

Response Form Publication Consultation (12 Feb – 26 Mar 2014)

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

Development Plan Document policies

Basements Publication Planning Policy Conservation and Design Publication Planning Policies

The Council undertook a 'soundness' consultation on the Basements Publication Planning Policy and Conservation and Design Publication Planning Policies in July/ September 2013. The Council has now produced additional evidence on the Basements Publication Planning Policy and made some amendments to the policy and its reasoned justification. The proposed Conservation and Design policies have also been amended.

The publication policy that is the subject of this consultation is intended to be submitted to the Secretary of State. **Therefore please make representations on this publication policy even though you may have submitted representations previously. Any previous representations will not be carried forward unless it is indicated so in response to Q1 or Q2 as relevant.**

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. The consultation period runs from **12 February 2014 – 26 March 2014**. Completed response forms **must be received by the Council by midnight on 26 March 2014**. The Council may not be able to consider representations received after this date.

Name:

Mr. Jarrett Knight-Hunt

Address:

Company/Organisation:

Self

Representing:

Self

Email:

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.

1. If you made representations to the July/ September 2013 Basements Publication Planning Policy would you like the Council to carry those representations forward?

Please tick the box that applies or leave blank if you did not make a representation previously. (If no response is provided the previous representation will not be taken forward)

Yes (with no further changes)

Yes (but with the additional changes as set out in this response form)

No (I am submitting a new response)

2. If you made representations to the July/ September 2013 Conservation and Design Publication Planning Policies would you like the Council to carry those representations forward?

Please tick the box that applies or leave blank if you did not make a representation previously. (If no response is provided the previous representation will not be taken forward)

Yes (with no further changes)

Yes (but with the additional changes as set out in this response form)

No (I am submitting a new response)

3. State planning policy or paragraph number to which you are referring

Primarily CL7b and CL7c (but also, by relation paragraphs 34.3.48 to 34.3.53, 34.3.58 and 34.3.69)

4. Do you consider the planning policy to be sound?

Yes

No

Please tick box as appropriate

5. 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.

I write in support of the new Policy Provision CL7-(b).

Opponents of the new policy are trying to create a false impression that the restriction of basements to a single storey is not widely supported across the Borough.

Nothing could be further from the truth. The real truth is that very few residents in the Borough either want or support basement multi-storey basements.

Most of the comments the Inspectorate will get arguing for multi-storey basements will come from architects and building contractors and their hired professional advisers. The individuals behind most of these organizations DO NOT even live in the Borough and, in the spirit of "localism", the Inspectorate should not even accept these comments as valid. The only relation these people have to the Borough is that they are all trying to make money on the misery of local residents.

Available data suggests a very limited demand for multi-storey basements. Kensington & Chelsea data show that there have been only a handful of basements greater than a single storey proposed. Our reading of maps available on line suggest that there have been less than 30 multi-storey basements, many of which were for larger and fully detached properties that would still be permitted under the new policy. This means that only a small handful of property owners have shown the greed and insensitivity to propose multi-storey basements on terraced properties (which specialist structural engineers engaged by RBKC have warned are particularly problematic). It would appear there have been less than 15 to 20 such applications.

By contrast, there have been literally thousands of residents protesting against basements in general. I personally attended several planning hearings involving basements, with each attracting 30-40 residents per application. If you consider the hundreds of basements contested in the Borough, this implies that collectively thousands of residents have taken hours out of their busy lives to attend a meeting to protest. And that only includes those who have attended in person. The Planning Department could easily tabulate the written comments received in opposition to basements over the years (but nevertheless seems to have permitted 90% of them).

please attach additional pages as required

6. 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

7. 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

- | | Yes | No |
|--|-------------------------------------|--------------------------|
| 8. Do you consider the Planning Policy Document to be legally compliant? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

9. 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

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

Yes	No
<input type="checkbox"/>	<input checked="" type="checkbox"/>

Please specify on what matter