

# 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:** James Agace

**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](mailto: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**

34.3.58, CL7b, CL7 c

**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.**

34.3.58. In the Second Draft Response table, you state multi-storey basements may be more complex and challenging. However, the Alan Baxter report says the risks are acceptable and there is no mention that basements should be limited to a single storey. Furthermore, regarding the council's response that construction of multi-storey basements are linked residential amenity, I have not seen evidence to support this, it is presumption, not fact.

CL7 b: While there is evidence that multi-storey basements are more challenging and complex, the Alan Baxter and Associates report does not recommend against them and do not carry any special risks. There is no mention in the report that basements should be limited to a single storey. Just because certain basement construction projects may be complex it does preclude their construction.

Multi-storey basements should be permitted. Sound engineering design should be a key factor in the decision.

CL7 c: Again with reference to the Alan Baxter report, the report does not recommend against building under existing basements as doing so does not carry any special risks. There is no mention in the report that basements should be limited to a single storey. Just because certain basement construction projects may be complex it does preclude their construction. Building under existing basements should be permitted. Sound engineering design should be a key factor in the decision.

**Please attach additional pages as required**

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

Yes

No

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

Please specify on what matter