

# 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:** HENRY PETERSON

**Company/Organisation:** ST HELENS RESIDENTS ASSOCIATION

**Representing:** 280 North Kensington residents

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**

CR4, CR5 and CR12 on Conservation

**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.**

**CONSERVATION AND DESIGN, POLICIES CR4, 5 AND 12**

Overall, the association supports the policies proposed by the council, and considers them sound and to reflect the views of local people in a borough with a significant architectural heritage.

On policy CR 4 Streetscape, paragraph e) currently reads as below and does not make sense. It should be amended to make clear that this policy applies also to freestanding advertising towers on private land.

*e. resist adverts that by reason of size, siting, design, materials or method of illumination, including on street furniture that harms amenity or public or road safety;*

On policy CR 5, we support the proposed text and especially sub-paragraph d) which reads 'require that there is no harmful increase in the sense of enclosure to existing buildings and spaces neighbouring gardens, balconies and terraces'. This 'sense of enclosure' policy is relatively unusual and may be challenged by developers. In our experience it has proved important in enabling the council to resist planning applications grossly over-ambitious in scale height and density, and which seek primarily to exploit the uniquely high land values in the borough.

We strongly support Policy CR12 on Building Heights. Many developers may argue that this is unduly restrictive, but in our view it is sound and reflects the view of residents of the borough.

## **BASEMENTS POLICY CR7**

We strongly support the council in its moves to strengthen its policies on resisting the construction of extreme basements. Given the very high residential values in the borough, the construction of such floorspace beneath existing dwellings has largely ceased to have anything to do with the need to expand a family home, and has become instead a form of speculative asset-building, often for absentee homeowners. The damage to the quality of life of neighbours is often extreme, and neither the planning system nor legislation on Part Walls were designed to cope with such circumstances.

We therefore consider the council's new policies to be sound, and particularly support proposals to limit the scale of basements, in terms of site coverage and depth, as set out in Policy CL7.

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.

**Please attach additional pages as required**

	<b>Yes</b>	<b>No</b>
<b>Do you consider the Planning Policy Document to be legally compliant?</b>	<input type="checkbox"/>	<input type="checkbox"/>

**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**