



BY APPOINTMENT TO  
HER MAJESTY THE QUEEN  
LACE OF ARMS - AND A SUPPLY OF ALL SORTS  
OF OFFICIAL AND PARLIAMANTARY  
PRINTING AND BOOK-BINDING

BY APPOINTMENT TO  
HER MAJESTY THE PRINCE OF WALES  
LACE OF ARMS - AND A SUPPLY OF ALL SORTS  
OF OFFICIAL AND PARLIAMANTARY  
PRINTING AND BOOK-BINDING

Waitrose

Planning Policy Team  
Brentwood Borough Council  
Town Hall  
Brentwood  
Essex CM15 8AY

BY EMAIL: [planning.policy@brentwood.gov.uk](mailto:planning.policy@brentwood.gov.uk)

Dear Sir or Madam

**BRENTWOOD BOROUGH LOCAL PLAN 2015 – 2030: PREFERRED OPTIONS  
CONSULTATION  
REPRESENTATION BY WAITROSE LTD**

Please accept this letter as our written comments on the Local Plan.

We have a requirement for a new full line store in Brentwood and are currently considering potential development opportunities in the town.

At this stage we are not in a position to comment on specific opportunities and allocations. We nevertheless welcome the opportunity to participate in this stage of the Local Plan and comment on its general policies and approach. Our comments are outlined below.

**Vision**

Waitrose supports the Local Plan's Vision. A new Waitrose store will make an important contribution towards achieving this Vision by providing an enhancement in the provision and quality of the town's food offer. Any scheme will also improve quality of life through the provision of accessible job opportunities for the local community and providing a new and enhanced retail facility.

**Policy S4: Provision for Retail and Commercial Leisure**

Waitrose supports the level of need that is identified for new convenience floorspace in the Borough.

Whilst we have an extensive track record of delivering investment in Town Centres, the Policy should however recognise that it can sometimes be appropriate to deliver a new Foodstore in locations on the edge of or outside a Town Centre where there are no suitable, viable or available opportunities. Policy S4 should therefore include a cross-reference to Policy DM9 which deals with the assessment of new proposals to provide clarity in terms of how such locations would be assessed. This will ensure that the policy is sufficiently flexible.

**Policy CP11: Strong and Competitive Economy**

Retail development can make a significant contribution to economic growth and intensification of vacant and under-utilised sites. We therefore support the recognition that is given to job growth by retail proposals under this policy.

Food shops of the John Lewis Partnership

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For the reasons explained under Policy S4 above, we recommend that criterion e. of this policy is amended to include reference to the provision of retail investment in locations outside the Borough Town Centres where the requirements of Policy DM9 are met. This will ensure consistency with the NPPF tests and provide a flexible policy that can deliver economic growth.

### **Policy CP13: Sustainable Transport**

We note this policy states major generators of travel demand should be located in Brentwood Town Centre and in District Centres. For the reasons already explained, a suitable location within such policy locations cannot sometimes be identified. Where this occurs, the travel demands of a use such as a Foodstore can be mitigated through design and sustainability measures including those described under this Policy.

On this basis to allow appropriate flexibility, the reference to the location of development should be amended to allow provision outside Town and District Centres where these have been appropriately assessed against Policy DM9 and the wider requirements of this policy.

### **Policy DM9: New Retail and Commercial Leisure Development**

We recommend the following amendments to this policy to ensure it is sufficiently flexible and conforms with the requirements of the NPPF:

#### **Criterion e.**

Where a retail development is being proposed in an edge or out-of-centre location it is often not feasible to be fully or even partially integrated with the existing shopping area. Indeed if a proposal complies with the Sequential and Impact tests then there is no requirement to ensure integration to be considered acceptable in retail policy terms.

To ensure Policy DM9 is sufficiently flexible and conforms with the NPPF we recommend this criterion is deleted.

#### **Criterion f.**

The objectives of this policy are acknowledged. In practical terms, it may not be viable to provide a 'range of shops' within a proposed development if a scheme has been only formulated to meet the requirements of a single occupier e.g. a standalone Foodstore. Such development can in itself contribute to an area's attractiveness, accessibility and vibrancy.

To ensure Policy DM9 is sufficiently flexible and complies with the NPPF (particularly paragraph 173) we recommend this criterion is either deleted or amended to require an application to demonstrate how it will contribute to attractiveness, accessibility and vibrancy. This can then ensure the delivery of standalone schemes and support their viability subject to wider policy compliance.

#### **Criterion g.**

The objectives of this policy are also acknowledged. The requirements of the policy do however place an unrealistic expectation on a developer as it is not often commercially viable to provide small units within a scheme let alone ensure these are capable of occupation for independent 'niche' retailers. As such a policy would threaten the viability of a development, it should be removed in order to be both deliverable and consistent with NPPF paragraph 173.

**Criterion h.**

The sub-division of an existing large retail unit can often provide a welcome opportunity to create a new retail store in a building where there is floorspace that is either vacant or surplus to requirements. This is also a sustainable form of development consistent with the NPPF through its re-use of an existing building and previously-developed site. We acknowledge that if the building is outside or on the edge of a Town/District Centre then compliance with the Sequential and Impact tests will be necessary. There is however no justification for this proposed type of policy restriction.

To ensure Policy DM9 is sufficiently flexible and conforms with the NPPF we recommend this criterion and accompanying paragraph 4.29 is deleted.

We hope these comments are of assistance and look forward to receiving acknowledgement in due course. We would also be grateful if you could continue to keep us notified on the Plan's progress.

Yours faithfully

**Ken Harrison**  
For and on behalf of Waitrose Ltd