

Response Form

Partial Review of the Core Strategy for the Royal Borough of Kensington and Chelsea with a focus on North Kensington

Development Plan Document policies

All representations **must** express a view regarding the soundness or legal compliance of a planning policy. If the representation does not comment on soundness or legal compliance, or deal with how a policy can be altered to make it sound the representation will **not** be valid.

Name: Neil Collins

Company/Organisation: _____

Representing: _____

Please complete the form and email it or send it to:

The Executive Director of Planning and Borough Development

f.a.o The Policy Team

The Royal Borough of Kensington and Chelsea

The Town Hall,

Hornton Street,

London W8 7NX

Email address: planningpolicy@rbkc.gov.uk

Publication Stage Representation Form

To be **“sound”** the contents of a local plan should be POSITIVELY PREPARED, JUSTIFIED, EFFECTIVE and consistent with NATIONAL POLICY.

“Positively prepared” means that the planning policy needs to:

- be prepared based on a strategy which seeks to objectively assess development and infrastructure requirements, including those of neighbouring authorities where it is reasonable to do so.
- It must also be consistent with achieving sustainable development.

“Justified” means that the planning policy must be:

- founded on a proportional evidence base
- the most appropriate strategy has been selected when considered against the reasonable alternatives.

“Effective” means that the planning policy must be:

- deliverable over its period
- based on effective joint working on cross – boundary strategic priorities.

“Consistent with National Policy” means that the planning policy should enable the delivery of sustainable development in accordance with the guidance contained within the National Planning Policy Framework (NPPF).

It must also be **legally compliant** which means that the planning policies have been prepared in accordance with legal and procedural requirements.

State planning policy or paragraph number to which you are referring

CL7 b, CL7 f, 34.3.62

Yes

No

Do you consider the planning policy to be sound?

Please tick box as appropriate

If you have selected YES and you wish to support the soundness of the planning policy, please give your reasons below. Please be as precise as possible. Please make it clear which paragraph number or Policy box number you are commenting on.

please attach additional pages as required

If you have selected NO to the planning policy being sound do you consider the planning policy to be unsound because it is not:

Positively prepared

Justified

Effective

Consistent with national policy

Please give details of why you consider the planning policy to be unsound and / or suggest changes as to how it could be made sound. Please make it clear which paragraph number or Policy box number you are commenting on.

CL7, b: There are a few reasons why this policy is unsound. Firstly, neither the Alan Baxter nor the Arup reports state that basements should be limited to a single storey. Secondly, no evidence has been provided to support only the construction of single level basement from an engineering perspective. RBKC should allow multiple storey basements to be built. As long as sound engineering design and practice is adhered to there should be no limit.

CL7, f: The construction of basements under listed buildings should not be excluded. The Alan Baxter report states that basement construction under listed buildings does not carry any extra risk. Additionally, English Heritage do not support such a blanket ban and states each application should be considered on a case by case basis. A case by case approach should be taken for basement construction under listed buildings.

34.3.62: There is no evidence that basement construction under listed buildings causes harm. I think correctly constructed and engineered foundations during the basement construction phase would help ensure a more robust and structurally sound building. This would help preserve a listed building for many more years to come. English Heritage does not support a blanket ban and a case by case basis should be considered.

Yes

No

Do you consider the Planning Policy Document to be legally compliant?

Please give the reasons for your choice below and be as precise as possible. Please make it clear which paragraph number or Policy box number you are commenting on.

please attach additional pages as required

Do you wish to appear at the Examination on any of these matters?

Yes

No

Please specify on what matter