



Planning Department  
Brentwood Borough Council  
Town Hall  
Ingrave Road  
Brentwood  
Essex  
CM15 8AY

**By email**

23 March 2016

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Dear Sir/Madam

### **BRENTWOOD DRAFT LOCAL PLAN 2013 – 2033 CONSULTATION**

We write on behalf of our client, Sainsbury's Supermarkets Ltd (SSL), to submit representations in relation to the draft Brentwood Local Plan, currently out on consultation.

SSL currently operate a supermarket at William Hunter Way. As a result, they are keen to be involved in the Local Plan process.

#### **Brentwood Draft Local Plan 2013-2033**

Policy 4.2 states that provision will be made for 7,240 new homes to be built in the borough between 2013-2033. SSL welcome this proposed housing target which will help to address the borough's housing needs.

Policy 6.5 identifies Key Gateways and states that development proposals in the vicinity of these areas will contribute to enhancing a positive impression of the Borough. It should be recognised that there is a limitation to the extent to which some developments can contribute to enhancing the local area due to their nature and function.

Figure 6.1 identifies the location of these Key Gateways however it is of such a scale that it is not possible to clearly identify their boundaries. Each "Key Gateway" shown in this figure covers a wide area of land. A "Key Gateway" should be a specific defined entrance or link, not an extensive wider area. This figure should be amended accordingly.

It appears that the SSL site forms part of one of the Key Gateways. Given its function as a supermarket and car park, much of which is set back from William Hunter Way, SSL object to the store being included in the Key Gateway boundary and the boundary should be amended accordingly.

The boundary of the Brentwood Town Centre Conservation Area currently includes the southern frontage of William Hunter Way. This boundary should be amended to exclude this area as there are no factors of special architectural or

historic interest in this area that merit protection.

The requirements of Policy 10.3 in relation to Sustainable Construction and Energy are overly prescriptive. Whilst sustainability should be encouraged, policy should not be so prescriptive that it could compromise the viability of new developments. Smaller scale developments such as extensions and small refurbishments are unlikely to be able to achieve these targets. As such, a flexible approach should be applied. The requirement to submit a Water Sustainability Assessment should be deleted as it places yet another unnecessary burden on developers.

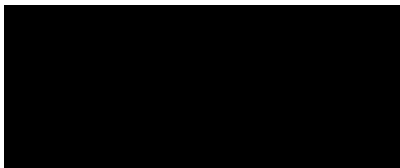
There are a number of prescriptive design policies. These design policies should reflect the guidance set out in the NPPF on design in terms of contributing positively to making places better for people.

The requirement to provide a thorough site and context appraisal for all developments is excessive. Any assessment of a development proposal against policy should be proportionate to what is being proposed.

Policy 10.8 states that new development proposals are expected to provide functional on-site open space and/or recreational amenities or where appropriate, financial contribution towards new or improved facilities nearby with the amount and type of provision required being determined according to the size, nature and location of the proposal. The wording of this policy suggests that all development will be required to make some provision regardless of what type of development is proposed. Provision of open space or recreational amenities is not always appropriate or necessary in order to make development acceptable. As such, this policy should be re-worded to make clear that in the provision of open space will be required where Regulation 122 compliant.

We trust that these representations will be taken into account in the next iteration of the Local Plan, however should you have any queries please do not hesitate to contact me or my colleague Helen McManus.

Yours faithfully

A large black rectangular redaction box covering the signature area.

Sean McGrath

cc: Ms Caroline Huett, SSL