

# 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:** Paula McPherson

**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**

34.3.55, 34.3.69

**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:**

<b>Positively prepared</b>	<b>Justified</b>	<b>Effective</b>	<b>Consistent with national policy</b>
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**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.**

34.3.55: This justification for this statement lacks any supporting evidence. Please provide evidence to show how having unexcavated soil in a single area will give better drainage. Again, where is the evidence to support the claim that keeping an unexcavated area of garden will support biodiversity. This is not reasoned justification, the statement should be removed.

34.3.69: With reference to the Alan Baxter and Associates report where it says 'once constructed, basements tend to perform much better in environmental terms than above ground construction'. This fact has been completely ignored and should be mentioned. Carbon emissions from basements must be considered throughout the useful lifespan of the basement, not just the construction phase. You are implying basements are poor in terms of carbon emissions without looking at the complete picture by selectively ignoring this statement. The justified reasoning here is invalid.

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**

