

Our Ref: 1675/100/LF

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10 August 2026

Dear Mr Chan,

Case Reference: HGY/2026/1858

Approval of details pursuant to condition 8 (Chartered Engineer), 9 (Hydrogeological and Geotechnical Investigations), 10 (Ground Movement Assessment), 11 (Movement Monitoring) and 12 (Drainage) attached to planning permission ref: HGY/2024/1676

We have been instructed by Mr and Mrs Purves of No. 8 Grange Road and by Messrs Schulz and Cossio Murillo of No. 6 Grange Road, London N6 4AP, to review the information recently uploaded to the Haringey Planning Portal in relation to the above conditions attached to planning permission ref. HGY/2024/1676.

Comments:

***Condition 8:** No development, including any excavation, shall commence until a suitably qualified chartered engineer has been appointed to inspect, approve and monitor the critical elements of both the temporary and permanent basement works. Details of the appointment, including the engineer's qualifications and responsibilities, shall be submitted and approved in writing by the Local Planning Authority. The appointed engineer shall remain in post for the duration of the basement works*

We acknowledge the letter from Mr Simon Robinson of Haskins Robinson Waters (HRW) to Haringey Planning Service, dated 29 May 2026, confirming HRW's appointment in relation to the proposed permanent works. We also note Mr Robinson's statement that the contractor will be required to appoint a suitably qualified temporary works engineer to supervise the temporary works and ensure that the stability of the existing structure, excavations and surrounding structures is maintained at all times. As no evidence has been provided that a suitably qualified temporary works engineer has been appointed to this role, Condition 8 cannot be said to be discharged.

***Condition 9:** Notwithstanding the information submitted to date, no development, including excavation, shall commence until a site-specific hydrogeological and geotechnical investigation has been carried out and submitted to, and approved in writing by, the Local Planning Authority. The investigations shall confirm groundwater levels and flow conditions*

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at the site, assess the hydrogeological and geotechnical impacts of the approved basement, and set out any mitigation measures required to ensure that the development will not increase flood risk or adversely affect the structural stability of the neighbouring properties. The development shall thereafter be carried out strictly in accordance with the approved mitigation measures.

We understand that this condition was attached to the planning permission in response to Campbell Reith's comment in section 4.25 of their Basement Impact Assessment Audit, Rev. P4, dated October 2025. Campbell Reith acknowledged that, before construction, a detailed design and damage assessment would be required to reflect the detailed structural design and the contractor's actual sequence of construction.

We note that only two structural part-sections have been provided as part of this submission (drawing 2630-HRW-ZZ-ZZ-DR-S-0200 P2). A complete package of detailed structural design information, together with the contractor's sequence of construction for the proposed basement, has yet to be submitted to and agreed by our clients.

With this in mind, we have reviewed HRW's document titled 'Construction Method Statement Commentary in Relation to Planning Conditions', Rev. 1, dated June 2026, and GEA's document titled 'Geotechnical Planning Review', Rev. 3, dated June 2026.

HRW's report states that Condition 9 requires a site-specific hydrogeological and geotechnical investigation to be carried out and submitted to the Local Planning Authority. However, Condition 9 also requires an assessment of the development's effects on neighbouring properties and any necessary mitigation measures. In our view, this assessment should be based on the detailed structural design and the contractor's actual sequence of construction and it is likely to require further site-specific hydrogeological and geotechnical investigations and groundwater monitoring.

Furthermore, GEA's report is a high-level review of Create's BIA, which was prepared solely for the purpose of obtaining planning approval and was based on a notional Stage 2 concept design and an assumed (rather than actual) sequence of construction. GEA's report also fails to set out any mitigation measures required to ensure that the development will not increase flood risk or adversely affect the structural stability of neighbouring properties. Finally, we have reviewed and agree with the comments made by Professor Kelvin Higgins of GCG, the specialist geotechnical consultant, on section 3.3 of GEA's report.

In our view, the information presented as part of this submission is insufficient to discharge Condition 9.

Condition 10: *Notwithstanding the information submitted to date no development, including any excavation, shall commence until an updated Ground Movement Assessment has been submitted to and approved in writing by the Local Planning Authority. The assessment shall use a methodology appropriate for sloping ground conditions and shall demonstrate that ground movements arising from the approved basement can be limited to Burland Category 1 for all neighbouring properties. The development shall thereafter be carried out strictly in accordance with the approved details.*

We acknowledge that, as part of their high-level review, GEA has reviewed the ground movement analysis prepared by Create and undertaken their own analysis. However, as with Create's analysis, GEA's analysis was carried out using WALLAP and is based on a notional

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top-down sequence of construction rather than the contractor's actual sequence of construction, which, as noted above, has yet to be prepared and agreed with our clients.

The GEA report and the suitability of a WALLAP analysis in this specific case have also been reviewed by Professor Kelvin Higgins of GCG, the specialist geotechnical consultant appointed by our clients. GCG maintains that a WALLAP analysis is inappropriate and that a full numerical analysis should be carried out; we concur with this view.

Accordingly, in our view, the information provided is insufficient to discharge Condition 10.

Condition 11: *The basement works hereby approved shall be carried out under the continuous supervision of a suitably qualified chartered structural or geotechnical engineer. Movement monitoring shall be installed and undertaken in accordance with the updated Ground Movement Assessment approved pursuant to the condition above, with readings taken at the intervals specified therein. If monitoring identifies movement exceeding Burland Category 1 threshold, all excavation and basement works shall cease immediately until a revised mitigation strategy has been submitted to and approved in writing by the Local Planning Authority. The development shall thereafter be carried out strictly in accordance with the approved mitigation strategy.*

We refer to our comments on Condition 8 regarding the lack of evidence that a suitably qualified temporary works engineer has been appointed to supervise the temporary works and ensure that the stability of the existing structure, excavations and surrounding structures is maintained. We also note that the monitoring regime, trigger levels and monitoring frequency have yet to be agreed with our clients. This agreement can be reached only once our clients have been given the opportunity to review and comment on the complete detailed structural design and the contractor's actual sequence of construction, neither of which has yet been provided. As none of the requirements of Condition 11 is currently met, this condition cannot be said to be discharged.

Condition 12: *Notwithstanding the submitted Basement Impact Assessment (BIA) prepared by Create Engineering Ltd (Ref. AW/VL/P22-2546/02 Rev. K, May 2025), and following detailed design of the scheme, revised drainage layout drawings shall be submitted to and approved in writing by the Local Planning Authority prior to commencement of development (excluding demolition and site clearance). The drawings shall demonstrate full coordination with the approved structural and piling design to ensure feasibility and avoid physical conflict. The development shall thereafter be carried out in accordance with the approved drainage details.*

We have reviewed HRW's drainage design drawing 2630-HRW-XX-XX-DR-C-0500 P.02 together with Proposed Basement Sections Sheet 1, drawing 2630-HRW-ZZ-ZZ-DR-S-0200 P2. These are the only two structural engineering drawings submitted as part of application HGY/2026/1858.

The drainage plans on drawing 2630-HRW-XX-XX-DR-C-0500 P.02 do not show the proposed ground-floor structure or piling; instead, they are presented as an overlay on the architect's ground-floor and basement plans. The drawing lacks detail, and no manhole schedule has been provided as part of the submission.

The position of the new drainpipe along the corridor between No. 8 and No. 6A Grange Road is shown on Section 1-1 of drawing 2630-HRW-ZZ-ZZ-DR-S-0200 P2. However, it is unclear whether the relocated inspection chamber conflicts with the proposed piles and foundations along this boundary, as no piling or foundation plans have been provided.

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A new surface-water drainpipe is shown along the boundary with No. 6 Grange Road on drainage drawing 2630-HRW-XX-XX-DR-C-0500 P.02. However, neither this pipe nor its relationship to the proposed basement structure and the foundations of the neighbouring structures at No. 6 Grange Road is shown on Section 2-2 of drawing 2630-HRW-ZZ-ZZ-DR-S-0200 P2. We also note that Section 2-2 shows only an assumed foundation for the boundary wall with No. 6 Grange Road, erroneously labelled No. 4. This is concerning, as the geometry of the existing foundations at the boundaries of the proposed basement would be expected to have been fully investigated by now rather than assumed.

A complete package of detailed structural design drawings for the proposed basement has not been provided. The information submitted to date is therefore incomplete and fails to demonstrate full coordination with the structural and piling proposals. Accordingly, Condition 12 cannot be discharged.

Summary and Conclusions:

The information submitted does not demonstrate compliance with the requirements of Conditions 8–12. In particular, evidence of the appointment of a suitably qualified temporary works engineer has not been provided; the hydrogeological, geotechnical and ground movement assessments are not based on the complete detailed structural design and the contractor's actual sequence of construction; the monitoring arrangements remain unagreed; and the drainage proposals have not been shown to be fully coordinated with the structural and piling design.

We therefore respectfully request that Conditions 8, 9, 10, 11 and 12 are not discharged at this stage. The applicant should be required to submit a complete and coordinated package of detailed structural, temporary works, geotechnical, ground movement, monitoring and drainage information for review before these conditions are reconsidered.

Yours sincerely

Luca Frasca
for Alan Baxter Ltd

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