



ISLINGTON

Regulation 12(a) Consultation Statement

Basement Development Supplementary Planning Document

November 2015



PART A: FORMAL CONSULATION ON DRAFT SPD

1 Introduction

- 1.1.** This document has been prepared in accordance with regulation 12(a) of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). It sets out details of the consultation that has taken place which has informed the development and refinement of Basement Development Supplementary Planning Document (SPD), which provides guidance to be used in the assessment of any planning application that involves excavation for the creation of new or additional subterranean/basement floorspace.
- 1.2.** This consultation statement sets out:
- early consultation activity undertaken to inform the preparation of the draft Basement Development SPD (further detail contained in Part B of this report);
 - who the council consulted when preparing the draft SPD; and
 - a summary of the issues raised during the public consultation stage, and how those issues have been addressed in the final version of the SPD.

2 Formal public consultation

- 2.1.** The council conducted a public consultation of the draft Basement Development SPD during the summer from 10 July until 4 September 2015. This exercise was undertaken to seek feedback on the proposed guidance from the public, industry, community groups and residents. Respondents were invited to provide general comments on the draft document, with the option to answer ten questions on specific sections of the SPD.
- 2.2.** Responses were welcomed via email, and in writing to the Council. In addition, an online questionnaire was set up using Survey Monkey that was accessible via the SPD webpage on the council's website. The questionnaire posed the following questions:
1. Do you have any comments on Section 6 of the draft SPD?
 2. Do you have any comments on Section 7.1 of the draft SPD?
 3. Do you have any comments on Section 7.2 of the draft SPD?
 4. Do you have any comments on Section 7.3 of the draft SPD?
 5. Do you have any comments on Section 7.4 of the draft SPD?
 6. Do you have any comments on Section 7.5 of the draft SPD?
 7. Do you have any comments on Section 7.6 of the draft SPD?
 8. Do you have any comments on Section 7.7 of the draft SPD?
 9. Do you have any comments on Appendix B of the draft SPD?
 10. Do you have any comments on Appendix C of the draft SPD?
 11. Do you have any other comments in relation to the draft SPD?
- 2.3.** The council targeted this public consultation to the following groups:
- E-mail to all e-mail addresses registered on planning policy consultation database (over 1700 registered).
 - E-mails and letters to various industry groups. Address information was sourced via the internet, and letters sent to specialist basement development firms active in the borough.
 - Where email addresses were not available, letters to local organisations registered on planning policy consultation database.
 - Letters to Islington's 48 elected councillors.
- 2.4.** In total, 19 responses were received; 15 written consultation responses and 4 online questionnaire responses. These responses are shown in full in Table 2.

3 Analysis of draft SPD consultation responses

- 3.1.** Nineteen responses were received from a range of respondents, as set out below. Although letters were sent to specialist basement development firms active in the borough, only two responses were received from the industry. The council's response to all written and online questionnaire responses is detailed in Table 2.

Table 1 Respondents grouped by category

Category	Number	Percent
Resident	6	32%
Community/Voluntary Group	3	16%
Basement Specialist	1	5%
Statutory Consultee	9	47%
Not stated	0	0
TOTAL	19	100

- 3.2.** Out of the nineteen responses received, nine (47%) gave broad support for the draft SPD, and five (26%) opted not to comment, and there were no responses with an in-principle objection to providing guidance on basement development.
- 3.3.** Two responses were received from Civil Engineers working in the relevant industry, one generally in support of the guidance, and the other raising questions around the level of intervention that the Council should adopt. Full responses to these comments are provided in Table 2 below.
- 3.4.** No evidence was presented in any of the nineteen responses in support of an alternative approach to basement development in the borough.

4 Conclusions

- 4.1.** Minor changes to the SPD were made in response to the consultation feedback on the draft SPD to improve the clarity of the document. The SPD will be taken to Executive for approval to adopt early 2016. The SPD will be a material planning consideration following its formal adoption.
- 4.2.** The production of the Basement Development SPD has involved extensive and ongoing consultation which has influenced both early development and later refinement of the document. The process has complied with the relevant Regulations.

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Table 2: Consultation responses on Draft Basement Development SPD

RESPONDENT	SUMMARY OF RESPONSE	RESPONSE FROM COUNCIL
Written responses		
Better Archway Forum	<p>Under point 7.6 Flood Risk, we would add that account must also be taken of ground water.</p> <p>Although not immediately evident, N19, and presumably other parts of Islington, features multiple small streams and water courses – the names Ashbrook Road and Brookfield Close offer clues but there are others. To take one example, one of the older residents pointed this, reporting that when Ash Court was built on Junction Road the builders ignored the small stream which ran down between the back gardens of the houses. As a result the new building on Junction Road flooded and more water protection had to be built. This causes limited problems if it is only a few feet deep, but if this type of water meets a larger blockage such as a basement, instead of diverting under the building it would flow into the foundations of neighbours.</p> <p>For this reason it will be important for those proposing basements demonstrate conclusively that there are no older/seasonal water flows which would be impeded by such a structure and might be good grounds for refusing the inclusion of a basement level in applications where permitted development rights do not apply, given the problems which can be caused. Parts of the Girdlestone Estate appear to be an example of the intractable problems caused when this type of issue is not properly addressed.</p>	<p>The Council agrees that groundwater flooding needs to be considered as an element of the overall assessment of flood risk for basement proposals. The SPD contains guidance on addressing flood risk for individual applications, and Section 6/Appendix B specifically requires Structural Method Statements to address groundwater levels as well as current and historic watercourses as part of the desk study. This is considered to be a robust and proportionate approach.</p>
Canonbury Society	<p>We have read with interest your draft SPD on Basement Development dated July 2015 and other related papers in which you've consolidated existing planning policies but not actually created any new policy to strengthen the council's armoury</p>	<p>As the SPD is planning guidance and therefore cannot formulate new policy, the Council considers that the guidance as drafted gives a clear and justified</p>

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	<p>of policies regulating subterranean development.</p> <p>On behalf of the Canonbury Society, I would like to comment as follows:</p> <ol style="list-style-type: none"> 1. As an opportunity to create new policy, this draft SPD is disappointing and it is weaker than we had expected particularly when it addresses Basement Development in Conservation Areas (Section 8) and Listed Buildings (Section 9). For example, Para 9.3 last line 'generally be resisted' should read 'generally be banned'; Para 9.5 1st line 'may not be' should read 'will not be'; Para 9.14 1st line 'If permission' should read 'in the unlikely circumstance that'. 2. Points for clarification, Para 7.2.2 can you define 'existing basement'? Does it mean lower ground floor typically found in Victorian and Georgian houses? DI.17 does 'within the curtilage of a listed building' mean 'outside the footprint of the listed building'? 3. We do not understand why you cannot adopt an outright ban on basements under listed buildings. You say that basements under listed buildings will be "resisted" rather than completely ruled out which in our view will create a lot of casework by applicants arguing in their favour the definition of 'resisted'. 4. In our response to the discussion paper and questionnaire dated 29th January 2015, we suggested that the council should adopt the policy of the Royal Borough of Kensington & Chelsea (RBK&C) which had been recently subjected to public examination and to a separate Planning Inspector's Report which found the policy to be 'sound'. <p>Interestingly, in a legal challenge in the High Court to this policy (CL7) by Zipporah Lisle-Mainwaring and Force Foundations (Basement Force) Ltd on 23rd July 2015, the judge found in the RBK&C's favour.</p>	<p>interpretation of our adopted planning policies with specific regard to basement proposals. The Council will consider the inclusion of a specific basement policy within the scheduled limited review of the Local Plan.</p> <p>The SPD contains a specific section on basements within Conservation Areas, which clarifies the specific issues that should be considered for a basement proposal in such a context.</p> <p>In response to the comments made, and for the avoidance of doubt, a minor amendment has been made to paragraph 7.2.2 to make a specific reference to lower ground floors within the definition. The Council considers this section provides sufficient clarity on what is considered to constitute an existing basement.</p> <p>The Council considers that it would be unduly restrictive to impose a blanket ban on basement developments within the curtilage of listed buildings, as the impact of a proposal on the significance of the heritage asset can only be considered properly when full details of the proposal are available.</p>
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	<p>In summary, the RBK&C's policy proposes:</p> <ol style="list-style-type: none"> I. A restriction to a single storey in most cases, with exceptions for large sites II. A reduction in the maximum extent basements can extend under a garden, from 85 per cent to 50 per cent III. An outright ban on basements under listed buildings IV. A requirement for construction traffic management plans to be submitted alongside planning applications to help limit disturbance during construction. <p>5. The only RBK&C policy we take issue with is the maximum extent to which basements can extend under a garden. In general we don't think they should extend under gardens at all and therefore consider 50% of the garden area to be far too generous. In exceptional circumstances and we would accept a figure closer to 20% of the garden area.</p> <p>6. We are pleased to note that the validation requirements applying to applications for basement development has been made much more stringent with relevant reports from professional advisers contributing to the Structural Method Statement (SMS) being demanded. The CMS will now be more comprehensive than it was which is necessary for the officers and members to properly consider such applications.</p> <p>7. We also note that the council quite rightly reserves the right to consult (at the expense of the applicant) an independent suitably qualified person to undertake an independent assessment for specific cases where conflicting information has been presented to the council, or where there are any particularly sensitive buildings, trees or other structures within the proximity of the site. We think this reservation should also include cases which involves complex technical engineering as well.</p> <p>8. Notwithstanding the above comments, we are generally happy with Sections 1 to</p>	<p>Whilst the Council acknowledges the concerns and issues around the retrofitting of basements underneath or close to Listed Buildings, the SPD takes a positive approach to outlining the issues concerned, by providing guidance on how these issues can be best resolved through design. Where the provision of a basement extension would result in harm the Listed Building, the guidance is clear that such as development would be resisted.</p> <p>The SPD sets out a key principle that in line with above ground development, all basement development needs to be appropriate and proportionate to its site context. Design Indicator DI.1 sets out a general parameters, however, any basement within a garden area/unbuilt upon area is subject to a number of sections within the guidance, with a range of design considerations which all help inform an appropriate level of development for a site. In some circumstances, a basement extending into 50% of the garden would not be appropriate for a number of potential reasons, and a lesser extent may be appropriate. This flexibility is necessary to ensure site circumstances are sufficiently taken into account.</p>
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	<p>7 and Appendices A to F which are useful and informative.</p> <p>We look forward to learning your conclusions from this consultation in due course.</p>	<p>Paragraph 6.8 ensures that a suitably qualified person(s) with relevant experience, be appointed and retained throughout the design and construction phase. New Paragraph 6.10 has been added to clarify that, where the basement proposed is an extension to an existing building or where the basement immediately adjoins an existing building, the retention of the suitably qualified person throughout the process will be secured by condition. With this safeguard in place, it is not considered necessary to require independent verification of the SMS in all instances.</p>
Resident	<p>I was glad to see in the 'Basement Development Discussion Paper' that consideration is being given to effects on local eco-systems and water courses. I have noticed several 'instant gardens' in my road, where extensive residential house developments/ renovations are followed by a general grubbing up of all existing vegetation which is then replaced with turfing and small shrubs which are 'sprinkled' with hosepipes for days. This is a loss of habitat for many birds and small insects which take years to recover and re-grow. We have lost our local populations of greenfinches and sparrows and many other small birds due to habitat loss (Anson Road/ Dalmeny Road. This is a sad thing - mature shrubs and small trees cannot be properly replaced by short turf and tiny shrubs/ bedding, especially when it happens in the middle of the summer!</p> <p>Anyway, the document looks good and thoughtful</p>	<p>Support is noted.</p>
Mayor of London	<p>The Council's approach to basement development is supported.</p>	<p>Support is noted.</p>

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Highways England	Having examined the above consultation document, we do not offer any comment to this proposal.	Noted.
Metropolitan Police	With particular reference to Basement Development and Development Viability proposals for new developments, where appropriate, must promote security and resilience to terrorism and have regard to the appropriate guidance published by the National Counter Terrorism Security Office (NaCTSO). All referrals for counter terrorism advice should be made to the Counter Terrorism Security Advisor (CTSA) via the Police Designing Out Crime Officer (DOCO) who will be the single point of contact.	Noted.
Designing Out Crime Group, Metropolitan Police	<p>This report concerns the inclusion of designing out crime and promoting community safety into Islington's draft 'Basement Development' and 'Development Viability' Supplementary Planning Documents.</p> <p>The London Plan draft Supplementary Planning Guidance at 'Policy 7.3 Designing Out Crime', clearly outlines The Mayor's commitment to ensuring that designs for the built environment serve to reduce crime and the fear of crime and encourages developers to include at least the main principles set out in the police Secured by Design (SBD) scheme.</p> <p>Being a MOPAC, Home Office and DCLG supported police initiative, SBD provides guidance to design teams and specifiers so that police preferred measures can be used to prevent crime.</p> <p>As research proves that adopting police SBD standards can reduce burglaries by 75% and both vehicle crime and criminal damage by 25%, The Mayors' advice in the draft planning guidance will reduce crime and the fear of crime.</p> <p>The police Secured by Design scheme recently introduced the Silver Award (details of which are attached at appendix A). This award sets out the minimum qualifying criteria for Secured by Design National Building Approval and is considered by</p>	The Council agrees that designing out crime and promoting community safety are important design considerations, as reflected by their inclusion with the Council's Development Management Policies. It is not considered necessary to replicate these requirements in the SPD.

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	<p>Building Control Officers and Approved Inspectors to be an acceptable compliance path for discharging Part Q of Schedule 1, Building Regulations 2010.</p> <p>The SBD Silver Award makes a major contribution to reducing crime and the fear of crime, as such we ask that Islington Council considers including compliance with the award in their guidance to developers.</p>	
<p>Consibee (Structural and Civil Engineers)</p>	<ul style="list-style-type: none"> • We generally support guidance provided by the SPD however, perhaps not surprisingly, there are a number of areas where we feel more clarity is required. • We totally agree with the qualifications required of the person submitting the SMS. • Possibly semantics, but the SMS is really a Basement Impact Assessment Flood Risk Assessment, a structural scheme and a Structural Method Statement. This only becomes clear after one has read the whole of sections 6 and appendix B and section 7.6 on flood risk. Maybe a pro-forma SMS or at least a summary would be useful to include to help get consistent submissions. • In the section on design in appendix B page 42, it asks for an assessment of movement and a limit on damage of category. It would be useful if this was expanded to make it clearer what is expected. For example on deep basements on particularly sensitive sites it would be reasonable to have an estimation of movement based on an analysis of the soil and construction method. This would then be used by an appropriately qualified person to assess the predicted damage. In contrast on a simple scheme, and using a stiffer form of construction (as described in the CIRIA guide) an appropriately experienced engineer would just use their judgement. A full analysis is expensive but if you really want to see that carried out then that should be made clear. • On the section on listed buildings it implies that that deepening of floor levels involving underpinning, even to vaults is unacceptable. Deepening vaults to create a bathroom or utility room is a very common form of extension, usually only requires a modest deepening, does not generally impact the main house, but will generally require underpinning. Creating useful additional habitable space in this way cannot sensibly be considered to change the hierarchy of the house, or the plan form, nor can most vaults be considered to be important historic fabric. We suggest that this isn't the type of basement extension that is 	<p>Support is noted.</p> <p>The contents of the SMS are to be proportionate to the site context, but at minimum must be in accordance with Appendix B. Paragraph 6.7 sets out the specific circumstances when physical site investigations may be required. This guidance is sufficiently clear to enable applicants to commission the appropriate evidence and level of assessment in support of a proposal.</p> <p>Impact on heritage assets needs to be individually assessed, when the full details of the proposal are available. In Islington, historic vaults are often an important feature, and contribute to the significance of the original building; intact vaults are particularly rare.</p> <p>Underpinning involves the introduction of modern construction methods and materials which alters the historic fabric of the</p>

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	<p>trying to be discouraged, and should apart from exceptional circumstances be allowed.</p> <ul style="list-style-type: none"> On a similar point, some basements have very low headroom so it would be reasonable in terms of amenity, air quality etc. to increase them a bit to improve the space and still remain subservient to the main floors. So is a blanket ban on underpinning of listed buildings reasonable? <p>Overall we support the aims of the SPD and the control it is trying to exert on basement extensions.</p>	<p>building, which in turn has the potential to irreversibly harm the special architectural or historic interest on the Listed Building. It is therefore important that The SPD sets out clear guidance to inform the assessment of planning (and listed building) applications and assist in consistency of decision making, therefore the Council considers the guidance as drafted is appropriate.</p>
Natural England	<p>Natural England does not consider that these Supplementary Planning Documents pose any likely risk or opportunity in relation to our statutory purpose, and so does not wish to comment on these consultations.</p>	<p>Noted.</p>
Resident	<p>Thank you for sight of your proposals.</p> <p>I am pleased to see that they have regard to protecting listed buildings and conservation areas.</p> <p>I agree with your proposals</p>	<p>Support is noted.</p>
Resident	<p>If the council is setting out tighter regulations on basement builds then how was it so easy to get permission to build a whole new underground complex of homes in the back gardens of 13 - 17 Thane Villas, N7?</p> <p>Quoting from your website -</p> <p>"Planning permission applicants will be required to provide detailed information on issues including the impact the development would have on surrounding gardens and trees."</p> <p>The above scheme which has been given the go ahead will have a profound impact on the back gardens. The construction access alone will require extensive clearance</p>	<p>The Council agrees the important role gardens play in the function and appearance of the borough. This is reflected in DM6.3 (E) which places limitations on development within gardens (private open space). The SPD provides further guidance on the implementation of this policy, however, each application is considered on its merits and the SPD does not seek to introduce a blanket ban on basement development.</p>

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	of mature garden space	
Office of Rail and Road	No comment	Noted.
Thames Water	Thames Water would like any guidance on Basement Development to include the need to fit all basements with a 'positive pumped device' (or equivalent reflecting technological advances), as this will help to ensure basements properties are protected from sewer flooding. Fitting only a 'non return valve' to basement properties is not acceptable as this is not effective in directing the flow of sewage away from the basement building.	Noted. The SPD has been amended to include this advice within Section 7.6 Flood Risk.
Transport for London	<p>Generally, the scale of the development covered by the proposed SPD is unlikely to be a concern for TfL. However, basement proposals on property adjacent to the Transport for London Road Network (TLRN), Strategic Road Network (SRN), above London Underground (LU) tunnels, especially shallow ones such as the Hammersmith & City, Circle or Metropolitan Lines or, more generally, on sites that are adjacent to TfL operational and non-operational land and property holdings have the potential to impact on the safe operation of the strategic transport network if inappropriately designed or constructed. TfL would be particularly concerned if a basement was proposed above or below an LU or London Overground (LO) tunnel or viaduct, or the TLRN.</p> <p>Accordingly, it is suggested that TfL as well as 'neighbours' would wish to be consulted early and if necessary raise concerns about specific proposals. As such, TfL would suggest that Section 5 (pg. 9) of the SPD should be amended to acknowledge that for any basement development proposals adjoining the TLRN/ SRN, LU/LO infrastructure or TfL land and property, TfL should be consulted, in accordance with London Plan policy 6.3 (assessing effects of development on</p>	As requested, the Council will consult TfL on basement applications in the instances specified as part of the planning application consultation process.

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	transport capacity).	
Health and Safety Executive	We have concluded that we have no representation to make at this stage of your local planning process. This is because there is insufficient information in the consultation document on the location and use class of sites that could be developed. In the absence of this information, the HSE is unable to give advice regarding the compatibility of future developments within the consultation zones of major hazard installations and MAHPs located in the area of your local plan.	Noted.
Questionnaire responses		
Civil Engineer	<p>Q1: Section 6 of SPD</p> <p>It is important to distinguish between site investigation and ground investigation. Both are required to adequately assess the construction risk. The extent of these investigations should be sufficient to adequately inform the particular planning and construction design stage. The document needs to be more stringent in the assessment of building movement. Significant building damage and impact upon adjacent buildings is likely to occur well before structural stability issues arise - (6.4) Assessment of ground movement should be a planning consideration. Control of ground movement should also be a planning consideration. Reasonable assessments can be made based on a good ground investigation, knowledge of the construction techniques; piling or underpinning etc. and the overall construction methodology including the sequence of temporary works. The construction process will cause ground movement but this can be controlled through good construction practice. A good ground and building movement monitoring system will act as a check against predicted movements. 6.7: There is no basis for determining a safe permanent design without knowledge of the engineering properties of the ground. It is therefore strongly recommended that 6.7 is altered to state that specific knowledge of the underlying ground conditions will be required to adequately and safely inform the design, assess ground movement and consequent building damage. It is strongly recommended that an independent check is made for all</p>	<p>Utilities such as gas a water mains are included in section 6.6 and are to be addressed in the SMS. This guidance is sufficiently clear to enable applicants to commission the appropriate evidence and level of assessment in support of a proposal.</p> <p>Design Indicator DI.1 has been drafted to respond to the various configurations of the built form in Islington, and in order to manage the cumulative impact of loss of gardens/unbuilt upon area. The impacts of this type of development are not limited to aesthetic considerations as set out throughout the various sections of the SPD.</p> <p>As with Design Indicator DI.1, DI.2 has been developed having regard to the scope of impacts associated with this type of</p>

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	<p>applications to ensure that the submission demonstrates as far as reasonably practicable a design and construction methodology that is safe to build and aims to minimize ground movement and building damage. Please note that other buried sensitive infrastructure such as gas and water mains need to be considered when assessing acceptability of movement due to basement construction</p> <p>Q3: Section 7.2 of the SPD</p> <p>I disagree with the need to limit basements so they are subservient to the original footprint of the building. My reasoning is as follows: 1. Above-ground extensions are visible to the public and therefore for aesthetic reasons, they need to be subservient to the main building. No such aesthetic considerations exist for basement extensions because these are by their nature invisible to outsiders. 2. In the SPD point 7.1.2, it is claimed that "where large basements extensions are proposed the resulting intensity of basement use may be out of keeping with the domestic scale, function and character with its context." I disagree with this. It is possible via planning conditions to limit the use of the basement space to get around the intensity problem. For example, it possible to resist permission to create bedrooms in the basement, and insist that they are living and storage areas only.</p> <p>I disagree with the need to limit basements so they are one story. I believe two stories should be permitted if it can be proven that it's safe to do so. Again, planning conditions can be placed to limit the use of the basement space to get around the intensity problem. For example, it possible to resist permission to create bedrooms in the basement, and insist that they are living and storage areas only.</p> <p>Q9: Appendix B of SPD</p> <p>Paragraph two needs to be rewritten. The council relies on the professional competency of the chartered engineer submitting the structural method statement. While the engineer will be able to demonstrate a permanent works design that can be built safely, he or she cannot be held liable if there is no contractual obligation for</p>	<p>development.</p> <p>Paragraph 6.8 ensures that a suitably qualified person(s) with relevant experience, be appointed and retained throughout the design and construction phase. New Paragraph 6.10 has been added to clarify that, where the basement proposed is an extension to an existing building or where the basement immediately adjoins an existing building, the retention of the suitably qualified person throughout the process will be secured by condition. With this safeguard in place, it is not considered necessary to require independent verification of the SMS in all instances.</p> <p>The recommended design process in Appendix B has been updated to refer to 'competent' design team, as suggested. The validation requirements are laid out in Appendix A, which will be required to be submitted at planning stage. This process is considered sufficiently clear.</p>
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	<p>them to be involved with the construction phase or temporary works. Refer to the recent house collapse in Stanhope Avenue Finchley. There needs to be a clear statement on who is responsible for the design, construction and management of temporary works and their competency. Temporary works is often left to the constructor and the control of temporary works is vital to limit movement and building damage. Strongly recommended that an independent check is made of the submission - see comment on section 6. Recommended design process: Use 'Competent' design team. Show the point at which the structural method statement is submitted. Show ground investigation stage. This will form part of the detailed design stage. Emphasize the need for ground movement and subsequent building damage assessment.</p>	
Lonsdale Society	<p>On behalf of the Lonsdale Square Society, while not all of the points we raised in the earlier consultation have been addressed, we believe the draft SPD represents a fair and balanced approach and we support it</p>	Support is noted.
Resident	Support	Support is noted.
Resident	<p>Q2: Section 7.1 of SPD</p> <p>I disagree with the need to limit basements so they are subservient to the original footprint of the building. My reasoning is as follows: 1. Above-ground extensions are visible to the public and therefore for aesthetic reasons, they need to be subservient to the main building. No such aesthetic considerations exist for basement extensions because these are by their nature invisible to outsiders. 2. In the SPD point 7.1.2, it is claimed that "where large basements extensions are proposed the resulting intensity of basement use may be out of keeping with the domestic scale, function and character with its context." I disagree with this. It is possible via planning conditions to limit the use of the basement space to get around the intensity problem. For example, it possible to resist permission to create bedrooms in the basement, and insist that they are living and storage areas only.</p> <p>Q3: Section 7.2 of SPD</p>	<p>Design Indicator DI.1 has been drafted to respond to the various configurations of the built form in Islington, and in order to manage the cumulative impact of loss of gardens/unbuilt upon area. The impacts of this type of development are not limited to aesthetic considerations as set out throughout the various sections of the SPD.</p> <p>As with Design Indicator DI.1, DI.2 has been developed having regard to the scope of impacts associated with this type of development.</p> <p>The Council's Tree Officers have advised that moving trees is generally only practical</p>

	<p>I disagree with the need to limit basements so they are one story. I believe two stories should be permitted if it can be proven that it's safe to do so. Again, planning conditions can be placed to limit the use of the basement space to get around the intensity problem. For example, it possible to resist permission to create bedrooms in the basement, and insist that they are living and storage areas only.</p> <p>Q5: Section 7.4 of SPD</p> <p>How about moving trees to the back of the garden? In that case, they would still be retained however they would be moved away from the proposed basement.</p>	<p>when the trees are saplings, the relocation of established trees being unlikely to be successful. As with all planning applications, each proposal is assessed on its merits, therefore there exists an inherent flexibility to respond to the specifics of an individual site. The SPD sets out clear guidance to inform the assessment of planning applications and assist in consistency of decision making, therefore the Council considers Section 7.4 is appropriate as drafted.</p>
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PART B: PRELIMINARY CONSULATION

1 Introduction

- 1.1.** This document has been prepared in accordance with regulation 12(a) of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). It accompanies a draft Supplementary Planning Document (SPD) which provides guidance to be used in the assessment of any planning application that involves excavation for the creation of new or additional subterranean/basement floorspace.
- 1.2.** This consultation statement sets out:
- early consultation activity undertaken to inform the preparation of the Basement Development SPD;
 - who the council consulted when preparing the draft SPD; and
 - a summary of the issues raised during the preliminary consultation stage, and how those issues have been addressed in the draft SPD.

2 Preliminary consultation

- 2.1.** The council conducted a preliminary consultation exercise on a discussion paper between 8 December 2014 and 30 January 2015. This exercise was conducted to gauge opinion on these matters, in order to ensure that the SPD focuses on the most important issues and provides advice and support that will be genuinely useful. Respondents were invited to answer five questions set at the end of the paper.
- 2.2.** The discussion paper posed the following questions:
1. Do you agree with Islington Council's intention to produce specific guidance in relation to the parameters set out in Section 16 Options Going Forward? Is there an alternative way the Council should consider addressing the planning issues associated with subterranean development?
 2. What design considerations/restrictions should the Council include to ensure impacts from subterranean development are minimised? How would these measures ensure consistency of decision making and consideration of cumulative impacts?
 3. Should the Council restrict subterranean development beneath listed buildings? If not, what would be an alternative way of ensuring the long term integrity of heritage assets?
 4. What level of information should be provided in support of a planning application involving basement development? Should this be for all instances of basement proposals, or should it differ for different circumstances? If no, how would the information requirements differ, giving justification for your reasoning?
 5. Do you have any further comments on the proposed Supplementary Planning Document? Are there any key issues (pertaining to basement development) that have not been raised in this paper and in your opinion should have been?
- 2.3.** The council targeted this preliminary consultation to the following groups:
- E-mail to all e-mail addresses registered on planning policy consultation database (over 1700 registered).
 - E-mails and letters to various industry groups. Address information was sourced via the internet, and letters sent to specialist basement development firms active in the borough.
 - Where email addresses were not available, letters to local organisations registered on planning policy consultation database.
 - Letters to Islington's 48 elected councillors.

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- 2.4.** An online questionnaire mirroring the questions posed in the discussion paper was also set up using Survey Monkey. This was accessible via the SPD webpage on the council's website.
- 2.5.** In total, 44 responses were received; 15 written consultation responses and 29 online questionnaire responses. These responses are shown in full in Table 2; a 'no comment' response was received from the Highways Agency and Natural England (both statutory consultees) which are not included in the table.

3 Analysis of preliminary consultation responses

- 3.1.** The 44 responses were received from a range of respondents, as set out below. Although letters were sent to specialist basement development firms active in the borough, no responses were received from the industry. However of the residents who responded, five also identified themselves as consultants/industry specialists. The council's response to all written and online questionnaire responses is detailed in Appendix 1.

Table 1 Respondents grouped by category

Category	Number	Percent
Resident	30	68%
Community/Voluntary Group	8	18%
Basement Specialist	0	0
Statutory Consultee	6	14%
Not stated	0	0

Question 1 Responses

- 3.2.** All of the 35 responses received to Questions 1 supported the Council's intention to produce specific guidance in relation to basement development. No alternative means of addressing the planning issues associated with basement development were put forward.

Question 2 Responses

- 3.3.** A total of 32 responses were received in regards to Question 2. Of these, one response indicated that no restrictions should be imposed on basement development, and the remainder of the responses supported various levels of control relating to the considerations identified in the Discussion Paper. The main issues raised by respondents related to:
- The need to restrict the depth and extent of basement development for a variety of issues including amenity, flood risk, biodiversity/loss of garden space, and sustainability
 - The need to strike a balance between the ability of property owners to expand their homes and the potential negative impacts of basement development, at both a site specific and cumulative scale across the borough
 - The need to ensure applications are assessed in an equitable, consistent and transparent manner

- The need for proposals to consider site conditions and any associated structural risk arising from the characteristics of the original building in coming to a robust design solution
- The need to ensure that any impacts arising from the construction process are appropriately mitigated/managed
- The need to provide for additional safeguards where proposals impacts on designated heritage assets.

Question 3 Responses

- 3.4.** The 32 responses to Question 3 supported varying levels of restriction in relation to development beneath listed buildings, ranging from a complete ban on any basement development related to a listed building, to a more permissive approach that prioritised the significance of the heritage asset while acknowledging the increased structural risk generally associated with such buildings.

Question 4 Responses

- 3.5.** There were 30 responses to this question, all of which supported clear guidance about the information required to be submitted in relation to all basement development proposals. In particular, respondents considered that information should be required in relation to site conditions, structural risk and construction impacts. As with Question 3, a number of responses indicated preference for requirements which are not planning matters.

Question 5 Responses

- 3.6.** Twenty-four respondents made further comments on the proposed SPD, which generally reiterated the need to develop robust and consistent guidance in relation to basement development and specific impacts associated with this type of development. Thames Water and English Heritage suggested further additions in relation to flood risk and archaeology, respectively, and Westminster City Council expressed a desire to promote greater coordination between boroughs in their approach to basement applications.

4 Next steps

- 4.1.** This consultation statement will be updated following public consultation on the draft SPD. A full consultation statement detailing work undertaken and responses received at both preliminary consultation and full consultation stages will be published alongside the final Basement Development SPD.

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Table 2: Consultation responses on Preliminary Consultation Discussion Paper

Question 1: Do you agree with Islington Council's intention to produce specific guidance in relation to the parameters set out in Section 16 Options Going Forward? Is there an alternative way the Council should consider addressing the planning issues associated with subterranean development?

Respondent	Comment	Council Response
Resident	Yes I do. Specific guidance is vital to control, fairly to all parties, a feature that could have a serious impact on amenity, living conditions and the structural integrity of large parts of Islington, including key listed building sites.	Support noted.
Resident	Yes. Basement developments are often a gross development out of keeping with the original design of the house. The construction work necessitating the removal of large quantities of soil, provision of substantial amounts of concrete and underpinning neighbouring properties are all a nuisance.	Support noted.
Resident	Yes, but the guidance shouldn't be overly prescriptive and should allow for sensitive and high quality development that assists in increasing the size and quality of the Islington housing stock.	Support noted.
Resident	I strongly support the production of specific guidance in relation to the items set out in Section 16. Unless specific guidance and requirements are set forth by Islington Council, it is very likely that these developments could irreparably damage both the natural and the historic environment of Islington. In addition, without adequate checks the rights of neighbours to quiet enjoyment and continued structural safety and amenity of their property are likely to be significantly prejudiced. In an area of relatively small plots and small gardens, there need to be in place restrictions which prevent disproportionate developments. Restrictions should be balanced with a property owner's right to improve and maintain his or her property.	Support noted.
Resident	Yes I do agree with Islington Council's intention to produce specific guidance. I believe it is the best way to control unfettered subterranean development. If the council's policy is explicit, then it will help to stem planning applications because developers will know that they have no chance of gaining permission for these works.	Support noted.
Resident	We strongly agree. Guidance and associated planning requirements are required to avoid subterranean developments causing structural and/or environmental damage and/or damage to the integrity of heritage assets. The parameters set out in Section 16 are the right ones in order to move forward on this important issue.	Support noted.
Resident	Yes, I feel strongly that clear, well-supported guidance needs to be provided – for householders, developers and planning officers. As it currently stands planning officers have no clear direction with which to assess applications and applicants have few parameters within which to prepare their proposals. Meanwhile owners of listed buildings are fearful as to the impact of basement	Support noted.

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Respondent	Comment	Council Response
	development in adjacent properties.	
Resident	Considering the weak foundations of the land on which most if not all the houses of Islington are built (clay beds) it is inadvisable to allow in the majority of cases subterranean development on period properties or near period properties. Reasons below.	Support noted.
Resident	Yes	Support noted.
Resident	Yes, otherwise some property developers will exploit the lack of guidance to the detriment of the local residents	Support noted.
Resident	Yes, it gives clarity to developers and residents and users of the borough.	Support noted.
Lonsdale Square Society	The Lonsdale Square Society strongly supports the production of specific guidance in relation to the items set out in Section 16. Unless specific guidance and requirements are set forth by Islington Council, it is very likely that these developments could irreparably damage both the natural and the historic environment of Islington. In addition, without adequate checks the rights of neighbours to quiet enjoyment and continued structural safety and amenity of their property are likely to be significantly prejudiced. In an area of relatively small plots and small gardens, there need to be in place restrictions which prevent disproportionate developments. Restrictions should be balanced with a property owner's right to improve and maintain his or her property. The Lonsdale Square Society believes the Council's detailed Discussion Paper represents a well-considered and informative start to the consultation process on this complex subject.	Support noted.
Resident	I totally agree and support the council's intention to proceed this way. Basement development is at an unprecedented increase and the future impact upon the local environment and residents/homeowners is currently unknown. Flooding implications and the material composition of London soil and clay call for a need for clear unambiguous guidelines supported with additional technical investigations by qualified technical engineers/surveyors on the proposed sites in question. Guidelines should also seek to clarify any loose parts of the council basement policy open to interpretation by developers or surveyor/contractors working for the clients motivated by the financial gains in undertaking a development project. Such guidelines provide some sort of future reassurance underpinned by a consistent standardised guidance which would be helpful in ensuring proper considerations backed by strong investigative technical standards have occurred. As a reference point, Camden has did an excellent job in shaping their basement guidelines policy www.camden.gov.uk/ccm/cms-service/download/asset/?jsessionid=5F3179E08C416A7185C7646F2A7123A3?asset_id=1503904	Support noted.
Resident	Yes. This is essential but parts need strengthening and the essential requirement should be obligatory.	Support noted.
Resident	Yes, I support the intention of Islington Council to produce specific and supplementary guidance, as the planning considerations may be of a different nature than those for other forms of development. Without adequate checks and balances, subterranean development can have a deleterious effect on the safety, amenity, foundations, historical integrity of neighbouring, adding	Support noted.

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Respondent	Comment	Council Response
	properties.	
Resident	Yes. These are sensible parameters and provide a good way of going forward.	Support noted.
Resident	Yes. I live in Lonsdale Square. The houses are listed in a Conservation area and it is important that their structural integrity and the amenity, wildlife corridors, protection from flooding and heat island effect provided by their gardens be protected.	Support noted.
Resident	Yes. Basement development needs to be closely controlled in order to protect adjoining properties and the environment	Support noted.
Resident	Yes, basements are technically complex and to be fair to applicants, unless there is a desire to ban them completely there needs to be a technically robust way of ensuring the impacts from basements have been considered and dealt with. It could be argued that much of what is currently requested in Camden or K&C isn't a matter for planning, however the potential impacts from a bad basement are so great that it is reasonable for planning to deal with it up to a level where it can be publically demonstrated the scheme is sound. Building Control and Party Wall Legislation has its place but is more concerned with detail not principal.	Support noted.
Resident	Yes guidance would be good to endure a position on the matter	Support noted.
Resident	This would be very helpful as at present there is no specific guidance on basements/sub-basements. As the paper indicates such proposed developments raise specific issues that need to be addressed in the planning process.	Support noted.
Highbury Fields Association	Writing on behalf of the Highbury Fields Association, we are aware of the problems that have been caused in other London boroughs, such as Kensington and Chelsea, where basements not only cause often a year of misery for neighbouring residents because of noise, vibration and large numbers of lorry movements over a year or more, but also can lead to structural and damp problems for neighbouring properties.	Support noted.
Resident	Yes. The construction of new basements beneath existing buildings is a recent phenomenon that is inadequately covered by existing legislation and guidance.	Support noted.
Resident	Yes	Support noted.
Resident	Indirectly, any building works have impact on the Environment, whether additional traffic, works in gardens or sourcing / installation of materials. Supranational (e.g EU) law should be used to force compliance. In addition, rather hefty fees should be charged (in the 10s of thousands) for the mere application. Council Tax should be levied twice (once for original building and one for the extension).	Support noted.
Thames Water	Supports and encourage Islington's intention to produce additional guidance with regards to Subterranean/basement developments.	Support noted.
Upper Street Association	Yes we agree that specific guidance should be produced as soon as possible, on grounds of structural security, associated nuisance to neighbours, and damage to gardens.	Support noted.
English	Specific guidance would be beneficial for appropriate designs for basements to historic buildings.	Support noted.

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Respondent	Comment	Council Response
Heritage	This should relate to an assessment of the significance of the assets, and an approach which is proportionate to their significance in line with the NPPF. This should include, but not be limited to, the points you raise in paragraph 9.6. This would help the council to ensure that any new structures associated with the basement development would enhance and preserve the historic character of the building or area.	
Residents of Lonsdale Square	Yes, we strongly support the production of specific guidance in relation to the items set out in Section 16. We believe that these developments could pose a serious threat to the natural and the historic environment of Islington. It is also crucial to protect the rights of neighbours to quiet enjoyment and continued structural safety and amenity of their property. Properties and their gardens are generally relatively small in this area and located close to the next property so it's really important to have restrictions which prevent disproportionate developments.	Support noted.
Islington Building Preservation Trust	<p>We have read your discussion paper and broadly agree with your inferences and that clear guidance as set out in Section 6 (Options going forward) is needed. We have prepared the following Technical Comments with respect to Section 10 (Geology and Topography) and Section 14 (Structural Impacts) of the discussion paper for you to consider when setting out the guidance suggested in Section 16.1.</p> <ol style="list-style-type: none"> 1. Design of temporary works, construction method and sequence. You cannot separate design from construction for a retro-fit basement - the permanent and temporary works are heavily dependent on the construction sequence and method, and the degree of care and precautions embedded in the method and sequence are crucial to minimising movement during construction. 2. Effect on ground water. Placing a large impermeable obstruction in the ground will inevitably affect the groundwater flows. In intact clay, these are very slow, but in fissured clay close to the surface they are not that slow and blocking the path of a sub-surface flow can raise the groundwater level upstream. I believe this has happened for a couple of properties along the line of the former Hackney Brook in Tufnell Park. 3. Effect on superstructure movements. <ol style="list-style-type: none"> i. During construction there is a considerable risk of movements, in both the building to receive the basement and adjoining properties, and this risk can be minimised by properly thought-through and executed design and construction under a. above. This risk is both that the building being supported over the hole will move and also that ground movements around the excavation will cause movements of the adjoining structures. ii. Once the construction work is complete, the situation changes depending on the soil. In granular soils, not much further movement will occur as such soils respond more or less immediately to changes of load. In cohesive soils, the building with the basement will initially move slowly as the clay around responds to its changed loading, perhaps even rising slightly due 	Support noted. The Council agrees that designs should demonstrate that they have appropriately considered site conditions and structural risk as relevant to the characteristics of the original building; details about the information requirements to be submitted as part of a planning application in regards to this issue will be set out in the draft SPD, including that the required reports have been prepared by a suitably qualified professional where applicable and as relevant to the particular site conditions.

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Respondent	Comment	Council Response
	to the reduced weight of soil, but in a few years it will become stable. The adjoining buildings will also move slightly in the first few years after construction but then will continue to move relative to the basement building as the soil's moisture content changes, either seasonally or due to trees and/or drains, due to their much shallower foundations. This risks repeated slight cracking in the parts immediately adjacent to the basement building.	
Resident	<p>I agree with everything that is in the consultation and feel that basements are too destructive to be allowed to proceed across the borough without any checks. I think the council should provide specific guidance regarding basements and it must be complied with. This is a fairly new thing (today's basements are not made in the same way as the cellars under Victorian houses, with lots of cement and tanking nowadays) and they can cause many problems to neighbours: http://www.standard.co.uk/news/london/my-neighbours-basement-dig-has-driven-me-out-says-john-majors-caterer-8713483.html Many of the building companies that are doing them have little or no experience and many problems to the existing housing stock may occur. I agree with especially with 5.2 of the document. The document seems to flag up many of the potential problems, with effects on drainage and flooding, The permanence of the change once made; the effects on trees and biodiversity. I do not know of an alternative way to address this but one thing is clear, all the council officers and design officers must be apprised of the problems to be considered with basements.</p> <p>I do not know of an alternative way to address this but one thing is clear, all the council officers and design officers must be apprised of the problems to be considered with basements.</p>	Support noted.
Resident	I think that the Council should be extremely cautious in allowing basement development.	Support noted.
Canonbury Society	Yes, we fully support the council's initiative in this matter for reasons of safeguarding structural stability in neighbouring buildings, reducing the damage to biodiversity in gardens and minimising nuisance to neighbours.	Support noted.
Islington Society	We are aware that a number of statutory controls are in place that are relevant to basement developments, notably in Highways, Building Control and Party Wall legislation, but it is clear that the primary control is through the planning system; except in the case of some permitted development, none of the other legislation comes into force until Planning Permission is granted. It is essential therefore that the guidance provided by the proposed SPD is robust. In this respect, we agree that specific guidance is needed covering all of the topics in Sections 7 to 15 of the discussion paper, similar in form to that envisaged in Section 16.	Support noted.
Amwell Society	We believe that such a policy is essential if Islington is to be spared the misery which has afflicted	Support noted.

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Respondent	Comment	Council Response
	<p>residents of Kensington & Chelsea, Westminster, Camden and elsewhere in recent years. As house prices rise, the borough's housing stock will be increasingly attractive to "money no object" purchasers who will be looking to dig down to install home theatres, fitness rooms, swimming pools etc. Existing planning guidelines do not adequately cater for this. The owners of a listed property in the New River Conservation Area recently advised neighbours to their intention to extend their basement and create a sub-basement extending out under the rear garden. This was in a typical Islington terrace of houses built in the 1830's on quite a steep incline. LBI Planning Department advised that they had no policies and guidelines dealing specifically with this topic. Although no planning application has thus far been submitted, it is clear that detailed guidance is now essential. This has been highlighted by a report in the Islington Gazette [18/12/14] which noted that:-</p> <p>a. In 2014 there have been 62 household applications containing basement development submitted to LBI, up from 41 in 2013</p> <p>b. The size and depth of the excavations have also increased with 'super basements' being dug under gardens losing trees and animal habitats.</p> <p>c. Councillors advised that they were unable to block digging one and a half floors down at new homes in Canning Road, Highbury, leading to concerns over the structural integrity of properties nearby & a spoiling of the borough's character as 'the town hall had no official policy on it'. d. Councillor Caroline Russell, representing Highbury East, said: "these deep basements involve complex construction which is extremely disruptive"</p>	

Question 2: What design considerations/restrictions should the Council include to ensure impacts from subterranean development are minimised? How would these measures ensure consistency of decision making and consideration of cumulative impacts?

Respondent	Comment	Council Response
Resident	We think that applications should be considered based on their own merit and there is no reason to impose restrictions to all.	As outlined in the Discussion Paper, the Council considers that the characteristics of basement development mean that it has the potential to have cumulative impacts across the borough, as well as specific impacts related to the individual development site. For this reason, a case by case approach to assessing applications would not address the cumulative impacts of such development in a clear, equitable or consistent manner, and therefore is not a reasonable approach that would support delivery of policy objectives and prevent unacceptable impacts. Moreover, while there is existing legislation that has

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Respondent	Comment	Council Response
		relevance to basement development (as set out in the Discussion Paper), this is largely from a reactive/retrospective approach in response to concerns arising once development has commenced and therefore other regulatory regimes do not provide for a positive, planned approach to basement development in the borough that ensures such developments are constructed in an appropriate manner from the outset.
Resident	The key consideration must be the extent of the development in a property. The greater the scope of any development, the greater the risk in all the respects identified in the discussion paper. One key control must be the extent of the development, both laterally and (particularly) vertically. A lateral extension affects the amenity of the area (it cuts down the garden feel of the area at the rear of the houses) and the greater the area, the more the effect on habitat, water collection and so on. These areas were designed to have open garden areas at the rear of the houses, and that is one of the key reasons that people would want to live in them. A row of basement developments materially (and adversely) affects this quality of the area. The larger the extension, Resident the greater the effect. A vertical extension has a series of potentially unforeseeable effects on drainage, flooding, ecosystems and the stability of the whole row. No structural engineer would say there is no risk to the structural integrity of a terrace and the remaining occupiers should not be required to run the risk. The greater the vertical (and indeed lateral) extension, the greater the risk.	The draft SPD will include specific guidance on the depth and extent of basement proposals, having regard to the impacts on the range of issues highlighted. Considerations such as flood risk and biodiversity will also be further addressed in separate sections of the SPD.
Resident	It seems sensible to allow late Victorian houses with uninhabitable cellars to be enlarged to be habitable basements. However early Victorian houses which usually have habitable basements with small rear extensions and front coal cellar vaults should only be allowed minor alterations with this curtilage. They should be allowed to extend out into their rear gardens.	The draft SPD will include general guidance applicable to all properties in the borough, as well as guidance specific to properties in Conservation Areas and listed building. The Council considers that it would not be justified to impose restrictions on the internal layout of individual buildings that are not designated as a heritage asset if the proposals accord with the relevant criteria in the SPD.
Resident	Restrictions should balance the legitimate needs for property owners to expand their homes whilst ensuring that there are not undue adverse impacts from the resulting development on the environment or others living in the locality. Any restrictions based on environmental or other impacts should be evidenced based and not overly precautionary or speculative.	The Council agrees that the SPD should provide clear guidance that ensures applications are assessed in a consistent and transparent fashion. The draft SPD will set out the information requirements to be submitted as part of a planning application in regards to the

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Respondent	Comment	Council Response
		issues highlighted insofar as these are a planning matter. As set out in the NPPF, where issues are covered by other regulatory/permitting regimes, local planning authorities should assume that these regimes will operate effectively.
Resident	The principal limitations should be driven by equity between neighbours: it would be completely wrong for extensions to be allowed on a first come first served basis whereby one house is granted an extension but the neighbour is then refused it because of the pre-existing extensions. So extensions should be limited if they infringe the development opportunities of neighbours.	This is one of the key drivers for producing guidance on basement development that considers both the cumulative impacts of basement development across the borough, as well as specific impacts related to individual developments. This approach will ensure that all applications are assessed in an equitable and transparent manner, so that individual applications do not unduly prejudice the satisfactory development/operation of adjoining land or the surrounding area as a whole.
Resident	The design considerations should consider the cumulative impact of these developments as well as the specific impact on neighbours and the immediate surrounding area. Islington has very little open space so private gardens are important for wildlife, air quality and drainage. Paving over garden spaces is detrimental but at least it can be seen as a temporary upset. Digging out garden spaces for underground development is likely to have a permanent impact on the local eco-system and building density. The overall design of the subterranean development, especially light wells, linking buildings and other glass structures needed to bring light into underground living spaces, should be of particular concern as they can be jarring and detract from the original building.	This is one of the key drivers for producing guidance on basement development that considers both the cumulative impacts of basement development across the borough, as well as specific impacts related to individual developments. Considerations such as flood risk, biodiversity and residential quality will also be further addressed in separate sections of the SPD.
Resident	- The depth of development in residential property should be limited to a single storey. - Designs must expressly address (1) structural risks to the property and any adjoining properties, and (2) the dispersal of rain water and risk of flooding. - Developments under the garden of a residential property should be limited to a maximum 33.33% of the garden area. - An extension from an existing basement into a garden should be structurally independent. - In the case of a listed building, the loss of historic fabric must be minimised.	The Council agrees that designs should demonstrate that they have appropriately considered structural risk as relevant to the characteristics of the original building; details about the information requirements to be submitted as part of a planning application in regards to this issue will be set out in the draft SPD. The draft SPD will include specific guidance on the depth and extent of basement proposals as well as designated heritage assets.
Resident	A clear set of design restrictions or rules, with variations according to context and type of development, would certainly aid consistency. The process would also be fairer as a result. Limits on the number of developments approved in particular locations would also restrict both the immediate and the cumulative impact. Suggested restrictions: - no more than one storey - no	This is one of the key drivers for producing guidance on basement development that considers both the cumulative impacts of basement development across the borough, as well as specific impacts related to

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	<p>more than an agreed percentage of garden for subterranean development; limits to the number of trees, shrubs that can be removed - development to be within the inner line of garden walls (ie, disallow propping, underpinning or reconstruction of walls - many such walls are listed, old, without foundations and liable to collapse) - disallow any loss of historic fabric - restrict extent and size of rooflights in extensions under gardens, to prevent light pollution and impact of local ecosystems Other considerations: - establish design quality standards, for both architecture and landscaping - require applicants to demonstrate that they have taken account of the geological, ecological, social and historical context of the proposed development - specifically exclude weekend working to prevent disruption to neighbours</p>	<p>individual developments. This approach will ensure that all applications are assessed in an equitable and transparent manner. Considerations such as the depth/extent of development, biodiversity and residential quality will be further addressed in separate sections of the SPD.</p> <p>While the draft SPD will require applicants to comply with established quality standards such as the Islington Code of Construction, it is not the role of the planning authority to approve a technical solution for a development proposal. The planning authority however does need to be satisfied that these issues have been sufficiently evaluated and responded to in the design solution and details about the information requirements to be submitted as part of a planning application in regards to this issue will be set out in the draft SPD.</p>
Resident	<p>The council should not allow for subterranean developments in the vast majority if not all of the borough. Main reasons: 1 - the quality of the land is inappropriate. There is too much movement - expansion and contraction of the soil with the seasons already (the soil is mostly - if not all - clay) 2 - The houses are designed to move naturally with each other as the seasons change. This is a factor of the traditional building practices (why they used lime mortar - allows movement with bricks - while cement is rigid and does not flex with movement) Any subterranean development will cease the movement of that property and break the rhythm of neighbouring properties, especially terraces. Neighbouring properties will therefore suffer cracks from movement which will be different to those houses with subterranean extensions built with modern practises requiring more rigid foundations. 3 - Already the council has huge bills and homeowners for the repair damage caused by subsidence as a result of the trees sucking in too much moisture. Imagine the bills to correct all the damage caused by subterranean construction ? The modern methods of construction are unsympathetic to traditional practices.</p>	<p>The Council agrees that designs should demonstrate that they have appropriately considered site conditions and structural risk as relevant to the characteristics of the original building; details about the information requirements to be submitted as part of a planning application in regards to these issues will be set out in the draft SPD. While the draft SPD will require applicants to comply with established quality standards such as the Islington Code of Construction, it is not the role of the planning authority to approve a technical solution for a development proposal. As set out in the NPPF, where issues are covered by other regulatory/permitting regimes, local planning authorities should assume that these regimes will operate effectively.</p>
Resident	<p>That any basement development must stay within the footprint of the house. That the person who instructs the work on the basement is liable for any damage to the building or surrounding buildings and for any structural issues resulting in the future. The person instructing the working</p>	<p>The Council considers that it would be unjustified to seek to limit basement development to the footprint of the house across the borough, however depending on</p>

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Respondent	Comment	Council Response
	should be forced to by insurance to covers the building and surrounding buildings for any future problem caused as a result of the development.	the specifics of the application there may be circumstances where basement development that extends beyond the footprint of the original building would be considered unacceptable. This will be elaborated on within the draft SPD. The contractual/insurance arrangements of those carrying out building works to a property are not a planning matter.
Resident	criteria for adverse impact on gardens trees and vegetation, flooding from run off due removal of gardens, adverse impact by overdevelopment of multi dwelling buildings	These considerations will be addressed in separate sections of the draft SPD.
Lonsdale Square Society	+Restrictions on depth to one storey only. + Restriction on area to a certain percentage of garden or footprint of house. Since the plot size in most streets in Islington is not large and the gardens are also small, this should be a key consideration. Limitation to 30-40% of the garden area if extending outwards or to the footprint if extending downwards are the absolute maximums. Given the likely need for structural support if extending either way, ensuring that the extension or related structural engineering does not impact on the footprint of neighbouring properties or their owners' ability to carry out developments in the future should form an important limb of the considerations. This should also assist in considering cumulative impacts in any particular area. + Designs should fully address structural risks to adjoining properties. + Limit developments in areas where it is anticipated that there may be multiple applications. + Landscaping and external treatments should be of the highest standards. Loss of historic fabric should be minimised. This includes historic garden features such as walls (see also below). + Many garden walls are old, with minimal foundations (and often listed), therefore the foundations and walls of basement developments should be kept strictly within the inner face of garden walls to avoid undermining them. Reconstruction of such historic walls or jeopardising their solidity so that they require propping should not be acceptable.	The Council agrees that the SPD should provide clear guidance that ensures applications are assessed in a consistent and transparent fashion that considers cumulative as well as specific impacts. The draft SPD will include specific guidance on the depth and extent of basement proposals as well as designated heritage assets. It will also set out the information requirements to be submitted as part of a planning application in regards to the issues highlighted insofar as these are a planning matter. As set out in the NPPF, where issues are covered by other regulatory/permitting regimes, local planning authorities should assume that these regimes will operate effectively. While the draft SPD will require applicants to comply with established quality standards such as the Islington Code of Construction Practice, it is not the role of the planning authority to approve a technical solution for a development proposal.
Resident	1. Restrict the level of basement develop to one story level down 2. Restrict the amount of front garden & plants/trees/hedges which can be demolished 3. Restrict basements extending beyond the footprint of the house which could cause increased structural risk 4. Restrict the level of light well coverage 5. Give greater consideration to the heritage of the street and the impact front garden light wells may have on the look of a street 6. Considerations should be given for access and safety exits for the basement 7. Consideration for sustainable design considerations should be given	The draft SPD will include specific guidance on the depth and extent of basement proposals, having regard to the impacts on the range of issues highlighted. However, the Council considers that it would be unduly restrictive to seek to limit basement development to the footprint of the house. The Council agrees that designs should demonstrate that they have appropriately considered site conditions and structural risk as relevant to the characteristics of the original building; details about the information

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Respondent	Comment	Council Response
		requirements to be submitted as part of a planning application in regards to these issues will be set out in the draft SPD. While the draft SPD will require applicants to comply with established quality standards such as the Islington Code of Construction Practice, it is not the role of the planning authority to approve a technical solution for a development proposal.
Resident	Proposals for basement excavation must demonstrate that there will be only small and acceptable movements and damage to nearby buildings. See also items 4 and 5 below	The Council agrees that designs should demonstrate that they have appropriately considered site conditions and structural risk as relevant to the characteristics of the original building; details about the information requirements to be submitted as part of a planning application in regards to these issues will be set out in the draft SPD. While the draft SPD will require applicants to comply with established quality standards such as the Islington Code of Construction Practice, it is not the role of the planning authority to approve a technical solution for a development proposal.
Resident	-There should be a complete bar on subterranean development of listed buildings; hence additional underground floors and rooms under gardens should be prohibited. This would ensure the structural, historical and architectural integrity of the buildings, for the present and for the sake of posterity. Once this sort of development is enacted it is irreversible. There is a London council precedent for this bar. The RBK&C has enacted a policy which prohibits the subterranean development of listed buildings. Subterranean development should also be firmly opposed for buildings in conservation areas. It could affect the historic, architectural and pleasing visual integrity of the area. Lightwells, stairwells, railings, steps all of which might be necessitated could affect the visual integrity of the area. Subterranean should also be strongly resisted for buildings which are not listed or in conservation areas, as it can have a negative and deleterious effect on the structural strength, strength of foundations, geological and hydrological nature of the property and neighbouring properties, cause flood and drainage damage, or interfere with proper drainage, and may limit the ability of other neighbouring and adjoining properties to carry out subterranean development. It also may have serious and negative legal implications if we are considering development for leasehold properties. It also may affect the biodiversity of the area and have a negative environmental impact. The development procedure itself will cause traffic congestion, pollution, unacceptable noise conditions, and increases the risk of injury to those working and	The draft SPD will include general guidance applicable to all basement proposals, as well as more detailed guidance specific to properties in Conservation Areas and listed buildings. However, the Council considers that it would be unduly restrictive to impose a blanket ban on basement development within the curtilage of listed buildings or in Conservation Areas as the impact of a proposal on the significance of a heritage asset can only be considered properly when full details of the proposal are available. The Council agrees that designs should demonstrate that they have appropriately considered site conditions, structural risk, flood risk and management of the construction process; details about the information requirements to be submitted as part of a planning application in regards to these issues will be set out in the draft

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	living in the immediate area.	SPD.
Resident	I think all basement developments should be refused. The disruption and nuisance caused by subterranean excavation is considerable. There is the loss of open space, the risk of flooding since the gardens cannot absorb rainwater, the loss of wildlife habitats and corridors, the effect on trees and loss of trees, the inability of terraces to move with ground movement, the danger to the structural integrity of the buildings, all of which make any subterranean development inappropriate.	The Council considers it would be unjustified to impose a blanket ban on basement developments in the borough, however the draft SPD will provide general guidance on how the potential issues highlighted should be addressed as part of proposals, including through submission of a Construction Management Plan.
Resident	There should always be adequate natural light and ventilation to underground developments. Any basement development should take account of the age and nature of the subject property and any neighbouring property which might be affected	The Council agrees that designs should demonstrate that they have appropriately considered site conditions and structural risk as relevant to the characteristics of the original building; details about the information requirements to be submitted as part of a planning application in regards to these issues will be set out in the draft SPD. Considerations relating to the quality of accommodation will be further addressed in a separate section of the SPD.
Resident	Strict rules should be set for the amount of garden space that can be taken by a development and also on the amount of soil left above the basement for planting. The biggest cumulative impact is the potential for successive developments in a street, so there could be restrictions limiting the number or size of a development. Technically although a larger development will go on longer and in theory be more risky, the impacts can be managed so if there is to be a restriction on size it needs to be absolute. On energy and sustainability there could be a requirement to calculate the energy use of a development and to offset it by consequential improvements to the rest of the building, or by other means such as payment into offsite works.	This is one of the key drivers for producing guidance on basement development that considers both the cumulative impacts of basement development across the borough, as well as specific impacts related to individual developments. This approach will ensure that all applications are assessed in an equitable and transparent manner. Considerations such as the depth/extent of development, landscaping and sustainable design will be further addressed in separate sections of the SPD.
Resident	I think all subterranean developments should be banned in Islington and London for that matter. Too disruptive to neighbours and the risks for problems can be high.	The Council considers it would be unjustified to impose a blanket ban on basement developments in the borough, however the draft SPD will provide general guidance on how the potential issues highlighted should be addressed as part of proposals, including through submission of a Construction Management Plan requiring compliance with the established Islington Code of Construction Practice.

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Resident	As part of the initial application there should be a requirement to have written expert opinions on matters relating to impact on groundwater/historic rivers/waterways [and springs] as well as reports by structural engineers on the impact of the works on surrounding properties and a construction management plan. I believe the applicant should have to pay a significant fee for the application given the additional work that will be generated for LBI officials.	The Council agrees that designs should demonstrate that they have appropriately considered site conditions and structural risk as relevant to the characteristics of the original building; details about the information requirements to be submitted as part of a planning application in regards to these issues will be set out in the draft SPD. While the draft SPD will require applicants to comply with established quality standards such as the Islington Code of Construction Practice, it is not the role of the planning authority to approve a technical solution for a development proposal. Planning application fees are set at the national level.
Highbury Fields Association	It would seem sensible to investigate whether the basements could not extend to the full width of the property in order to avoid damage to the neighbouring property. There have been huge insurance payments amounting to over £20M in 2013 because of such problems. The same width restriction should apply to basements under gardens to protect garden walls foundations. This would be a consistent response.	The SPD will include specific guidance on the depth and extent of basement proposals. The insurance arrangements of those carrying out building works to a property are not a planning matter.
Resident	Given the age of Islington's combined drainage system and the great pressure it is already under due to increased water usage and increased surface water run-off, it seems very reasonable to require a proposal for a basement beneath a garden or other un-drained surface to include measures that result in no additional surface water being discharged into the drainage system, and to delay the discharge of existing surface water from roofs etc so that the problems posed by the lack of capacity of the system are reduced rather than increased. Many basements constructed beneath existing buildings, particularly those built beneath an original semi- or full basement, provide accommodation that is almost totally reliant on artificial light and ventilation. In my experience it is used to house some service functions, such as utility rooms, that can then be moved down from higher up, but in affluent areas is also used to house servants in conditions that I do not regard as adequate. The increased energy demands of these spaces is to some extent offset by the reduced heat loss of subterranean construction, but again it seems very reasonable to link the construction of a basement to a general package of measures that will reduce the energy requirement of the altered building and not increase it. As a nation we have made very little progress in reducing the energy consumption of our existing housing stock and yet we are expecting it to last longer and longer - statistics from the Housing Federation suggest that we are demolishing and replacing existing houses at such a slow rate that on average they will not be replaced for 1000 years. The construction of a basement beneath an existing house requires a major investment and so provides an opportunity to tackle the energy consumption of the entire	The Council agrees that these are relevant issues to be considered in the assessment of basement proposals, and the draft SPD will provide further guidance on the criteria to be satisfied by proposals in relation to flood risk and sustainable design.

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	house as part of that package of investment.	
Resident	Subsidence, damp, light provision	The draft SPD will set out guidance regarding the quality of accommodation to be provided by proposals, however the consideration of subsidence and damp are not a planner matter.
Resident	Absolutely no garden, green space, wall, pavement or access way should be altered or touched.	The Council considers it would be unjustified to impose the restrictions suggested.
Thames Water	Section 11 on Flood Risk is supported, however it is considered that reference should be made to not only flooding from heavy rainfall but all sources of pluvial flooding such as sewer flooding.	The draft SPD will include reference to all types of pluvial flooding.
Upper Street Association	<p>We would insist that no such development should be permitted under listed buildings at all; that any basement development should be contained within the overall envelope of any building, not taken to its boundaries; also that senior independent consultants are employed at the applicants; expense; and on adequate consultation with neighbours..</p> <p>We firmly support the recent revised policy on basements of the RB Kensington and Chelsea. However we do not believe that basement development should be permitted under any gardens, for a variety of environmental reasons.</p>	The Council considers that it would be unduly restrictive to seek to limit basement development to the footprint of the house or to impose a blanket ban on basement development within the curtilage of listed buildings; the impact of a proposal on the significance of a heritage asset can only be considered properly when full details of the proposal are available. The Council agrees that designs should demonstrate that they have appropriately considered site conditions and structural risk as relevant to the characteristics of the original building; details about the information requirements to be submitted as part of a planning application in regards to these issues will be set out in the draft SPD. While the draft SPD will require applicants to comply with established quality standards such as the Islington Code of Construction Practice, it is not the role of the planning authority to approve a technical solution for a development proposal. Neighbours are notified of all planning applications, and the draft SPD will also encourage early engagement with neighbours by those bringing forward proposals.
Residents of Lonsdale Square	<ul style="list-style-type: none"> • Limit depth to one storey only. • Limitation to 30-40% of the garden area if extending outwards or to the footprint if extending downwards are the absolute maximums. Given the likely need for structural support if extending either way, ensuring that the extension or related structural engineering does not impact on the footprint of neighbouring properties or their owners' ability to carry out developments in the future should form an important limb of the considerations. This should also assist in considering 	The Council agrees that the SPD should provide clear guidance that ensures applications are assessed in a consistent and transparent fashion that considers cumulative as well as specific impacts. The draft SPD will include specific guidance on the depth and extent

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	<p>cumulative impacts in any particular area.</p> <ul style="list-style-type: none"> • Limit developments in areas where it is anticipated that there may be multiple applications. Landscaping and external treatments should be of the highest standards. Loss of historic fabric should be minimised. This includes historic garden features such as walls which should be protected from damage or the need to rebuild them or support them. • Designs should fully address structural risks to adjoining properties. <p>Setting restrictions for each development which are proportionate to the plot and surrounding area should assist with consistency in that there will be different solutions for different plots but based on one set of rules. Incorporating a fair method of assessing and controlling damaging cumulative impacts must start with a rigorous approach to each site. In addition, an assessment of the potential effect of identical developments in adjoining properties and the wider area in which permission is sought should help to protect against over-development. Otherwise the very necessary focus on cumulative impacts could encourage more development as people seek to "get in first" particularly if there were to be overall limits on the amount of developments in any one area.</p>	<p>of basement proposals as well as designated heritage assets. It will also set out the information requirements to be submitted as part of a planning application in regards to the issues highlighted insofar as these are a planning matter. As set out in the NPPF, where issues are covered by other regulatory/permitting regimes, local planning authorities should assume that these regimes will operate effectively. While the draft SPD will require applicants to comply with established quality standards such as the Islington Code of Construction Practice, it is not the role of the planning authority to approve a technical solution for a development proposal.</p>
Resident	<p>One thing is that it is one thing for people to dig a basement under their own house if it is detached, but another if it is going to affect their neighbours. Basements are unique in the potential effects on the neighbouring properties having much more potential to damage the existing properties and because of the protracted building time.</p>	<p>The Council agrees that designs should demonstrate that they have appropriately considered site conditions and structural risk as relevant to the characteristics of the original building; details about the information requirements to be submitted as part of a planning application in regards to these issues will be set out in the draft SPD. Submission of a Construction Management Plan will also be required.</p>
Resident	<p>1 Hydrogeological conditions are really an unknown until basements are built - and it could be many years before effects are felt</p> <p>2 Construction Impacts: While not, it seems, a planning issue they should be. The construction process always takes longer than it is planned and the noise, pollution and disruption to neighbours are immense. I live in a mews where it would be impossible for a basement extension to be excavated without very serious disruption and egress issues. At present it seems that the planning permission is granted before the construction issues are brought into play. I think it should all be part of the same process. Understandable concerns from neighbours about disruption and possible damage to property are dealt with retrospectively - which is too late.</p> <p>3 Drainage and foul water issues: To dig down means that some waste water will have to go up, thus disrupting existing systems</p>	<p>The Council agrees that these are relevant issues to be considered in the assessment of basement proposals, and the draft SPD will provide further guidance on the criteria to be satisfied by proposals, including submission of a Construction Management Plan at the time of application.</p>

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	4 Trees and shrubbery need to be protected at all time. Islington does a good job in maintaining its trees in an extraordinary dense urban environment. This has to continue.	
Canonbury Society	<p>We see no reason why LBI can't adopt the basement policy of the Royal Borough of Kensington & Chelsea which has been recently subjected to public examination and to a separate Planning Inspector's Report which found the policy to be 'sound'. Consequently, at a full council meeting held on the 21st January 2015, the RBK&C's policy on basements (CL7) was formally adopted. In summary, the policy proposes:</p> <ul style="list-style-type: none"> • A restriction to a single storey in most cases, with exceptions for large sites • A reduction in the maximum extent basements can extend under a garden, from 85 per cent to 50 per cent • An outright ban on basements under listed buildings • A requirement for construction traffic management plans to be submitted alongside planning applications to help limit disturbance during construction. <p>The only RBK&C policy we take issue with is the maximum extent to which basements can extend under a garden. In general we don't think they should extend under gardens at all and therefore consider 50% to be far too generous. In exceptional circumstances and we would accept a figure closer to 10%. We think that by having an easy-to-understand policy, LBI will achieve a consistency of decision-making which will save a lot of time and expense for the council and applicant alike.</p>	While the Council agrees that many of the considerations set out in Kensington and Chelsea's policy in relation to basement development are generally applicable to basement developments across London, and the Council has worked with other Central London boroughs to coordinate the information requirements for submission basement proposals insofar as possible, guidance within the SPD must be based on the local borough context to be considered robust and justified.
Islington Society	<p>Particular emphasis should be given to a technical structural assessment of the proposals, notably an assessment of the effect on superstructure movement in neighbouring and nearby properties. In this respect, the SPD should define the information to be provided with the application, which should include:</p> <ul style="list-style-type: none"> - an assessment of the short-term and long-term impact on adjoining properties bearing in mind the underlying geology and topography. - a method statement and construction management plan including - the temporary works needed during construction and risk mitigation measures - an assessment of any impact on sub-surface water flow. <p>The issue was raised at the meeting on 19 January concerning the expertise required to assess any specialist analyses provided by applicants, which may be outside the expertise available within the Council. It is suggested that a levy might be charged to complex basement and excavation applications to pay for independent expert opinion. We are particularly concerned about the likely quality of basement accommodation. Whilst it is likely that applicants will be adamant that they are satisfied that they will be happy with the conditions and amenity obtaining in the subterranean spaces, their quality must be judged against more impartial criteria for the benefit of future occupants.</p>	The Council agrees that designs should demonstrate that they have appropriately considered site conditions and structural risk as relevant to the characteristics of the original building; details about the information requirements to be submitted as part of a planning application in regards to these issues will be set out in the draft SPD. While the draft SPD will require applicants to comply with established quality standards such as the Islington Code of Construction Practice, it is not the role of the planning authority to approve a technical solution for a development proposal. The draft SPD will set out guidance regarding the quality of accommodation to be provided by proposals,
Amwell Society	A review of the consultation documents/responses published by Westminster and Kensington &	While the Council agrees that many of the

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	<p>Chelsea and the subsequent guidelines issued on basement planning applications shows how LBI can minimize the impact of subterranean developments and ensure consistency of decision-making. A review e.g. five years from the implementation of any new guidelines would enable LBI to see what the cumulative impact of the new measures had been.</p> <p>Key to the success of any guidance is their ability to withstand legal challenges. The report issued by David Vickery, an Inspector appointed by the Secretary of State for Communities and Local Government, 'On the examination into the partial review of the core strategy for the Royal Borough of Kensington and Chelsea with a focus on north Kensington-Basements Planning Policy', issued on 2/12/14, has shown that this can be achieved. The inspector backed the new Kensington & Chelsea guidelines with few revisions being required. The guidelines state that:</p> <ul style="list-style-type: none"> a. Basement developments under listed buildings will not be permitted. b. Elsewhere basement developments are permitted, subject to limits on their scale. The maximum extent basements can extend under gardens is to be reduced from 85% to 50%. That 50% has to be a single area of space. c. Basements beneath existing homes are limited in almost all cases to a single storey below ground d. There is a requirement for Construction Traffic Management Plans to be submitted alongside the planning application to help protect residents from disturbance caused by these developments. <p>The success of [and need for] the consultation and new guidelines can be seen from the comments by the Cabinet Member for Planning, Cllr Tim Coleridge, after the Inspector issued his report, "Basements have been the single greatest planning concern our residents have expressed to us in living memory. Many have experienced years of misery from noise, vibration, dust and construction traffic. Two years ago we started drafting a policy to try and strike the right balance between addressing our residents' concerns and the genuine need for people to expand their homes. It hasn't been easy and basement developers have aggressively opposed us every step of the way. We are delighted that the inspector agrees that we have got it right while at the same time praising us for our extensive public consultation. This ruling is a victory not only for the Council but also our residents who have been overwhelmingly supportive of what we have been trying to do"</p> <p>One issue, which probably carries more weight in Islington than elsewhere, is the structural impact of basement developments on neighbouring properties. Much of Islington's housing stock consists of 19th century terraces of rather narrow houses, built with virtually no foundations and, in many cases, on sloping land. Many owners have had to spend large amounts of money stabilising their</p>	<p>considerations set out in Kensington and Chelsea's policy in relation to basement development are generally applicable to basement developments across London, and the Council has worked with other Central London boroughs to coordinate the information requirements for submission basement proposals insofar as possible, guidance within the SPD must be based on the local borough context to be considered robust and justified.</p> <p>The Council agrees that designs should demonstrate that they have appropriately considered site conditions and structural risk as relevant to the characteristics of the original building; details about the information requirements to be submitted as part of a planning application in regards to these issues will be set out in the draft SPD.</p>

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	<p>homes, even with no developments taking place in adjoining houses. The prospect of major excavations taking place just a few feet away would cause great anxiety to many, if not most of our members. Anecdotal evidence, mainly from Kensington & Chelsea suggests that sub-basement excavations can cause damage to adjoining properties, even where measures recommended by Civil/Structural Engineers were adopted.</p> <p>The Amwell Society is fully supportive of this LBI initiative and recommends that the Council should adopt policies broadly similar to those adopted in Kensington & Chelsea. In particular, we recommend that only in the most exceptional circumstances should sub-basement developments beneath existing houses be permitted.</p>	

Question 3: Should the Council restrict subterranean development beneath listed buildings?

Respondent	Comment	Council Response
Resident	Extensions beneath back garden, limited to 1 storey, should not be restricted as they do not harm the listed building features and integrity. It would be much better to have this kind of extension rather than back extension which sometimes make a big difference to the look of listed houses.	The significance of listed buildings is often related to the historic fabric, floor hierarchy and plan form of the original building, as well as the external appearance of the building. The draft SPD will therefore differentiate between the creation of new basement extensions underneath listed buildings and basement extensions close to the original building.
Resident	Yes it should. For all the reasons in the discussion paper. It is, of course, easy to set out negative responses to any proposal, and to scare-monger. But the problems identified in the paper are real, and not scare-mongering. On the other side, what are the benefits of allowing a development. It will be doubtless thought to improve a property, but only for the benefit of the one owner. No increase in housing capacity (in terms of numbers) is achieved. A man is, of course, prima facie free to do with his property what he wishes, but within the limits set by the legitimate interests of others. The interests of neighbours in terms of amenity and structural rigidity are legitimate interests which ought not to be sacrificed or risked.	Support noted.
Resident	All design work on Listed Buildings should be restricted to architects who have a formal qualification in this field and experience on working on buildings similar to that being considered. At present there is a monstrous basement overdesign being being constructed in Huntingdon/Crescent Streets designed by a German architect	The qualifications of those undertaking design work in regards to listed buildings is not a planning matter.
Resident	The Council should restrict subterranean development beneath listed buildings only to the extent that it would have a material adverse effect on the listed building or local environment. In general,	The Council agrees that it would be unduly restrictive to impose a blanket ban on basement developments

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	<p>subterranean development which is not disproportionate to the existing building (for example, is not an 'iceberg' style development which is larger than the original building itself) is likely to be a beneficial means of extending the housing stock since the visual impact of such development can, if properly managed, be kept minimal. Whilst we fully agree that listed buildings are an important heritage asset, they must be allowed, as they have done historically, to adapt to the needs of their long term dwellers and should not remain preserved untouched like museum specimens. Particularly in Southern Islington, many of the residential listed buildings are relatively small for larger families. Developments can occur without compromising the integrity of heritage assets and we agree careful design and planning is crucial to this. To restrict in a blanket fashion would simply be an easy way out of making what would be potentially difficult decisions and would unduly discriminate against families who are likely to be amongst some of the main proponents of basement extensions beneath listed houses. From empirical evidence we believe there has been a trend over the last 10 years of listed houses in Islington being converted back to their original state of single dwellings to be occupied by families. With increasing property prices, and if families are forced to move out of the area to find more space, we believe this trend would be reversed and more houses would be divided up into multiple dwellings once again (given the high demand for 1 and 2 bed properties in the area) resulting ultimately in a reduction in the integrity of our heritage assets and a reduction in the the longevity of ownership of listed properties.</p>	<p>within the curtilage of listed buildings, as the impact of a proposal on the significance of a heritage asset can only be considered properly when full details of the proposal are available. The significance of listed buildings is often related to the historic fabric, floor hierarchy and plan form of the original building, as well as the external appearance of the building. The draft SPD will therefore differentiate between the creation of new basement extensions underneath listed buildings and basement extensions close to the original building.</p>
Resident	<p>Yes. It is assumed that this question proposes a restriction with respect to development beneath existing basements rather than extensions from existing basements into garden areas. I believe all development under listed buildings should be prohibited as has just been adopted by the Royal Borough Kensington & Chelsea. Extensions from existing basements into gardens should be subject to a very high level of evidence to demonstrate structural safety and should be structurally independent as per the Kensington & Chelsea policy. In addition, there should be no impact on historic character of the building and the extension should be limited in scope. This is because such subterranean extensions would likely destroy the character of historic properties and pose particular risks to the historic housing of Islington which is valued not just by their owners but by the residents of Islington as a whole. In addition, many houses in Islington are not listed but form an important part of the historic streetscapes of the borough and/or they adjoin listed buildings. Careful consideration should be given to whether this restriction should apply to locally listed assets as well as nationally listed ones. This would be consistent with DM 2.1 but should be specifically dealt with in any guidance to make clear the importance of historic buildings, listed or otherwise, in this borough.</p>	<p>Support noted. The draft SPD will differentiate between the creation of new basement extensions underneath listed buildings and basement extensions close to the original building. Applications in relation to listed buildings are also subject to the listed building consent regime; the Council does not consider that it would be appropriate to seek to apply a similar level of restriction to non-designated heritage assets.</p>
Resident	<p>Yes, I think that the Council should restrict subterranean development beneath listed buildings and their gardens. Not only may these types of development put the fabric of the building at risk, but they can have knock-on effects on neighbouring heritage properties. Similarly, the character,</p>	<p>Support noted. The draft SPD will differentiate between the creation of new basement extensions underneath listed buildings and basement extensions</p>

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	sustainability and historic integrity and authenticity of the building is likely to be adversely affected, as well as altering the character of the neighbouring area.	close to the original building. The Council considers that it would be unduly restrictive to impose a blanket ban on basement developments within the curtilage of listed buildings, as the impact of a proposal on the significance of a heritage asset can only be considered properly when full details of the proposal are available.
Resident	Yes. The long-term integrity of heritage assets must be preserved.	Support noted.
Resident	Yes, I strongly believe that development under listed buildings should be restricted. Islington has a wonderful heritage of domestic housing, commercial and public buildings. Basement developments under listed buildings should be specifically prohibited, for the reasons set out in Section 14. Basement extensions into the gardens of listed buildings should only be allowed in exceptional circumstances, following an historic impact assessment and structural survey - in order to protect both the structural and historical integrity of Islington's built heritage. It is essential that under garden developments should be structurally independent from the rest of the building because of the threat to its structural integrity. In Lonsdale Square for instance, (which is Grade II* listed), there is detailed evidence that in alternate houses the party wall was not tied in to the rear wall, meaning that each pair of houses is structurally interdependent. Despite this evidence two below garden developments have been given planning and listed building approval in the past 6 months.	Support noted. The draft SPD will differentiate between the creation of new basement extensions underneath listed buildings and basement extensions close to the original building. The Council agrees that designs should demonstrate that they have appropriately considered site conditions and structural risk as relevant to the characteristics of the original building; details about the information requirements to be submitted as part of a planning application in regards to these issues will be set out in the draft SPD.
Resident	The council should restrict subterranean development beneath listed buildings - for reasons above.	Support noted.
Resident	Yes	Support noted.
Resident	yes otherwise destroy character of area	Support noted.
Resident	Yes, as firstly it diminishes the historic and architectural integrity of buildings which are a key feature and attraction of the borough and secondly it risks structural damage to the existing and neighbouring buildings.	Support noted. The draft SPD will differentiate between the creation of new basement extensions underneath listed buildings and basement extensions close to the original building. The Council agrees that designs should demonstrate that they have appropriately considered site conditions and structural risk as relevant to the characteristics of the original building; details about the information requirements to be submitted as part of a planning application in regards to these issues will be set out in the draft SPD.
Lonsdale Square Society	Yes. It is assumed that this question proposes a restriction with respect to development beneath existing basements rather than extensions from existing basements into garden areas. The Lonsdale Square Society believes all development under listed buildings should be prohibited as	Support noted. The draft SPD will differentiate between the creation of new basement extensions underneath listed buildings and basement extensions

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	has just been adopted by the Royal Borough Kensington & Chelsea. Extensions from existing basements into gardens should be subject to a very high level of evidence to demonstrate structural safety and should be structurally independent as per the Kensington & Chelsea policy. In addition, there should be no impact on historic character of the building and the extension should be limited in scope. This is because such subterranean extensions would likely destroy the character of historic properties and pose particular risks to the historic housing of Islington which is valued not just by their owners but by the residents of Islington as a whole. In addition, many houses in Islington are not listed but form an important part of the historic streetscapes of the borough and/or they adjoin listed buildings. Careful consideration should be given to whether this restriction should apply to locally listed assets as well as nationally listed ones. This would be consistent with DM 2.1 but should be specifically dealt with in any guidance to make clear the importance of historic buildings, listed or otherwise, in this borough. The houses of Lonsdale Square - which we believe to be the only Grade II* listed square in Islington - illustrate the dangers regarding the structural integrity of C18th and C19th buildings (as mentioned in paras 14.5 and 6 of the Discussion Paper). We have evidence from more than one property in the square that in alternate houses the party wall was not tied in to the rear wall, meaning that each pair of houses is structurally interdependent. We would be happy to supply photographic evidence of this. Excavations to the rear or under such walls could therefore conceivably destabilise these houses.	close to the original building; applications in relation to listed buildings are also subject to the listed building consent regime. The Council considers that it would be unduly restrictive to impose a blanket ban on basement developments within the curtilage of listed buildings, as the impact of a proposal on the significance of a heritage asset can only be considered properly when full details of the proposal are available. The Council agrees that designs should demonstrate that they have appropriately considered site conditions and structural risk as relevant to the characteristics of the original building; details about the information requirements to be submitted as part of a planning application in regards to these issues will be set out in the draft SPD.
Resident	Yes, listed buildings are on old heritage sites, which means basement excavations put the site at much more structural risk. If the site is precious why interfere with its underlying fabric at the foundation level which will probably be over 100 years old.	Support noted. The Council agrees that designs should demonstrate that they have appropriately considered site conditions and structural risk as relevant to the characteristics of the original building; details about the information requirements to be submitted as part of a planning application in regards to these issues will be set out in the draft SPD.
Resident	Development near listed buildings need not be banned but the criteria to show there will be no damage should be more stringent than those for non-listed buildings.	The Council agrees that it would be unduly restrictive to impose a blanket ban on basement developments within the curtilage of listed buildings, as the impact of a proposal on the significance of a heritage asset can only be considered properly when full details of the proposal are available. The draft SPD will differentiate between the creation of new basement extensions underneath listed buildings and basement extensions close to the original building; applications in relation to listed buildings are also subject to the listed building consent regime. The Council agrees that designs should demonstrate that they have appropriately

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Respondent	Comment	Council Response
		considered site conditions and structural risk as relevant to the characteristics of the original building; details about the information requirements to be submitted as part of a planning application in regards to these issues will be set out in the draft SPD.
Resident	Yes unequivocally. There is the impact on the historic design, the danger to adjacent structures, the inability to restore the building to its original state, the loss of gardens which are an integral part of the original design, all of which speak against subterranean development	The Council considers that it would be unduly restrictive to impose a blanket ban on basement developments within the curtilage of listed buildings, as the impact of a proposal on the significance of a heritage asset can only be considered properly when full details of the proposal are available. The draft SPD will differentiate between the creation of new basement extensions underneath listed buildings and basement extensions close to the original building; applications in relation to listed buildings are also subject to the listed building consent regime.
Resident	Yes. There should be a complete bar on underground development beneath listed buildings as (a) such development is generally out of keeping with the original building and (b) underground development may well interfere with the structural stability of such buildings	The Council considers that it would be unduly restrictive to impose a blanket ban on basement developments within the curtilage of listed buildings, as the impact of a proposal on the significance of a heritage asset can only be considered properly when full details of the proposal are available. The draft SPD will differentiate between the creation of new basement extensions underneath listed buildings and basement extensions close to the original building; applications in relation to listed buildings are also subject to the listed building consent regime. The Council agrees that designs should demonstrate that they have appropriately considered site conditions and structural risk as relevant to the characteristics of the original building; details about the information requirements to be submitted as part of a planning application in regards to these issues will be set out in the draft SPD.
Resident	No. The argument about differential movement applies equally to listed and non-listed buildings. In terms of impact to the listed building itself, it could be argued that a new set of foundations will actually help preserve the upper parts of the structure as it removes the potential for future ground movement. I believe the issue of significance should be more to do with the design of the	The Council agrees that the primary concern for the planning regime is the impact of proposals on the significance of the listed building; however the significance of listed buildings is often related to the

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	basement in terms of layout and impact on the structure above rather than having a new basement under it. It could be argued that a basement development under or adjacent to a listed building should have a higher test applied to it in terms of allowable movement. Certainly the condition and fragility of adjoining buildings should be a consideration in a BIA.	historic fabric, floor hierarchy and plan form of the original building, as well as the external appearance of the building. The draft SPD will therefore differentiate between the creation of new basement extensions underneath listed buildings and basement extensions close to the original building; applications in relation to listed buildings are also subject to the listed buildings consent regime. The Council agrees that designs should demonstrate that they have appropriately considered site conditions and structural risk as relevant to the characteristics of the original building; details about the information requirements to be submitted as part of a planning application in regards to these issues will be set out in the draft SPD.
Resident	Yes always especially listed buildings. The risk of damage and unforeseen events should not be underestimated.	The Council considers that it would be unduly restrictive to impose a blanket ban on basement developments within the curtilage of listed buildings, as the impact of a proposal on the significance of a heritage asset can only be considered properly when full details of the proposal are available. The draft SPD will differentiate between the creation of new basement extensions underneath listed buildings and basement extensions close to the original building; applications in relation to listed buildings are also subject to the listed building consent regime. The Council agrees that designs should demonstrate that they have appropriately considered site conditions and structural risk as relevant to the characteristics of the original building; details about the information requirements to be submitted as part of a planning application in regards to these issues will be set out in the draft SPD.
Resident	The consultation document makes the point very well about the impact basement developments may have on the structures of surrounding properties built in the 18th/early 19th century. I would like to see a restriction e.g.no basements to encroach outside the existing envelope of the building above/no double basements.	The Council agrees that it would be unduly restrictive to impose a blanket ban on basement developments within the curtilage of listed buildings, as the impact of a proposal on the significance of a heritage asset can

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		only be considered properly when full details of the proposal are available. The significance of listed buildings is often related to the historic fabric, floor hierarchy and plan form of the original building, as well as the external appearance of the building. The draft SPD will therefore differentiate between the creation of new basement extensions underneath listed buildings and basement extensions close to the original building; applications in relation to listed buildings are also subject to the listed building consent regime.
Highbury Fields Association	Georgian and early Victorian houses had minimal foundations so are at greater risk than more modern buildings.	The Council agrees that designs should demonstrate that they have appropriately considered site conditions and structural risk as relevant to the characteristics of the original building; details about the information requirements to be submitted as part of a planning application in regards to these issues will be set out in the draft SPD.
Resident	Beyond requiring a higher standard of structural design appropriate to the building, I think not. One aim of the control of work to listed buildings should be to ensure that it retains its value in the widest sense so that people will continue to value it in the future. To fossilise a listed building by a prohibition on subterranean development could be counterproductive. In the construction of a new basement beneath an existing building, the construction process often requires, or would be much eased by, the replacement of its lowest floor, and pressure to permit this should be carefully weighed against the damage that would be caused to the heritage asset.	The Council agrees that the primary concern for the planning regime is the impact of proposals on the significance of the listed building; however the significance of listed buildings is often related to the historic fabric, floor hierarchy and plan form of the original building, as well as the external appearance of the building. The draft SPD will therefore differentiate between the creation of new basement extensions underneath listed buildings and basement extensions close to the original building; applications in relation to listed buildings are also subject to the listed buildings consent regime. The Council agrees that designs should demonstrate that they have appropriately considered site conditions and structural risk as relevant to the characteristics of the original building; details about the information requirements to be submitted as part of a planning application in regards to these issues will be set out in the draft SPD.
Resident	No, the council should not restrict development beneath listed buildings. I think the council is correctly looking to preserve existing original features (for example, an original floor, staircase, etc). However where the construction of the new basement does not impact on these features and	The Council agrees that it would be unduly restrictive to impose a blanket ban on basement developments within the curtilage of listed buildings, as the impact of

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	where there is a clear line between new and old (this could be made into a requirement) then why restrict the creation of extra space in a part of London where space is extremely limited?	a proposal on the significance of a heritage asset can only be considered properly when full details of the proposal are available, as noted by the respondent. However, the significance of listed buildings is often related to the historic fabric, floor hierarchy and plan form of the original building, as well as the external appearance of the building. The draft SPD will therefore differentiate between the creation of new basement extensions underneath listed buildings and basement extensions close to the original building.
Resident	Yes, there should be no risk to listed buildings, and council should ensure responsible usage and maintenance	Support noted; the usage and maintenance of development once constructed is not a planning matter.
Resident	YES! It would be absolute madness to have underground extensions that can be bigger than the house on top. A maximum of a small larger room should be all that should be downstairs below ground.	The Council agrees that the primary concern for the planning regime is the impact of proposals on the significance of the listed building; however the significance of listed buildings is often related to the historic fabric, floor hierarchy and plan form of the original building, as well as the external appearance of the building. The draft SPD will therefore differentiate between the creation of new basement extensions underneath listed buildings and basement extensions close to the original building; applications in relation to listed buildings are also subject to the listed buildings consent regime.
Upper Street Association	Yes. Not to be allowed at all on grounds of a variety of structural considerations.	The Council considers that it would be unduly restrictive to impose a blanket ban on basement developments within the curtilage of listed buildings, as the impact of a proposal on the significance of a heritage asset can only be considered properly when full details of the proposal are available. The draft SPD will differentiate between the creation of new basement extensions underneath listed buildings and basement extensions close to the original building; applications in relation to listed buildings are also subject to the listed building consent regime. The

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		Council agrees that designs should demonstrate that they have appropriately considered site conditions and structural risk as relevant to the characteristics of the original building; details about the information requirements to be submitted as part of a planning application in regards to these issues will be set out in the draft SPD.
English Heritage	In line with the NPPF, English Heritage supports policies that ensure development is sustainable. As such we are conscious that there are likely to be cases where basements could be built under listed buildings where any harm to significance is considered to be negligible or outweighed by public benefits. This means that a blanket ban is unlikely to be appropriate; however, if you are able to demonstrate through a strong evidence base that restrictions are necessary, we would be happy to support such an approach.	Support noted. The Council agrees that it would be unduly restrictive to impose a blanket ban on basement developments within the curtilage of listed buildings, as the impact of a proposal on the significance of a heritage asset can only be considered properly when full details of the proposal are available, as noted by the respondent. However, the significance of listed buildings is often related to the historic fabric, floor hierarchy and plan form of the original building, as well as the external appearance of the building. The draft SPD will therefore differentiate between the creation of new basement extensions underneath listed buildings and basement extensions close to the original building.
Residents of Lonsdale Square	<p>Yes. We think that all development under listed buildings should be prohibited as has just been adopted by the Royal Borough Kensington & Chelsea. Extensions from existing basements into gardens should be subject to a very high level of evidence to demonstrate structural safety and should be structurally independent as per the Kensington & Chelsea policy. In addition, there should be no impact on historic character of the building and the extension should be limited in scope - as set out above. This is because such subterranean extensions would likely destroy the character of historic properties and pose particular risks to the historic housing of Islington. For example, we understand that in relation to more than one house in Lonsdale Square (which is Grade II*), alternate houses do not have the party wall tied in to the rear wall meaning that each pair is interdependent.</p> <p>In addition, many houses in Islington are not listed but form an important part of the historic streetscapes of the borough and/or they adjoin listed buildings. Careful consideration should be given to whether this restriction should apply to locally listed assets as well as nationally listed ones. This would be consistent with DM 2.1 but should be specifically dealt with in any guidance to make clear the importance of historic buildings, listed or otherwise, in this borough.</p>	The Council considers that it would be unduly restrictive to impose a blanket ban on basement developments within the curtilage of listed buildings, as the impact of a proposal on the significance of a heritage asset can only be considered properly when full details of the proposal are available, as noted by the respondent. However, the significance of listed buildings is often related to the historic fabric, floor hierarchy and plan form of the original building, as well as the external appearance of the building. The draft SPD will therefore differentiate between the creation of new basement extensions underneath listed buildings and basement extensions close to the original building. Applications in relation to listed buildings are also subject to the listed building consent regime; the Council does not consider that it would be appropriate to seek to apply a similar level of restriction to non-

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		designated heritage assets.
Resident	I think the council should restrict basement building beneath listed buildings. Most of these buildings are old, and were built to move with ground movement. They have survived for hundreds of years like this and no- one knows what the effects of underpinning and basement construction will be long term on these properties. They will have to be underpinned which will permanently alter their character as well as using a lot of cement etc. to do the underpinning. If people do not have enough space they should move house, not start permanently altering the landscape and affecting other people.	The Council agrees that designs should demonstrate that they have appropriately considered site conditions and structural risk as relevant to the characteristics of the original building; details about the information requirements to be submitted as part of a planning application in regards to these issues will be set out in the draft SPD.
Canonbury Society	Yes, in principle this type of development should be prohibited.	The Council considers that it would be unduly restrictive to impose a blanket ban on basement developments within the curtilage of listed buildings, as the impact of a proposal on the significance of a heritage asset can only be considered properly when full details of the proposal are available, as noted by the respondent. However, the significance of listed buildings is often related to the historic fabric, floor hierarchy and plan form of the original building, as well as the external appearance of the building. The draft SPD will therefore differentiate between the creation of new basement extensions underneath listed buildings and basement extensions close to the original building; applications in relation to listed buildings are also subject to the listed building consent regime.
Islington Society	It should also be made clear that special rules apply to basement and garden excavations to Listed Buildings (perhaps by reference to the emerging revised Urban Design Guide) where the presumption will be that new basements and excavations will not be permitted because of the drastic change to the plan-form and character of the building that this is likely cause. This will also apply to buildings in Conservation Areas where lowered levels and changes to external appearance necessary to service the below-ground accommodation may affect the character of the Conservation Area.	The Council considers that it would be unduly restrictive to impose a blanket ban on basement developments within the curtilage of listed buildings, as the impact of a proposal on the significance of a heritage asset can only be considered properly when full details of the proposal are available. However, the significance of listed buildings is often related to the historic fabric, floor hierarchy and plan form of the original building, as well as the external appearance of the building. The draft SPD will therefore differentiate between the creation of new basement extensions underneath listed buildings and basement extensions close to the original building. A separate section in

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Amwell Society	Kensington & Chelsea policy is to resist the development of new basements or extension of existing ones under listed buildings, because: "The special architectural or historic interest of listed buildings goes beyond appearance. It includes the location and hierarchy of rooms and historic floor levels, foundations, the original purpose of the building, its historic integrity, scale, plan form and fabric among other things. Consequently, the addition of a new floor level underneath the original lowest floor level of a listed building, or any extension of an original basement, cellar or vault, may affect the hierarchy of the historic floor levels, and hence the original building's historic integrity". The Amwell Society broadly supports this policy. The vast majority of listed buildings in the Amwell area already have a single storey basement extending to the full footprint of the original house. We recommend that there should be a presumption against extending basements beyond this. However there should be scope to approve small scale development to existing basements where a modest increase in extent and/or ceiling height will make the space materially more habitable.	relation to Conservation Areas will also be included. Support noted. The Council considers that it would be unduly restrictive to impose a blanket ban on basement developments within the curtilage of listed buildings, as the impact of a proposal on the significance of a heritage asset can only be considered properly when full details of the proposal are available, as noted by the respondent. However, the significance of listed buildings is often related to the historic fabric, floor hierarchy and plan form of the original building, as well as the external appearance of the building. The draft SPD will therefore differentiate between the creation of new basement extensions underneath listed buildings and basement extensions close to the original building.

Question 4: What level of information should be provided in support of a planning application involving basement development? Should this be for all instances of basement proposals, or should it differ for different circumstances?

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Resident	It should deal with all the matters identified in the discussion paper as needing to be dealt, and in particular all the technical matters relating to structural integrity and the effect on the environment. It should be couched in terms that those affected can understand and, if appropriate, challenge.	The Council agrees that designs should demonstrate that they have appropriately considered site conditions and structural risk as relevant to the characteristics of the original building; details about the information requirements to be submitted as part of a planning application in regards to these issues will be set out in the draft SPD. While the draft SPD will require applicants to comply with established quality standards such as the Islington Code of Construction Practice, it is not the role of the planning authority to approve a technical solution for a development proposal.
Resident	Individual streets should be informally consulted as to what development they would prefer. Guidelines as to what the council would approve should be published.	Neighbours are notified of all planning applications, and the draft SPD will also encourage early

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		engagement with neighbours by those bringing forward proposals. The draft SPD will set out clear guidance in relation to basement development in the borough.
Resident	It is clear that very careful due diligence is required to support any extension application - principally, but not limited to, the impact on the structural integrity of neighbouring property and the potential impact on development opportunity of neighbouring property.	This is one of the key drivers for producing guidance on basement development that considers both the cumulative impacts of basement development across the borough, as well as specific impacts related to individual developments. This approach will ensure that all applications are assessed in an equitable and transparent manner, so that individual applications do not unduly prejudice the satisfactory development/operation of adjoining land or the surrounding area as a whole. The Council agrees that designs should demonstrate that they have appropriately considered site conditions and structural risk as relevant to the characteristics of the original building; details about the information requirements to be submitted as part of a planning application in regards to these issues will be set out in the draft SPD.
Resident	All cases involving basement proposals should be required to give full information , not only about the design of the work, but the likely intrusion into neighbouring properties and the timescale and disruption that would be suffered by neighbours during the works, particularly the noise, vibration and dirt caused by digging out and the removal of large quantities of subsoil.	The Council agrees that designs should demonstrate that they have appropriately considered site conditions and structural risk as relevant to the characteristics of the original building; details about the information requirements to be submitted as part of a planning application in regards to these issues will be set out in the draft SPD. A Construction Management Plan will also be required.
Resident	All such planning applications should be accompanied by: (1) a structural engineer's report paid for by the applicant (see Discussion Paper 14.7); (2) a hydrological report paid for by the applicant covering, inter alia, flood risk (see Discussion Paper 11.3); (3) specialist evidence paid for by the applicant that the geology/topography can support the proposed development (see Discussion Paper 10.6); (4) where applicable, confirmation from Thames Water that shared drains will not be adversely affected by the proposed development.	The Council agrees that designs should demonstrate that they have appropriately considered site conditions and structural risk as relevant to the characteristics of the original building; details about the information requirements to be submitted as part of a planning application in regards to these issues will be set out in the draft SPD, including that the required reports have

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		been prepared by a suitably qualified professional where applicable and as relevant to the site conditions.
Resident	Yes. There should be a requirement to provide the following: - independent structural engineer's report as in paragraph 14.7 - topographic/geological report as per 10.6 - flood risk assessment - biodiversity report (to include a detailed plan and images of trees, bushes etc.) - statement of impact of the construction process, to minimise disruption to neighbours - a drainage study (submitted with the application, not retrospectively as a condition). Many of Islington's Victorian buildings have shared main drains. For example in Lonsdale Square a shared drain runs at the rear of the properties and then passes beneath the basement of every 3rd or 4th house.	The Council agrees that designs should demonstrate that they have appropriately considered structural risk and the other issues highlighted. The draft SPD will set out the information requirements to be submitted as part of a planning application in regards to these issues, including that the required reports have been prepared by a suitably qualified professional where applicable and as relevant to the site conditions.
Resident	This topic is very sensitive. There is a big difference between minor amends and wholesale new stories under houses. The latter is what is most disruptive to the densely built borough's housing stock.	This is one of the key drivers for producing guidance on basement development that considers both the cumulative impacts of basement development across the borough, as well as specific impacts related to individual developments. This approach will ensure that all applications are assessed in an equitable and transparent manner, so that individual applications do not unduly prejudice the satisfactory development/operation of adjoining land or the surrounding area as a whole.
Resident	Ground investigations and geotechnical modelling as well as structural calculations by chartered engineers.	The Council agrees that designs should demonstrate that they have appropriately considered structural risk and ground conditions. The draft SPD will set out the information requirements to be submitted as part of a planning application in regards to these issues, including that the required reports have been prepared by a suitably qualified professional where applicable and as relevant to the site conditions.
Resident	all proposals	The draft SPD will provide general guidance in relation to basement development across the borough.
Lonsdale Square Society	The Lonsdale Square Society believes that a very high level of due diligence should be required for any planning application. The following reports should form the minimum requirements: - structural engineer's report - an independent report paid for by the applicant should be required as referred to in para 14.7 of the Discussion Paper; - report on/ evidence that the geology and topography can support the proposed development as referred to in para 10.6 of the Discussion Paper; - formal report on/ assessment of flood risk and impact on adjoining land and properties to the extension as referred to in para 11.3 of the Discussion Paper; - report on impact on the	The Council agrees that designs should demonstrate that they have appropriately considered structural risk and the other issues highlighted. The draft SPD will set out the information requirements to be submitted as part of a planning application in regards to these issues, including that the required reports have been

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	<p>biodiversity of area, landscape and trees (and bushes) as referred to in para 7.12 of the Discussion Paper; - analysis of impact on any shared services in particular drains or the ability of adjoining properties to receive existing services in an uninterrupted fashion or new services at any time in the future; - the location of drains in particular should be assessed: for example, in Lonsdale Square there are shared drains which run along the rear of the properties, then pass though beneath the basement of every third or fourth property (eg under No 33). Any excavations at the rear of houses or under them could disturb this arrangement. A Thames Water opinion on whether plans will impact on existing waste water drainage or other drainage issues should therefore be obtained in advance; - analysis of energy efficiency and sustainability as referred to in para 12 of the Discussion Paper - this should include consideration of light pollution, which is not mentioned in the Discussion Paper as these developments tend to rely on large rooflights; - report on impact of construction and how it will be managed to minimise disruption to adjoining neighbourhood.</p>	<p>prepared by a suitably qualified professional where applicable and as relevant to the site conditions.</p>
Resident	<p>13. The level of information should be detailed due to the risks and impacts which come with basement excavations. Excavations are not loft extensions but significant developments which move foundations. The level of risk calls for more detail to support planning applications especial residential applications. In my view the following should be provided to support an application: The reasons as to why a basement is being proposed 14. The reason for its use 15. The level of depth of the basement excavation 16. The materials to be used and engineering design techniques 17. The number of persons benefiting from the development whether residential or commercial 18. The site's and surrounding areas flood risk assessment 19. The named qualified technical engineer & surveyor who would be on site to monitor flood risk, subsidence and ensure the foundation work is done quickly, on time and to the correct speck to reduce the risk of problems to the site and surrounding sites within 30 metres or so of the basement excavation 20. Evidence of the named architects and qualified experienced builders in basement conversions. The builders undertaking the work must be qualified with insurance to avoid legal action and counter suing against the council. 21. Several area spans of Bore hole analysis on soil, with an investigative report of the site to determine the composition of the soil/London clay areas. In tandem, the council could also use this info to compile a database of the soil composition in Islington. 22. A proposed construction schedule detailing the timetable for length of works with contingency explained for exceeding the time frame. The management schedule to include excavation and demolition management details e.g. will heavy vehicles /equipment be used for demolition and excavation etc, where will such equipment be located etc...how will rubble be moved from the site etc... 23. Environment schedule regarding how food risk, drainage ventilation and the carbon footprint will be managed through the project 24. Clear consideration given to adjoining properties and to the environment with in 30ft of the development e.g. how will the site be coved, how will dust be controlled, how will noise be controlled etc... 25. A current photo of the</p>	<p>The Council agrees that designs should demonstrate that they have appropriately considered structural risk and the other planning considerations highlighted. The draft SPD will set out the information requirements to be submitted as part of a planning application in regards to these issues, including that the required reports have been prepared by a suitably qualified professional where applicable and as relevant to the site conditions. However several of the issues raised are not within the scope of the planning process to secure, for example a named site supervisor.</p>

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	outside of the property and a wider shot showing the surrounding properties to ascertain the environment and heritage of the street 26. It should be for ALL basement developments as such deep excavations will affect the public/residents in some way, from public carriage way issues caused by construction traffic and skips, to traffic parking stress issues, dust, noise, dirt on the street, increase in vermin, road and pedestrian access issues as well as structures to adjoining properties. Such developments have a wider impact than is usually considered.	
Resident	There must be a specific ground investigation and design report for each proposal for basement excavation. Proposals must include designs of retaining wall support for nearby structures and buildings. Investigations and designs must be done and checked by qualified and experienced GROUND engineers (not structural engineers). Investigations and designs should meet all the requirements of Eurocode EC7.	The Council agrees that designs should demonstrate that they have appropriately considered ground conditions. The draft SPD will set out the information requirements to be submitted as part of a planning application in regards to this issue, including that the required reports have been prepared by a suitably qualified professional where applicable and as relevant to the site conditions.
Resident	All proposals for subterranean development should be accompanied by a structural engineer's report, a report on the geological and hydrological circumstances which might be harmfully affected by the proposed development, and a report explaining any flood risks that might occur as a result of the development. These risks should take into account the risks that adjoining and neighbouring properties might entail as a result of the development.. Would these risks mean that if these properties wished to develop their properties in the same mode, that they would not be able to as a result of cumulative impact? Reports should also be submitted regarding the impact upon biodiversity, landscaping, environmental safety and local services that the development would affect. All these reports must be carried out by highly qualified firms or individuals and be paid for by the applicant. If the council considers that additional reports are necessary, the applicant must pay for these as well. Many of the houses in the borough, especially those that are listed or in conservation areas, have shallow foundations and could be adversely affected by development carried out by the owners or owners of nearby properties. One has to think of development in a commutative context. If subterranean development were permitted for all properties, what would be the cumulative effect upon the visual, historical, and architectural integrity of the area? What would be the cumulative effect on the drainage, biodiversity, environmental safety, and energy conservation potential of the area? Planning guidelines cannot only apply to one building and not another. If we allow one, we have to allow all. To allow the potential for all could have serious consequences regarding the character and amenities of the borough. All major development is noisy, causes pollution, can affect the safety of people living and working in the area and, overall, the ability of the locality to live peacefully and amicably together.	The Council agrees that designs should demonstrate that they have appropriately considered structural risk and the other issues highlighted. The draft SPD will set out the information requirements to be submitted as part of a planning application in regards to these issues, including that the required reports have been prepared by a suitably qualified professional where applicable and as relevant to the site conditions.
Resident	Listed buildings need a higher level of information, especially when they are within conservation areas where trees are listed and where trees should not have their ability to root impaired. There	The draft SPD will include general guidance, as well as guidance specific to properties in Conservation

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	is also a need to protect the structural stability of adjacent listed buildings.	Areas and listed buildings.
Resident	There should be (a) a detailed assessment as to the impact of the proposed development on drainage and any potential flooding issues (b) a detailed assessment as to the impact of the proposed development on the environment of the neighbourhood (c) a detailed assessment (including a report by a structural engineer) as to the impact of the proposed development on the structure and structural stability of the subject property and all neighbouring properties.	The Council agrees that designs should demonstrate that they have appropriately considered structural risk and flood risk/drainage. The draft SPD will set out the information requirements to be submitted as part of a planning application in regards to these issues, including that the required reports have been prepared by a suitably qualified professional where applicable and as relevant to the site conditions.
Resident	A basement impact assessment should be provided for all basement applications. To ensure they are consistent there should be a proforma produced which covers all the potential impacts, on the existing building, adjoining buildings and structures, ground water, trees, drainage, other infrastructure and any site specific issues. Every basement will be different but it should be down to the applicant to set out what impacts are relevant and demonstrate how they are being minimised or made acceptable by the design. To be able to do this a BIA needs to include a structural scheme and a method statement explaining how the basement will be constructed. A site investigation isn't essential, apart from in particularly sensitive locations so long as information on ground conditions has been obtained from records and is included and discussed in the BIA. A BIA should be prepared and signed off by a Chartered Structural Engineer. A drainage plan and design to deal with ground water should be signed off by a Chartered Civil Engineer. Any advice on hydrology (a hydrological study) will need to be provided by a Chartered Hydrologist.	The Council agrees that designs should demonstrate that they have appropriately considered the issues highlighted. The draft SPD will set out the information requirements to be submitted as part of a planning application in regards to these issues, including that the required reports have been prepared by a suitably qualified professional where applicable and as relevant to the site conditions.
Resident	Ban them all.	The Council considers that it would not be justified to impose a blanket ban on basement development.
Resident	See 2 above. Higher level requirements should automatically apply to all Conservation areas. Detail of pumps/pumping noise should be required where water/waste water will need to be pumped up to the external waste/water pipes in the street.	The draft SPD will include general guidance, as well as guidance specific to properties in Conservation Areas and listed buildings.
Highbury Fields Association	There should be an independent assessment of the soil conditions and the ground water norms of the building in question	The Council agrees that designs should demonstrate that they have appropriately considered site conditions. The draft SPD will set out the information requirements to be submitted as part of a planning application in regards to these issues, including that the required reports have been prepared by a suitably qualified professional where applicable and as relevant to the site conditions.
Resident	Consider likely lifetime energy issues, such as forced ventilation and ground water pumping and impact on neighbouring property also, issues of noise and other disruption to neighbours during	The draft SPD will include a section on Sustainable Design, and will set out the information requirements

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	the building phase.	to be submitted as part of a planning application, including a Construction Management Plan.
Resident	See question 2. May differ if intended use is for work or housing	Noted.
Resident	ALL basement applications should be treated the same, for that otherwise, some "clever clogs" finds the "get out of jail free card" and the building frenzy continues. All should provide full environmental impact, risk assessment, and full impact on the structure of the existing building, plus a mandatory clause agreeing not to touch any of the exterior, whether it is garden, access, green space or pavement.	This is one of the key drivers for producing guidance on basement development that considers both the cumulative impacts of basement development across the borough, as well as specific impacts related to individual developments. This approach will ensure that all applications are assessed in an equitable and transparent manner, so that individual applications do not unduly prejudice the satisfactory development/operation of adjoining land or the surrounding area as a whole. It will set out the information requirements to be submitted as part of a planning application; however the Council considers that it would be unjustified to seek to impose a restriction that proposals do not affect the exterior of the building.
Thames Water	Therefore Thames Water would like any design guidance produced to include the need to fit basements with a 'positive pumped device' (or equivalent reflecting technological advances), this will help to ensure basements properties are protected from sewer flooding. Fitting only a 'non return valve' to basement properties is not acceptable as this is not effective in directing the flow of sewage away from the basement building	Reference will be included in the draft SPD.
Transport for London	TfL support the submission of Construction Logistics Plans (CLPs) for development near to Transport For London's Road Network (TLRN) and bus corridors. Furthermore, when a planning application is proposed in these locations and also near to London Underground (LU) infrastructure, TfL require consultation.	A Construction Management Plan will be required for basement development applications.
Upper Street Association	We favour a general and consistent policy	This is one of the key drivers for producing guidance on basement development that considers both the cumulative impacts of basement development across the borough, as well as specific impacts related to individual developments. This approach will ensure that all applications are assessed in an equitable and transparent manner, so that individual applications do not unduly prejudice the satisfactory development/operation of adjoining land or the surrounding area as a whole.
Residents of	A high level of due diligence should be required for any planning application. The following reports	The Council agrees that designs should demonstrate

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Lonsdale Square	<p>should form the minimum requirements:</p> <ul style="list-style-type: none"> - structural engineer's report - an independent report paid for by the applicant should be required as referred to in para 14.7 of the Discussion Paper; - report on/ evidence that the geology and topography can support the proposed development as referred to in para 10.6 of the Discussion Paper; - formal report on/ assessment of flood risk and impact on adjoining land and properties of the extension as referred to in para 11.3 of the Discussion Paper; - report on impact on the biodiversity of area, landscape and trees as referred to in para 7.12 of the Discussion Paper; - analysis of impact on any shared services in particular drains or the ability of adjoining properties to receive existing services in an uninterrupted fashion or new services at any time in the future; - in particular, Thames Water should assess in advance whether damage to drains would occur. In Lonsdale Square, there are shared drains which run along the rear of the properties, then pass though beneath the basement of every third or fourth property (eg under No 33). It is therefore very important to make sure that the existing drains are not compromised. - analysis of energy efficiency and sustainability as referred to in para 12 of the Discussion Paper - this should include an assessment of light pollution as these developments often rely on large rooflights. - report on impact of construction and how it will be managed to minimise disruption to adjoining neighbourhood. 	<p>that they have appropriately considered the issues highlighted. The draft SPD will set out the information requirements to be submitted as part of a planning application in regards to these issues, including that the required reports have been prepared by a suitably qualified professional where applicable and as relevant to the site conditions.</p>
Resident	<p>I just have a few comments in relation to BIAs:</p> <ul style="list-style-type: none"> - basement impact assessments should be required for all basement applications; - BIAs should be provided at the planning stage so they are available at public consultation as this aids in the community understanding what is proposed; -BIAs should be independently verified by a structural engineer. 	<p>The Council agrees that designs should demonstrate that they have appropriately considered the issues highlighted. The draft SPD will set out the information requirements to be submitted as part of a planning application in regards to these issues, including that the required reports have been prepared by a suitably qualified professional where applicable and as relevant to the site conditions. Other than in limited circumstances, the Council does not consider that it will be necessary to secure independent verification of supporting documents if these have been appropriately certified in the first instance.</p>
Resident	<p>The developers should definitely get a structural engineer's survey before they apply for Planning permission, and the council should have a list of approved structural engineers who are experts in basements which the developers have to use. One such is GeotechnicsLtd who were used by Camden Council in such a case. Otherwise they might use one who has little experience or knowledge of basements and their special problems. The structure of the ground in particular</p>	<p>The Council agrees that designs should demonstrate that they have appropriately considered structural risk/ground conditions. The draft SPD will set out the information requirements to be submitted as part of a planning application in regards to these issues,</p>

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	<p>should be taken into account.</p> <p>The developer must have adequate insurance to compensate neighbours should it be necessary and should be required to find alternative accommodation for affected neighbours if required while the build is going on. Why should the neighbours have to pay for repairs or be driven from their homes (see above) so that developers can make money? If all this puts developers off, then all well and good as basements do not provide good living accommodation and should be reserved for additions to existing houses which have the main living areas above ground.</p>	<p>including that the required reports have been prepared by a suitably qualified professional where applicable and as relevant to the site conditions. However it is not considered appropriate to maintain a list of approved structural engineers as certification of such professionals is carried out by an independent body. The insurance arrangements of builders are not a planning matter.</p>
Canonbury Society	<p>Owing to the construction methods of subterranean development being more technical, the documentation and particularly the construction method statement (CMS) needs to be more comprehensive than usual for the officers and members to properly consider such an application. The CMS must include a report on the ground and hydrological conditions of the site and explain how the structural stability of buildings will be safeguarded during construction of the basement and beyond.</p> <p>Complexity will vary but we are of the opinion that if an application involves a technical engineering aspect, the council should reserve the right to instruct its own independent expert adviser, usually a qualified civil or structural engineer, at the applicant's cost.</p> <p>In addition a draft construction traffic management plan needs to be submitted by the applicant.</p>	<p>The Council agrees that designs should demonstrate that they have appropriately considered structural risk/ground conditions. The draft SPD will set out the information requirements to be submitted as part of a planning application in regards to these issues, including that the required reports have been prepared by a suitably qualified professional where applicable and as relevant to the site conditions. A Construction Management Plan will be required for basement development applications.</p>
Amwell Society	<p>A high level of information should be required for any basement development application. In addition to a report on the technical issues detailed in 14.3 of the consultation document there should be further requirements e.g. as with the revised guidance on basement applications seen with the City of Westminster. Section 4 Submitting a Planning Application provides an 'Application checklist' which requires the following for all application:</p> <ol style="list-style-type: none"> Completed Application Forms Drawings including site location plans, existing and proposed plans, sections and elevations and landscaping plan Structural statement prepared and signed off by a Chartered Civil Engineer [MICE] or Structural Engineer [MI Struct.E] and including supplementary geo-hydrology reports where this is not being provided by the same engineer. Reference is made to Section 6.4 and Appendix 1, where there is further advice given. Construction Management Plan (Reference is made to Section 6.8 which provides extensive guidance on what such a plan should cover) CiL Liability assessment form. <p>Applicants are strongly advised to provide 'Evidence of engagement with adjoining occupants, and a schedule and timetable of works'.</p> <p>The Amwell Society believes that all this information should be provided at the time of the</p>	<p>The Council agrees that designs should demonstrate that they have appropriately considered structural risk/ground conditions. The draft SPD will set out the information requirements to be submitted as part of a planning application in regards to these issues, including that the required reports have been prepared by a suitably qualified professional where applicable and as relevant to the site conditions.</p>

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	application. Any additional detail required by LBI to review the application should also be at the cost of the applicant (as seen with Westminster). Applications which do not comply with these requirements should be rejected automatically.	

Question 5: Do you have any further comments on the proposed Supplementary Planning Document? Are there any key issues (pertaining to basement development) that have not been raised in this paper and in your opinion should have been?

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Resident	The document raises important issues. Free-ranging basement development should not be allowed for all the reasons set out in the paper.	Comment noted.
Resident	Most of Islington's victorian housing is terraced and built of brick with lime mortar. If a rigid concrete box is built under one house it may well compromise the integrity of the terrace.	Comment noted.
Resident	Subterranean developments approved prior to the introduction of a formal policy by the Council should not act as precedent for planning applications after the introduction of such a policy.	All planning applications are assessed on their own merits.
Resident	I think the Discussion Paper is an excellent assessment of the issues and will provide a strong basis for formal guidance. I am pleased that the Council is giving this important subject the attention it deserves. Thank you.	Support noted.
Resident	I used to write about building basements and new homes for The Sunday Times (I was their self-build expert) and was an editor of property magazines. I would advise extreme caution with regards to subterranean extensions on period properties. While minor extensions in some cases will be fine. Wholesale new stories underneath existing properties are not recommended. Because, the knock on effect on neighbouring properties is extreme and expensive to remedy (if indeed it's possible to remedy which I doubt). Furthermore the disruption to neighbours while building works goes on is intense.	The Council agrees that designs should demonstrate that they have appropriately considered structural risk/ground conditions and construction impacts. The draft SPD will set out the information requirements to be submitted as part of a planning application in regards to these issues, including that the required reports have been prepared by a suitably qualified professional where applicable and as relevant to the site conditions.
Resident	Allowing big basement expansions changes the type of person buying a house or ground floor flat. Instead of someone who wants to live in the home you end up with developers buying the properties. This means that profit is the main motivation and that in order to maximise margins any attempted development will be as large as possible. As they are a developer they are not interested in the detrimental effects it will have on the residents already living in the area. I am currently in this situation. There has been a planning application submitted by a developer to extend the basement of ground floor flat under both the front and back gardens of the Victorian	The draft SPD will include specific guidance on the depth and extent of basement proposals.

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	Terrace I live in (135 Huddleston Rd). The developer also wants to build out in to the halfway in to back garden and tear down the back of the house and rebuild it even though the terrace of the middle flat is on top of that part of the building. In my opinion allowing over development of basement leads to attempts to overdevelop above ground as with my house which stands to lose the use of both front and back gardens. Even if the application is rejected the residents still have to go through a stressful time waiting to find out what the results of the planning application will be.	
Resident	Deterioration in the living environment and overcrowding	The draft SPD will include guidance on the quality of accommodation to be achieved by proposals.
Resident	I would like consideration of the impact on pedestrians of basement developments. My family is typical in that it is the most popular way for people to get about in the borough (including children going to school, walking the dog, and the vast majority of retail, social and community activities) and so pavement obstacles, especially with a pram, buggy, small child or dog, cause considerable impact. Keeping the pavement unencumbered by use of an overhead chute to the waste skip making a good sized arch for pedestrians, wheelchair users etc to pass through should be a requirement. I've seen these and they make a huge difference.	The draft SPD will include a requirement for proposals to submit a construction management plan as part of the application.
Resident	All excavations unload the ground and will cause movements in nearby structures; this is unavoidable. The design must ensure that these are so small that they cause no discernable damage to nearby buildings.	The Council agrees that designs should demonstrate that they have appropriately considered structural risk/ground conditions. The draft SPD will set out the information requirements to be submitted as part of a planning application in regards to these issues, including that the required reports have been prepared by a suitably qualified professional where applicable and as relevant to the site conditions.
Resident	Should Thames Water be required to comment?	Thames Water has responded to the Discussion Paper.
Resident	The Council should take account of issues which are not usually regarded as planning matters (for example, given the acknowledged inadequacy of Building Regulations and Party Wall awards) as residents need to be protected against the consequences of neighbouring underground development.	As a planning policy document, the draft SPD can only take account of planning matters. As set out in the NPPF, where issues are covered by other regulatory/permitting regimes, local planning authorities should assume that these regimes will operate effectively.
Resident	Islington has a very strong policy for surface water discharge from new developments. To be consistent this could be extended to basement developments and particular for basements in minor aquifers which are important stores of ground water. It could be required that any ground storage removed by a development is replaced by tanks or other means of retaining water on a site.	The Council agrees that designs should demonstrate that they have appropriately considered site conditions, including groundwater flows, however it is not considered appropriate to require groundwater storage on site as this would in itself impede recharge to the underlying aquifer.
Resident	No ban them all.	The Council considers that it would not be justified to

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		impose a blanket ban on basement development.
Resident	In the case of a basement extension application put forward by one of our neighbours a listed tree was wilfully cut down before the application was made. Whilst LBI confirmed that no application had been made to cut down the tree we were told that no action would be taken other than a requirement to possibly replant a tree elsewhere. In the same way that knocking down listed buildings should be a serious offence I feel that the removal of listed trees without consent should be an equally serious offence. The tree was a healthy ornamental fruit tree that blossomed every year. There is no point in allowing applicants to get round the rules on trees/developments by such action. The application [later withdrawn] would have excavated the garden down one floor to a point beyond the extent of our garden [as the neighbour has a longer garden]. Again any policy needs to take into account the impact on the surrounding gardens and not just the garden of the applicant. Reference is made to the fact that often in the Islington Terrace there is no rear access to a property and where this is the case earth has to be taken by hand, or mechanically, out of the front of the house. This is very disruptive/noisy and restrictions/requirements on this issue would be helpful.	The Council agrees that it is necessary to consider both the cumulative impacts of basement development across the borough in developing guidance, as well as specific impacts related to individual developments, and this will be addressed in the draft SPD. The requirement for a Construction Management Plan to be submitted with the application will also be set out.
Resident	Please do not restrict protection to listed property There are a lot of buildings in Islington that were basically thrown up in the mid to late Victorian period. Extensive excavation near these properties will put them at increased risk of full or partial collapse.	The draft SPD will include general guidance application throughout the borough, as well as guidance specific to properties in Conservation Areas and listed buildings, to ensure that applications are assessed in a consistent and transparent manner.
Resident	It seems essential to compile a record of existing and proposed basements so that there is a sound basis for consideration of their cumulative impact on the issues identified in the consultation paper. As it is important to record those basements that are actually built rather than those that receive planning consent, this might best be achieved as part of the Building Control process. In my work as a structural engineer, one of the problems that arises with the construction of a new basement beneath one house in a terraced structure is that the new basement provides a far more stable foundation for that house than for its neighbours. This 'exports' damage due to any movement, whether caused by the construction of the basement or arising in the future, to the neighbouring properties yet there is no mechanism for holding the owner of the basement responsible for such damage. As stated in the discussion paper, the Party Walls Act was not drafted to include such work in its scope as it limits the Building Owner's responsibility for damage to the Adjoining Owners' property to that arising before completion of construction. Given the predominance of clay subsoil in Islington, the full effects of the construction of a 'retro-fit' basement are not likely to become apparent for a decade or more but the Adjoining Owners then have no recourse to a remedy. I do not know to what extent to planning process can make up for the deficiencies of the Act, but at least it could require an assessment of the long-term impact of the change of foundations on the neighbouring properties where they are part of a single	<p>The Council agrees that it is necessary to consider both the cumulative impacts of basement development across the borough in developing guidance, as well as specific impacts related to individual developments, and this will be addressed in the draft SPD. Building Regulations are independent of the planning process.</p> <p>The Council agrees that designs should demonstrate that they have appropriately considered structural risk as relevant to the characteristics of the original building. The draft SPD will set out the information requirements to be submitted as part of a planning application in regards to these issues, including that the required reports have been prepared by a suitably qualified professional where applicable and as relevant to the site conditions.</p>

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	structure, as in most terraces. I also consider that pressure from the affected Boroughs for revision of the Act would be beneficial.	
Resident	No. It is commendable that the Council is starting to curb the building frenzy. In St. George's Avenue, there are still scaffolding up and building works right left and centre, making a peaceful conservation area a nuisance and noise polluted place. Plus, I can see many trees being cut down. Owner occupiers should pay a huge levy for any planning application and lease agreements should have a clause forbidding any expansion whatsoever.	Planning applications fees are set at the national level.
Thames Water	Section 11 on Flood Risk is supported, however it is considered that reference should be made to not only flooding from heavy rainfall but all sources of pluvial flooding such as sewer flooding. With regards to design, sewage networks are designed to surcharge to just below the man hole cover level. The introduction of a basement development could mean that connection points within that development become the lowest release point on the network and therefore flooding of a basement could occur, even in areas which have not previously been affected by flooding. Thames Water would like to work closely with London Borough of Islington as they prepare and consult on their Basement Development guidance.	Reference to this will be included in the draft SPD.
Westminster City Council	Westminster has recently adopted a Supplementary Planning Document on Basement Development and we are currently developing a new planning policy on this issue. One of the issues raised by developers in our consultations has been the lack of consistency between central London boroughs in the types of information required when submitting basement applications, and a suggestion that greater coordination between boroughs would be beneficial.	The offer to coordinate is welcomed and will be pursued.
English Heritage	We note that you have not considered the impact of basements on archaeology, and would encourage you to amend this and consider adding details of the 19 archaeological priority areas within the borough to assist homeowners and developers. Basement extensions often affect Georgian or Victorian buildings, many of which are listed either nationally or locally. Some local authorities within London, supported by parts of the wider conservation community, and on several occasions by the Planning Inspectorate, take the view that these proposals can cause unacceptable harm to heritage assets. Camden Council and the Royal Borough of Kensington and Chelsea have developed evidence bases to support policies that control the size and location of basement extensions, as well as the type of information they expect to be submitted with planning applications. You may wish to look at their methodologies, which have been successful both at Examination and at subsequent appeals to add to the robustness of your guidance. We note that English Heritage should be consulted on any development to Listed Buildings which involves the demolition of all or a substantial part of the interior of the principle building (i.e. floors and floor slabs), and that we will consider each case on its merits.	Reference to archaeology will be included in the draft SPD.
Resident	I feel strongly that the Urban Design Guide section 2.4.7. should be raised from a guideline to be part of Council Policy. It ensures that developments will not be built in gardens that are too small and by ensuring that any basement must be separate from the terraces will protect neighbours from having a basement attached to their house with all the concomitant problems. It seems that	The Urban Design Guide is not within the scope of this consultation. The Basement Development SPD will provided detailed guidance in relation to basement development in the borough, including on the

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	<p>the Planning Officers and Design Officers ignore guidelines when it suits them and so I think it needs to be given more power.(See P122127) Also the Planning and Design Officers need more supervision and training as many good policies are in place but are not followed. I am not sure what is the point of guidelines if they are just going to be ignored.</p> <p>Catherine West stated in the Islington Gazette that "as a council we are determined to protect gardens and only allow building in garden areas on the site of a previous building." This is not what happens. The minimum areas of gardens that can be left gives too much of a green light to development on gardens . There should be no new development on more than 15% of an existing garden irrespective of how much garden is left. Islington has one of the lowest amounts of green space in the country and it needs more protection. People will try to put new build basement houses on sites that are too small for a normal house and this must be resisted.</p> <p>Basement living areas may affect the health of their occupants. They may have virtually no sunlight even in underground outdoor areas which could affect Vitamin D levels and the lack of daylight may affect people's mood. The BRE minimum standard is only 2% of available daylight which would mean occupants would have to have electric light on all the time which passers by will see during the day and will confuse wildlife. We should ensure that any basement has at least 5% of available daylight by means of lightwells and sun pipes.</p> <p>Any new build with a basement should be flagged up and be considered by the Planning Committee not left to delegated powers.</p>	depth/extent of development and quality of accommodation achieved.
Resident	Finally some general thoughts. Islington Council should make it policy not to encourage basement development. No one would choose to live in a basement if they could avoid it. They are dark with little natural light. Their construction is noisy and disruptive. They are bad for the environment in many ways. If people want more space for gyms/cinema rooms etc they should move.	The draft SPD will include guidance on the quality of accommodation.
Islington Council	In all cases, basement and excavation proposals will be based on their merit	All planning applications are assessed on their own merits.
Amwell Society	A key issue for LBI is ensuring that there is in place a proper basement application process, including supervision and enforcement as construction progresses. In addition there is the issue of blatant disregard of the rules prior to an application being put forward that would, if not breached, have prejudiced an application. A recent example in the Amwell Society area was the cutting down of a healthy ornamental fruit tree within a Conservation area, without LBI permission, to facilitate a subsequent basement application where the tree had formerly stood. Whilst reported to the LBI Tree Preservation officer it seems that no action will be taken other than possibly the planting of another tree elsewhere in the garden. This may be an issue of 'budgets' and LBI	The draft SPD will include a requirement for proposals to submit a construction management plan as part of the application, however the planning enforcement process is outside the scope of the SPD.

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	resources are likely to be put under increased pressure in the coming years. However if planning law is not enforced, then any basement development requirements issued by LBI will be meaningless.	