

CD/1732A/114(09December09)Kensington&Chelsea

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9 December 2009

Dear Sir or Madam

**ROYAL BOROUGH OF KENSINGTON & CHELSEA: PROPOSED SUBMISSION CORE  
STRATEGY  
COMMENTS ON BEHALF OF WM MORRISON SUPERMARKETS PLC**

With reference to the above, we write on behalf of our client, Wm Morrison Supermarkets Plc, to thank you for providing us with an opportunity to comment on the Submission Core Strategy.

Morrisons are a major food and grocery superstore retailer and whilst they do currently operate any stores within the borough, they may seek such representation in the future. They would therefore like to be kept informed and consulted on further documents which will comprise the Local Development Framework for Kensington and Chelsea.

We have the following comment to make on our clients behalf.

**Policy CE1: Climate Change**

Our client objects to criteria a) of draft Policy CE1 which requires non-residential development to meet BREEAM standard 'Excellent' in the period to 2015 and BREAAAM standard 'Outstanding' thereafter.

The Council has not consulted with all sectors of industry to confirm whether BREEAM standards Excellent and Outstanding are achievable or realistic. Therefore we consider that it is crucial for draft Policy CE1 to incorporate some flexibility to ensure that it does not represent an unreasonable burden on companies which could jeopardise investment, regeneration and employment creation in the borough.

As currently worded we consider that this policy is unsound as it contains no such flexibility. Accordingly, Morrisons request that Policy CE1 is modified by the insertion of text to confirm that the requirement to meet these BREEAM standards will be subject to tests of viability and suitability.

We trust that the above is helpful. However, if you have any queries, please contact Clare Dickinson at the address above.

Yours faithfully



PEACOCK & SMITH

Enc.

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**Proposed Submission Core Strategy for the Royal Borough of Kensington and Chelsea with a focus on North Kensington**

**Development Plan Document**

**Local Development Framework**

**Publication Stage Representation Form**

Please e-mail this form to: [planningpolicy@rbkc.gov.uk](mailto:planningpolicy@rbkc.gov.uk)

*Alternatively send this form to:*

Planning Services  
Policy Team  
Room 328  
The Town Hall  
Hornton Street  
London  
W8 7NX

*For further information:*

Visit our website at: <http://ldf-consult.rbkc.gov.uk>

Phone the LDF hotline on: 020 7361 3879

**Responses must be received no later than midday Thursday 10 December 2009**

**Personal Details**

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To be "sound" a core strategy should be JUSTIFIED, EFFECTIVE and consistent with NATIONAL POLICY.

"Justified" means that the document must be:

- founded on a robust and credible evidence base
- the most appropriate strategy when considered against the reasonable alternatives

"Effective" means that the document must be:

- deliverable
- flexible
- able to be monitored

"Consistent with National Policy" means that it is consistent with government guidance contained within Planning Policy Guidance and Planning Policy Statements

Do you consider the core strategy to be legally compliant?

Yes

No

Do you consider the core strategy to be Sound?

*Please tick the appropriate box*

**If you have selected YES and you wish to support the legal compliance or soundness of the core strategy, please be as precise as possible when setting out your comments below**

Please make it clear which Paragraph number, Vision box number, Policy box number or Objective box number you are commenting on.

PLEASE REFER TO ATTACHED LETTER

**Please attach additional pages as required**

**If you have selected NO do you consider the core strategy to be unsound because it is not.**

Justified

Effective

Consistent with national policy

*Please tick the appropriate box*

Please give details of why you consider the core strategy to be unsound or not legally compliant. Please be as precise as possible when setting out your comments below.

Please make it clear which Paragraph number, Vision box number, Policy box number or Objective box number you are commenting on.

**Please attach additional pages as required**