

REP/118/1010

Examination of the Partial Review of the Kensington and Chelsea Core Strategy

Basements Publication Planning Policy

We are responding to the Main Modifications to Basements Submission Planning Policy (BAS 01).

New Paragraph 34.3.73

We have experience of CTMPs in Markham Square, which has a narrow one-way road running round a garden square. At 44 Markham Square (one of the case studies in the 2010 Eight Associates Report), planning consent was granted despite almost unanimous opposition from residents, with the imposition of a pre-condition requiring a CTMP to be approved in writing by RBKC. We were involved in the process of approval of the CTMP, its practical implementation, its breach and the service of an enforcement order on the developer and freeholder by RBKC.

We are strongly in favour of the proposed requirements for both a draft CTMP to be submitted with the application for planning consent for a basement and for a condition requiring a full CTMP to be attached to a planning consent for a basement. It is essential that traffic issues are addressed in detail at this initial stage and that there should be public scrutiny of the proposals. We do not accept the argument that this is too early. The vast majority of issues, such as the extent of the work, the dimensions of the site, the width of the carriageway, the local road configuration and the vehicles to be used, are capable of determination before the commencement of a project and will not change significantly, if at all.

We agree with the general description of the matters to be contained within the CTMP, including the requirement that the CTMP should take into account and allow for other active or permitted construction works. More detailed provisions will be included in the SPD, as anticipated.

We accordingly support the proposed wording for the new paragraph 34.3.73.

We have noted a typo in the tenth line of the bullet point: the word "from" should be deleted.

Policy CL7 (I)

We continue to object to the concept of not causing unacceptable harm as we believe that no harm is acceptable in this context; the Council has committed itself to **improving** road safety and **reducing** risk.

The Markham Square Association

11 November 2014