

RESPONSE TO COMMENTS ON PLANNING APPLICATION HGY/2023/0850 - REVISION A

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DATE: 04/06/2024

In response to comments made by Neighbours:

No.	Neighbour's Name	Neighbour's Comment	Symmetrys Response
1.	Marijke Van Beesten	My earlier comments from last year still apply. I note that no further hydrology survey has been carried out. I agree with comments made by CREOS and various neighbours regarding environmental concerns, access to the site and the severe disruptions to residents of Cranley Gardens during the works which will no doubt take at least 2 years rather than the 1 year period referred to in the application. The precedent that could be set by this development is really worrying. Flooding caused by local geology and the disruption of underground water sources do not bear thinking about as a result of this planned development - and then opens the floodgates to more of this type of development. I apologise for the brevity of this note, I have had recent eye surgery and am struggling to make comment during the 2 week window, which given the nature of this is far to short	The ground investigation undertaken by Site Analytical Services Ltd, Report Reference 21/33613 dated May 2021, confirms groundwater on site to be perched water. Further, the true groundwater level was not encountered on site at the excavation depths proposed. The project will ensure a competent Contractor is appointed; as part of the Contractor's Health and Safety and Construction Methodology, they will manage any on site dewatering, whilst also ensuring downstream flood risk is managed.
2.	CLlr Pippa Connor	Planning application HGY/2023/0850 I would ask that this application is determined by Planning Committee as this basements footprint will set a precedent around allowing basements to be mainly set underneath gardens and not as previously understood, under the actual main building. I would also ask that the risk of flooding to neighbouring properties is also considered in light of the conclusion of the LBHGEO's report. A resident has noted that based on the submitted plans that The drawing also shows a basement of which only 15% is under the building's footprint and 85% out it. That is not what is conventionally understood as a basement, but approval will set a precedent of that nature. At most, it is a hybrid development, for which Haringey, like most other local authorities, has no planning policies. The report by LBHGEO, consulting Engineers, has highlighted the increased off-site flooding risk: 'As explained in section 3 above and in contravention of Policy DM24 the development would obstruct an overland flood route and increase flooding at the down gradient Park Road/Priory Road junction undermining recent efforts to alleviate this.' In light of this report's conclusions regarding the flooding risk and the comments above from a resident regarding the precedent that could be set regarding the footprint of a basement, I would argue that this planning application should be determined by the Planning Committee.	With reference to Section 9.2 of the Flood Risk Assessment and SUDS Report, document 21066-SYM-XX-XX-RP-C-0001, dated May 2023, the existing overland flow route through the site runs from Cranley Gardens road, in the South-East direction, towards the Playing Fields. Based on the Topographical Survey, drawing 4177-01 dated March 2021, water entering the site will follow the hard landscape. Thus, water will flow through the front driveway, along the side footpath, following the paving into the rear garden, then leave the site towards the Playing Fields. The proposed SUDS Strategy, drawing 21066-SYM-C-Sk002-Rev B, contained in document 21066-SYM-XX-XX-RP-C-0001, involves permeable paving to the front driveway. Permeable paving allows rainwater to permeate through the top layer and into the subbase to be temporarily stored before discharging at a controlled rate into the public sewer, subject to Local Authority approval. The permeable paving has been designed with enough storage up to the 1 in 100 year storm event plus a 40% allowance for climate change. This method respects the existing surface water overland flow route and does not direct rainwater elsewhere, thus, will not increase the flood risk towards the Park Road/Priory Road junction. As for the rear garden, as long as the proposed external levels fall in the South East direction, as per existing conditions, then there is no disruption to the overland flow route.

3.	S R Lefroy-Brooks	We object to this development for the reasons detailed in our LBHGEO response (SEE FILES FOR FULL REPORT) to the Re-consultation Review of Additional Information document ref LBH4692 dated 29/04/24 submitted to L B Haringey today REASON 1 INCREASED OFF-SITE FLOOD RISK In contravention of Policy DM 24 the development would obstruct an overland flood route and increase flooding at the Park Road / Priory Road junction, undermining recent efforts to alleviate this. REASON 2 SEVERED SEWAGE SERVICES TO NEIGHBOURING PROPERTY The public sewerage services to the adjoining property at No 137 would be cut by the proposed development, with no prospect of a diversion. This would be a wholly unacceptable impact.	With reference to reason 1, please refer to Section 9.2 of the Flood Risk Assessment and SUDS Report, document 21066-SYM-XX-XX-RP-C-0001, dated May 2023; the existing overland flow route through the site runs from Cranley Gardens road, in the South-East direction, towards the Playing Fields. Based on the Topographical Survey, drawing 4177-01 dated March 2021, water entering the site will follow the hard landscape. Thus, water will flow through the front driveway, along the side footpath, following the paving into the rear garden, then leave the site towards the Playing Fields. The proposed SUDS Strategy, drawing 21066-SYM-C-Sk002-Rev B, contained in document 21066-SYM-XX-XX-RP-C-0001, involves permeable paving to the front driveway. Permeable paving allows rainwater to permeate through the top layer and into the subbase to be temporarily stored before discharging at a controlled rate into the public sewer, subject to Local Authority approval. The permeable paving has been designed with enough storage up to the 1 in 100 year storm event plus a 40% allowance for climate change. This method respects the existing surface water overland flow route and does not direct rainwater elsewhere, thus, will not increase the flood risk towards the Park Road/Priory Road junction. As for the rear garden, as long as the proposed external levels fall in the South East direction, as per existing conditions, then there is no disruption to the overland flow route. With respect to reason 2, this is a Thames Water asset. Thames Water will be consulted with to enable the sewer position to be either retained or diverted. The flow through the sewer from the neighbouring property will be maintained.
4.	Glenys Law	Haringey's Planning Department is under public scrutiny. There have been many sound objections to this planning application both on social and environmental grounds. There will be an enormous public outcry if this application is given approval. It's time Haringey made a clear decision to ban private basement swimming pools on environmental grounds.	No action required.
5.	Atia Hafezjee	Currently out back view is of ancient trees and untouched habitats of hundreds of birds. There are hundreds of, untouched nests and birds all year. House #139 already obstructing a nearly flawless view for all, with its unusually long extension and cage. A gym/ pool will destroy trees, habitats & views info of gardens which currently is of sunrise. I'm reminded every morning when I look out and see its concrete long building where the landscape and horizon of sunset used to be. A gym and pool will make this far worse and unfair to the whole road. The noise, pollution, destruction of nature and habits. Lovely neighbours so nothing personal.	Crawford Partnership to provide comment.

In response to Thames Water's comments made on 27/03/2024:

No.	Thames Water's Comment	Symmetrys Response
1.	Waste Comments The proposed development is located within 15 metres of a strategic sewer. 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) 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." 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. https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB	We would accept this as a Condition.
2.	As required by Building regulations part H paragraph 2.36, Thames Water requests that the Applicant should incorporate within their proposal, protection to the property to prevent sewage flooding, by installing a positive pumped device (or equivalent reflecting technological advances), on the assumption that the sewerage network may surcharge to ground level during storm conditions.	We would accept this as a Condition.
3.	If as part of the basement development there is a proposal to discharge ground water to the public network, this would require a Groundwater Risk Management Permit from Thames Water. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991.	We would accept this as a Condition.
4.	We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing trade.effluent@thameswater.co.uk . Application forms should be completed on line via www.thameswater.co.uk . Please refer to the Wholesale; Business customers; Groundwater discharges section.	We would accept this as a Condition.
5.	We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Should the Local Planning Authority be minded to approve the planning application, Thames Water would like the following informative attached to the planning permission: "A Groundwater Risk Management Permit from	We would accept this as a Condition.

	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. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing trade.effluent@thameswater.co.uk . Application forms should be completed on line via www.thameswater.co.uk . Please refer to the Wholesale; Business customers; Groundwater discharges section.	
6.	There are public sewers crossing or close to your development. If you're planning significant work near our sewers, it's important that you minimize the risk of damage. We'll need to check that your development doesn't limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes	Noted.
7.	Thames Water would advise that with regard to WASTE WATER NETWORK and SEWAGE TREATMENT WORKS infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.	No action needed.
8.	Water Comments If you are planning on using mains water for construction purposes, it's important you let Thames Water know before you start using it, to avoid potential fines for improper usage. More information and how to apply can be found online at thameswater.co.uk/buildingwater .	Noted.
9.	Any property involving a swimming pool with a volume exceeding 10 cubic metres of water will need metering. The Applicant should contact Thames water on 0800 316 9800. On the basis of information provided, Thames Water would advise that with regard to water network and water treatment infrastructure capacity, we would not have any objection to the above planning application. 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.	Noted.

In response to the report 'Reconsultation Review of Additional Information' by LBHGEO, dated April 2023.

No	Document Reference	LBHGEO's Comment	Symmetrys Response
1	Section 3.1 Tracker 4.7	On issue 4.7 there is a misinterpretation of a figure the January 2022 Section 19 Flood Investigation Report for Part Road (North) by McCloy and a suggestion that the Moselle Brook flowed along Cranley Gardens itself and had been culverted. A cursory inspection of the topography of Cranley Gardens show that Cranley Gardens runs down an elevated spur that forms a watershed between two streams and it is a reflection of the quality and extent of the applicant's flood risk assessment that this has not been recognised. Instead the applicant introduces a proposal to introduce "ground improvement across the site" and recommends "trial pits to be dug across the site and logged by a geotechnical engineer prior to any constructions works". These proposals suggest an apparent general lack of understanding of the ground at this site.	Clause 5.3.3. of "Section 19 Flood Investigation Report" by McCloy Consulting states "A culverted section of the Moselle Brook passes through Cranley Gardens, crossing Park Road and continuing along Farrer Road, eventually reaching Priory Road from where it continues to the east". The latter statement, in conjunction with Figure 5-3 of the same report, confirms the location of the culverted stream is as assumed by Symmetrys report. The information obtained from the borehole dug at 139 Cranley Gardens, and the site investigations at 112 Cranley Gardens (15 m to the northwest of the site, carried out by GEA) confirmed no water bearing deposits was found. As stated in Symmetrys answer to tracker 4.7 in document 21066-SYM-XX-XX-RP-S-0002-Rev B – Addendum, the residual risk of encountering soft spots during excavations would be dealt with by allowing for ground improvement across the site, by digging the soft spots and replacing the soil with well compacted fill.
2	Section 3.2 Tracker 4.8	...In short, any flood flow across the property as indicated above will dissipate to some degree within the green space of the playing fields, whereas if this flow is to be diverted back onto the Cranley Gardens carriageway it will have no such opportunity and will simply add to the water that already collects at the Park Road/Priory Road Junction.	The permeable paving at the front driveway will not direct water to the Park/Road/Priory Road junction. See response given to Section 6.1, no. 4 below
3	Section 4 Campbell Reith BIA Audit	...As a result the BIA audit does not provide reassurance as to the feasibility of the construction proposals both in regard to obstructing an overland flood route and also in regard to inhibiting a public sewer.	See response given to Section 6.1, no. 4 below. With regard to the public sewer, Thames Water will be consulted with to enable the sewer position to be either retained or diverted. The flow through the sewer from the neighbouring property will be maintained.
4	Section 6.1 Increased Off-site flood risk	As explained in section 3 above and in contravention of Policy DM 24 the development would obstruct an overland flood route and increase flooding at the down gradient Park Road/Priory Road junction, undermining recent efforts to alleviate this.	With reference to Section 9.2 of the Flood Risk Assessment and SUDS Report, document 21066-SYM-XX-XX-RP-C-0001, dated May 2023, the existing overland flow route through the site runs from Cranley Gardens road, in the South-East direction, towards the Playing Fields. Based on the Topographical Survey, drawing 4177-01 dated March 2021, water entering the site will follow the hard landscape. Thus, water will flow through the front driveway, along the side footpath, following the paving into the rear garden, then leave the site towards the Playing Fields. The proposed SUDS Strategy, drawing 21066-SYM-C-Sk002-Rev B, contained in document 21066-SYM-XX-XX-RP-C-0001, involves permeable paving to the front driveway. Permeable paving allows rainwater to permeate through the top layer and into the subbase to be temporarily stored before discharging at a controlled rate into the public sewer, subject to Local Authority approval. The permeable paving has been designed with enough storage up to the 1 in 100 year storm event plus a 40% allowance for climate change. This method respects the existing surface water overland flow route and does not direct rainwater elsewhere, thus, will not increase the flood risk towards the Park Road/Priory Road junction. As for the rear garden, as long as the proposed external levels fall in the South East direction, as per existing conditions, then there is no disruption to the overland flow route.

5	Section 6.2 Severed sewage services to neighbouring property	As explained in section 5, the public sewerage services to the adjoining property at No 137, upon which the latter is reliant, would be cut by the proposed development, with no prospect of a diversion. This would be a wholly unacceptable impact and must therefore be recognised as a material planning consideration.	This is a Thames Water asset. Thames Water will be consulted with to enable the sewer position to be either retained or diverted. The flow through the sewer from the neighbouring property will be maintained.
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