Site no H794 Dunbotle lane Site address Flash Lane, Mirfield Application number 2017/60/94124/E

Mirfield Town Council Comments

An analysis of potential re-emergence should be included in the flood risk, assessment should be provided given that there are existing properties at lower levels adjacent to the proposed site.

It is my understanding that this site has been identified as high risk in terms of former coal workings and grouting of bell pits mine workings and shafts are likely. An analysis and demonstration of how this will affect infiltration via soakaways.

Holst soil engineering carried out boreholes in 1973 the deepest investigation borehole was 5m deep, however, the Blocking seam sites at 10-20m deep The Coal authority website outlines the site to be a high-risk area and shallow working are present.

Shallow mine workings and historic mine entries can present a hazard to existing or new development potentially adversely impacting the stability of surface structures and infrastructure. They can also present a risk to public safety. Since 1872, there has been a law that requires all coal mine operators to deposit working plans of the mine with the Government following the cessation of operations. Prior to this date the plans were often destroyed or kept in private ownership due to competition between the mine operators. The Coal Authority has over 120,000 mine plans. Shallow coal mining is defined as lying at a depth of up to 10 x the thickness of coal seam extraction down to a maximum depth of 30 metres Shallow workings do not have

Guidelines state seasonal testing will be required. BRE Digest 365, however, would the testing be carried out before or after any ground remediation works are completed.

Local report of flooding on Kirklees records include Flash Lane in 2012 attributed to blocked gullies. Several reports at the bottom of St. Mary's Avenue associated with <u>failing drainage infrastructure</u>. incidents occurred in Shill Bank Lane 2010.

Several incidents were recorded at the end of St. Mary's Avenue. This was due to a failing soakaway.

The site also conflicts with surface water flood maps that show a linear pattern (depression) flow route where houses are to be located. more information is required to demonstrate that there is a commitment to ensure houses are protected from such events and overland flows, and it is feasible that water from the highway will not enter curtilage in the final promoted design and adjacent existing property's downstream. Flood routing should not terminate with-in 150m of any existing low level properties under ground nor over ground.

Due to the size of the site, seasonal testing should be required. BRE Digest 365 should be followed for testing procedures but the design should be in line with all other NPPF drainage guidance on the 1 in 30 and 1 in 100+ climate change events

I would advise land drainage protection will be required for the properties located at lower levels from landscaped areas that could generate runoff from saturated land.

Mitigation proposals should be stated. Temporary Drainage Strategy Protection of existing properties during the construction phase post soil and vegetation strip will be required as increased runoff is envisaged on this sloping site.

A suitable plan, including protecting existing drainage infrastructure from blockages and sedimentation should be formulated alongside a construction phasing plan.

SUDS & Management Companies a detailed plan should be provided for maintenance of any sUDS with assigned roles and frequencies visits and experience will be required.

Consultation with Yorkshire Water will be required for any proposed disposal of surface water into the public sewer network,



Suporting Drawings



S Benson