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Our Ref:
Your Ref: **A/23/15/OUT**
Email: [REDACTED]
Date: **4 August 2015**

Mr N Crowther
Planning Department
Arun District Council
Arun Civic Centre
Maltravers Road
Littlehampton
West Sussex, BN17 5LF

Sent by email: neil.crowther@arun.gov.uk

Dear Mr Crowther

**PLANNING APPLICATION AT LAND SOUTH OF NEW ROAD (A259) AND EAST OF BROOK
LANE, ANGMERING**
APP REF: A/23/15/OUT

We write on behalf of our client, Waitrose Ltd, in respect of the above application submitted by SDB Investments Ltd, CDP Ltd and M&S Plc.

As you will be aware, we have submitted two previous letters of objection on behalf of Waitrose in relation to this application. We note that additional documents have now been uploaded online regarding retail matters including a Retail Policy Response from Montagu Evans dated June 2015, a letter from Montagu Evans dated 30 June 2015 and an Addendum Report prepared by DPDS dated June 2015.

Waitrose has a number of queries regarding these documents, however, we note that Serena Page of Dalton Warner Davis wrote to you on 16 July 2015 raising a number of the points already. It may therefore be that you have already responded to Ms Page addressing these points. In which case, it would be useful if you could provide a copy of your response. As per Ms Page's email, we are seeking to establish what order the above documents were submitted and whether you are awaiting a further response from the applicant regarding the retail issues associated with the application.

Waitrose are also concerned the applicant has failed to address the points of objection raised in our previous submissions. For example, Montague Evan's letter dated 30 June 2015 states that *'further to discussions with the Council and their advisors we have agreed that it will be assumed that the Waitrose will still be in Littlehampton in 2015 and will have relocated to Rustington by 2018'*. We clearly set out in our letter dated 11 May 2015 that the relocation of the Waitrose was expected towards the end of July 2015, which has indeed materialised with the Rustington store now open and the Littlehampton store now closed. We request that the

applicant is required to take into account the fact that the relocation of the Waitrose store has now taken place.

Moreover, notwithstanding the revised figures now presented by Montagu Evans, a similar conclusion is drawn in terms of the cumulative impact of the proposal on Rustington town centre – previously it was estimated at 7.45% and it is now estimated at 7.29%. This equates to a trade diversion of £3.03m from Rustington. Montagu Evans argue that this level of impact on Rustington is *'not significant'* and that the *'vitality and viability of the Centre will be boosted considerably when Waitrose take occupation'*.

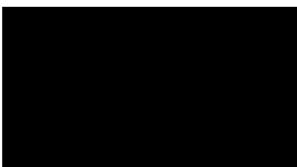
As set out in our previous objection, it is our view that the vast majority of this impact will be felt on the new Waitrose store. As the store has only been open a matter of days, it has had no opportunity to become established and this level of impact is likely to lead to the store trading below benchmark levels at a time when it is most vulnerable to this type of direct out of centre competition.

Waitrose therefore continue to have significant concerns that the cumulative impact of the proposed development would have a significant impact on the turnover of the new Waitrose store. In turn this will mean that the new Waitrose store will not realise its potential in terms of 'boosting' the vitality and viability of the town, as claimed by the applicant.

We also note that a letter of objection dated 23 July 2015 has been submitted on behalf of Ropemaker Properties Ltd, the freehold owner of the former Waitrose store in Littlehampton, which calls into question the applicant's sequential assessment. In light of this letter, we share their concern that the applicant has failed to properly assess the suitability of the former Waitrose store in accordance with the sequential test as set out in the NPPF, particularly as the letter demonstrates that the unit is capable of being subdivided and highlights the fact that no evidence is presented to demonstrate that the unit is unviable for convenience retailing.

As mentioned, we would be grateful if you could provide a response to the points raised in this letter or a copy of your response to Ms Page's correspondence which raised similar concerns. We would also be grateful if you could provide confirmation of the timescale for the determination of the application.

In the meantime, this letter should be treated as a further letter of objection to the current application.



SHIRLEY KARAT
Director