

**Opinion on the Royal Borough of Kensington and Chelsea Basement Policy Review:
Partial Review of the Core Strategy, February 2014**

Executive Summary

- As early as February 1996, English Heritage issued an advisory guide entitled “London Terrace Houses 1660-1860. A guide to alterations and extensions.” In this document some practical advice on basement conversions and alterations was set.
- We find it significant that at this date (1996) English Heritage was offering pragmatic guidance primarily on works to existing basements, rather than new excavations. Their guidance does not amount to any form of ‘blanket’ ban.
- In the Core Strategy, Part G of Policy CL2 “New Buildings, Extensions and Modifications to Existing Buildings” states: ‘The Council will require it is demonstrated that subterranean extensions meet the following criteria;
 - I. The proposal does not involve excavation underneath a listed building.
 - II. The stability of the existing or neighbouring buildings is safeguarded’.

It seems to us that this already suggests a blanket ban on new excavations beneath listed buildings, whilst giving equal weight to legitimate structural engineering considerations.

- With regard to listed buildings, we believe that the structural engineering considerations should outweigh planning considerations. Alan Baxter has stated that from a structural engineering point of view there is little difference between a listed and unlisted building. We consider that in many cases a basement conversion or excavation need not harm the special interest of a listed building provided it can be safely achieved in structural engineering terms.
- We note a lack of consistency with National Framework Policy in regard to basements and listed buildings. No other authority in London or nationally has sought to limit basements in this way. Effectively there is already a virtual ban in excavating beneath the footprint of listed buildings in RBKC and it seems to us that this goes against National Policy and English Heritage guidance of each case being judged on its own merit.
- It is illogical that above ground rear extensions to listed buildings are deemed to be acceptable in principle but not subterranean development that, apart from the possible requirement of air vents or other grills, will be invisible.