

Begin forwarded message:

From: Patrick Hope-Fallner <> **Subject: Re: Your Ref: BS-2135**
Date: 11 November 2014 11:46:34 GMT
To: Chris Banks <bankssolutionsuk@gmail.com>

Printer found Chris: 2 prints in the mail today

Sent from my mobile
Patrick Hope-Falkner

On 10 Nov 2014, at 22:31, Patrick Hope-Falkner <> wrote:

Chris, my limited submissions are set out below, and attached as a separate PDF as well. I am out of town at the moment, without access to a printer. Do you need me to post paper copies to you? Or can you possibly save me from that?

Main Modifications to Basements Submission Planning Policy (BAS 01)

New paragraph 34.3.73

... Basements SPD will be adopted which will provide guidance for the information that will need to be submitted with basement applications

I am hugely in favour providing intelligent construction management plans/surveys and thought through

construction traffic analyses before planning is even considered. So in principle I strongly support new paragraph 34.3.73. However after years of experience of RBKC's Planning Department and their whole approach to the interests of affected neighbours, I am fearful that the precatory nature of the words I have underlined will quickly be used to emasculate the whole purpose of the new paragraph. It needs to be rephrased to ensure the new provisions are always mandatory and never optional. It would be simple to tighten the language by substituting the underlined words with "...mandate the information that must be submitted with all...".

Beyond that I wholly support the new provision in all respects, apart from the typo in the CTMP bullet others have pointed out.

Policy CL7 (l)

ensure that traffic and construction activity does not cause unacceptable harm to pedestrian, cycle, vehicular and road safety, ; adversely affect bus or other transport operations (e.g. cycle hire), significantly increase traffic congestion, nor place unreasonable inconvenience on the day to day life of those living, working and visiting nearby

Aside from the punctuation going slightly awry (after 'road safety' in the first line) this really needs to be beefed up. Can any "harm" ever be acceptable? Do eg pedestrians have to die to make this point? Just as importantly, at what point does inconvenience become 'unreasonable'? Living in the metropolis has its drawbacks, everyone knows that, but persistent nuisance needs to be prevented. A bedridden neighbouring resident should not have to put up with more than 3 days before being able to call upon RBKC planning enforcement to intervene to stop a health-threatening nuisance.

Policy CL7 (n)

be designed to safeguard the structural stability of the existing building, nearby buildings and other infrastructure including ...

Whilst I again applaud the principle of the provision, the language is too weak not to attract evasive tactics by developers. Beefing up is again required, perhaps something like "designed (if necessary, over-designed) to ensure and safeguard ..."

Many thanks

Patrick Hope-Falkner