

[REDACTED]

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**From:** [REDACTED]  
**Sent:** 28 April 2011 15:03  
**To:** [REDACTED]  
**Subject:** Representations to LDF Consultation Document - Development Management DPD Proposed Submission [Virus Control Checked]  
**Attachments:** Rep Form Dev Mgt Proposed Sub...pdf

Debee

On behalf of our client, Sainsbury's Supermarket Ltd, we enclose a copy of our representations for the above document.

Should you have any queries please do not hesitate to contact Seam McGrath or me.

Regards

Chris

**Chris Key**  
Senior Planner

[REDACTED]



**Indigo Planning Limited**  
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## Representation Form

### Development Management Proposed Submission

This form has two parts -

Part A - Personal Details

Part B - Your representation(s)

**Please fill in a separate sheet for each representation you wish to make.**

#### Part A

**Personal Details** - if an agent is appointed, please only complete Title, Name & Organisation boxes below but complete the full contact details of the agent.

Title	<input type="text"/>
First Name	<input type="text"/>
Surname	<input type="text"/>
Job Title*	<input type="text"/>
Organisation*	<input type="text" value="SAINSBURY'S SUPERMARKETS LTD"/>
Address line 1	<input type="text" value="C/O AGENT"/>
Address line 2	<input type="text"/>
Address line 3	<input type="text"/>
Address line 4	<input type="text"/>
Postcode	<input type="text"/>
Telephone No	<input type="text"/>
Email Address*	<input type="text"/>

#### Agent Details (if applicable)

<input type="text" value="MR"/>
<input type="text" value="SEAN"/>
<input type="text" value="MCGRATH"/>
<input type="text" value="DIRECTOR"/>
<input type="text" value="INDIGO PLANNING"/>
<input type="text" value="SWAN COURT"/>
<input type="text" value="11 WORPLE ROAD"/>
<input type="text" value="LONDON"/>
<input type="text"/>
<input type="text" value="SW19 4JS"/>
<input type="text" value=""/>
<input type="text" value=""/>

\* where relevant



## Part B - Please use a separate sheet for each representation

In order to ensure that the scope and content of your representations on the Development Management DPD Proposed Submission version is focused on issues of soundness and legal compliance, you are requested to make your representation on this official form that has been specifically designed to assist you in making your representation or alternatively an interactive version of the Development Management DPD Proposed Submission is available on the Council's consultation website [www.southend.gov.uk/ldf](http://www.southend.gov.uk/ldf).

The Planning Inspectorate has issued guidance 'Local Development Frameworks – A Brief Guide to Examining Development Plan Documents (September 2010)' [http://www.planningportal.gov.uk/uploads/pins/dpd\\_procedure\\_guide.pdf](http://www.planningportal.gov.uk/uploads/pins/dpd_procedure_guide.pdf).

Name or Organisation

INDIGO PLANNING

### 1. To which part of the DPD does this representation relate?

Paragraph

Policy

DM10

Proposals Map

### 2. Do you consider the DPD is

2.1 Legally compliant

Yes

No

2.2 Sound\*\*

Yes

No

\*\*The considerations in relation to the DPD being 'Sound' are explained in Planning Policy Statement 12 in paragraphs 4.36 – 4.47, 4.51 and 5.52 and the boxed text. If you have entered No to 2.(2), please continue to Q3. In all other circumstances, please go to Q4.

### 3. Do you consider the DPD is unsound because it is not:

3.1 Justified

3.2 Effective

3.3 Consistent with national policy

**4. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.**

WE DO NOT CONSIDER THAT POLICY TABLE 6, ENTITLED 'EMPLOYMENT SECTORS' IS SOUND. POLICY TABLE 6 OUTLINES A RANGE OF EMPLOYMENT SECTORS BUT FAILS TO INCLUDE RETAIL IN THIS. THIS IS NOT CONSISTENT WITH NATIONAL POLICY GUIDANCE SET OUT IN PPS4, WHICH CONFIRMS AT PARAGRAPH 4 THAT RETAIL DEVELOPMENT AS A MAIN TOWN CENTRE USE IS CONSIDERED TO BE ECONOMIC DEVELOPMENT AND PROVIDE SUSTAINABLE ECONOMIC GROWTH.

continue on a separate sheet if necessary

**5. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 3 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

IN ORDER TO MAKE POLICY TABLE 6 AND POLICY DM10 SOUND, WE CONSIDER THAT TABLE 6 SHOULD BE AMENDED TO INCLUDE RETAIL DEVELOPMENT. THIS WOULD MAKE THE DPD SOUND AS IT WOULD BE CONSISTENT WITH NATIONAL POLICY SET OUT IN PARAGRAPH 4 OF PPS4.

continue on a separate sheet if necessary

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

**6. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?**

**No,** I do not wish to participate at the oral examination.

**Yes,** I wish to participate at the oral examination

**7. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:**

WE WOULD LIKE TO PARTICIPATE AT THE ORAL PART OF THE EXAMINATION, AND CONSIDER THIS NECESSARY IN ORDER TO SET OUT THE DETAILED REASONING AS TO WHY THE COUNCIL'S APPROACH TO EMPLOYMENT SECTORS SHOULD BE CONSISTENT WITH PPS4.

continue on a separate sheet if necessary

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Signature

(INDIGO PLANNING)

Date

29/04/2011