

RBKC Basement Policy Review
Austin Mackie Associates for Waltonwagner
Representor Reference 183
Matter 6

Issue 6.1

Whether CL7 f. is justified by the evidence, consistent with national policy, and effective

A blanket prohibition on all works under a listed building is not sound; it is not consistent with the principles of national policy, nor positively prepared or supported / justified with appropriate evidence base.

The principles within NPPF and past and emerging conservation guidance are that the acceptability of proposals affecting a heritage asset should, for example, be informed by an understanding of the asset's significance.

The Council in its evidence base asserts that, for example, the foundations and lower floor plans of a listed building are significant (34.3.61 of BAS 01 and 3.13 of BAS 18). However, it is inappropriate to pre-determine through planning policy that all works under a listed building would be unacceptable.

The Borough has granted large number of listed building consent applications for internal alterations to a listed building on the basis that, for example, they affect only the internal elements of lower levels, which are traditionally of lesser architectural or historic significance. Such areas are often, for example, of a low architectural quality reflecting their prior service function, contain little or no interesting detail and have a plan form that is not considered to be significant. In many properties these areas have already been significantly adapted to meet the needs of households with former smaller kitchens, stores etc being amalgamated to create modern kitchens or leisure spaces.

Similarly, external alterations are often permitted to facades of LB's where they possess a lesser significance to principle facades.

It is therefore inappropriate to pre-determine through planning policy that basement works under a listed building would have an unacceptably negative impact.

A far more appropriate approach would be to require any proposals for subterranean development under or within the curtilage of a listed building to be supported by an assessment of the buildings significance and the impact of the proposals on that significance.

It would be appropriate for the RJ to advise what areas the supporting assessment should address, but a blanket ban is entirely unacceptable and not sound.