

Date: 1st August 2025

Your Ref: LU/93/25/PL

Our Ref: 18117

DWD

69 Carter Lane
London
EC4V 5EQ

Emma Sheppard
Arun Civic Centre,
Maltravers Road,
Littlehampton,
West Sussex,
BN17 5LF

Dear Emma

COMMENTS LETTER – UNITS 5-7 WATERSMEAD BUSINESS PARK NORWAY LANE/WORTHING ROAD LITTLEHAMPTON BN17 6LS (REF: LU/93/25/PL)

DWD has been instructed to write to you on behalf of Store Property Investments Ltd regarding planning application ref: LU/93/25/PL for the 'Part demolition, conversion, refurbishment and re-elevation of Units 5 and 6 and construction of retail (food and non-food), leisure and food & beverage units (Use Class E), together with associated car parking, access, loading areas, landscaping and associated works. This application is in CIL Zone 2 and is CIL Liable' at Units 5-7 Watersmead Business Park Norway Lane/Worthing Road Littlehampton BN17 6LS.

DWD has reviewed the planning application submission and would like to provide comments on the planning application and concerns about the retail impact assessment.

In the event that Arun District Council are minded to grant planning permission we would strongly urge the following:

- Conditions to strictly control the unit sizes to prevent sub-division;
- Conditions to control the use of each unit, particularly having regard to the convenience/comparison split;

- Contributions to off-set the impact of the proposals on nearby town centres;
- S106 obligations that seek to ensure that where there is duplication in the retail offer, that a presence within the town centre is maintained.

We have considered each of these matters in this letter in greater detail.

Background

The application proposes the partial demolition of the existing units in order to make way for a new retail, leisure and food & beverage development. Following a review Arun District Council’s interactive planning policy map, it is understood the application Site is not allocated for development but is located within the ‘Built up Area Boundary’. The proposed development comprises the conversion, refurbishment and re-elevation of Units 5 and 6 and construction of 9 units for retail (food and non-food), leisure and food & beverage uses (Use Classes E(a), E(b) and E(d)).

Following a review of the proposal, it is understood that the below floorspace has been put forward.

Unit Number	Total Floorspace (sqm, GIA)
A1	1,922
A2	2,906
A3	140
A4	939
A5	2,066
A6	2,040
A7	1,027
A8	1,008
A9	507
-	270

Total	12,815
-------	--------

The application Site is out-of-centre, as it is located over 300m from a defined centre/Primary Shopping Area. The nearest Centre is Wick Village Centre which is 1.1km to the south-west. Littlehampton Town Centre is 1.6km to the south.

Our client has interests in the nearby land and in particular actively manages assets in Rustington Town Centre.

Whilst we would dispute the comments made regarding the need for employment related development within Arun District, our main concerns are with the submitted technical work from a retail perspective. There is a well-identified and known demand for employment development in Arun and therefore we find it difficult to see how the retail consultants can sustain an argument that demand is low.

Submitted Retail Assessment

The proposed development seeks to redevelop the site which currently consists of three individual industrial units. The application proposes the partial demolition of the existing units and in its place purposes a total of 9 units.

The Retail Assessment does not go into depth on the potential occupiers with the exception of Unit A5 being sought by Lidl. There is a letter in Appendix 3 which is authored from Lidl to confirm that it is their intention to keep their existing store at New Road Littlehampton. However, there isn't any mechanism suggested in regard to how this would be guaranteed. In terms of protecting the vitality of Littlehampton in particular, we encourage the LPA to consider how a legal agreement provision could be used to secure Lidl's presence in the town centre either in its current location or a location of equivalent size. Whilst it is encouraging to see these words from Lidl, without any obligation they offer no guarantees that a presence would be retained. It is implicit in the assessment that the loss of Lidl to Littlehampton would be significantly detrimental to the vitality and viability of the town centre. The Retail Assessment is also reliant on the contention that the rest of the occupiers are not already present within the study area, again we ask the LPA to incorporate this into the legal agreement, otherwise there is nothing to stop the retail anchors from existing town centres taking space in the new units. As above the loss of further anchors would be considered significantly adverse.

The modelling used to justify the Lidl unit shows that in spite of the very direct competition between the proposal and the Lidl at Littlehampton it is expected to cannibalise only 0.02 million of turnover. Given that Lidl are working in partnership with the applicant it would be fair to seek some evidence regarding other openings and whether this figure is accurate. We are aware that in other locations Lidl has been closing stores in town centre locations for example Lidl Paignton.

The assessment has in our view significantly underestimated the impacts of the proposed development on nearby centres – Littlehampton and Rustington in particular. The assumptions made in the Retail Assessment arrive at a figure of 9.5% cumulative impact on Littlehampton and 6.4% on Rustington. The report is not considered to justify that either centre would be able to absorb such large volumes of proportional trade diversion. Although we believe these figures underestimate the impact, even at these levels we consider it would be reasonable for Arun to conclude that the impacts on the town centres would be severely detrimental to their vitality and viability. Given the large scale of the impacts identified it will be extremely important that the future use of the site is tightly controlled to ensure that impacts cannot be further exacerbated. Some conditions have been suggested by the applicant e.g. relating to mezzanines, however, we consider that further conditions and obligations would be necessary. No potential legal contributions are suggested to support the centres, and the report is silent on the manner in which previous out of centre schemes have sought to provide obligations in legal agreements to seek to address the harm caused. In previous years appointed Arun Retail Consultants have concluded that much smaller schemes are finely balanced in terms of the acceptability of the impact levels. Given that this scheme is substantially larger and that the vitality and viability of the centres is in a worse position post-pandemic it is expected that Arun's appointed retail advisors would conclude that the impacts are beyond acceptable limits.

Key to seeking to minimise impacts is to ensure that the unit sizes do not directly compete with the town centre offer. We consider that the units at present are too small in this regard, however if permission is granted then the condition should be tightly controlled to prevent subdivision. It should also be noted that when comparing the current application alongside a previous scheme at Land south of New Road (A259) & East of Brook Lane Angmering (reference: A/11/17/OUT), the proposal suggests that the scheme would have similar impacts on Littlehampton and Rustington despite being over 6 times the retail size in sqm. This calls into question the figures that have been presented within the Retail Assessment. Please see the figures below.

Application Reference	Summary of Floorspace	Cumulative Impact on Rustington	Cumulative Impact on Littlehampton
A/11/17/OUT	1,487 sq m A1 retail and 581 sq m A4	5.7%	6.6%
Current application	12,815 sq m	6.4%	9.5%

On the basis of the above, it is considered that the cumulative impact on both centres is likely to be greater than the retail assessment suggests. If the Council's retail advisors do conclude that the level of impact is acceptable it will be important that appropriate mitigation in the form of financial sums should be confirmed, ensuring Rustington is also included in the mitigation proposed.

Summary

As a result of the above our client, Store Property Investments Ltd, objects to the application unless these points are taken into consideration and addressed. We would be grateful if the Council could acknowledge receipt of this letter and keep us updated on the progress of the application, moving forward.

I trust the above is sufficient, however, should you wish to discuss our response or the proposed application in further detail, please contact myself or Serena Page [REDACTED]

Yours sincerely

[REDACTED]

Georgina Smith

Senior Planner

DWD

[REDACTED]

Nicola Oktay

From: Emma Sheppard
Sent: 14 August 2025 11:29
To: Planning.Responses
Subject: Objection LU/93/25/PL
Attachments: Freeths Retail Impact Assessment Letter RM V.pdf

Importance: High

Good morning

Please can the attached be uploaded to the application as an objection.

Many thanks

Emma

Advanced leave notice Friday 8th, Friday 15th and Friday 22nd August

Emma Sheppard BA (Hons) MRTPI
Principal Planning Officer
Planning Services







T: 07851 243252
E: emma.sheppard@arun.gov.uk

Working days Tuesday-Friday

Arun District Council, Civic Centre, Maltravers Rd, Littlehampton, West Sussex, BN17 5LF
www.arun.gov.uk



Our priorities...

 <p>Improving the wellbeing of Arun</p>	 <p>Delivering the right homes in the right places</p>	 <p>Supporting our environment to support us</p>	 <p>Fulfilling Arun's economic potential</p>	 
--	---	---	--	--

Note: I occasionally send emails outside of working hours. If this arrives outside your normal working hours, please do not feel compelled to respond immediately.

From: Serena Page [REDACTED]
Sent: 01 August 2025 14:34
To: Emma Sheppard <Emma.Sheppard@arun.gov.uk>; Planning <Planning@arun.gov.uk>
Cc: Georgina Smith [REDACTED]
Subject: Comments LU/93/25/PL
Importance: High

CAUTION: This email originated from outside of the organisation. You should take extra care when clicking links or opening attachments - if you are unsure the content is safe contact the IT Helpdesk before clicking or opening.

Good afternoon Emma

Please find attached comments in relation to application reference LU/93/25/PL.

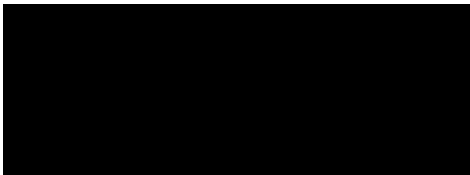
We would be very grateful if you are able to confirm receipt of the attached comments. If you had any queries regarding the comments we would be happy to discuss.

Kind regards

Serena

Serena Page

BA MA (Cantab) MSc MRTPI
Director



Chartered Surveyors & Town Planners

69 Carter Lane, London, EC4V 5EQ

DWD

DWD is the trading name of DWD Property and Planning Limited, a subsidiary of RSK Environment Limited. Registered in England No. 15174312. Registered Office: Spring Lodge, 172 Chester Road, Helsby, Cheshire, England, WA6 0AR. This e-mail (and any attachments) may be confidential and privileged and exempt from disclosure under law. If you are not the intended recipient, please notify the sender immediately and delete the email. Any unauthorised disclosure, copying or dissemination is strictly prohibited.