

Response ID ANON-D83X-JEPR-R

Submitted to **Local Plan Reg 19** Submitted on **2019-11-17 21:24:05**

1 What is your name? Paul Handley

Development Vision and Good Growth in Brent

17 Development Vision: Achieving our Potential

Development vision matrix of choices - How strongly do you agree/disagree with the development

vision:

Neutral

Please provide feedback on the vision here:

18 Good Growth in Brent

good growth matrix of choices - How strongly do you agree/disagree with the vision for Good

Growth in Brent?:

Neutral

For those which have been checked, please state your reasons:

19 Policy DMP1 (Development Management General Policy):

DMP1 matrix of choices - How strongly do you agree/disagree with this policy?:

Neutral

For those which have been checked, please state your reasons::

Places

20 Which Place would you like to comment on? (you will get the opportunity to select additional places to comment on throughout the survey)

Please select a place::

Themes

47 Which theme would you like to comment on? (you will get the opportunity to select additional themes to comment on throughout the survey)

Please select a theme::

Design

Design

48 Policy BD1 (leading the way in good urban design):

agreement matrix BD1 - How strongly do you agree/disagree with this policy?:

Neutral

If any boxes have been checked, please give your reasons::

49 Policy BD2 (tall buildings in Brent):

Agreement matrix BD2 - How strongly do you agree/disagree with this policy?:

Neutral

If any boxes have been checked, please give your reasons::

50 Policy BD3 (Basement Development):

Agreement matrix BD3 - How strongly do you agree/disagree with this policy?:

Strongly disagree

Is not Positively prepared, Is not Justified, Is not Effective, Is not Consistent with national/regional policy

For those which have been checked, please state your reasons::

In summary, the current and proposed basement policy is not sufficiently rigorous and does not adequately safeguard the interests of neighbours. It is suggested that it should therefore be reviewed, not least to bring it in line with the basement policies now adopted by other London boroughs.

Whilst paragraph 6.1.3 recognises the negative impacts of large scale basement development it goes on to say that many aspects of concerns raised by residents are controlled by regimes outside the planning system. This approach represents an abdication of responsibility by the planning department and fails to safeguard the interests of neighbours. It is therefore unsound, unfit for purpose and requires significant change - not least to bring it in line with other London boroughs which have responded to problems with basement developments by the introduction of a more stringent approach by the inclusion, for example, of requirements for specific technical and engineering data to be provided at the application stage.

As part of the rethink of this section of the Local Plan it should be made clear that the council will only give approval for basement development where it is demonstrated to its satisfaction that the proposal will not cause harm to neighbouring properties or the structural, ground, or water conditions of the area.

To achieve this the basement policy should therefore make clear that an assessment of the potential scheme's impact on drainage, flooding, groundwater conditions and structural stability is required at the application stage. The full range of technical criteria required should be specified and detailed in a guide for applicants considering a basement planning application. This would establish a formal and comprehensive basement impact assessment process which would give confidence to neighbours that a scheme had been technically assured before being approved.

I hope that in making the above comments I have demonstrated that the current basement policy does not meet the "soundness" tests and trust that significant changes will be made so that those residents potentially affected by such schemes will no longer be exposed to the levels of concern and anxiety that can be generated by the current practice.

51 Would you like to comment on another theme?

No

Delivery and Monitoring

97 Do you have any comments to make on the Delivery and Monitoring chapter?

Please ensure that you reference specific paragraphs/ figures::

No

Appendices

98 Do you have any comments to make on the Appendices chapter?

Please ensure that you reference specific paragraphs/ figures::

No

Integrated Impact Assessment

99 Do you have any comments to make on the Integrated Impact Assessment?

Please make sure you reference the section you are commenting on::

Survey Feedback

100 Please provide feedback on the format and content of this survey below:

Feedback on survey:

Fair Processing Statement

101 Would you like for your personal data to be used for reasons other than identifying your representation and for contact in relation to this?

Yes