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To: [Planning Strategy](#)
Subject: Local Plan update for Brent Planning related to Basement Developments 2019
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Please find below response to the Local Plan in respect to the Basement SPD drafted in 2017. Unfortunately the portal is not working so I copy my report in full below;

**Local Plan Update for Brent Planning related to Basement Developments; 2019
Response to draft Plan; November 2019**

The last meeting I attended with Brent Planning department, (regarding basement development) was held in March 2017. My remit in that meeting was to state a case for a more vigorous approach by Brent Planning department to applications for basement developments. My experience with a basement application (2015- 2018) relates to my neighbour at 24 Dartmouth Road, NW2 4EX. After 3 years the planning application was finally rejected on Appeal, by the Inspectorate of Buildings. Therefore, I was happy to see the process had started in 2017 by Brent Planning department in the form of the Draft Planning Basement SPD dated February 2017. However it did not set out rigorous enough requirements at planning stage for obtaining planning permission for basement developments. In retrospect, had there been more stringent requirements set by the Brent Planners, the applicant's basement plan would have been discounted very quickly.

By comparison the public can read the London Borough of Camden's planning guidance document;

'CPG4 Basements and Lightwells' draft November 2017 and formerly updated on 26th March 2018. The Guidance was prepared to support the policies in the Camden Local Plan 2017'. So why do the London Councils of Westminster, Chelsea & the Royal Borough of Kensington, Camden, and Islington (all local councils to Brent) have such strict requirements for a 'Basement Impact Assessment'? It is to protect the public at large from inappropriate and unsafe developments and in effect protecting Council planning departments from contentious basement developers, and legal claims from occupiers, neighbours and neighbourhoods.

What planning departments of the London Councils have in common is a standard set of requirements to safeguard the planning team and the public at large. A 'checklist' provides a common guidance, a language of understanding with other teams doing similar work.

The glaring omission in the SPD produced by Brent in 2017 is **'The Structural Method Statement (SMS) which requires qualification by consultants related to each field.**

So the following are the required legal requirements for planning to get approval for a basement development;

- A Basement Impact Assessment overview report (structural engineer).
- Full structural design drawings and calculations (structural engineer).
- A Construction Method Statement (structural engineer).
- A Ground Investigation and Assessment (hydrogeologist).
- A Ground Movement Assessment (structural engineer).

Further reports such as; a Traffic Management Report, Construction Management Plan and Sustainable Urban Drainage Strategy may also be required for larger schemes. In the Brent Planning Draft for Basement planning these reports have been suggested, but not required by law. They have been sidelined and therefore, given over to Building Control to pick up any problems and relying on the integrity of the professional teams.

Camden require all applicants to pay for these reports and be included from the start of the application process for the basement, and these are then checked within the planning department and I quote from their (London Borough of Camden) planning document;

'Audit review: Basement Impact Assessments are technical documents which must be prepared in accordance with planning policies and guidance and submitted with planning applications for basement development. The Council obtains independent audits of BIAs from Campbell Reith Consulting Engineers in order to ensure that they meet the technical policy requirements. In 2017 officers reviewed the [BIA audit process with Campbell Reith](#) (PDF) in order to ensure the process is relevant, efficient and effective.'

In effect the applicant is paying for Basement Impact Assessments, and the cost of the application.

The Plan for Brent should have **parity in the respect of Basement planning requirements**, to the National Planning Policy (NPPF) paragraph 153 and the other London Borough already mentioned. That and the above should be taken in consideration to safeguard the legal position of Brent Planning department from neighbours, occupiers and neighbourhoods who find themselves unprotected by their local council.