



Supplementary Retail Impact Assessment

Land West of Courtwick Lane, Wick, Littlehampton Planning Application Reference LU/72/25/OUT

1 Scope & Purpose

- 1.1 This supplementary report has been prepared by Quod on behalf of NCL Estates Limited ('the Applicant') in respect of a pending planning application (ref. LU/72/25/OUT) on land west of New Courtwick Lane, Wick, Littlehampton ('the Application Site').
- 1.2 Specifically, this provides a response to the comments raised by Nexus Planning ('Nexus')¹ who have been instructed by Arun District Council ('ADC') to advise on retail policy matters. For ease of reference the same broad headings identified by Nexus have been utilised in this report.
- 1.3 This report should be read alongside the Retail Impact Assessment ('RIA') (March 2025) that supported the planning application, which addresses relevant retail policy matters.

2 Study Area & 10-minute drivetime area

- 2.1 An updated plan showing the extent of the Study Area is enclosed at **Document 1**. This includes the extent of the 10-minute drivetime.

3 Financial Impact Assessment Tables

- 3.1 As requested, the impact tables (Document 4 of the RIA) are provided in Excel format. This is provided at **Document 2**.
- 3.2 The tables have been updated in light of noting a minor error in the analysis. This correction results in the overall impacts on some existing centres reducing slightly compared to the impacts identified in the RIA; this does not change the overall conclusions.

4 Household Survey Tabulations

- 4.1 As requested, a copy of the household survey results in Excel form is provided at **Document 3**.
- 4.2 In terms of the household survey results provided at Document 5 of the RIA, we can confirm that this is weighted results with online shopping / internet included.

5 Experian Goad Data

- 5.1 Quod has access to digital plans produced by Goad. We did not have Goad Category Reports for Littlehampton and Wick. Instead, we updated the digital information. Under our licencing

¹ Briefing Note ('Initial Review of Retail & Main Town Centre Land Use Supporting Information – Requests for Clarification and Additional Information') received from ADC on the 17th July 2025



Note continued

agreement with Goad this cannot be reproduced. However, we have provided a summary of existing units within both centres, which includes a breakdown of floorspace size at ground floor. This is provided at **Document 4**.

6 Linked Trip Data

- 6.1 Nexus has requested further cross tabulations from the household survey to understand linked trips. This information is provided at **Document 5**.

7 Proposed Food and Beverage Land Use Elements

- 7.1 Nexus highlights that very little analysis has been provided with regard to the 2no. food and beverage ('F&B') units to be provided.
- 7.2 The F&B units collectively extend to 523 square metres of floorspace and the proposed use of this floorspace is within Class E(b) / hot food takeaway (sui generis). When considered in isolation, this level of floorspace is well below both the thresholds set by both the NPPF (2,500 square metres) and the Local Plan (1,000 square metres) when an impact assessment is required.
- 7.3 Within this context, we do not consider that it is necessary to assess the likely trading effects of these elements of the proposal. Such an approach is entirely consistent with that undertaken in support of a similar development at Salt Box Field in Bersted (ref. BE/135/18/PL), which was accepted by ADC (and their retail advisors at the time, GL Hearn). Significantly, this application was determined under the same local planning policy context as the current proposals at the Application Site. Notwithstanding, for robustness and completeness, we set out below further consideration of the likely trading effects of the proposed F&B units.
- 7.4 As set out planning application submission, the intended occupiers of the F&B drive thru units are McDonalds and Costa. Both operators are currently represented in the local area, albeit principally in out-of-centre locations along main arterial routes – such as at Crossbush Services off the A27 and Worthington Road Services off the A259. Indeed, McDonalds is not located within the neighbouring defined centres, including Littlehampton and Wick. It is these destinations that the proposed McDonalds will draw the bulk of its trade.
- 7.5 Whilst it is acknowledged that there is an existing KFC in Rustington town centre, this offer already trades successfully alongside existing out-of-centre McDonalds, and this will continue alongside the proposed development.
- 7.6 Likewise, Costa is already represented in the local area, with a number of existing out-of-centre units, together with existing provision within the defined centres of Rustington and Littlehampton. This multi-offer of Costa is commonplace across the UK, reflecting the different roles the various destinations serve. Indeed, it is intended that the proposed F&B outlets will largely serve pass-by trade, and local employees in the surrounding area, providing an



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alternative to similar drive-thru facilities elsewhere in the area – all of which are located outside defined centres.

- 7.7 For these reasons, the impact (if any) of the proposed F&B uses on the long-term vitality and viability of neighbouring defined centres will be negligible.
- 7.8 Overall, there is no suggestion that the existing F&B offer of Rustington and Littlehampton, which includes a number of bars and pubs, will not be significant adverse (the policy test).

8 Commitments / Cumulative Impact

- 8.1 Nexus has requested that the RIA be updated to consider the cumulative impact of the proposed development alongside an extant permission at Hampton Park for mixed-use development (ref. LU/47/11), which includes also retail and F&B floorspace.
- 8.2 In considering this specific matter, it is important to highlight that neither the NPPF nor supporting Planning Practice Guidance ('PPG') require an assessment of cumulative impact. Paragraph 95 of the NPPF states that:

"Where an application fails to satisfy the sequential test or is likely to have significant adverse impact on one or more of the considerations in paragraph 94 it should be refused." (our emphasis)

- 8.3 The NPPF establishes that it is the 'application' that should be assessed as to whether the proposals will lead to a significant adverse impact – not applications. The NPPF was first published in 2012 and has been revised on numerous occasions since, most recently in December 2024, and this position has not changed. Indeed, whilst consideration of cumulative impact was explicitly required under the predecessor to the NPPF², this is no longer the case.
- 8.4 Similarly, although the supporting PPG³ refers to considering cumulative effects of recent developments, this is in relation to setting a local impact threshold not in assessing planning applications.
- 8.5 Local planning policy (both adopted and emerging) makes no reference to the need to assess cumulative impact when considering retail impact. Policy RET DM1 of the adopted Local Plan simply states that the need for a scheme to meet the impact tests of the NPPF. No reference is made to the need to consider a cumulative impact when assessing retail proposals.
- 8.6 Within this context, we would question whether it is necessary to undertake a cumulative impact assessment to understand whether the application proposal is likely to lead to a significant adverse impact.

² Planning Policy Statement 4 (2009)

³ Paragraph: 015 Reference ID: 2b-015-20190722



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- 8.7 Furthermore, in considering the Hampton Park scheme, it is important to note that this comprises a significant mixed-use development of up to 1,260 residential dwellings, up to 13,000 square metres of employment floorspace, a 100-bed hotel, 60-bed care home and up to 3,500 square metres of retail local facilities. As such, any retail floorspace provided as part of this scheme will largely meet some of the on-site day-to-day requirements – as confirmed by the documentation submitted in support of the application.
- 8.8 Nevertheless, as requested a cumulative impact assessment has been undertaken for completeness and on a without prejudice basis that such an assessment is not required by policy.
- 8.9 The cumulative impact assessment is contained at Document 2 and summarised at Table 1 below. In undertaking this assessment, it is assumed that the retail uses permitted at Hampton Park will be delivered and trading by 2030. This is not certain. Outline planning permission was granted in 2013, and it is understood that the retail element of the development has not yet come forward. Reserved Matters for the retail and F&B uses have not yet been submitted and the Outline permission allows these to be made until 23rd January 2026. Should reserved matters not be submitted in the next 6 months, this element of the Outline permission will lapse.
- 8.10 Likewise, there is no certainty that all this floorspace will comprise retail uses. The Planning Statement submitted in support of the application identifies⁴ that the retail floorspace will include a convenience foodstore of 500 square metres, and F&B outlets of up to 500 square metres and up to 500 square metres of mixed retail uses. This represents a substantially lower quantum of floorspace to that tested as part of the cumulative assessment undertaken, which assumes that up to 3,500 square metres will comprise retail floorspace. The intention is to deliver a local centre to meet on-site needs, and the Design and Access submitted in support of the outline permission identifies that the scale of will be limited to complement with existing and proposed provision in neighbouring town centre elsewhere, including Littlehampton. Within this context it is highly unlikely that the entire floorspace (if delivered) will comprise solely retail (Class E(a)) floorspace. Our approach overstates the likely impact.

⁴ At Paragraph 2.1



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Table 1: Anticipated Cumulative Trading Effects of the Proposal and Commitments (Main Centres)

Destination	Solus		Cumulative	
	Impact	Change in Turnover Post Development (2025-2030)	Impact	Change on Turnover Post Development (2025-2030)
Littlehampton	-3.6%	+£1.17m	-4.9%	+£0.58m
West Durrington	-1.4%	+£3.20m	-1.8%	+£2.71m
Rustington	-0.7%	+£2.88m	-1.2%	+£2.68m
Arundel	-0.6%	+£0.47m	-0.7%	+£0.46m
The Strand	-0.1%	+£0.08m	-0.3%	+£0.07m

Source: Table 12 at Document 2

8.11 Based on the very robust cumulative assessment undertaken, whilst the impact on defined centres increases, this remains limited (-4.9% of less) and would not undermine the long-term vitality and viability of neighbouring centres. Post-development, the retail turnover of all centres will continue to increase over the five-year period.

8.12 As outlined above, it is also important to reiterate that the above cumulative impacts assumes that 3,500 square metres of retail floorspace will be delivered, and that this will be provided by 2030. This is unlikely. There a November 2022 dismissed appeal on the site (ref. APP/C3810/W/22/3304168) which states (at paragraph 26) that:

“The appellant makes the point that Policy EMP SP3 (and its accompanying map) show the gross areas of the strategic employment land allocations and that “...the actual floorspace and employment capacity of each site will be determined as development proposals are worked up in detail. Local environmental constraints, the eventual use class of occupiers and design issues will be important determinants for each site”. It is highlighted that the allocation provides for a gross area in excess of the 2 hectares allocated. It is also noted that the areas identified on the Policies Map do not precisely tally with the areas granted for ‘non-residential development’ within the Hampton Park permissions. From the evidence, it appears that the appellant has counted around 1.22ha of land opposite/near the appeal site (made up of 0.9 and 0.32 hectare parcels of land) as having permission for non-residential uses and which still remains available for such. In addition, three other parcels near the appeal site have incorporated mixed uses, including a 0.28ha care home site, and 0.81ha and 0.56ha parcels with permission for retail and residential uses.” (our emphasis)

8.13 Within this context it is highly unlikely that the quantum of retail floorspace that has been ‘tested’ will be delivered.



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- 8.14 Furthermore, no allowance has been made for the substantial 'on-site' expenditure generated as part of the wider Hampton Park scheme. The driving rationale for any retail floorspace that is provided is to meet local needs.
- 8.15 By not account for these factors (as assumed for the purposes of this assessment) the limited cumulative impacts identified will be substantially overstated given the overly robust approach that has been adopted. In reality, should retail development come forward at Hampton Park (which is highly uncertain, at least in the short term) the identified cumulative impact identified on neighbouring centres will be much lower than identified.
- 8.16 Against this background, we maintain that the RIA conclusions remain entirely valid. Whilst we do not believe it necessary to consider cumulative impact, it has been demonstrated that the proposals (either in isolation or together with other retail schemes) will not lead to a significant adverse impact on neighbouring centres. It therefore remains that the impact test is satisfied.

9 Sequential Test

- 9.1 Nexus refers to additional sites considered as part of the sequential assessment undertaken in support of the pending application for a much larger scheme at Norway Lane / Worthing Road, Littlehampton (also known as the Bodyshop scheme)⁵ that was submitted after the current application at the Site.
- 9.2 A number of sites identified and have already been assessed as part of the submitted RIA. These include:
- Vacant units within Littlehampton town centre;
 - Former Waitrose, Avon Road, Littlehampton;
 - Vacant units within Rustington Local Service Centre;
 - North Littlehampton / Hampton Park Masterplan Local Centre; and
 - Land West of Brook Lane and South of A259, Angmering.
- 9.3 All these sites were dismissed as being unsuitable and unavailable for the proposed development. The same conclusion is reached by the evidence submitted in support of the Bodyshop scheme.
- 9.4 The additional sites identified as part of the Bodyshop scheme application also do not provide a sequential alternative to the Application Site. All these sites fall below the minimum 1 hectare identified threshold in identifying the parameters for applying the sequential approach⁶ and are

⁵ Ref. LU/93/25/PL

⁶ As set out at Paragraph 3.28 of the submitted RIA



Note continued

too small to accommodate the proposed development. Nevertheless, for completeness consideration of these additional sites is provided below.

- 9.5 The Windmill, Coastguard Road, Littlehampton** comprises an out-of-centre site that extends to only 0.09 hectares and comprises a recently refurbished cinema. This is too small to accommodate the proposed development and in any event in active use as a cinema. It is not suitable and available for the proposed development.
- 9.6 Land at Paterson Wilson Road, Littlehampton** extends to 0.81 hectares and comprises a former ambulance station and associated car park and an existing police station. Whilst this overall site is already too small, part of the site is in active use (police station), which minimises the development potential of this site. Furthermore, planning permission was granted in June 2024 (ref. LU/45/24/PL) for residential development. Overall, this site is not available or suitable for the application proposals.
- 9.7 Land North of Water Lane, Angmering** and **Land at Arundel Road, Angmering** both comprise out-of-centre locations and provide no sequential advantage over the Application Site. No further consideration of these sites is therefore needed.
- 9.8** Overall, it remains that no sequentially preferable site exists for the proposed development that is available and suitable for the proposed development.

10 Summary and Conclusions

- 10.1** This Supplementary Retail Impact Assessment provides the additional information requested by Nexus and continues to demonstrate that the proposals accord with relevant retail planning policy.
- 10.2** It is also important to reiterate – as set out in our previous correspondence to ADC⁷ – there is no requirement for this application and the much larger Bodyshop scheme to be determined at the same time. The two schemes are not directly comparable and are entirely different in scale. The quantum of retail floorspace proposed by the Bodyshop scheme is more than 11,000 square metres (or over 500%) greater than that to be provided by the proposals at the Application Site. The implications, including retail impact, are not directly comparable, and there is no basis for both applications to be determined at the same time. Unlike established case law⁸, the two schemes are not competing for the same planning permission.
- 10.3** Against this background, there is no retail policy reason why the current planning application cannot be supported.

ENDS

⁷ Letter dated 26th June 2025

⁸ Including the High Court Judgment Lidl Great Britain Limited v East Lindsey District Council & Aldi Stores Limited [2024] EWHC 1641 (Admin)