

from Bob

Good morning Alison

Re: 156 Castle Hill, Reading

As you know I met Peter Moore , Innovation's "Engineer", at the property on Wednesday 29th November 2017. He had no previous knowledge of, or involvement in your Claim but he had read the "file" and I think he had copies of the various reports with him on an his iPad/ lap top.

We discussed the following :

- 1 A brief history of the building.
- 2 A brief history of the past claims , including the underpinning and tying-in of the front elevation in 2005, the replacement of the rear drainage in 1997 and the new retaining wall to the rear terrace constructed in 1999.
I also briefly explained that ties had been installed at roof level .
- 3 A brief history of the current Claim and our grievances with Innovation/SMS.
- 4 The recent drainage report and proposals for repairs.
5. Superstructure repairs.
- 6 The tree root report and SMS's requirement that you should deal with the removal of the trees at your cost.
- 7 The case for underpinning the rear additions and the adjacent section of the main rear elevation.
8. Heritage Consultants Ltd's fees.

I accompanied Peter Moore on an inspection of the building and

pointed out the main cracks and gap indicating the settlement and rotation of the rear additions away from the main building. We also went down into the cellar. He took photographs of the main cracks.

We also noted the hedge/large shrub on your neighbour's land, along the boundary line, adjacent to the rear additions. (Prior to the meeting I also went around to the next door property to check out the vegetation adjacent to your property).

Peter Moore also took note of the large Cedar tree at the front of your neighbour's property and the distant Sycamore in your neighbour's rear garden.

DRAINAGE REPORT

Peter Moore agreed that the recent Drainage Report plan and the original 1997 drawing of the replacement drainage were incompatible and that the anomalies needed to be resolved before any drainage repairs could be contemplated.

He was also of the opinion that the short length of drain from the toilet into the main run had probably not even been surveyed. I made it clear that, as well as requiring an accurate survey of the drainage and the extent of damage, we also require a detailed proposal and programme for the drainage repairs, including how they will co-ordinate the works with the local Water Authority who are responsible for the repair of the shared section of drain, so as to prevent delays and any confusion when the works are eventually carried out. He agreed to report back to his office and action the above. I promised to send him a copy of the original 1997 drainage drawing.

SUPERSTRUCTURE REPAIRS

Peter Moore expressed the view that the crack/gap between the addition and the main building appeared to be recent, indicating current movement, and he was at a loss to explain why there had been a delay in further investigating the Claim. He also expressed the view that the level monitoring readings were 'odd'. He agreed that the rotational crack/gap between the addition and the main building needed a repair to include structural ties and a waterproof filling. I suggested the possibility of jacking back the additions in an

attempt to reverse the rotation so as to close the gap thus making the repair more effective and easier to achieve. To my amazement he thought this was a good idea and said that Innovation " had done a lot of jacking in similar circumstances " !!!! He agreed to report back to his office so that a specification for the superstructure repairs can be agreed.

TREE ROOT REPORT

Peter Moore agreed that the band of clay subsoil under the rear addition was only of intermediate plasticity and was not desiccated. He also took the point that the root samples appeared to be from trees remote from the rear additions whereas no roots from the close-by hedge and shrubs were recorded. He also took the point that all the trees are subject to Protection Orders and that as a principle they should not be/could not be removed because of their environmental value. He expressed the view that the trees in question were unlikely to be a factor, in the current or any future subsidence, (bearing in mind that the underpinning to the front elevation, carried out in 2005, appears to have been successful and is therefore continuing to give protection to the front elevation). He said he would report back to his office accordingly. I promised to send him a copy of the Tree Protection Plan.

THE CASE FOR UNDERPINNING

I set out to him the case for underpinning.

1. Underpinning would be a permanent solution to a longstanding problem.
2. The drains have already been repaired before but have failed again. I suggest that there has been a cycle of building movement, consequent drain damage, causing further ground disturbance, resulting in further subsidence and so on, on-going. Properly designed underpinning would be a permanent solution to this problem. There is no reason why 20 year-old drains should suffer from wear and tear. The damage is more likely to be the result of ground movements or movement of the building.

3. Properly designed underpinning would negate the necessity for removing the amenity of any of the mature and Protected trees.
4. Underpinning would be compatible with and be a logical extension to the underpinning installed beneath the front of the property.
5. The subsoils on which the foundations beneath the rear additions rely for their support are not consistent but are variable and layered and vulnerable to disturbance. Test Pit 1 shows the foundations to be relying for their support on soft made ground! There is also a 'hard spot' immediately behind the additions caused by the deeper localised cellar area. Underpinning founded in the underlying firm/stroke dense sand would permanently overcome these problems.
6. The property has a long history of movement and this Claim and previous Claims have been on-going over a period of some thirty (30 year). I suggest that this fact makes a good case for ending this cycle by extending the underpinning carried out at the front so as to support all the remaining walls where there is evidence of recent/current subsidence.
7. I propose that the extent of the underpinning should be designed to support all of the back additions plus the adjacent section of the main rear elevation.

Peter Moore asked me what method of underpinning I would propose. I replied, that in view of the underlying firm sand, a good bearing capacity could be achieved and, that in the circumstances, continuous traditional underpinning should provide an adequate solution. However, I added that I am still trying to obtain copies of the Specification and Drawings for the apparently successful underpinning which was carried out beneath the front elevation, as these will give guidance as to the most appropriate underpinning solution for the rear additions and main back wall.

Peter Moore appeared personally sympathetic to my opinion but he made it quite clear that his Company's policy was never to carry out

underpinning unless there were very exceptional circumstances. He will no doubt report back to his office regarding our discussions about underpinning and we will therefore need to set out our case to them, despite Peter's negative comments about Innovations attitude to underpinning.

I said that notwithstanding the Insurance Claim, my advice to my client was to underpin the rear additions and rear wall and that she was minded to take matters 'to the wire' if underpinning was rejected.

HERITAGE LTD'S FEES

I raised the matter of Heritage's fees. Peter Moore said that he had no brief or authority to discuss our fees and that we should take this matter up directly with Mark Studely.

SUMMARY

Apart from the underpinning, the above record of our meeting appears to show that we are moving forward, at least in relation to the drainage repairs, the crack repairs and the question of the trees. However, at the end of our meeting Peter Moore volunteered that in fact he was not an Engineer but is a Surveyor who has had a long experience in subsidence matters and Loss Adjusting. It was also clear that he had been sent to meet me in order to placate our grievance and consternation at Innovation's previous refusal to arrange a meeting with us. Peter Moore clearly has no authority and will simply act as a 'messenger' in order to relate back to his office. I do not think there is likely to be any change in Innovation's attitude and we now need to plan the next move.

I will draft a separate e-mail to Innovation setting out the record of our meeting and the matters concerning the drainage, superstructure repairs and the trees which we agreed, together with the case for underpinning.

It would also be my intention to send a copy of my e-mail to Innovation/SMS to your Insurers and for us to take up the matter of

our fees directly with your Insurers. Could you please confirm your current Insurers and if you have an e-mail address or telephone contact number it would be helpful.

Regards

Bob Snelling
For Heritage Consultants Ltd