

**Grange Cottage
8 Grange Road
Highgate
London
N6 4AP**

12 August 2026

Mark Chan
Planning Service
London Borough of Haringey
5th Floor Alexandra House
Station Road
Wood Green
London N22 7TY

Dear Mark,

6A GRANGE ROAD, HIGHGATE, LONDON N6 4AP – PLANNING REF HGY/2026/1858

Many thanks for notifying us of this application to discharge conditions 8 to 12 attached to planning application HGY/2024/1676. We note that in paragraph 8.92 of your report on HGY/2024/1676 you say:

“The LPA recognises that objectors have raised detailed and highly technical evidence, including alternative professional opinions from Alan Baxter Ltd and the Geotechnical Consulting Group. Such differences of professional judgement are not unusual in complex basement schemes, where modelling assumptions, hydrogeological interpretation and construction methodologies can legitimately vary between experts.”

Alan Baxter Ltd (“**ABL**”) and the Geotechnical Consulting Group (“**GCG**”) are both highly respected industry experts with extensive experience of basement excavations in this part of London, including the damage caused to 4 Grange Road from groundwater damming created by the basement closest to the 6a site - actual data studiously ignored by the professionals employed by the applicant. We have once again asked ABL and GCG to review the documents posted to your website under the reference HGY/2026/1858. Their comments have been submitted to you directly.

As the basement works included in HGY/2024/1676 propose 11m deep piles within centimetres of the side wall foundations of both neighbouring properties with no groundwater drainage, in paragraphs 8.93 and 8.94 you note that while the application and audit have provided a sufficient basis for acceptance in **principle**....:

“.....To ensure that the findings of the independent audit remain unchanged through the detailed design stage, and to provide further assurance to those who have made technical representations, additional precautionary measures are secured through pre-commencement conditions. These require the submission of a site-specific hydrogeological investigation, updated ground-movement modelling appropriate to the sloping site, coordinated drainage and piling design, and the appointment of a supervising chartered engineer, together with real-time monitoring.”

“Such details will be developed further as part of the detailed design of the project and will in turn be subject to formal submission and approval by the Council. In line with normal practice, any such submissions will be publicly available and consulted on, providing adjoining owners and other interested parties with the opportunity to comment before the conditions are discharged.”

Together with our advisers, we believe that there is an inherent risk of harm to our homes should the assumptions on which the applicant’s calculations are based turn out to be incorrect. We therefore appreciate the relevant conditions attached to HGY/2024/1676 and the opportunity to comment on this application to discharge them.

We comment on the attempts to discharge each condition below:

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 temporary and permanent basement works (emphasis added)**. Details of the appointment, including the engineer’s qualifications and responsibilities, shall be submitted to and approved in writing by the Local Planning Authority. The appointed engineer shall remain in post for the duration of the basement works.*

Reason: To ensure the basement is constructed safely and without undue impact on the structural integrity of neighbouring buildings, in accordance with Policy DM18.”

While EngineersHRW have provided a letter confirming their appointment to provide services *“in relation to the permanent works”* and *“will be contractually obligated to appoint a qualified temporary works engineer”*, they appear not to have read the condition clearly – it is not met until suitably qualified chartered engineers have been appointed to cover both the temporary and the permanent basement works. In a situation of this complexity, it would be expected that the term *“suitably qualified chartered engineer”* would apply to engineers listed in the Register of Geotechnical Specialists (ROGEP) to demonstrate appropriate geotechnical competence (as is Professor Higgins of GCG). EngineersHRW have not evidenced the necessary geotechnical competence themselves and have not appointed anyone at all to the position of temporary works engineer. As there is no evidence of appropriate appointments to either the permanent or temporary works engineer positions the requirements of this condition have not been met, and the condition should not be discharged.

Condition 9

*“**Notwithstanding the information submitted to date (emphasis added)**, no development, including any 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 investigation shall confirm groundwater levels and flow conditions at the site, assess the hydrological 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 neighbouring properties.

The development shall thereafter be carried out strictly in accordance with the approved mitigation measures.

Reason: To ensure the development does not increase flood risk or harm the stability of neighbouring buildings, in accordance with Policies DM18 and DH7 of the Haringey Development Management DPD (2017)."

Once again, EngineersHRW appear not to have understood the requirements or the reasoning for this condition – they simply assert that “the investigations contained within the Create BIA have been reviewed by GEA and are considered sufficient for the proposed development”. The whole point of this Condition (as explained in paragraph 8.93 of your report issued as part of the approval process) is that the application has so far only provided sufficient evidence that “the outstanding matters **are capable** of being met” (emphasis added). The Condition details measures required to demonstrate that these matters **will** be met by the construction of this basement as it is actually proposed to be constructed (in accordance with Haringey policy DM18 and Highgate Neighbourhood Plan policy DH7).

Instead, the stated scope of the GEA work is “to complete a high level review of the information that has been submitted in support of the planning application”. Specifically, no “site-specific hydrogeological and geotechnical investigation” has been carried out – let alone one meeting the requirement of the Condition. You will note the detailed technical commentary on HGY/2026/1858 provided by Professor Higgins of GCG concluding with his opinion that “the information presented is insufficient to discharge Condition 9”. In particular, he draws attention to the WALLAP methodology used by Create and GEA being based on two case histories where ground conditions are very different to those of Grange Road, while continuing to ignore the actual problems encountered from a basement development just two doors away.

Rather than providing additional information as the lead-in words of the condition require, GEA’s approach is to re-examine the already-submitted information. This failure by GEA to carry out any site-specific investigation simply continues an apparent determination to ignore inconvenient facts relating to the application site – an approach we have seen from this applicant in respect of other aspects of HGY/2024/1676. What is required for this site is a full and appropriate numerical analysis and this has still not been done. In view of the fact that the applicant currently wishes to progress these basement proposals with no groundwater drainage incorporated into the design, it is absolutely essential that the correct detailed analysis is carried out.

We note that the latest drawings provided in support of this application (2630-HRW-ZZ-ZZ-DR-S-0200 Section-P2) show, for the first time, the “assumed” level of the foundations for No. 6. The assumed level given for the top of these foundations is 111.50, approximately half a metre higher than the actual ground floor level of No 6 as shown on the topographical survey submitted with HGY/2024/1676 as Create BIA Rev K Appendix B. This demonstrates a complete indifference to the reasonable interests of neighbours. That EngineersHRW and their client believe that no further site investigation is required when, after all this time, they are just guessing about such an – in every sense – fundamental issue as the level of foundations for No 6 is extraordinary.

Finally, as noted by ABL, the Condition requires that “*the development shall thereafter be carried out strictly in accordance with the approved mitigation measures.*” No detailed design information nor any contractor’s sequence of construction has been provided nor have mitigation measures been detailed and so no benchmark is even proposed for meeting this Condition. We do not see how this condition can be discharged.

Condition 10

“Notwithstanding the information submitted to date (emphasis added) 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 (emphasis added).

Reason: To ensure the basement can be constructed without causing damage to neighbouring buildings, in accordance with Policy DM18 of the Haringey Development Management DPD and Policy DH7 of the Highgate Neighbourhood Plan."

As noted above, GEA have simply redone the WALLAP calculations already submitted, despite Professor Higgins having commented on the use of this being insufficient to address the particular circumstances of this site. He is clear that the adjustment GEA have made to these calculations to allow for the sloping site is inadequate, and indeed ABA have once again noted that in the absence of a proposed actual sequence of construction GEA's analysis is based only on a notional construct. Again, no detail of how the development is to be carried out is offered for approval, and so no benchmark is proposed against which to measure compliance.

Once again, the Condition has not been met.

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 thresholds, 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.

Reason: To ensure the works do not cause structural damage to neighbouring buildings, in accordance with Policy DM18.

EngineersHRW offers a series of statements as to what will happen at some unspecified point in the future regarding the appointment of an appropriately qualified temporary works engineer and Co-Ordinator, submission of "full proposals, method statements and calculations to the engineer and all appropriate parties (party wall surveyors, etc.) for approval prior to the start of any works on site" and agreeing with neighbours the extent of monitoring. None of this has happened so far and so it is not clear how EngineersHRW believe that they have provided any basis for discharge of this Condition.

Despite this, they write, without disclosing their calculations, that they agree that damage levels will only be at the Burland Scale one level.

It is not surprising that we note and agree with Professor Higgins that the monitoring system installed should be sufficiently robust to allow preventative action to be taken **before** damage to adjacent properties (in order to comply with the requirements of DM18) and that the approved monitoring system needs to be installed in time to produce a baseline which captures a full set of seasonal variations before construction starts.

Condition 12

Notwithstanding the submitted Basement Impact Assessment (BIA) prepared by Create Consulting Engineers 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.

Reason: To ensure the drainage strategy is compatible with the structural design and basement construction, and to prevent conflict between drainage infrastructure and foundation elements, in accordance with Policy DM18 of the Haringey Development Management DPD and Policy DH7 of the Highgate Neighbourhood Plan.

Two revised drainage drawings have indeed been submitted, but these do not demonstrate the full coordination with the approved structural and piling designs required by this condition. In fact, no detailed structural and piling design diagrams are provided here and the section drawing contains no reference to drainage on the no. 6 side at all. The drawings have been commented on in detail by ABA, identifying various points of concern.

We add that the drainage design drawing proposes that an “existing foul water drain be jetted and surveyed”. This drain is shown as running under the existing passageway to the SE of the site immediately next to our wall. *No such drain exists.* Instead, as we have pointed out to the applicant very many times, the foul drain for our kitchen and the original 6a house ran across the front of that house and was connected to the road sewer on the no. 6 side of the site (as indicated by the location of the temporary site toilet). The run of the drain in front of the original house was removed during the unauthorised excavation work in 2019 leaving our kitchen waste discharging directly into the 6a site. The most basic site investigation would have confirmed these details.

When the requirements of this condition are seriously addressed, we will require confirmation that the new foul drainage pipe to be connected to our kitchen drainage will be of the same dimensions as the existing pipe and that there will be protection to prevent blow back of fumes when the 6a basement sewage pump is in action.

Until the requirements of this condition are met and a full set of coordinated drawings are made available it is not possible to determine whether the proposal is feasible and avoids physical conflict between any part of the drainage network and the proposed piles. It would also not be possible to determine if the development has been carried out in accordance with approved details.

We reserve our position to comment further once better particulars are provided of the proposed drainage layout and its coordination with the structural and piling design. We also fully reserve our private law rights in connection with the right of way under which the proposed drain is intended to run.

Other Matters

- Under “Drainage” the EngineersHRW commentary says “*The surface water strategy is unchanged with an attenuation tank in the rear garden being pumped to a new connection in the street. This will run through a root protection zone for part of the*

route and this will be constructed in accordance with Arboricultural Method Statement prepared by MMArboriculture”.

However, MM Arboriculture produced two arboricultural method statements dated October 2022 and November 2024 (rev final). The second being produced in response to comments on the first and included in the list of approved documents in the HGY/2024/1676 decision notice. However, the Create BIA Rev K, includes the October 2022 report in its appendices. The surface water strategy must be constructed in accordance with the November 2024 (rev final) report.

- The levels shown on the engineering drawings are inconsistent with the levels shown on the approved architectural drawings. For example, the level of the access path to our utility room is shown as 112.300 on the engineering drawings and 112.370 on the approved architectural drawings. We have been assured that the path will remain at its existing level in order to maintain our right of way – we expect this assurance to be adhered to. The step is already high and so an additional 70mm would inhibit our right of way.
- The GEA report includes reference to groundwater levels at 14 View Road as 6.5m below ground. This is incorrect – please see the borehole logs attached which show levels of 3.6m and 4m. Information used in any of the calculations covered by these conditions must be correct.
- The HGY/2024/1676 reports include reference to the installation of an air source heat pump and yet this has not been shown on any of the drawings. In such a constricted site there are a restricted number of possible locations and a possibility of noise nuisance to neighbours. This issue must be addressed.
- In view of the proximity of work to the neighbouring houses, should this proposal proceed to appointment of a Contractor, we request that they are registered with the Considerate Constructors Scheme.
- The Thames Water review of HGY/2024/1676 included the following:

“Thames Water requests the following condition to be added to any planning permission. “No piling shall take place until a PILING METHOD STATEMENT (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) and piling layout plan including all Thames Water wastewater assets, the local topography and clearance between the face of the pile to the face of a pipe has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement and piling layout plan. Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure. Please read our guide ‘working near our assets’ to ensure your workings will be in line with the necessary processes you need to follow if you’re considering working above or near our pipes or other structures.”

“Thames Water would like the following informative attached to the planning permission: “A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made

without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991.”

“Thames Water recommends the following informative be attached to this planning permission. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.”

None of these requests were included in the HGY/2024/1676 decision notice. We request that they are included in future relevant decision notices.

Conclusion

The approach adopted by the applicants in this application is simply not understood.

We are told that the applicant is building this house for occupation by himself and his family, in which case, one would think that he would want to ensure the project progresses in a way that addresses issues raised in a competent and facilitative manner, in order to prevent problems developing in the future for himself as well as his neighbours. The work required to discharge these conditions is work that will need to be done in a considered manner at some point before commencement of the construction on site.

The approach here however, appears to be a rush to do the minimum work necessary to tick the discharge box for these conditions with apparently no understanding or consideration for all those who wish to ensure that this complex excavation proceeds safely. As neighbours, we are entitled to expect our properties will remain intact from the construction process (consistent with the Council's policies).

It is abundantly clear that the information filed on the Haringey website at present, as relating to HGY/2026/1858, does not fulfil the requirements of conditions 8, 9, 10, 11 or 12 attached to HGY/2024/1676 and therefore, these conditions cannot be discharged at this time. All that has been achieved by this application is additional project expense.

We ask that this application to discharge conditions 8, 9, 10, 11 and 12 attached to HGY/2024/1676 is formally refused.

The information that we have commented on and that our advisers have reviewed is that shown on the Haringey website at the date of this letter.

In accordance with your duty to act in a procedurally fair way, if there is any further related information that has not been posted on the website, or if any is received in the future relating to this application, we ask that it is posted and that we and other objectors are alerted and given 3 weeks from receipt of the alert to provide comments.

Yours sincerely

Simon and Carolyn Purves

Attached: Borehole logs for 14 View Road

CC: Catherine Smyth – Haringey Planning Service
Matthew Gunning – Haringey Planning Service

James Argles – Haringey Planning Service
Denis Ioannou – Haringey Building Control
Andrew Darwin – Keystone Law
Luca Frasca – Alan Baxter Ltd
Kelvin Higgins – Geotechnical Consulting Group