

9th December 2021

Dear Nick, Sarah,

I write to you in relation to our S73 application at Jefferson Park Phase 2, Whitehaven.

Please find enclosed the following documents to add to this application:

- Plan 208 – This plan relates to Condition 9 (Landscape Management Plan)
- CCTV Drainage – This relates to Condition 7 and provides a survey of the culverted watercourse.
- Aboricultural Method Statement – This provides the information required for condition 10.
- Jefferson Park Construction – This relates to condition 8 and provides details of the Construction Method Statement

As part of the Variation please see below list of drawings with updates:

<u>Condition 2</u>	
<u>Original drawing</u>	<u>Updated Drawing</u>
Site Location Plan 101	No change
Block Plan 201	201A
Site Plan 202	202A
Materials & Boundary Plan 205	205A

Following ongoing discussions, I would also like to ask you to review the below and consider amending the following conditions:

- Condition 3 –

“Prior to the commencement of works, the current gas regime on site following Ciria 665, undertaking monitoring for a minimum of 3 months with at least 1 measurement below 1000 millibars must be submitted to and approved in writing by the Local Planning Authority.”

We would propose to alter the pre commencement condition to state -

“CS2 / Amber 1 protection measures must be installed with a validation certificate to be provided to Copeland Borough Council”

The site is underlain by known voids related to historic coal workings. The wells installed historically were shallow (<5.00m bgl) with monitoring response zones in the drift deposits, as such, the potential for mine gas was not recorded within the previous monitoring.

The site needs to be grouted and stabilised to facilitate development, as such, this will ultimately influence the ground gas regime at the site. Due to this potential for displacement of gas and associated migration pathways, we'd suggest as a precaution CS2 / Amber 1 protection measures are installed. To undertake further monitoring at this stage (pre grouting) would not provide reliable and representative data, as the ground conditions will change significantly on completion of the stabilisation works.

Therefore, for the avoidance of doubt, based on the above rationale and the proposed Type A Building (private housing), it is envisaged that a point score of 3.5 will be required in accordance with BS8485 (2015) +A1 (2019).

The 3.5 points will be achieved by a combination of the following mitigation measures:

- Cast in-situ monolithic reinforced ground-bearing raft or reinforced cast in-situ suspended floor slab with minimal penetrations (1.5 Points); and
- Installation of a suitable gas resistant membrane independently validated by E3P (2 Points).

The ground gas membrane will be installed by the contractors' specialists and independently validated by E3P where a validation certificate will be issued.

Should you have any queries with the above or documentation please do not hesitate to contact me on

Kind regards

Kerry Dryden
Senior Development & Delivery Manager