis within its context and landscape rather than as percentages or amounts. That said, the Natural England Green Infrastructure Framework (including principles and standards), and the Building with Nature Framework and Standards, have been referenced as guidance for applicants to utilise.

It is important to remember that proposals are considered on their merits. The implementation and delivery of policies are considered within a site's context and as proportionate to the scale and impact of development. Local community initiatives that accord with the policy will be supported.

#### Additional Technical Question

**Should the policy be expanded to explicitly state blue infrastructure and better connect with design and water policies in relation to SuDS and water management?** Of the 17 comments, 11 said “yes”, 2 said “no”, and 4 did not provide a reaction. In response to the comments, the policy and its supporting text have been amended to include blue infrastructure. It is important to remember the Development Plan must be read as a whole. Policies SDW1-3 address the protection of the water environment, flood risk management, and sustainable drainage, respectively.

**Policy SDG3 Public Open Space, Sports and Recreational Facilities  
(previously Policy SD46)**

Number of comments on policy: 28

Number of additional responses to technical questions: 148

**Reaction to Regulation 18 Consultation**

Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Not stated
1	11	2	2	0	11

**Summary of issues and key themes raised**

Respondents endorse the delivery of public open space on new developments. However, in recognising the benefits of economies of scale, and that rigid criteria may undermine viability in areas with higher land costs, there are divergent views about whether the threshold for open space delivery should be 10 homes or more.

Respondents recommend adding food-growing elements into the policy (such as allotments, community orchards, and community farms) and stress that standards for public open spaces and sports facilities should be informed by up-to-date evidence and recognised benchmarks, while ensuring accessibility within a 15-minute walk. There are calls for the integration of accessible and inclusive design principles that address the needs of people with reduced mobility, preserve burial grounds as reflective spaces, and enhance sports and recreational facilities to better serve communities. There are also calls for early community engagement, exemption of school playing fields, and consideration for context-sensitive applications in both rural and urban areas.

**Key themes raised:**

- Mandatory open space provision in new developments
- Integration of food growing elements
- Evidence of open space provision and assessment
- Accessible and inclusive green infrastructure standards
- Preservation of burial grounds and cemeteries
- Enhanced provision of sports and recreational facilities
- Community engagement and inclusive design
- Context-sensitive application in rural and urban areas

**Overview of SDNPA response and way forward for the Local Plan**

The Development Plan must be read as a whole. A number of comments are covered by other policies and do not need to be repeated in Policy SDG3. In response to specific comments about Policy SDG3:

- Criteria 1 and 2c refer to accessibility.
- Criterion 2a supports recommendations of local authority playing pitch and built facilities strategies.
- Criterion 2c amended to include the word “inclusive”.
- Criterion 2d added so new provision is informed by community engagement.

- Criteria 3 sets out requirements for buildings and playing surfaces outside of defined settlement boundaries that provide sports and recreational facilities.
- Supporting text highlights benefits of open space, sports and recreation.
- Supporting text clarifies the policy applies to publicly and privately owned sports and recreational facilities, incl. school playing fields and sports clubs.
- Supporting text explains proposals involving school playing fields will be considered on a case-by-case basis considering educational needs (NPPF Paragraph 100), playing fields policy and guidance, and whether facilities can be newly provided, reconfigured, and/or protected from unnecessary loss.
- Supporting text explains the Authority will encourage the preparation of Community Use Agreements (CUAs) at schools whose facilities are used by communities to meet local sports and recreational needs.

The South Downs Open Space Study is currently under preparation and will provide an update of existing provisions, and identified needs, for different types of public open spaces in settlements across the National Park.

#### Additional Technical Questions

**Should we require developments for 10 homes or more to provide open space, or set a higher threshold?** Of the 13 comments, 3 said “set a higher threshold”, 9 said “10 homes or more to provide open space”, and 1 did not provide a reaction. The policy has been tested in the local plan viability assessment and the outcome is that proposals for 10 dwellings or more should be viable to provide public open space.

**Should we include requirements / considerations for allotments, community orchards and community farms?** Of the 16 comments, 13 said “yes”, 2 said “no” and 1 did not provide a reaction. In response, Criterion 5 has been amended to include allotments and community gardens / orchards, and supporting text has been added to clarify support for community farms subject to other material considerations. The South Downs Open Space Study is currently under preparation – see above.

**Do you think we should update Figure 7.6 (p153) of the Adopted Local Plan using either Fields in Trust standards (November 2024), Natural England’s Green Infrastructure Standards (January 2023), or a different recognised standard?** Of the 119 comments, 4 said “Fields in Trust standards”, 8 said “Natural England standards”, 2 said “a different recognised standards, and 105 did not provide a reaction and/or comment. In terms of a different recognised standard, playing pitch strategies (PPS) and a quantitative analysis of recreation land were recommended. PPS do not include standards for public open space and their recommendations for sports and playing pitches are supported in Criteria 2a. As for a quantitative analysis of recreation land, the South Downs Open Space Study is currently under preparation – see above. In the meantime, Fields in Trust standards (November 2024) are being proposed in the amended policy.

## Policy SDG4 Local Green Spaces (previously Policy SD47)

Number of comments on policy: 32

Number of additional responses to technical questions: n/a

### Reaction to Regulation 18 Consultation

Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Not stated
3	9	2	4	1	13

### Summary of issues and key themes raised

Respondents stress that accessible green areas can support community cohesion and wellbeing by providing safe and welcoming areas for informal recreation. Respondents insist that development should only be permitted on local green spaces in highly exceptional circumstances, and that such circumstances should be clarified in the policy. They also highlight the advantages of integrating local green spaces into the wider green infrastructure network for air quality, biodiversity enhancements, habitat restoration, and urban drainage.

Respondents feel that more green areas should be considered for designation, while other respondents object to the proposed designation of specific green areas listed in the policy. In addition, there are calls for clarity about the status of designated local green spaces in made neighbourhood development plans, and there are concerns over the duplication of various designations and the impact of land uses on the functionality of designated local green spaces.

#### Key themes raised:

- Community and recreational value
- Development constraints and exceptions
- Integration into wider green infrastructure
- Expansion and inclusion of new green areas

### Overview of SDNPA response and way forward for the Local Plan

A local green space is a designation used to provide special protection for green areas which are demonstrably special, and of particular importance, to local communities. A local green space can only be designated in a neighbourhood development plan or a local plan, providing it meets the criteria set out in the 2024 National Planning Policy Framework (NPPF) – see Paragraphs 106-108. The Authority can only assess and consider green areas for designation that have been nominated.

Any comments related to specific green areas proposed for designation, and any new nominations for specific green areas, have been considered in Sections 7-8 and Appendices 1-2 of the 2026 South Downs Local Green Space (LGS) Assessment.

The Planning Practice Guidance (PPG) explains that the management of a local green space is the responsibility of the landowner. In instances where land is already protected by an existing designation, the PPG explains that different designations are intended to achieve different purposes, and consideration should be given to whether any additional local benefit would be gained from local green space designation.

Further explanation – including consideration of existing village greens - is provided in Section 6 of the 2026 South Downs Local Green Space (LGS) Assessment.

The supporting text for the policy clarifies that the green areas listed in Policy SDG4 are in addition to the local green spaces already designated in made neighbourhood development plans. In terms of “very special circumstances” where development may be permitted on a local green space, the supporting text explains that this will be considered on a case-by-case basis and where any harm is clearly outweighed by other considerations.