

Appendix 1 - Summary of Responses to the Residential Extensions and Alterations Supplementary Planning Document and Recommended Proposed Changes

Consultation responses and proposed changes to the document are set out in the recommendations below. Additions to text are underlined whilst with deletions are highlighted with ~~strikethrough~~.

General	
Respondent	Natural England
Response	"No comment"
Officer Response	Noted
Recommendation	No Change
Respondent	Highways England
Response	"No comment"
Officer Response	Noted
Recommendation	No Change

Section 1.0 Introduction	
Respondent	Historic England
Response	"You may wish to include a sentence in para 1.3 to the effect that Brent's local conservation staff can give advice on proposals within conservation areas, or relating to listed buildings"
Officer Response	It is agreed that this would provide helpful clarification.
Recommendation	<u>"The Council's heritage officer will be able to give specialist advice on proposals within conservation areas, or relating to listed buildings"</u>

Section 2.0 Detailed Guidance	
Respondent	Gulfray Qayyum
Response	<p>"Section 2.4 P10: Two storey extensions</p> <ul style="list-style-type: none"> • "Two storey rear extensions to all houses are normally unacceptable". This must be a typo. I trust you are referring to non-end of row terraced houses • 2:1 Rule: This needs to be filled out as it is not clear what this is referring to for the purposes of the consultation on this document. • 45 Degree Rule: this should be introduced in SPD2 to ensure consistency between SPD1 and SPD2. One rule for developers and one for tax

	<p>paying residents would be unacceptable. Postcode lottery likewise unacceptable. See comments in SPD1 consultation responses. –“• The 2:1 Rule should be replaced whole heartedly with the 45 Degree Rule instead of being tentatively introduced with so many subjective caveats and unclear and potentially conflicting statements that water down this otherwise sensible addition. For example, “45 degree angle <i>may be</i> acceptable if it compiles [sic] with daylight and sunlight studies” is not required</p> <ul style="list-style-type: none"> • Please refer to BRE’s “Site layout planning for daylight and sunlight: a guide to good practice” which has extensive and universally accepted studies corroborating the use of the 45 Degree Rule without compromising amenity to light • Excluding Brent, 72% of all Greater London councils adopt the 45 Degree Rule. The rest do not preclude its use and nor do they use 2:1 as the starting basis • The Planning Advisory Service (PAS), advisors to local councils on planning matters, endorse the use of BRE guidelines“
Officer Response	<p>There is a typo in the first sentence, this should refer to two storey rear extensions generally being unacceptable if they are terraces.</p> <p>1:2 rule and 45 degree rule was discussed fully with Development Management and it is felt that both rules are relevant in the borough. 1:2 rule for SPD2 only and 1:2 and 45 degree angle for SPD1.</p>
Recommendation	<p>“Two storey rear extensions to all <u>terraced</u> houses are normally unacceptable due to the adverse impact (loss of light and outlook) on adjoining occupiers”</p>
Respondent	Patrick O Connor, Willesden Green Town Team.
Response	<p>“A substantial part of the housing stock in Brent Central (i.e. Kilburn, Willesden Green, Harlesden, Kensal Rise, Queens Park) consists of Victorian / Edwardian terrace properties. As space is becoming a greater luxury, residents require progressive planning policies to help them maximise their properties and realise underused space. Willesden Green Town Team (“WGTT”) have consulted with some local residents and have taken on board their comments on the draft planning policy (SPD2), as follows:</p> <p>2.3 Depth – Attached Houses, including Terraces and Semi-Detached The phrase “permissible depth and condition for every additional meter beyond 3 meters” is causing confusing amongst residents. It would be helpful if a diagram was included to clarify.</p> <p>2.5 Rear Dormer Windows The reference to “L shaped dormers are not normally permitted” is vague and it would be helpful to clarify the situations when L shaped dormers are permitted, including a diagram.</p> <p>2.5 Hips and Gables It would be helpful if a diagram was included to clarify the description regarding conversion of a hipped roof into a gable etc.</p> <p>2.5 Extensions to Outriggers continued The reference to “L shaped extensions are allowed provided they are 3 meters from the rear” is confusing for residents. It would be helpful if this</p>

	<p>was reworded to state “L shaped extensions are allowed provided they are no greater than 3 meters in depth from the deepest part of the existing building (i.e. the outrigger) and including a diagram to show a L shaped extension (Figure 6 only illustrates the 3 meter extension).</p> <p>Given the volume of period terrace properties with outriggers, it would be helpful if the Design Guide provided positive guidance to extend and alter such space. A major issue amongst local residents is that the roof space of outriggers is redundant, albeit there are examples where residents have successfully included dormers in such space. Importantly, residents in all seven of Brent’s neighbouring boroughs (Harrow, Barnet, Camden, Westminster, Kensington & Chelsea, Hammersmith & Fulham and Ealing) are permitted to make alterations and extensions to the outrigger roof space. Whilst care needs to be taken, well-designed applications that would not cause significant harm to privacy and character appearance (of the specific property or neighbouring properties) should be encouraged.</p> <p>2.6 Balconies and Roof Terraces With a large proportion of residents living in converted apartments, access to private outdoor space is a luxury most residents do not benefit from. The WGTT’s feedback is that the Design Guide should provide greater clarity and guidance to allow residents to create balconies and roof terraces. For example, consideration should be given where:</p> <ul style="list-style-type: none"> - design reduces the impact on the existing elevation; - careful choice of materials and colour to match the existing elevation; - possible use of setbacks to minimise overlooking; - possible use of screens or planting to prevent overlooking of habitable rooms or nearby gardens, without reducing daylight and sunlight or outlook; and - need to avoid creating climbing opportunities for burglars.”
Officer Response	<p>2.3 Depth – Attached Houses, including Terraces and Semi-Detached It is acknowledged that as worded this could cause confusion. As such the wording can be amended to provide additional clarity and also a diagram added that further clarifies the point.</p> <p>2.5 Rear Dormers – reference to L shaped dormers has been removed and the paragraph rewritten to offer more clarity.</p> <p>2.5 Hips and Gables – diagram will be included</p> <p>2.5 Extension to outriggers continued – diagram will be included</p> <p>2.6 Sentence to be added on design of balconies / roof terraces</p>
Recommendation	<p>2.3 Depth – Attached Houses, including Terraces and Semi-Detached. “the maximum depth normally permitted is 3.0 metres (Fig. 4). However, <u>under Permitted Development Rights¹ in some circumstances up to 6 metres is permissible will be acceptable. This will be on condition that if the extension is longer than 3 metres it will be expected to be set in from the boundary. This will be for at least a metre set in for extensions up to for four metres, two metre set in for extensions up to five metres and three metre set in for extensions of up to six metres. i.e. for every additional metre beyond 3.0 metres, the extension should be set in from the boundary an additional metre.”</u></p> <p>Included a diagram to provide an example</p> <p>2.5 Hips and Gables – diagram added</p>

	<p>2.5 Extension to outriggers continued – diagram added</p> <p>2.5 Rear Dormers “L-shaped dormers are not normally permitted-changed to Dormers that project onto or over a rear projection (whether it is original or an extension to the house) will not normally be permitted.”</p> <p>2.6 “<u>Designs should aim to minimize the impact on the elevation, match existing materials and colours, and use setbacks where possible.</u>”</p>
Respondent	Woodland Trust
Response	<p>“Given the strong wording in the <i>Brent Design Guide</i>, I was disappointed with the omission of any mention of trees in the Residential Extension SPD. Therefore I suggest an additional section 2.11 at the end of that section:</p> <p>“2.11 Trees Where the placement of a building or extension is likely to result in the loss or damage to a significant tree, either in the applicant’s garden or within a neighbouring property, a suitable design solution that retains the tree(s) should be found.”</p> <p>In paragraph 2.9 “<i>Parking in Front Gardens</i>” I would recommend you add street trees into the list in the final bullet point, as follows (addition in red): “The position of the drive or parking space will not have a significant negative impact on the street, street trees, your neighbour, your garden and your house.”</p>
Officer Response	<p>2.11 This point is accepted as trees can provide a valuable feature in the environment and ideally should be retained wherever possible. The suggested changes to the text will be made.</p> <p>2.9 Parking in Front Gardens: This point is accepted as it would be desirable to ensure that there will be no loss of street trees in association with provision of parking in a property. The suggested changes to the text will be made.</p>
Recommendation	<p>2.9 Additional bullet point: “<u>The position of the drive or parking space will not have a significant negative impact on the street, street trees, your neighbour, your garden and your house</u>”</p> <p>“<u>2.11 Trees: Where the placement of a building or extension is likely to result in the loss or damage to a significant tree, either in the applicant’s garden or within a neighbouring property, a suitable design solution that retains the tree(s) should be found.</u>”</p>

Section 3: Glossary	
Respondent	Patrick O Connor, Willesden Green Town Team
Response	<p>"It would be helpful if the following words are defined and included in the Glossary:</p> <ul style="list-style-type: none"> - Outrigger - Obscure glazed - Parapet - Eaves - Gable - Porch - Canopy - Hipped Roof"
Officer Response	It is accepted that the incorporation of these terms within the glossary will assist with a better understanding of the document.
Recommendation	<ul style="list-style-type: none"> - <u>Outrigger - Part of a house that extends perpendicular to the rear</u> - <u>Obscure glazed - Opaque glass reducing visibility for privacy reasons</u> - <u>Parapet - Protective edge of a roof or balcony; wall or fence</u> - <u>Eaves - Part of a roof that meets or overhangs the walls</u> - <u>Gable - Wall with triangular part where it meets the pitched roof</u> - <u>Porch - Front extension containing the main entrance; partially open or fully closed</u> - <u>Canopy - Deep overhanging roof to provide shelter below</u> - <u>Hipped roof - Pitched roof that slopes to the front, rear and side walls"</u>

Other non-material changes considered appropriate to improve the document

These changes are not significant, nor seek to introduce issues not previously consulted upon, but will improve the clarity of the document. They also reflect its change in status from draft to adopted document.

Other non-significant changes considered appropriate to improve the document.	
Part of Document	Title Page
Issue	Amend to reflect the adoption date, the fact that it also addresses other residential alterations too and improve its presentation by incorporating a picture of an interesting residential alteration.
Recommendation	Title Page change: “RESIDENTIAL EXTENSIONS & ALTERATIONS DESIGN-GUIDE SUPPLEMENTARY PLANNING DOCUMENT 2-SPD2 JanJuly 20178
Part of Document	Page 2 Consultation Information.
Issue	Remove to reflect that the document has been adopted.
Recommendation	<p>“The Draft Brent Residential Extensions Guide Supplementary Planning Document 2017 is published for consultation. You are invited to respond to us with your comments.</p> <p>Further copies of this document can be downloaded from the Brent Council website at: www.brent.gov.uk/spd2</p> <p>Make your comments by the following ways:</p> <p>By email to: planningstrategy@brent.gov.uk</p> <p>By writing to: Planning Policy & Projects Team, Brent Civic Centre, Engineer’s Way, Wembley, HA9 0FJ</p> <p>Please reference your comments to the relevant policy or paragraph of the document.</p> <p>All comments must be received by 17:00 17th August 2017</p> <p>Comments, along with officer responses and if necessary proposed changes to the document will be reported to the Council’s Cabinet. Cabinet will need to adopt the final version of the Supplementary Planning Document.”</p>
Part of Document	1.1
Issue	<p>Update to reflect that the document has been adopted.</p> <p>Update to further explain the rationale why it might be useful for permitted development rights.</p>
Recommendation	<p>“This document is a Supplementary Planning Document (SPD) to Brent Council’s Local Plan, specifically policy DMP 1. <u>Once adopted, A draft version of the SPD was consulted upon in July – August 2017 for 6 weeks. The Council’s Cabinet considered representations made, appropriate amendments to the document’s contents and adopted it as a SPD in January 2018.</u> †This SPD will be a material consideration in the determination of planning applications. Where planning permission is needed to alter or extend your house, proposals should conform to the guidance in this SPD. This guidance may also be useful for helping ensure that development that benefits from permitted development rights <u>can be more sympathetically undertaken to fit in with its context.</u>”</p>

Other non-significant changes considered appropriate to improve the document.

Part of Document	2.1
Issue	<p>Width: add limit of 4m width to the 2/3 rule Set-in from joint boundary: remove sentence in 1st paragraph, amend 2nd bullet for clarification Building design features: amend 1st paragraph for clarification</p>
Recommendation	<p>Width: “Side extensions should be no wider than two thirds the width of the original house, <u>with a maximum width of 4m.</u>”</p> <p>Set-in from joint boundary: “Single storey side extensions will normally be allowed to be built up to the common boundary. This will ensure that if your neighbour also extends there is not an awkward narrow gap between the two extensions which cannot be maintained. There are <u>Exceptions to this guidance which includes:</u> - where the gap between properties is unusually large and this the extension <u>this would provide a dominant result in a disproportionate addition that is more than half the width of the original house;</u>”</p> <p>Building design features: “<u>The building materials should where possible match the main house. Extension features like such as doors and windows should also be of similar design and use the same</u> have similar proportions and be constructed in the same materials as the other windows of the as those in the main house. Match the materials used on the main roof of the house. Particular attention should be given to the roof design, <u>in of the eaves particular the eaves and the gutter to ensure this does not overhang the boundary.</u> Other details such as unusual brick bonds, quoins, string courses, plinth, corbelled eaves, stone or tile creased lintels etc. (see glossary) found on the original house should also be considered for inclusion in your design.”</p>
Part of Document	2.2
Issue	<p>amend 1st paragraph to include 2/3 rule set-in: amend 1st paragraph for clarification amend 2nd paragraph to include 2/3 rule remove last sentence to avoid confusion height: add requirement to match existing roof types design: amend text for clarification</p>
Recommendation	<p>“Side extensions should <u>normally</u> be no wider than the internal measurement of the front room of the <u>two thirds of the width of the original house</u>”</p> <p>Set-in: “A set in and/or set back is required from the main front wall to <u>ensure the extension is suitably subservient to the main house and to prevent the creation of a terracing effect between buildings</u>in filling of gaps between buildings. If a setback is not provided a row of detached or semi-detached homes may appear to change character and become a row of terraced houses.</p>

Other non-significant changes considered appropriate to improve the document.

As with single storey side extensions the Council will permit development up to the boundary. The exceptions to this are when the extension would be more than two thirds the width of the property or where the light into any existing side window on an adjoining property, which provides the only means of light for any habitable room, is unduly affected.
~~A parapet at first floor eaves is not acceptable.~~

Height/roof details:
 “The roof should match the pitch angle and materials used on the main roof of the house. Flat roofed or “False pitch roofs” (see glossary) are unacceptable. The extension should have a hipped side roof plane where the existing roof is hipped to the side, and a gable end where it is gabled. The ridgeline of the new extension should be set to a minimum of 0.5m below the ridgeline of the original house to ~~reduce its visual impact~~ensure it appears suitably subservient. Every effort to retain features like chimney pots, stacks, party walls and ridge tiles should be made.”

Design:
~~Similar to~~The guidance set out in section 2.1: Single storey side extensions should also be followed if a two story side extension is proposed. In addition windows will may be permitted in the side elevation on corner properties in order to ensure an interesting street frontage.

Part of Document 2.3

Issue
 Depth: remove references to PD rights, add text and diagrams to clarify (Figs. 5,7)
 Site levels: amend text to clarify and strengthen policy (as *)
 Height: remove last sentence to avoid confusion
 Outriggers: remove duplicate text (under depth)

Recommendation
 Depth:
“Attached Houses, including Terraces and Semi-detached: the maximum depth normally permitted is 3.0 metres from the original wall of the house (Fig. 4).
~~However under the prior approval process, permitted development rights accept that in design terms a 6 meter rear extension is permissible. As such an extension up to 6 metres in depth may be acceptable providing that for every additional metre beyond 3.0 metres in depth, the extension should be set in from the boundary by an additional metre to protect neighbouring residential amenity (Fig. 5 – drawing added).~~

New single storey extensions to an existing two storey outrigger should not project further than 3 metres from the rear elevation (face) of a terrace, or semi- detached house (Fig. 6).
L shaped extensions are allowed generally permitted provided they do not extend further than 3 metres from the rear and comply with the details below provided on height (Fig. 7 - drawing added).
 If your neighbour’s house is set at a lower level or has a different rear building line this depth may have to be reduced by a commensurate amount*.

Detached Houses: the maximum depth normally permitted is 4.0 metres.

~~However, under the prior approval process, Permitted Development Rights 8metres is accept that in design terms an 8 metre extension is permissible. As such, an extension up to 8 metres in depth may be acceptable providing that for every each additional metre beyond 4.0 metres the extension should be set in from the boundary an additional metre to protect neighboring residential amenity. on condition that for every additional metre beyond 4.0metres, the extension should be set in from the boundary an additional metre”~~

Site levels:

Other non-significant changes considered appropriate to improve the document.

"If your neighbour's house is set at a lower level or has a different rear building line this depth may have to be reduced by a commensurate amount*.
~~*If there is a cChanges in levels and the position of buildings within adjoining properties, including the locations and nature of window within those properties should be clearly shown on drawings. , this needs to be shown in plan. If a raised terrace is proposed, this will be examined on a case by case basis. The terrace may set , there is an expectation that the extension is set in from the boundary and screen planting proposed to mitigate the potential impact, and this will be examined on a case by case basis."~~

Height:
~~"In some cases a pitched roof may have an unreasonable impact on your neighbour and will not be permitted."~~

Outriggers:
~~"Extensions to outriggers. Extensions which infill the side return between a two story outriggers.....
 New single storey extensions should not project further than 3 metres from the rear elevation (face) of a terrace, or semi-detached house, or 4 metres from the rear elevation of a detached house (Fig. 6). L shaped extensions are allowed provided they are 3 metres from the rear."~~

Part of Document 2.4

Issue
 1st sentence specifies 'terraced' housing
 depth: added limit of 3m depth
 height: added last sentence to clarify impact of dormers

Recommendation
 "Two storey rear extensions to all terrace houses are normally unacceptable"

Depth:
 "the middle of both your any neighbours nearest habitable room window (this includes kitchens but excludes bathrooms, storage cupboards etc), up to a maximum depth of 3 m.
 Where there is a flank wall window which provides sole light to a habitable room (including kitchens) any loss of light to this room will be taken into account and is likely to reduce the size of extension considered acceptable."

Height:
 "The design, shape and materials of the roof must match the original roof. Every effort to retain roof features should be made. It is often not possible to erect a two storey rear extension where there is an existing rear dormer window as this can result in an unacceptable design."

Part of Document 2.5

Issue
 Side dormer: dimensions added
 rear dormers: removed sentence on L-shaped dormers to avoid confusion
 added sentence to restrict 'rear projecting'
 removed last sentence to avoid confusion

Other non-significant changes considered appropriate to improve the document.	
	hips/gables: amended text to clarify
Recommendation	<p>Side dormer windows: “<u>They should be set down from the ridge by at least 0.3m and must be set up from the eaves line by at least 0.5 metre measured along the roof plane. Fig.10 amended to reflect this.</u>”</p> <p>Rear Dormer Windows: “Rear dormers can be the full width of the original roof plane outside conservation areas. They should be set down from the ridge by at least 0.3m and must be set up from the eaves line by at least 0.5 metre <u>measured along the roof plane</u> (Fig. 9). L-shaped dormers are not normally permittedDormers that project onto or over a rear projection (whether it is original or an extension to the house) will not normally be permitted.”</p> <p>Hips/ gables: “The conversion of a hipped roof into a full gable is permitted generally acceptable. However, where there is an existing <u>two storey side extension with a hipped roof, a full gable to main house would not be acceptable in design terms.</u> however conversions should be a gabled roof extension for a gabled main building and a hipped roof extension to a hipped main building. Conversion of a 2 storey side extensions with a hipped roof to full gable end are not generally allowed. Side or rear dormers are <u>not</u> not possible on a generally permitted on a 2 storey rear projection or extension however as described above are allowed on the original <u>main rear</u> roof plane.”</p>
Part of Document	2.6
Issue	balconies: amended text to clarify
Recommendation	“Balconies and roof terraces can be difficult to achieve provide without impacting adjoining residents. Any proposal should be, but preferably they are designed not to overlook the habitable room windows or gardens of adjoining properties.”
Part of Document	2.8
Issue	amended 1 st bullet to clarify
Recommendation	“Should not have a driveway access <u>that complies with the Council’s guidance relating to accesses to the highwayany wider than 3.0m. In the case of a shared access the opening should be no more than 3.5m, and should restrict the ability to drive across the footway outside of the authorised access.</u> ”
Part of Document	2.9
Issue	Several small changes
Recommendation	<ul style="list-style-type: none"> • “The hardstanding surface is constructed in high quality materials and to reduce the risk of river/surface water flooding elsewhere, water run-off from to combined/surface water sewers <u>these areas</u> should be minimised through containment within your property boundary either feed into soft landscaping areas and/or soakaways/water storage tanks. • A front wall is provided to prevent vehicles crossing the pavement access to any other part of your front garden other than from the driveway.

Other non-significant changes considered appropriate to improve the document.	
	<ul style="list-style-type: none"> • The design of your front garden maintains a 50/50 balance between soft and hard landscaping. • However, where it is not possible to achieve the 50/50 balance and there is 30% soft landscaping is proposed (as mentioned in domestic vehicle footway crossover guidance notes), extra attention needs to be placed on the design of the front garden to ensure that it is high quality incorporating bin storage, etc. • The distance from the back edge of the public footpath to the front wall of your house is at least 4.8m so that your car does not overhang the pavement. • The position of the drive or parking space will not have a significant negative impact on the street, your neighbour, your garden and your house."
Part of Document	2.10
Issue	added last paragraph to clarify
Recommendation	"Submissions should demonstrate that the outbuilding is reasonable required for purposes "Incidental" to the main dwellingshouse, and that they do not include any forms of primary accommodation such as bedrooms, bathrooms/shower rooms, toilets or kitchens."
Part of Document	Glossary
Issue	Inclusion of terms that were not used in the document
Recommendation	<p>-Casements - The hinged opening sections of window frames.</p> <p>-Console Bracket - A decorative bracket which supports a bay window or part of a roof.</p> <p>-Glazing Bars - The bars of wood or metal which separate individual panes in a window.</p> <p>-Half timber - Often called 'timber framing', this means timbers applied vertically or horizontally to the walls of houses as a decorative feature.</p> <p>-Hopper Head - A cast iron box for collecting rainwater which feeds into a drainpipe.</p> <p>-Imperial bricks - The bricks that were used to build older houses, which are larger than today's 'metric' bricks.</p> <p>-Jambs - The side sections of a door or window frame.</p> <p>-Leaded light - A window made of small pieces of glass joined by strips of lead.</p> <p>-Pantile - A roof tile molded in an 'S' curve that interlocks.</p> <p>-Roughcast - Cement Wall finish with small stones added to the mixture.</p> <p>-Roughcast elements - Small areas of roughcast used decoratively.</p> <p>-Sill - The bottom section of a window frame that projects from the wall to allow rain to run away.</p> <p>-Spalled bricks - Bricks that have lost their front faces or outer skins through frost damage.</p> <p>-String course - A projecting band of brickwork or stone, usually between the ground and first floors.</p> <p>-Terracotta details - Specially shaped bricks used as decorative features.</p>