



Mid Sussex District Council

Oaklands
Oaklands Road
Haywards Heath
West Sussex
RH16 1SS

04 December 2025

Dear Andrew Watt,

ADDENDUM TO REPRESENTATION LETTERS SUBMITTED BY WORTH PARISH COUNCIL DATED 27TH MAY 2025 AND 1ST OCT 2025.

RELATING TO DM/24/2957: SEVER EXISTING LAND TO RETAIN EXISTING PUBLIC HOUSE USE AND AN AREA OF PUB GARDEN AND ERECT A CONVENIENCE STORE AND 4 NO. APPARTMENTS WITH ASSOCIATED WORKS, INCLUDING ALTERATIONS TO THE EXISTING VEHICLUAR ACCESS AND CAR PARK (AMENDED PLANS AND RETAIL JUSTIFICATION RECEIVED 1 MAY 2025)(UPDATED DRAINAGE, ECOLOGY AND LANDSCAPING INFORMATION RECEIVED 26 JUNE 2025) (OFF-SITE HIGHWAY WORKS PLAN RECEIVED 9 SEPTEMBER 2025) (RETAIL JUSTIFICATION ADDENDUM RECEIVED 10 NOVMBER 2025)

I am writing on behalf of Worth Parish Council. This letter provides an addendum to the previous representation letters, and objections, submitted by Worth Parish Council (dated 27th May 2025 and 1st October 2025) relating to application DM/24/2957.

Submission of this further representation follows the applicant's submission of a "*Retail Justification Addendum*", dated Nov 2025 and prepared on behalf of the applicant by ROK Planning. Paragraph 1.1 of the Retail Justification Addendum says it has been prepared to "*further assess the findings of the Retail Justification Statement dated 23rd April 2025 undertaken in support of a planning application*" and provides some commentary on the application of the sequential test in relation to the proposal.

This letter reaffirms Worth Parish Council's **objection** to the proposal, and examines the substance of the additional retail justification set out by ROK Planning, alongside their earlier Retail Justification Statement, dated 23 April 2025.

Sequential Test

The crux of ROK's argument is that a sequential test is not required because the site is located within Copthorne, which is defined as a Local Service Centre by the development plan. The Retail Justification Addendum, Nov 2025, repeats that claim, but also appears to provide a sequential test justification that - based on a 1.5km catchment - there are no centres within the catchment, and thus a sequential approach is demonstrated.

It is for the District Council, as the Local Planning Authority, to determine whether the sequential test evidence provided by ROK Planning appropriately satisfies national and local policy requirements. In our view, we maintain that a 'Local Service Centre' as defined by the Local Plan, should not automatically be interpreted as a 'Town Centre' for the purposes of the sequential test (for the reasons previously expressed), and it cannot

be the case that development plan retail policy requirements apply only to town, village and neighbourhood centres and not all settlements within the district.

We also question the relevance of the appeal decisions attached to the Retail Justification Addendum, Nov 2025. Each of those appeals are from around a decade ago, and each concern proposals within built up areas of significant towns, each of which are distinctly different to the size and status of Copthorne.

Impact - Copthorne Neighbourhood Plan Policy CNP4

Our previous objection, acknowledged that because the amount of retail floorspace proposed by this application (372 sq.m gross) falls below the 500 sq.m threshold set by Policy DP2 of the Mid Sussex District Plan 2014-2031, there is no retail planning policy requirement for a specific retail impact assessment to be undertaken for this application.

However, again as we noted in our previous objection, that does not remove consideration of the potential impact of the proposal on the Copthorne Post Office which is a designated Important Community Facility, and protected by Policy CNP4 of the Neighbourhood Plan.

Policy CNP4 says: *"Development proposals that would result in the loss of an Important Community Facility (whether that be the actual facility/building or the use of the facility/building), should be refused..."*

Our concern is that the proposed new convenience store must represent a risk to the continuing viability of the neighbouring KwikMart, which houses the Copthorne Post Office. Accordingly, if there is a risk that the KwikMart store would close as a consequence of the proposed development, then it follows that there is a risk that the Post Office would be lost, which would be contrary to the purpose and objective of Policy CNP4.

That consideration is not acknowledged and not addressed by either the ROK Retail Justification Addendum, the previous April 2025 Retail Justification paper, or anywhere else within the application documents.

Rather, the Retail Justification Addendum, with reference to the April 2025 Retail Justification paper, simply claims that there is surplus existing available expenditure for the proposed store and thus sufficient local spending to support the proposed new store in addition to Copthorne's existing stores.

The expenditure figures provided by the applicant are set out in their April 2025 Retail Justification paper, and having reviewed their data, we are concerned that what the data actually shows, if it is applied consistently, is that there is insufficient expenditure capacity to support Copthorne's stores and the proposed store.

The proposed store is expected to be used for 'top-up' convenience goods shopping, and the applicant has assumed that top-up expenditure on convenience goods constitutes 50% of the total convenience goods expenditure of their assumed catchment area. That assumption does not align with usual standard assumptions in respect of convenience goods shopping practice, and does not align with the Mid Sussex Retail Study (from which ROK Planning source data they rely on for their assessment of capacity) which is a key part of the evidence based underpinning the development plan, and which adopts a 75%/25% ratio of main/top-up convenience expenditure. See for example Footnote b, Table 2b of the Mid Sussex Retail Study.

If the ratio of main food shopping to top-up food shopping is assumed to be 75%/25% the amount of top-up convenience expenditure available to support the proposed new convenience store would **not** exceed the forecast turnover of the new store. Using the applicant's own figures, we calculate that rather than a surplus of top-up expenditure there would be a **deficit** of some £1.96 million.

Or, to put it another way, the applicant's own figures, applied consistently, show there is insufficient spending to support the turnover expectations of all the stores. That would potentially therefore put the future viability of existing stores – including the nearby KwikMart and thereby its resident Post Office – at risk. That is not an outcome that should be supported, and it would be contrary to the intent and objective of Policy CNP4.

On that basis we maintain our objection to the proposal on Policy CNP4 grounds.