

Planning Statement

Open Spaces Reserve Matters Application Hampton Park, Littlehampton

November 2025



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Executive Summary

This planning statement supports the Open Spaces reserve matters application for the remaining open space elements to be delivered at our Hampton Park development site. It provides details for the following elements:

- Playing Pitches, Changing Rooms and Car Parking Area
- The Northern Allotments
- Eastern extent of the Black Ditch Open Space

All of the design parameters have been established through the outline consent, and this application seeks to deliver in accordance with those parameters.

Thorough consideration has been given to the National Design Guidance and Living with Beauty (Building Better, Building Beautiful Commission, 2020).

The specialist team advising Persimmon Homes on these updated development proposals are:

- Persimmon Homes – Architecture and Design
- Stantec – Flood Risk and Compensation
- Mayer Brown – Drainage Strategy and Engineering Design
- ECOSA - Ecology
- ACD – Landscape Design
- Southern Energy Consultants – Sustainability
- Barrel Tree Consultants – Tree Survey and AMS

This planning statement should be read in conjunction with the accompanying Design and Access Statement.

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1.0 Introduction

- 1.1 This Planning Statement accompanies the Reserved Matters Application (RMA) for the remaining open spaces at the North Littlehampton Strategic Allocation, known as Hampton Park. The original outline consent was approved in 2013 under reference LU/47/11. It was subsequently amended under a s73 application (LU/182/15/PL), which included revised masterplan and parameter plans.
- 1.2 This reserve matters application seeks to secure approval for the playing pitches, changing rooms, car parking area, the northern allotments and the eastern extent of the Black Ditch open space.
- 1.3 The design parameters for the Hampton Park development site were established under outline consent LU/47/11, which was subsequently amended via s73 consent LU/182/15. The s73 process was an extensive and forensic one undertaken between 2015-2017, during which a Development Framework Document for the development site was agreed and approved. This Development Framework Document provides the pattern book for delivery of Hampton Park. It establishes design parameters that all reserve matters need to adhere to. As such this Framework Document along with the parameter plans attached to the s73 consent have been used as the basis on which to develop the proposals submitted.
- 1.4 In addition, thorough consideration has been given to the Arun Adopted Local Plan, the Arun Design Guide, the Open Space and Recreation Standards SPD and the Parking Standards SPD. We have also fully considered design advice contained within the National Design Guidance and Living with Beauty (Building Better, Building Beautiful Commission, 2020). The scheme fully embraces the guiding principles of those linked documents and, of course, the planning policy framework.
- 1.5 The relocation of the northern allotments, change / clarification in car parking provision, and the change in size of changing facilities building that are proposed in this reserve matters application require regularisation through a separate s73 application. This has been prepared and is submitted concurrently with this reserve matters application.

2.0 The Reserved Matters Site

2.1 The elements of this reserve matters site are as follows:

- The Sports Pitches, Changing Rooms and Car Parking Area.
- The Northern Allotments.
- Eastern extent of the Black Ditch Open Space Area.

2.2 All parcels are within the North Littlehampton Strategic Development Allocation, which Persimmon Homes has been delivering under the marketing name 'Hampton Park'. The strategic allocation is located north of the railway line and south of the Black Ditch.

2.3 The playing fields, car park, changing facilities and allotments occupy an area of land of 3.79ha, and the eastern extent of the Black Ditch is 17.50ha. This equates to a total open space area of 21.29 ha. In addition, the changing facility building is 275 sqm in size.

2.4 These parcels, along with a separate reserve matters applications for the Local Centre / Phase 6b, and Phase 6a comprise the remainder of the strategic allocation which Persimmon will build out under outline consent LU/47/11 (as amended by LU/182/15).

3.0 The Application Site Context

- 3.1 The development site is located on the eastern edge of the strategic allocation. Open space associated with the Black Ditch lies to the north and east. To the west is the residential development comprising Phase 6a and it is from here that access to the playing pitches is provided via a bridged access over the Norway Ditch. To the south is a small parcel of land outside of the ownership of Persimmon Homes, and land owned by Persimmon but which falls outside of the strategic allocation.
- 3.2 The northern allotments were originally envisaged to be delivered on a small parcel of land located in the southeastern corner of the strategic allocation. However, this parcel has accessibility issues due to the need to cross the Norway Ditch and also it is a rather isolated location. As such it is now proposed to deliver the allotments to the south of the playing fields.
- 3.3 The Black Ditch open space is the meadow land between the development site and the Black Ditch; it extends across the northern boundary of the development site and round the playing fields. This application seeks to secure the delivery of the section of open space around the playing fields (the eastern extent). This is an area of open space with will be managed for ecological purposes, with some informal public access provided.

4.0 The Planning Assessment

(a) Compliance with the Outline Consent (including s106)

- 4.1 This reserved matters application has been prepared following engagement with Planning Officers, the Town Council and the North Littlehampton Steering Group.
- 4.2 It accords with the outline consent; its parameter plans and the aspirations of the Development Framework Document that has been approved for the whole development site.
- 4.3 The Development Framework Document set important development cornerstones. The first was the establishment of specific land uses and all reserve matter applications have sought to deliver the aspirations of each of these. For this reserve matters application, it is the remaining elements of open space that lie to the east of the development site.
- 4.4 The second cornerstone was defining specific character areas. All reserve matter applications have needed to demonstrate compliance with the character areas relevant to its development proposals. The open spaces sit outside of the defined character areas, but they are closely related to the Green Edges residential character areas delivered as part of Phase 6a which borders them. A key objective has been to ensure that active uses are overlooked, and pedestrian permeability is facilitated between the built development elements and these open space features.
- 4.5 This leads on to the third cornerstone, which was providing for permeability and connectability. Necessary cycle and pedestrian links are provided within the proposed development and these accord with the principles established on the pedestrian and cycle access parameter plan (ref: 519.GR.L.014B to be superseded by Rev C as part of the separate s73). This includes informal linkages around the open spaces to ensure that ease of movement is permitted and that access from one area to another is facilitated.
- 4.6 The final cornerstone was the drainage strategy for the whole development site – with the creation of a central wetland area. The central wetland area has been consented and delivered. Drainage requirements for the playing pitches and northern allotments will be connected into this existing system. The playing pitches will also function as additional flood plain storage supporting the function of the central wetland area. They have been designed to ensure optimum usability, while ensuring that they provide a practical storage function in a flood event.

4.7 A key consideration for this phase of development is deliverability and usability. Issues in this regard are as follows:

- The Norway Ditch provides a physical constraint for access, and an engineered solution is required. This is both expensive and complex. It also renders the original northern allotment site largely undevelopable, as the level difference would mean a very large bridge construction that would take up much of the land.
- The playing fields are now located in flood zones 2/3 – due to changes in the Environment Agencies mapping, though in reality the area does not have a history of significant flooding. This needs to be balanced with the flood compensation function that the area also provides for. This could impact the usability of the pitches in real terms.
- The deliverability and cost of providing for a development platform above the flood risk levels for the car park and changing rooms. This needs to be kept as minimal as possible so as not to erode the flood compensation function and also be cost effective to deliver.
- Future management of the playing fields and changing facilities, it is unlikely that the District Council will take on the long-term management, therefore they will have to be transferred to the management company for the development site. It is important not to over-burden residents and as such a rationalised provision is required.
- The need to relocate the allotments to a more usable and less isolated location.

4.8 Regarding compliance with the s106 agreement attached to the outline consent, this reserve matters application will secure the delivery of the playing pitches, allotments, changing facilities building, car park and part of the Black Ditch open space. It provides the necessary detailed drawings that show the precise boundaries of these areas, and the specification to which they will be delivered including landscape details, drainage and construction details. The ecological management and maintenance details for these areas are also provided in the submitted Ecological Mitigation and Management Plan. The only element of detail which is not provided with the submission is the programme of delivery as this is not possible to determine until a deliverable consent is secured. However, the relevant occupation triggers are noted and understood. This planning statement, and the accompany DAS, detail the evolution and design approach

to these open space elements; it also details where there has been any change from what is required under the outline and the accompanying s106.

- 4.9 These changes can be summarised as the relocation of the northern allotments, change / clarification in car parking provision, and the change in size of changing facilities building. They will be regularised by a separate s73 application which is submitted concurrently with this reserve matters application and includes a proposed DoV the s106 agreement to ensure that the s106 is also duly regularised.

(b) Pre-application engagement

- 4.10 In combination with the above issues, we have carefully considered and incorporated the comments raised by officers following a detailed pre-application process undertaken during August – October 2025. Initial feedback from a series of workshops was received in a letter dated 29th September 2025, which resulted in some amendments being made to our design concepts and proposals. The amended design concepts were submitted for further review and discussion by officers. They were also presented in a Steering Group meeting held on 17th October.

Initial submission details:

- 3 playing pitches of adult size were rationalised to 2 senior pitches and a cricket square – this allowed for appropriate flood compensation to be maintained as well as providing for cricket provision which is needed locally.
- Playing pitches were designed to be as usable as possible all year round – they were shown to be positively drained and set a level of a 1 in 100 year plus climate change (25%) event. Modelling was provided that demonstrated the real-life implications of any flooding / ponding on the pitches.
- A smaller car parking area with secure cycle parking provision was shown.
- The car park included some soft landscaping to help soften this area.
- A smaller changing room building comprising 2 changing rooms and an accessible WC/changing area was proposed.
- Storage along with a kitchenette and lobby that had a dual function of a meeting area was provided for.
- A small external covered area was shown, along with additional seating close to the pitches.
- The allotments were relocated to a location south of the playing pitches.

- 4.11 With regards to the northern allotments, engagement has been undertaken with the Town Council. They raised concerns regarding the isolated nature of the original location adjacent to parcel F2, which in combination with the level difference in this area render accessibility difficult. As such a revised location to the south of the playing pitches is now proposed. An amended concept of providing the allotments south of the playing fields has been shared with the Town Council and has been viewed positively. This amended concept allows for a single crossing over the Norway Ditch and some additional allocated car parking spaces in the playing field car park.
- 4.12 A further formal response from Planning Officers was received on 5th November 2025. This is detailed below, with our response in *italics*:

- Pitches:

- Two amended pitch options have been proposed. This includes a combined cricket and youth football pitch; or two football pitches. From the data supplied, it would be preferable in respect of flood risk for two football pitches to be provided. Officers will need to discuss this aspect further with ADC Parks and Landscapes. *Noted, we are progressing with plans for 2 pitches and a Flood Risk Assessment Addendum will be provided that presents the flood compensation solution and usability of these pitches.*
- It was noted that at the Steering Group it was indicated that a combined cricket pitch and two football pitch option had been resolved, and was subsequently proposed over the two previous options. This appeared to supersede the amended plans previously supplied for comment; and though stemming from option 2, it was not clear from the previously supplied information that this option included to provision of cricket in addition to the two football pitches. This will also need to be discussed further with ADC Officers, as there is a possibility that these pitches will be adopted. *The cricket pitch overlays the 2 playing pitches. If formal sporting groups seek to use the pitches the football and cricket seasons do not overlap and as such there will be no conflict between uses / users. Local use by residents and visitors can freely use the space to their own informal requirements.*
- The space to the west of the allotments is awkward (as shown in the layout included within the presentation). It should be explored as to whether the allotments could extend further into this space. This could provide space for a

picnic / bench area, or small facility for allotment tenants to swap seeds or store equipment. These are facilities provided at other allotments in Littlehampton (such as Worthing Road or Kingley Gate). It may additionally be beneficial if disabled parking could be provided within the allotments, if accessible plots are to be provided. *Following further engagement with the Town Council 4 additional parking spaces have been provided for the allotments, including spaces for disabled users, and we have extended out the western boundary to provide an informal amenity grass area with some picnic benches.*

- Changing Facility:

- The number of changing rooms should reflect the number of pitches. It is possible that 4 different teams could be using the 2 pitches at any one time. We would therefore expect sufficient provision to accommodate multiple teams. *The provision has been increased to provide 4 changing rooms.*
- The reduced kitchenette / lobby space is disappointing. This offers very little internal social space for people to congregate, and has limited usability. This building should offer sufficient space for flexible use, such as a clubhouse, rather than just changing and storage. *The requirements of the outline consent are to provide changing rooms not a clubhouse. A purpose-built community centre will be provided in the local centre, and activities associated with clubhouses can take place in this space. Notwithstanding this, a kitchenette and larger socialising space is provided appropriate to the buildings primary function as changing rooms.*
- A canopy providing sufficient cover for shelter and seating should be provided to the front and side elevation. *A large, covered area that could accommodate seating is provided for.*
- The picnic area shown to the north of the changing facility should be better integrated / associated with the building. *The picnic area provided is well related to the playing fields. It provides for a breakout space and social gathering in proximity to both the building and fields.*

(c) Planning Policy Context

- 4.13 It is important to reiterate that the proposals have been aligned with the Council's key guiding documents: (i) the Development Framework Document and (ii) the Arun Design Guide.
- 4.14 We have sought to incorporate an array of policy and technical requirements, particularly in relation to the design and function of the playing pitches.
- 4.15 The policy documents that we have had full consideration of are as follows:
- Arun Adopted Local Plan,
 - Arun Design Guide,
 - Arun Open Space and Recreation Standards SPD
 - Sports England Guidance
 - National Football League Guidance
- 4.16 We have also fully considered design advice contained within the National Design Guidance and Living with Beauty (Building Better, Building Beautiful Commission, 2020) where appropriate. The scheme fully embraces the guiding principles of those linked documents and, of course, the planning policy framework.
- 4.17 Of particular relevance is Adopted Local Plan Policy D DM1 which requires layouts to consider legibility, in terms of ease of navigation, and should incorporate focal points and active edges to neighbourhoods - through incorporation of landscaping and open space features. We have sought to ensure that an appropriate relationship with the adjoining residential development is provided and that these areas of open space fulfil the objectives of the outline consent. In this regard public accessibility and movement has been a consideration in designing usable areas.
- 4.18 It is considered that the design of the open space features is fully in accordance with both the approved outline scheme and framework document.
- 4.19 Regard has been had to the Council's SPD on Open Space and Recreation Standards as well as relevant Sports England guidance for playing pitches and facilities, as is appropriate to the features being proposed. The open space areas have been designed to comply with the guiding principles in this document as far as is relevant when weighing up the outline parameters and site-specific constraints and requirements of likely end users. In this regard it is important to highlight that these proposals will bring forward the final elements of open space that were assessed and approved with the outline consent as being necessary to provide the facilities required to support the quantum of residential development approved under that planning permission.

(d) Playing Pitch Design

- 4.20 The application submission provides a design for the playing fields and surrounding area. We have provided 2 full sized senior / adult playing pitches that are 100m x 64m, this space can also provide for cricket pitch in the summer months, outside of the football season.
- 4.21 The submission also demonstrates how pitches of this size can be accommodated within the 3.79ha area detailed for the playing pitches in the outline consent, while also providing space for the car parking and changing facility requirements and the northern allotments.
- 4.22 Regarding the playing pitches' location in flood zones 2 and 3, there has always been an acknowledgement that an element of the pitches would be in the flood plain. From a review of the outline consent, including the original parameter plans (drawing ref: GR.L.11) it was noted that the informal leisure area within the flood plain included one formal pitch, so at least one pitch was accepted and designed to be in the flood plain. We removed this annotation in the amended parameter plan 519.GR.L.011B under LU/182/15 but that does not change the fact that the top playing field was always in the flood plain.
- 4.23 This design concept of the northern pitch being within the flood plain was followed through into the Outline FRA – where one of the pitches was shown as “Flood Gain” in the FRA that accompanied this consent.
- 4.24 As such there has always been acceptance that one pitch, at least, would potentially flood.
- 4.25 The extent of the flood plan has changed with new Environment Agency mapping now showing the whole area to fall within flood zone 2/3. However, the actual history and extent of flooding has not changed and in that respect the baseline considered with the outline consent remains a valid one.
- 4.26 Our Flood Risk consultants Stantec (formally Peter Brett Associates, the original authors of the outline FRA) undertook a Pitch Levels Assessment which was submitted as part of the pre-application process. This document considered the options for raising the level of the pitches to reduce the flood risk to the pitches and the impact on the consented floodplain storage. Following engagement with officers, option 2 has been determined to be the most appropriate. The playing pitches have been designed to be as usable as possible all year round – they are designed to be positively drained and set a level of a 1 in 100 years plus climate change (25%) event. Modelling is provided within

the FRA Addendum submitted with this application that demonstrates the real-life implications of any flooding / ponding on the pitches.

- 4.27 In terms of the reference flood levels, the floodplain storage proposals approved by the EA with the outline consent, require the proposed playing fields area to be levelled off to 1.54m AOD. This is at a level subject to shallow flooding in a 1 in 20 Annual Probability (1 in 20-year) flood event. This is the consented baseline.
- 4.28 The design submitted with this reserve matters raise the pitches a nominal amount to match the 1 in 100 plus climate change (25%) flood level – 1.85m AOD and therefore is a betterment over the consent baseline. In real terms of the usability, the playing pitches should not be overly compromised by any flood event.
- 4.29 When considering all options, it is important to note that any raising of ground above the consented level of 1.54m AOD will impact on floodplain capacity and reduce the volume gained from the consented position. The consented/ baseline position being a volume gain of +8,194m³. The need to provide flood compensation needs to be balanced carefully with the useability of the pitches and allotment area and when considered in isolation the raising of the pitches and development platform for the car park / changing rooms and northern allotments results in a loss of 7,003m³ of floodplain storage. However, to mitigate this, gains are provided by lowering land to the east of playing field area and north of Phase 6a – resulting in a gain of +9,265m³, a significant betterment compared to the existing situation and an improvement over the baseline approved floodplain balance of over 1,000m³.
- 4.30 In terms of the design of the pitches, they have been designed to a flat level, as any gradient would have a negative impact on the levels detailed in the assessment by Stantec. In simple terms if the pitches are designed with a gradient, then the level by which they must be designed out of the flood plain will increase and with it the volume gain from the consented position will be reduced. We have assumed that the Council and the EA would require compliance with the consented position as far as is reasonably practicable. However, a flat level does not mean the pitches cannot be designed with appropriate drainage to ensure that they drain properly and water does not pool on their surface. Pitch design details show how a sub-base of sand and gravel will mean that surface water can percolate into a collector pipe. This pipe will then connect into the wider surface water design for the area and Phase 6a.

(e) Drainage

- 4.31 Surface water from the open spaces will be incorporated into the overall strategy approved as part of the central wetland areas, known as South and East of the Wetlands. Attenuation is provided via permeable paving in the car park area and then discharged at allowable rates into the Black Ditch and then connect to the mains system in Phase 6a. By allowing surface water from the open space to discharge at controlled rates, the drainage functionality of the area east of the Norway Ditch will be more efficient than the current 'undeveloped' situation, ensuring that the pitches and allotments are as usable as possible throughout the year.
- 4.32 With regard to foul water from the changing facilities building, this will drain into a new package pump station that will pump effluent across the Norway Ditch into the adjacent Phase 6a foul network.
- 4.33 Full details of the drainage design for the Open Spaces is provided in the Drainage Report by Mayer Brown that accompanies this application.

(f) Changing Facilities and Car Park

- 4.34 Details for the changing room building and car parking area are provided with this application submission. In accordance with the advice received during the pre-application discussions, the changing rooms will provide for the following:
- 4 adult sized changing rooms. All have showers and access to a WC.
 - One accessible WC and changing room accessed via a central / communal lobby.
 - A store / equipment room.
 - A socialising area.
 - Car parking comprising 30 spaces (including 2 disabled) for the playing pitches and 10 spaces (including 2 disabled) for the allotments. The car parking provision for the playing pitches is below the s106 requirements but in order to ensure the flood compensation function of the area remains positive, and the requirements of the relocated allotments, the development platform needs to be rationalised – a DoV to the s106 will secure this amendment.
 - The car park is located in a discrete location behind the playing fields and to the side of changing room building, with landscaping to further soften any visual impact.

- Sheltered Cycle Parking - 12No cycle spaces will be provided in the car park area.
- 2 motorcycle spaces are provided.
- 3 active EV charging points are provided for.

4.35 The building is 275sqm in size and therefore will not be able to achieve full BREEAM certification. However, a fabric first approach has been taken to its design to accord with sustainability principles and an air sourced heat pump with sufficient PV panels will be provided to deliver the 10% renewable energy requirement.

(g) Management of the Playing Pitches, Changing Facilities and Car Park

4.36 It is likely that the playing pitches and changing facility will have to be transferred to the management company.

(h) Northern Allotments

4.37 The location of the Northern Allotments on the eastern site of the Norway Ditch does pose some design issues that have had to be considered. The most significant is the level difference (some 3.24m drop down) from Parcel F2 to the outline approved allotment site. Providing a bridged access road over to it, designed to adoptable standards, would mean that the access road would have to protrude to approximately halfway into the allotment site, which does not allow for efficient design especially when parking and storage requirements are added. It would also be a visually intrusive structure and achieving accessible / level allotment pitches around it would be difficult, resulting in a relatively small amount of pitches being provided.

4.38 Therefore, to optimize the usability and functionality of the area it is proposed to relocate the allotments to a new location south of the playing fields. This means a single crossing over the northern allotment is provided, serving both the playing fields and allotment. 10 allocated car parking spaces in the car park (including 2 disabled spaces) are provided for allotment holders.

4.39 This design solution enables a larger allotment offering to be provided and the design submitted has been agreed with the Town Council.

4.40 The allotments are located on land that is naturally higher than the pitches with a 1:200 slope from the east to west from existing ground at about 2.9m AOD. To replicate the 1 in 100 year plus 25% climate change allowance the allotment level will be retained as

existing as far as possible - where land falls north-west from 2.5m AOD down to a levelled area at 1.54 AOD at the north-west end. They will also be positively drained.

(i) Black Ditch Open Space

- 4.41 With regards to the Black Ditch Open Space, east of the playing pitches, this whole area is very overgrown. Therefore, to provide connectivity to the open space that is being provided as part of the Phase 6a reserve matters application, a programme of ecologically led site management will be implemented along with the creation of informal self-binding gravel footpaths to enable movement around the pitches to the Black Ditch.
- 4.42 The existing PROW will provide an existing connection for access to and along the Black Ditch, with a wayfinder. In addition, we are proposing a route that would link round the playing pitches to the open space to the east - which would be in accordance with the principles shown on the revised pedestrian / cycle parameter plan. There is an area of sedge bed directly to the east of the existing PROW, this could become waterlogged at certain times of the year, therefore an alternative mown footpath is shown to the east of the playing pitches which would enable this area to be avoided when very wet.
- 4.43 Some of the land in this area will need to be lowered to provide the flood compensation mitigation required to offset the development of the playing pitches, allotments and associated infrastructure. Habitat removal will be undertaken under the advice and guidance of ecologists, and an appropriate long term ecologically led mitigation strategy to reinstate habitat will be followed. This is detailed in the Ecological Impact Assessment and Ecological Management and Maintenance Plan (EMMP) that accompany this application submission.

(j) Ecology

- 4.44 The site was previously dominated by horticultural uses. It is relatively overgrown with pockets of scrub and bramble.
- 4.45 The whole of the development site of Hampton Park lies with the Impact Risk Zone 2 for the Arun Valley SPA. Therefore, a Shadow HRA is required and is submitted alongside this RMA. This report will enable officers to conclude whether the proposed development will lead to significant effect on the SPA.
- 4.46 The Shadow HRA undertaken by ECOSA considers four source-receptor pathways:

1. The development site is not within 600m of the SPA and as such this source-receptor was screened out.
 2. The wintering bird surveys that were undertaken have found no presence of the Bewick Swan on site or in adjacent habitats therefore this source-receptor pathway was screened out.
 3. It was determined that while the site is connected hydrologically to the Arun Valley SPA, it is located down river and therefore the proposed development will have no impact on the SPA, this source-receptor pathway was screened out.
 4. It was determined that the proposals would not lead to higher levels of nutrients entering the Arun Valley or lead to water pollution by virtue of its downstream location, this source-receptor was screened out.
- 4.47 As a result, it can be concluded that the proposals alone will have no likely significant effect on the Arun Valley SPA as a result of these identified source-receptor pathways. Further, as per the EU ruling of *Peter Sweetman and Others v An Bord Pleanála* an in - combination assessment is not required.
- 4.48 Updated survey work has been carried out in 2025, and the results are contained in the Ecological Impact Assessment undertaken by ECOSA. There was no evidence of water voles, notable invertebrates, badgers, great crested newts or hazel dormice recorded during the survey work. However, reptiles, birds and bats were found to be present.
- 4.49 ECOSA have also prepared an Ecological Mitigation and Management Plan which details the proposed ecological mitigation for this phase of development in more detail. The management period is 10 years from commencement on site, and its overall objective is to retain and enhance the long-term ecological value of the site. These will be achieved through the following measures:
- The protection of retained habitats within the site.
 - Creation of new, native species-rich and wildlife friendly habitats to enhance biodiversity at the site.
 - Establishment of long-term management prescriptions for new and retained habitats to ensure the habitat diversity and suitability for wildlife is maintained.
- 4.50 Specific mitigation measures for the open spaces are as follows:
- New external lighting to be installed will comprise of hooded luminaries directed away from vegetation.

- Vegetation removal to be undertaken outside of the main bird nesting season of March to August. Any vegetation clearance outside of this time period to be undertaken with ecological supervision.
- New planting to mitigation loss of habitats for breeding birds.
- One barn owl box to be installed on a suitable retained tree within the wider site.
- Reptile translocation to a receptor site east of phase. 5 hibernacula will be created in the receptor site. It will also be appropriately fenced.
- Installation of two invertebrate towers will be installed within the retained open space.
- Eradication of American Mink.
- Re-establishment of seasonably wet grassland following land lowering for flood compensation.
- Increase ecological value of the three existing ditches.
- Introduction of native tree, shrub and grass species in areas of new planting.

(k) Trees

- 4.51 The proposals align with Adopted Policy ENV DM4 by providing the necessary arboricultural assessment, tree survey and protection plan with the application submission. There are no notable trees on the open spaces land, and there will be some minor tree and hedge removal to accommodate development. However, this will not have any impact on the wider setting, and their loss will have no detrimental impact on local character. Further the proposed landscape scheme seeks to introduce new trees and planting as part of the development proposals which will mitigate the loss.
- 4.52 Regarding the creation of a footpath access in the Black Ditch Open Space, there is the potential for some impact on the RPAs of retained trees in some places, however a precautionary no dig approach will be taken to their construction. This is detailed on the tree protection plan.

5.0 Concluding Remarks

5.1 Persimmon Homes are committed to delivering the full aspirations of the outline planning consent relating to the North Littlehampton Strategic Allocation, and this open space reserve matters application provides the final piece of the jigsaw. It will ensure the delivery of the remaining open space elements, enabling the full place making aspirations of the outline consent to come to fruition.

5.2 A key consideration for this phase of development is deliverability and usability. Issues in this regard are as follows:

- The Norway Ditch provides a physical constraint for access, and an engineered solution is required. This is both expensive and complex. It also renders the original northern allotment site largely undevelopable, as the level difference would mean a very large bridge construction that would take up much of the land.
- The playing fields are now located in flood zones 2/3 – due to changes in the Environment Agencies mapping, though in reality the area does not have a history of significant flooding. This needs to be balanced with the flood compensation function that the area also provides for. This could impact the usability of the pitches in real terms.
- The deliverability and cost of providing for a development platform above the flood risk levels for the car park and changing rooms. This needs to be kept as minimal as possible so as not to erode the flood compensation function and also be cost effective to deliver.
- Future management of the playing fields and changing facilities, it is unlikely that the District Council will take on the long-term management, therefore they will have to be transferred to the management company for the development site. It is important not to over-burden residents and as such a rationalised provision is required.
- The need to relocate the allotments to a more usable and less isolated location.

5.3 Full consideration has been given to these issues in the evolution of the design of playing pitches and allotments. What is being proposed seeks to deliver the aspirations of the outline consent, while responding to the constraints that the area is subject to.



5.4 Persimmon Homes commend these development proposals as an appropriate response to the site, its setting, and the fulfilment of Local Plan requirements and policies.