

Our Ref: 2995/MR/LT20260703

3rd July 2026

Neil Crowther
Group Head of Planning and Building Control
Arun District Council
Arun Civic Centre
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Littlehampton
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MRPP
MARTIN ROBESON
PLANNING PRACTICE

Town Planning Consultants
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Via Email: neil.crowther@arun.gov.uk

Dear Neil,

FULL APPLICATION FOR FOODSTORE CLASS E(a) (ALDI) AND TWO DRIVE-THRU UNITS; AND OUTLINE APPLICATION FOR LIGHT INDUSTRIAL FLOORSPACE – CLASSES E(g)(iii) and B8. LAND TO THE WEST OF NEW COURTWICK LANE, WICK, PLANNING REFERENCE: LU/72/25/OUT

We act on behalf of Tesco Stores Limited. Our client trades from a superstore at Broad Piece, Littlehampton. We make representations in respect of the above application on the following issues;

1. Failure of the sequential assessment test, and
2. Adverse impact on planned investment and the need to assess cumulative effects.

Failure of the Sequential Assessment Test

The applicant's agent's Retail Impact Assessment (RIA) March 2025 seeks to address the sequential test. This was supplemented by an 'Additional Retail Response' (ARR) November 2025. The RIA failed to consider the committed strategic site known as "North Littlehampton" which is identified in the Littlehampton Neighbourhood Development Plan (LNDP). This is an urban extension for 1,260 homes, 13,000m² of employment premises, up to 3,500m² of retailing, a hotel and other uses being implemented under planning permission LU/47/11 (January 2013). And the LNDP's Policy 9 designates a new local centre as part of the North Littlehampton Masterplan. The permitted retail area is currently undeveloped and is being actively marketed. It is therefore available and suitable for development and should be considered a sequentially preferable opportunity.

Our assessment is supported by the Council's retail adviser. Nexus finds that, "As a consequence of the (LNDP), the North Littlehampton local centre is a sequentially preferable location to both proposals (including the Norway Lane scheme) and should be subject to detailed consideration. At the present time both applicants classify it as an out of centre site, which we consider to be incorrect. Therefore, further detailed assessment is required from both applicants".

Martin Robeson Planning Practice is a trading division of Martin Robeson & Partners Ltd
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The agent's ARR then considered the North Littlehampton site but rejected it on the basis of an allegedly restrictive condition that, "*The development hereby permitted shall not be carried out except in substantial accordance with the illustrative masterplan drawing number GR. L [1]002 Rev A ('the Masterplan'), and the Design and Access Statement incorporating Design Guidance dated February 2011*" (condition 6 attached to the original outline permission (LU/47/11) as reported at the ARR's section 2.1). The ARR asserts that new development there would need be strictly in accordance with the approved drawings and that this renders the opportunity unsuitable to accommodate the application proposal. However, the permission is in outline, drawings relied on are 'illustrative' and the condition does not require proposals to be 'strictly in accordance' with the masterplan.

The planning permission (Ref: LU/47/11) provides for "*up to 3,500m² of Class A local facilities*". There are no conditions in the decision notice which control the land use mix for the Class A floorspace or the scale or format of units which can be provided. The retail element and Local Centre status are consolidated in the LNDP and the North Littlehampton Masterplan. Consequently, the North Littlehampton Local Centre is a sequentially preferable site for the application proposal.

In undertaking sequential assessment one should not only have regard to the flexibility afforded by planning policy and masterplans but applicants are expected to demonstrate flexibility on issues such as format and scale. The Planning Practice Guidance (NPPG) promotes a pragmatic and responsive approach to site assessment explaining that 'potential town centre or edge-of-centre sites are not required to accommodate the exact scale and form of the proposed development'.

Adverse Impact on Planned Investments and the Need to Assess Cumulative Effects

The NPPG states that in assessing impact consideration should be given to, "*...the extent to which an application is likely to undermine planned developments or investments based on the effects on current/forecast turnovers, operator demand and investor confidence*" (paragraph: 015 Reference ID: 2b-015-20190722).

The Council's adviser's review of the applicant's agent's RIA states: "*For Littlehampton town centre, the Town Centre Strategy ('TCS') lists a large number of potential/proposed projects. None of these would appear to have any material overlap with the New Courtwick Lane application, although the Town Council, as author of the TCS, should be asked to comment upon this*" (paragraph 6.40). The Town Council have objected to the application. It has prepared a Town Centre Strategy Action Plan Update June 2025 that seeks to, "*...improve the commercial viability of the town centre for existing and potential new businesses*". However, the applicant's agents have failed to assess the proposal's potential impact on this relevant initiative.

There is, in addition, the committed North Littlehampton strategic site, referred to above. The LNDP's Policy 9 identifies a new local centre as part of its Masterplan. Planning permission has previously been granted for a mixed-use urban extension which included 3,500m² of new retail floorspace (LU/47/11 January 2013). The permitted retail area is currently undeveloped and is being actively marketed. This is a planned development

requiring investment that could be undermined based on “*current/forecast turnovers, operator demand and investor confidence*”(NPPG, paragraph: 015 Reference ID: 2b-015-20190722). The Council's retail consultant, Nexus, has similarly identified the applicant's agent's failure to have regard to this apparently sequentially preferable location. The applicant's agent responded arguing that the site's outline consent for a 500m² convenience store development cannot accommodate the scale proposed in their scheme. However, this conflicts with the sequential test's expectation that the existing limitations can be adapted as maybe reasonably possible to accommodate the importance of meeting the town centre first Policy objective. The first sequential test has thus been failed.

In addition to the application the subject of this representation, the local planning authority has before it a planning application at Norway Lane, Littlehampton (LU/93/25/PL). The application is also for an out-of-centre, retail proposal. If both were permitted there would likely be a significant trading overlap between the Aldi application's proposed 1,912m² of floorspace and the proposed 5,152m² of food and non-food retail floorspace at Norway Lane. Whilst the applicant's agent has claimed that a cumulative assessment of impacts is unnecessary, it is a normal expectation to ensure a 'worst-case' scenario is accounted for. This is a highly appropriate convention that should be adopted in this case.

We understand it is the Council's intention to determine both applications at the same time based on the Judgment in *Lidl v East Lindsey Council (ex parte Aldi) July 2024*. This Judgment confirms that the appropriate and legally sound approach in the case of multiple applications, particularly where there is a potential choice to be made either between the proposals, or for their combination, is for their determination to be made at the same time. It is therefore necessary for the Council to understand the outcomes relating to the significance of adverse impacts on the town centre and for the North Littlehampton Local Centre scheme in a scenario where both applications were approved.

Conclusions

The application site is in an out-of-centre location with no policy designation. There is a committed strategic site at North Littlehampton identified in the Littlehampton Neighbourhood Development Plan and consolidated in a Masterplan. This is a designated Local Centre in the Development Plan and is well connected to the Town Centre by a new bus route. The opportunity provides for up to 3,500m² of retail floorspace, has permission and is being marketed. It is undeveloped, available and suitable to accommodate a food store. The sequential test, and its requirement to demonstrate flexibility in accommodating proposals on 'town centre' sites, has therefore not been met.

There are Town Council supported initiatives for planned town centre investment. These, and the prejudice to bringing forward the planned development of the centre at North Littlehampton, are the types of potentially severe impacts that national and local planning policy seek to prevent. A thorough assessment of the harm arising from the cumulative impact of this application's proposals together with those at Norway Lane, should be provided.

For all these reasons, the application should be refused.

Yours sincerely,

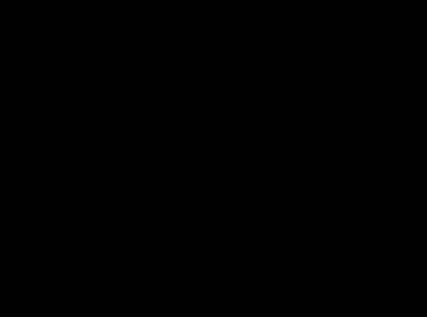
[REDACTED]

Martin Robeson

[REDACTED]

cc: emma.sheppard@arun.gov.uk

PL- Rep



Arun District Council, Civic Centre, Maltravers Rd
Littlehampton, West Sussex, BN17 5LF
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From: Emma Sheppard <Emma.Sheppard@arun.gov.uk>
Sent: 06 July 2026 15:52
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Subject: E: LU/72/25/OUT

Good afternoon

Please can this be uploaded to the above application – it is a representation.

Kind regards

Emma

Emma Sheppard BA (Hons) MRTPI
Principal Planning Officer
Planning Services
[Redacted]
E: emma.sheppard@arun.gov.uk



Working days Thursday & Friday

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From: Martin Robeson [Redacted]
Sent: 03 July 2026 16:43
To: Neil Crowther <Neil.Crowther@arun.gov.uk>

Cc: Emma Sheppard <Emma.Sheppard@arun.gov.uk>
Subject: LAND TO THE WEST OF NEW COURTWICK LANE, WICK, PLANNING REFERENCE: LU/72/25/OUT

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We act on behalf of Tesco Stores Ltd and submit representations regarding the above planning application.

If you have any queries, please do not hesitate to contact us.

Yours sincerely,

[Redacted signature]

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