



By Email

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

10th February 2015

Our Ref: 14/2229

Dear Sir / Madam,

Representations to Brentwood Borough Council's Strategic Growth Options Consultation – January to February 2015

I am writing on behalf of my Client, ALDI Stores Ltd (ALDI) to submit written representations in respect of the above consultation.

ALDI currently employs over 12,000 people in the UK, of which around 9,500 are in existing stores. This number is anticipated to grow considerably through ambitious growth plans, increasing representation and provide much needed competition to the UK grocery sector.

Unlike larger supermarkets, ALDI's specialist business model means stores do not act as 'one-stop-shops' and thus complement, rather than compete with, existing shops and services. The reality is a new ALDI can secure clear, tangible benefits, including physical regeneration, retail choice and competition, linked trips and spin-off trade, as well as jobs with exceptional training opportunities. The majority of staff are employed locally and indeed in most instances ALDI agree to Local Labour Agreements, thus widening potential benefits during construction as well as when the store is trading.

ALDI are actively seeking potential investment opportunities within Brentwood Borough and we have noted that Nathaniel Lichfield and Partners' December 2014 Retail and Commercial Leisure Study recognises the qualitative and quantitative deficiency in terms of existing convenience retail floorspace across the Borough; in particular that discount foodstores are not represented within existing provision. Capacity for around 5,500 sq.m gross convenience retail floorspace is identified across the plan period, the majority of which will be provided in Brentwood Town Centre.

ALDI are aware of the town centre opportunity sites that have been identified within the Strategic Growth Options document, and are monitoring developments on each of these sites with a view to delivering beneficial development to Brentwood in the future. Whilst ALDI supports the 'town centres first' policy of directing the majority of convenience retail development to Brentwood, to absorb current trade surplus and extend retail choice, it is also considered that the emerging policy should make provision for meeting the additional retail needs created by the proposed strategic housing allocations in more outlying locations within the Borough.

The Strategic Growth Options Consultation, at paragraph 3.3, states a requirement to provide for around 360 new homes per year, which over 15 years equates to around 5,500 homes, around 3,000 more than what can be provided from brownfield sites. The document proposes large strategic housing allocations at land east of Running Waters and Heron Hall, at Ingrave

and Herongate to the east of the Borough, for example. In addition, a further strategic allocation at West Horndon could in theory accommodate up to 2,000 new homes.

Whilst the Consultation proposes to allocate appropriate town centre sites to meet growing retail needs, we believe that further clarification is needed as to how the local needs of new strategic residential allocations, particularly to the east of the Borough, would be met. We note that provision is made within the Retail and Commercial Leisure Study for directing some of the identified retail floorspace to serve these locations, in the event that significant large-scale housing development takes place. ALDI fully supports this assertion.

Paragraph 5.30 of the Study considers that the proposed strategic housing allocation at West Horndon alone could meet a gross convenience retail floorspace of 809 sq.m (on the basis of 2,000 additional homes being provided), and we share the view that the emerging Local Plan should ensure that *local* retail needs are met in full, and are not compromised by limited site availability within new strategic allocations. At West Horndon for example, the Consultation makes provision for mixed use development, building on the 2013 Preferred Options Consultation on the Local Plan, which identifies retail as an appropriate form of development at Policy CP4 and Policy S4. It is considered appropriate to apply this principle to other larger strategic housing allocations, to ensure that local retail needs are met in full.

The provision of convenience retail floorspace at a local scale can serve an important role in encouraging sustainable shopping patterns, reducing the need for new residents to travel into Brentwood to fulfil their shopping needs. Given there is already an existing requirement for an additional foodstore to meet town centre needs, it would not be expected that further provision outside of the main town centre would be to the detriment of Brentwood's vitality and viability. Future housing growth will create the opportunity for neighbourhood foodstores to serve these new areas, creating accessible facilities and sustainable shopping patterns.

In summary, whilst ALDI remains supportive of the policy direction to promote additional convenience retail floorspace to Brentwood Town Centre, we believe the emerging policy should also allow the opportunity for the creation of new centres to serve the areas of housing growth. Emerging Policy S4 proposes to allocate a quantum of retail floorspace to the West Horndon Opportunity Area, and it is considered that this principle should be applied elsewhere in the Borough.

I trust the above is self-explanatory and provides clear rationale for the suggested amendments, and would respectfully request that these adjustments are made. I would be grateful to be kept informed of progress and future consultations on this and other policy matters. In the meantime, please do not hesitate to contact me should have any further questions.

Yours sincerely



Paul Gargey

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