

**Matter 10: Structural Stability**

*Issue 10.1: Whether CL7 n. is justified by the evidence, consistent with national policy, and effective.*

1. Criterion n requires that subterranean development should “be designed to safeguard the structural stability of the application building, nearby buildings and other infrastructure including London Underground tunnels and the highway”.
2. We do not argue with this statement of the obvious. Our Representations address these issues at section 12 [paragraphs 276-294]. It has since been confirmed by the Council that issues of structural stability are not relied upon to limit the number of basement storeys [paragraph 290 of BAS 06/02] and we have no particular quarrel with this requirement.
3. We would only emphasise that control over the quality of the contractor is likely to be more effective in pursuit of this objective than requiring details at application stage – as advised by the Council’s consultant Alan Baxter [see our Representations at paragraph 278 d.].
4. We are also aware that these issues are more readily controlled and enforced in private law proceedings than by the planning system.
5. To provide evidence on these issues I will be attending the Hearing Session together with
  - a. Trevor Vincent BSc C.Eng M.I.Struct. E.. Partner at Vincent & Rymill Consulting Civil & Structural Engineers. Trevor is a chartered engineering with over 30 years experience in London. He has completed over 100 structural basement designs and regularly designs complex basements in prime central London including within the Grosvenor and Cadogan Estates.

- END OF HEARING STATEMENT -