

QPARA RESPONSE TO DRAFT BASEMENT SPD

The members of QPARA believe that measures should be put in place to ‘preserve and enhance’ - two of the guiding principles enshrined in the Design Guide - the special architectural integrity of the homes in this estate within the Queens Park Conservation Area.

We do not accept that the draft SPD gives reassurance that these fundamental principles are protected nor the security and reassurance for residents required from the issues and problems associated with basement developments. We would like to see more ambitious demands with greater protection for residents.

Background

- a) Houses in this area are about 100 years old, designed and built as 2-storey terraces using soft lime mortar, without deep foundations, ‘floating’ on soil and sub-soil which moves as part of a street scene where originality and lack of pollution and visual intrusion are essential elements.
- b) The sub-soil consists of 2 layers of clay with different densities and structure which cause the buildings above to rise and fall as they absorb seasonal changes in water content. Basements need to punch through top layers to provide stability and strength, using modern materials. Adjoining properties without such developments are more likely to suffer structurally from this essential difference. These problems can take many years to materialize.
- c) The anti-social impact of noise, vibration, dust, heavy lorry movements in small narrow streets, loss of parking spaces, and damage to trees and pavements are experienced over long and protracted periods during construction.
- d) The Party Wall Act and standard Highways and environmental legislation affords some protection during construction and for a limited period following but not long enough for the evidence of structural problems to materialize and those responsible to be held to account. There is little evidence that proper monitoring on a regular basis takes place.

Requests and improvements

We request that the following issues are addressed and that more requirements from developers **prior to the planning application** process are put in place. Steps should be taken so that all extra costs from basement proposals are borne by the applicant.

1. **Full geological report** of the site and adjacent land including water survey by qualified experts
2. **Environmental report** on sustainability of the proposal including impact on trees – street and site – pavements, roadways, drainage etc. All trees must be protected. A statement of how the proposed development will enhance the CA should be supplied with photos of the existing site.
3. **Building Control oversight** from Brent Officer to any development in the Conservation Area irrespective of any external agent. Evidence of qualifications and suitability of constructors provided. Brent inspectors should always have full access to any basement development and a named Brent Officer should be displayed at the construction site for concerned neighbours to be able to contact.

4. **A standard restriction on lightwells** on the front or side where any light pollution to the street or other properties or invasion of privacy would result. A restriction on the size of any basement related to the size of the site and property.
5. **No external access** to basements from the front or rear of the property.
6. **Fully supported plans for waste** and soil removal with details of how and where deposited. Clear descriptions must be included of how the health of local residents is protected from dust and noise pollution. Plans for vehicle, street and pavement cleaning and maintenance.
7. **Constructors to provide details** of all vehicles delivering materials and approved contractors; days and hours of operation; general noise levels during construction and permitted machinery with noise levels and periods of operation. All contractors to be members and sign up to CCS.
8. **Highways:** number of skips and location to be agreed. Number of vehicles permitted on site/street. Monitoring and enforcement required on all transport to the site.
9. **Restrict Permitted Development** rights for basements within the CA.
10. Does the proposal and construction plan meet the ‘**anti-neighbourly**’ aspect, protecting other residents from undue anti-social intrusion?
11. Requirement that an enduring **Bond** or some other measure be put in place by the applicant for a minimum of 10 years to address evidence of damage after completion.
12. Use of **CIL** or s.106 agreement, or some other measure to enforce compliance and provide financial protection.

We believe that houses within the CA should be basement free. At the very least developers should be required to apply for full planning permission and demonstrate a need for the development and an intention to preserve and enhance. We were concerned that the consultation showed that Brent found obstacles to many of the suggestions made to set high standards and compliance with the SPD. We urge you to resist such restrictions in the revised policy. We request more co-operation between departments within Brent and resources applied to ensure all relevant departments take an active part in the planning approval, monitoring and enforcement process for proposals in the CA.

We are grateful for the opportunity to comment on the draft and hope that you will address our concerns positively and that a Basement SPD can be added to the Queens Park Design Guide when agreed.

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 for QPARA Committee