

**Hearing Statement - 3/representor number**

**Savills Client Consortium**

**Matter 3: The order of the reasoned justifications for the Policy**

***Response from Savills Planning***

*Question 16: From my reading of the Plan's reasoned justification, paragraph 3.14 of BAS02 and other documentation, I understand that the Council has a priority order for the reasons justifying the Policy. These are, in order: the increasing number of basement planning applications; that these developments are primarily under existing dwellings and gardens within established residential areas; that the Royal Borough is very densely developed and populated; the adverse impact on residential amenity, primarily on residents' health, wellbeing and living conditions due to factors such as noise and disturbance, vibration, dust and heavy vehicles over prolonged time periods, together with the loss of rear gardens and structural stability concerns; the desire to limit carbon emissions; the need to retain natural gardens and trees to maintain the character and appearance of the Royal Borough, along with sustainable drainage and biodiversity requirements; the adverse impact on the large number of listed buildings and conservation areas in the Royal Borough; and, lastly, the adverse visual impact of certain externally visible aspects of these developments. Is this correct? If so, should it be more clearly stated in the Plan? If the above is not correct, please explain.*

We consider that the draft policy is not justified, as the existing policy framework is suitable for managing basement development. We therefore do not comment specifically on the order of justification, and our previous representations and response to the other Matters sets out our reasoning as to why we disagree with the Council's various justifications for the revised policy.