

Camden Local Plan Proposed Submission Draft 2025

Basements Topic Paper

October 2025

1 Introduction

- 1.1 The Camden Local Plan Proposed Submission Draft was published for consultation and engagement from the start of May to the end of June 2025. Following this, the Plan was then submitted to the Planning Inspectorate for examination in public at the beginning of October 2025.
- 1.2 This topic paper supports Policy D6 Basements in the Camden Local Plan Proposed Submission Draft 2025. It provides further background and information on the Council's proposed approach to managing basement development in the borough.

2 Background

- 2.1 The Council introduced a dedicated basements policy as part of its Development Management Policies document adopted in 2010 (Policy DP27). This was in response to an increase in the number of applications for basement development in the borough and significant residential and community concern about the impacts that basement schemes were having on the living conditions and quality of life of residents and local environmental conditions. Policy DP27 sought to address a variety of issues including structural stability, drainage, the water environment, amenity, loss of open space and trees and heritage matters.
- 2.2 Policy DP27 and its successor – Policy A5 of the Camden Local Plan 2017 - have formed an approach to managing basement development that has generally operated in the borough successfully. Both policies were tested at examination and found to be sound. Policy A5 limits basements to no more than one storey in most cases and made it a requirement for all basement developments to minimise harm by reference to a rating on the Burland Scale.
- 2.3 One of the purposes of the current Local Plan review is to consider how well our planning policies are working and whether changing circumstances justify altering the approach. The Council has gained considerable practical experience from applying the policy to many basement schemes in the borough. Since the current Local Plan was adopted in 2017, the Council's own data of planning applications shows that over 270 basements have been approved where a Basement Impact Assessment was required. Previous refinements of the Council's approach to basement applications have been informed by comments made by residents and developers, in particular during Local Plan consultations and in response to specific basement applications. Representations regarding our basement policy have similarly informed the current Local Plan review. Residential basement development in Camden continues to be concentrated in particular areas relating to factors such as the size and type of home, the size of the plot and is influenced by property markets and household income.
- 2.4 While the Council is the decision maker on basement planning applications, it works closely with an external engineering consultancy to ensure that all of

the technical aspects of a scheme are fully understood and independently assessed. This auditing process is considered to be best practice and funded by the applicant. The policy operates in tandem with detailed planning guidance described below.

3 Policy Context

National context

National Planning Policy Framework (NPPF)

- 3.1 The only reference the NPPF specifically makes to basement development is in the Flood risk vulnerability classification at Annex 1 which identifies basement dwellings as being “highly vulnerable”. The overarching objectives of the NPPF are however relevant. In particular, the achievement of sustainable development which means “that the planning system has three overarching objectives (an economic objective, a social objective and an environmental objective) which are interdependent and need to be pursued in mutually supportive ways so that opportunities can be taken to secure net gains across each of the objectives.”
- 3.2 Chapter 15 of the National Planning Policy Framework sets out the approach to “Conserving and enhancing the natural environment”. Amongst other matters, it states in paragraph 187(d) that Planning policies should be: “minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs”. Paragraph 192(a) provides further detail stating that plans should “Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks... and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation” and (b) “promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity”.
- 3.3 Chapter 14 of the NPPF explains how the planning system should support the transition to net zero by taking “a proactive approach to mitigating and adapting to climate change.” Paragraph 164(b) states that new development should be planned for in ways that: “help to reduce greenhouse gas emissions, such as through its location, orientation and design.” Paragraph 167 sets out that “Local planning authorities should also give significant weight to the need to support energy efficiency and low carbon heating improvements to existing buildings...”
- 3.4 Paragraph 75 of the NPPF states that Local Plans “should consider the case for setting out policies to resist inappropriate development of residential

gardens, for example where development would cause harm to the local area”.

London Plan 2021

- 3.5 The London Plan 2021 introduced new policy D10 on Basement development. It states that “Boroughs should establish policies...to address the negative impacts of large-scale basement development beneath existing buildings, where this is identified as an issue locally”.
- 3.6 The supporting text in paragraph 3.10.2 notes that “The construction of basements can cause significant disturbance and disruption if not managed effectively, especially where there are cumulative impacts from a concentration of subterranean developments”. The text also states that the Mayor will support boroughs in restricting large-scale basement excavations – defined as “those that are multi-storey and/or those that extend significantly beyond the existing building footprint”, given that “basement development can impact on land and structural stability as well as causing localised flooding or drainage issues”.
- 3.7 The London Plan also states that “smaller-scale basement excavations, where they are appropriately designed and constructed, can contribute to the efficient use of land, and provide extra living space without the costs of moving house”. Policy D10 also recognises that some smaller basement development will be permitted development. (Camden introduced an Article 4 direction, which came into force on 1 June 2017, removing permitted development rights that meant that a planning application was not generally required where a basement would be built entirely underneath a property and not extend beyond it).

4 Local context

Camden Local Plan 2017

- 4.1 Policy A5 on Basements states that the Council will only permit development where it is demonstrated to its satisfaction that the proposal would not cause harm to (a) neighbouring properties; (b) the structural, ground, or water conditions of the area; (c) the character and amenity of the area; (d) the architectural character of the building; and (e) the significance of heritage assets. The Local Plan 2017 introduced detailed requirements in criteria (f) to (m) on the siting, location, scale and design of basements which “must have minimal impact on, and be subordinate to, the host building and property”. This included the limit that basements should be no more than one storey except for large comprehensively planned sites and set out other requirements which principally control the size of basements, including the extent of development beneath gardens.
- 4.2 The policy also sets out the requirement for applicants to prepare a ‘Basement Impact Assessment’ as evidence of the likely impact of proposals, including details of geotechnical, structural engineering and hydrological investigations

and modelling. The Council also requires Construction Management Plans for most basement developments.

Neighbourhood Plans

- 4.3 There are three adopted neighbourhood plans - [Hampstead, Highgate and Redington Frogna](#) that have basement planning policies complementing the borough wide planning policy. They contain additional expectations around the evidence that should be provided and how construction management issues be addressed.

Camden Planning Guidance on Basements, January 2021

- 4.4 This supplementary planning document gives detailed guidance on how the Council will apply Local Plan Policy A5 when making decisions on new basement development or extensions to existing basement accommodation. It provides detailed advice on how the Council will apply criteria f. to m. of Policy A5 and includes illustrations to inform the size of basement proposals. It also provides information on how Basement Impact Assessments (BIA) should be undertaken and what information should be provided. To assist applicants with preparing a BIA, the Council has prepared a proforma and a 'Scope of Services' document which explain the engineering input that is likely to be needed. The Council has a basements ['resource' page](#) on its website as part of its advice to potential applicants on making planning applications (where these documents can be found).

Evidence

- 5.1 The Council considers that the evidence base prepared for the Draft Local Plan is adequate, proportionate, relevant and up to date in line with the National Planning Policy Framework. The following paragraph set out the main sources of evidence that have informed the preparation of Policy D6 on Basements.

Camden Local Plan Evidence Report – Survey of basement development 2016 (EB36)

- 5.2 To inform local plan policy, the Council sent a survey to all addresses in the borough where basements had recently been developed (a total of 9,368 addresses). 614 responses were received. 46% of those responding were a direct neighbour to a basement development. The survey explored matters such as the length of the construction timetable, the nature of construction impacts and disturbance, changes to the water local water environment, visual impacts and damage to properties. The most frequently raised issues in the detailed comments provided by respondents were noise, dust and damage to properties.

- 5.3 The Council has not repeated the survey for the Proposed Submission Draft but considers that the Survey's findings are still relevant, as evidence of the nature of the impact of basement developments. From representations made during the draft Local Plan preparation process and concerning individual planning applications, it is evident that basement construction impacts continue to be a concern for local residents and amenity organisations.

Camden geological, hydrogeological and hydrological study, November 2010 (EB37-EB42)

- 5.4 The Council commissioned Arup to provide detailed evidence and guidance which describes how a "risk-based impact assessment" for basement development should be undertaken. This informed the development of the Council's BIA process and Camden Planning Guidance on Basements. This process is itself based on the format of an Environmental Impact Assessment (with stages for 'Screening'; 'Scoping'; 'Site investigation and study'; 'Impact assessment' and 'Review and decision making'). From the outset, it was envisaged that external auditing of BIAs would be required to check their adequacy.
- 5.5 Chapter 5 of the Study outlines the potential key impacts of basement construction in Camden and how these might be best managed. Surface water flow and flooding, groundwater and slope stability are identified as matters requiring investigations and modelling, all form elements of the BIA.

Embodied carbon impact of basement extensions 2024, Etude, Currie & Brown and Jensen Hunt Design (EB19)

- 5.6 The Study considers how basements are constructed in different contexts and the scope for reducing the proportion of embodied carbon in basement developments.
- 5.7 To support further investigation and analysis of the relative carbon emissions associated with basement construction in Camden, the Study recommends that applicants submit embodied carbon figures for new basement proposals as part of a proforma or written justification (which would potentially form a component of the Council's existing BIA). This would set out the design decisions and assumptions being made. The consultants advise that the latest version of IStructE Structural Carbon Tool should be used to conduct the calculations and suggest that applicants could consider how their proposals perform against the benchmark embodied carbon figures that appear in the Study. The collection of embodied carbon figures for a wide range of basement proposals can potentially be used as a basis for setting targets at a future local plan review.

6 Local Plan approach

- 6.1 Basement development can have greater impacts than other domestic development. It can change ground and water conditions, potentially leading

to ground instability and flooding, and have significant construction impacts, due to the complexities of excavation.

- 6.2 The Council recognises the need to protect the environment and adjoining neighbours, properties and buildings from these impacts through its basement policy.
- 6.3 The Proposed Submission Draft Local Plan largely continues the existing approach in policy A5 in the current Plan, which was found sound at examination, and policy D6 is also considered a sound approach. Although the Council considers that adopted policy A5 is operating effectively, it is considered appropriate to make amendments to increase the effectiveness of Local Plan policy in protecting the environment and neighbours and their property, as follows:
- Basements should not exceed the footprint of the host building (Part C. 3)
 - An applicant should provide the Council with data to show the upfront embodied carbon of the basement (Part E. 3)
 - Clarification that basements in flood risk areas should not involve the creation of self-contained flats, or bedrooms, bathrooms or kitchens and that a positive pumped device should be installed (Part F.1)
- 6.4 The wording in part F.1 of Policy D6 is intended to replace existing wording in Policy A5 that says: “The Council will not permit basement schemes which include habitable rooms and other sensitive uses in areas prone to flooding”. Applicants have sometimes queried the definition of “habitable rooms” and whether it is reasonable to restrict kitchens and bathrooms despite their association with an elevated risk of flooding. Flood incidents in Camden have highlighted that self-containment of dwellings can be problematic as the occupants of this space may not be aware of local flood issues and are likely to be particularly vulnerable to water entering their homes. Installation of kitchens and bathrooms increases the potential risk of self-containment as it is difficult to monitor how basements are being occupied and used.
- 6.5 The Council’s [Strategic Flood Risk Assessment](#) (SFRA) (EB20) states that “New self-contained dwellings (e.g. installation of bedrooms, bathrooms, or kitchens) should be restricted in areas where specific flood risk has been identified” (paragraph 6.2.14) and “Camden Council should consider restricting the placement of sleeping accommodation below the external street level in areas of ‘high’ flood risk such as surface water in order to reduce the risk of water ingress into bedrooms during extreme rainfall events” (paragraph 7.2.34). Flooding incidents in the borough have resulted from or been exacerbated by the surcharge of sewers, linked to extreme rainfall events. Basements are especially vulnerable and the SFRA recommends that “basements are restricted in areas at the highest risk of sewer flooding” (paragraph 7.2.35). The revised wording at F. 1 of Policy D6 is intended to be more explicit about the vulnerabilities of residential accommodation. The Council’s wider approach to managing flood risk is set out in Policy CC10 of the draft Local Plan.

- 6.6 Positive pumped devices for basements have been secured for many years in Camden as a mitigation tool – Thames Water requested that they be made a requirement of the Local Plan’s basements policy to raise awareness and ensure consistency of approach where basements are considered by the Council to be acceptable. Thames Water have commented (in response to the Regulation 18 draft) that properties can be at risk of sewer flooding outside of areas of flood risk. The Council has therefore proposed reference to these devices in F.1.

Retaining garden space, biodiversity and ecological networks

- 6.7 Camden has a sizeable number of large residential properties where a basement extending to 50% of the garden, as provided for in the current policy, would be a substantial size and cover a significant area beneath the garden, and lead to ground conditions being irreversibly changed. Large gardens often have particular biodiversity importance and mature gardens contribute significantly to a number of the borough’s conservation areas. Draft Local Plan Policy NE2(7) states the Council will “recognise the biodiversity value offered by gardens and soft landscaping, in contributing to wildlife corridors and providing a ‘stepping stone’ between designated nature conservation sites, avoiding detrimental impacts on the function of an existing/emerging corridor”.
- 6.8 The value provided by biodiversity and gardens is something that neighbourhood plans in the borough wish to see sustained: e.g. [Hampstead Neighbourhood Plan 2025-2040](#) policies DH1, DH3, NE1, NE2 and NE4 [Redington Frognal Neighbourhood Plan](#) policies SD1, SD2, SD4, SD5, BG1 and BG12, and [Highgate Neighbourhood Plan](#) policies OS2, DH3, and DH10. Therefore, Draft Policy D6(C) introduces a requirement that basements should “not exceed the footprint of the host building in area, except for works to create a lightwell or access to the basement”.
- 6.9 Residents and community groups have raised concerns about the cumulative losses of gardens from basement development across neighbourhoods and the significant impacts arising from subterranean development within often large gardens, may have on habitats and species. Neighbourhood forums in Camden have identified and mapped the vital role of gardens in contributing to local wildlife networks, as part of adopted neighbourhood plans in the borough.
- 6.10 One area where there is a significant amount of basement development is Redington Frognal in the north of the borough. It has a leafy, green character, with streets of mainly large properties, and is predominantly designated as a conservation area. In 2021, the Council adopted the Redington Frognal Neighbourhood Plan, prepared by the Redington Frognal (Redfrog) Neighbourhood Forum which states “adjoining rear gardens with trees and hedges form particularly diverse and important habitat network, both at ground level and above, enabling wildlife in the Redington Frognal Area to circulate, and providing a refuge. Together, they form Core Sustenance Zones

for bats, birds and other wildlife species...” (section 4.13). Basement development in this area is described as impacting on “Generous land plots with well-vegetated gardens... intrinsic to the setting of the Redington Froggnal Conservation Area... with attendant losses to the soil, or garden substrate, and the vegetation. Soil and garden substrate play a crucial role in supporting and providing a number of ecosystem functions, including the provision of habitat (shelter and forage for a range of wildlife). The development of basements often results in tree loss and reduces the scope for the future planting of large-canopy native trees, which are so intrinsic to the Redington Froggnal Conservation Area” (section 4.27.2).

- 6.11 The Hampstead Neighbourhood Forum recently prepared a revised version of their Neighbourhood Plan. Hampstead is an area of the borough which is a ‘hotspot’ for basement construction. Similar to nearby Redfrog, most of the area is designated as a conservation area. One of the reasons for the Forum’s review was “to enhance the biodiversity networks that are so important in a green area such as Hampstead”. The Plan notes in paragraph 4.12 that “Hampstead Heath, along with other Sites of Importance for Nature Conservation, supports a remarkable diversity of plants and wildlife. But these islands cannot exist in isolation. To fulfil their potential for nature, they must connect through ecological networks. The Plan outlines “priority areas between these green islands as opportunities to enhance connectivity and reduce fragmentation.” On gardens, paragraph 4.13, the Plan states “Every garden has a part to play in supporting biodiversity. The Plan area contains certain unique characteristics: an important number of veteran trees, wet areas and ponds and the large number of forest-type trees interspersed in large gardens”.
- 6.12 Chapter 5 of the adopted Hampstead Neighbourhood Plan states that the area has unique vulnerabilities to basement construction as Hampstead “is set on one of the largest and highest hills in London... as a consequence, a significant number of Hampstead streets are downward sloping, where hard standing or building footprint enlargement produces additional surface water run-off and drainage requirements, increasing flood risk in storm periods to vulnerable areas such as South End Green / Fleet Road, South Hampstead and West Hampstead (paragraph 5.4). The Plan comments on the area’s soil types, its hydrological properties and the potential risks associated with the movement of groundwater and underwater streams. It is an area with generally older properties, shallow foundations and narrow streets.
- 6.13 The Plan comments on the potential noise and disturbance and the possibility of trees being directly or indirectly harmed through basement construction works. The Forum state “Surveys among residents have resolutely identified this [basements] as being of considerable concern within the community and the evidence we have gathered justifies these concerns...”
- 6.14 Since the Local Plan 2017 was adopted, the Council declared a [climate and ecological emergency](#). One of the key actions has been the adoption of a

revised biodiversity strategy called [“Creating space for nature”](#). This promotes “creating and maintaining stepping stones and corridors of habitat through the borough, and improving and expanding existing ones as well as looking after what we’ve already got... Failure to create, maintain, improve and expand opportunities for wildlife will not only impact Camden’s wildlife but those of neighbouring boroughs...” The strategy states that development should increase rather than harm biodiversity and its delivery is reliant on “everybody... cooperating to nurture healthy ecosystems and increase the quality of life for all”. While the Council acknowledges that the size of gardens and basement developments varies, retaining the existing approach in Policy A5 would result in further cumulative losses of mature gardens resulting from the construction process. This would be contrary to the goals of the Council’s Climate Change Action Plan and Biodiversity Strategy.

- 6.15 The excavation of a basement and the ongoing construction work is likely to result in the complete loss of existing biodiversity value and habitats above ground with areas of mature planting and trees most affected. While restoration can theoretically occur on completion, existing habitat will be lost and some habitat and biodiversity may never recover. Where recovery of the garden’s biodiversity value does take place, it is likely to take a substantial period to realise. The concentration of basements in particular locations, may result in disproportionate impacts on certain types of gardens or individual corridors. The Council’s own planning applications data shows that since the current Local Plan was adopted in July 2017, over half of all permitted basement schemes where a Basement Impact Assessment was required have extended into a garden (at least 150 schemes). Combined with various forms of above-ground development (including permitted development rights), the continuing disturbance and loss of garden space and biodiversity value is likely to be substantial.
- 6.16 The Council considers that in order to optimise the significance of residential gardens as a biodiverse resource, greater emphasis should be placed on maintaining such areas in their existing intact state. This is also likely to be particularly beneficial to sustaining the character of conservation areas. For example, section 4.9 of the Redington Frognal Neighbourhood Plan notes that there has been a “substantial cumulative area of natural soft-surfaced garden... lost.” The Forum’s evidence suggests that there has been “a serious and unsustainable rate of loss (equivalent to one in six gardens) at a time of growing surface water flood risk and climate change”.
- 6.17 Excavation of a garden and construction of a large basement typically involves a lengthy construction programme. The Council is aware of some exceptional examples where the build programmes have been longer than 3 years, while the Council’s 2016 basements survey found that over a third of basement schemes lasted more than 24 months. These works will often involve the removal of the existing ground surface and any contribution made to local biodiversity will be lost. Gardens are also an important resource in providing infiltration during rainfall events. This has become more vital given

the increased frequency of severe storms and rainfall events associated with climate change. Gardens are an important contributor to the borough's resilience to flooding through their ability to store water and slow runoff.

- 6.18 Although the existing criteria (f) to (m) in Policy A5 already cover the overall size of a basement, and the associated impact on gardens, the Council has found that under this approach, large homes and/or properties with large gardens tend to have disproportionately large basements resulting in more significant impacts on gardens and biodiversity and local amenity. The Council's SFRA also notes that larger and adjoining basements are likely to create greater diversions in groundwater flows, potentially increasing risks of groundwater flooding. Introducing further restriction on basement size is likely to mean that average construction programmes will be shorter, fewer complex excavation works may be required and therefore, while the local community will still experience some disturbance arising from basement construction, the cumulative impacts will be less and periods of 'high impact works' shorter. There may also be benefits in terms of flood risk management.
- 6.19 Basement development is also widely recognised as being a particularly noisy type of development because of the reliance on powerful, loud machinery and tools. While there will be construction noise with other types of development, local residents often tell the Council that the noise emanating from (particularly larger) basement builds has an especially disruptive impact on their home life and in some cases, on their health and wellbeing. Home working, and care arrangements, are examples of when the effects can be especially intrusive. With more people working at least part of the week at home and hotter conditions in the Summer (meaning residents wish to keep windows open), reducing the circumstances in which basement development will be supported is likely to have positive impacts on local amenity.

The carbon intensity of basement construction

- 6.20 The Council has commissioned a study to understand the potential carbon intensity of basement schemes, "[Embodied carbon impact of basement extensions](#)" (EB19). This found that basements are associated with high-embodied carbon expenditure due to their reliance on materials such as reinforced concrete. Basement extensions will generally have a significantly higher carbon footprint compared to above-ground extensions due to the materials and construction methods required. The consultants explored the relative embodied carbon of a loft conversion plus a new roof versus a basement. They found that the embodied carbon of a loft conversion almost invariably exceeds an above ground floor extension for the same floor area.
- 6.21 Basement construction also involves extensive excavation, adding to carbon emissions through fuel use and soil removal, which will in turn be exacerbated in larger basement schemes. Other London boroughs have also commissioned evidence which point to the significant carbon intensity of basement development. A life cycle analysis of extensions and subterranean developments (Eight Associates report for Royal Borough of Kensington &

Chelsea) found that single storey basements can be around 55% more carbon intensive than comparable above ground extensions.

- 6.22 A report by WSP for City of Westminster was focussed on new development schemes (rather than extensions to existing homes). They found that “by restricting the construction of new basements in London, it is likely that both a large cost and carbon saving can be achieved.” However, the Study notes the detrimental viability implications of removing lettable basement floorspace in commercial schemes and the resulting impact on overall scheme profitability. Basements in larger mixed-use commercial schemes can provide valuable ancillary services such as bike storage, showers, changing areas, building services and servicing and support delivery and servicing arrangements. These schemes are concentrated in areas that are predominantly commercial in character where there will tend to be less impact on neighbouring residential properties.
- 6.23 Camden’s Embodied Carbon Study makes various recommendations about structural design parameters as means of reducing embodied carbon. This includes challenging the use of propped basement schemes in some cases, encouraging applicants to consider a mixture of propped and unpropped retaining walls and using profiled concrete ground floor slabs which are recognised as utilising less concrete. Due to the inherent variation in development types in the borough, the Study does not propose the use of a quantitative metric that would be a policy target (or ‘cap’). However, it suggests that the benchmarks and findings can be used to drive reductions in energy intensity, e.g. through discussions between officers, the Council’s engineering consultant and developers. This can enable queries to be made about assumptions used in scheme design and selection of materials.
- 6.24 The study also suggests that the Council requests the submission of embodied carbon figures which could potentially form the basis of a future target, e.g. when the Local Plan is next reviewed. It suggests there would be particular value in incorporating this as a component of the existing BIA process with data gathered at both pre- and post-construction to capture changes in structural dimensions, architectural proposals and material specifications. It states that: “Adding embodied carbon to the list of issues which the BIA needs to address is logical: it would not add a disproportionate amount of work/costs to the current process and would not require a different set of skills. It would also encourage better structural design through the careful use of concrete” (page 37).
- 6.25 The Council has therefore proposed criterion E. 3 in draft Policy D6: “applicants will be required to demonstrate that proposals for basements: have sought to reduce the embodied carbon of the basement. The Council will request the applicant to provide data showing the upfront embodied carbon of the basement proposal”. To ensure this follows a proportionate approach, paragraph 12.125 confirms that this would not apply to new lightwells. The Council considers that the approach is reasonable and justified.

Circumstances in large comprehensively planned sites

- 6.26 Policy D6 in the Proposed Submission Draft allows basements to be developed directly underneath buildings and for lightwells to be created while reducing the cumulative impact on disturbance on biodiversity, the local environment, neighbours and the community. This will ensure that additional living space can be provided where it is needed. The Council also considers that retaining greater flexibility for large comprehensively planned sites as D6(D) is justified as these sites are likely to be in locations which are already densely largely built up (such as Central London) or involve large sites, such as a number of Local Plan site allocations, where it is much easier to design and bring forward new open space and green areas. As highlighted above, in locations such as Central London, and on comprehensive sites, basements can be an important enabling element of development.

7 Conclusion

- 7.1 While the Council considers that the existing approach in Camden Local Plan Policy A5 is generally effective, it is appropriate to refine the approach to address changing circumstances and reflect the Council's experiences of implementing the policy where necessary. Proposed Submission Draft Local Plan Policy D6 responds to the Council's declaration of a climate and ecological emergency by seeking to maintain gardens and green areas in their natural and green state where possible to help to sustain biodiversity and ecological networks, which are vulnerable to loss.
- 7.2 Basement excavation and construction is an activity which can result in significant disturbance and the greatest impacts will arise from the largest schemes. Excavation of large areas of garden and lengthy construction programmes are a particular concern for our residents and the situation can be magnified due to the potential cumulative impacts of multiple basements schemes coming forward in one area.
- 7.3 The Council considers that the approach set out in the revised draft policy D6 on Basements is reasonable and proportionate. It is positively prepared, justified, consistent with national and Londonwide policy, and is therefore sound. It is based on a thorough understanding of Camden's unique circumstances and the known impacts of basement development in the borough.