

Environment Agency comments

They appreciate from email correspondence, further to their previous response letter (SO/2021/120966/01-L01) and the recommendations made within, additional and/or revised reporting has now been submitted relating to sought discharge of the conditions detailed above.

It remains their understanding from correspondence and latest submissions made that phasing plan submitted (uploaded 04 Feb 2021, Rev 01) remains relevant and that full discharge for all phases detailed within this plan is still being sought for the following conditions: 18(a), 19(a), 55, 56, 57, 58, 60 and 66. In line with the above, it also remains their understanding that only the partial discharge of conditions 59 and 63 is being sought, so far as they relate to Plots I-N (encompassed within Phases 1 and 5 of the approved site phasing plan).

In order to inform their updated position statement, their Groundwater and Contaminated Land (GCL) Team has undertaken a review the following reporting, listed below, on the basis of their ongoing engagement with the site and the work undertaken during separate chargeable reviews for the developers and their environmental consultants.

Documentation Reviewed:

- Letter – Former Manox Site – Miles Platting: Synopsis of Technical Submission.
- Report Ref: 13-887-L3. Prepared by E3P. Date: May 2021;
- E3P Remediation & Enabling Works Phasing Plan. Report Ref: 13-887-R8. Date: April 2021;
- E3P Coal Mining Risk Assessment & Specification for the Consolidation of Abandoned Mine Workings (ref. 13-887-R7-Rev A). Date: January 2021
- E3P Specification for Supplementary Site Investigation 13-887-L2 (rev1). Date November 2020
- E3P Outline Remediation Strategy and Options Appraisal Report Reference: 13- 887-R5-4. Date: April 2021.
- Pile Design Contaminated Land Risk Assessment, Miles Platting. Reference: 13- 877-R10-1. Date: February 2021.
- E3P Ground Stability Letter Report. Ref: 13-887-L4. Prepared by e3p Ltd. Date: March 2021.
- Specification for Supplementary Site Investigation and Remediation Treatment Trial/ Pilot Study. Report Reference: 13-887-L2-Rev 1. November 2020.

Environment Agency Position (Updated) Further to the above, please see outline below their updated statements of position / conditional recommendations for this application.

Condition 18(a): Shallow Mine Workings

As submitted we are unable to recommend the discharge of condition 18 attached to planning permission 125596/FO/2019. Document Reviewed: - Coal Mining Risk Assessment & Specification for the Consolidation of Abandoned Mine Workings (ref. 13-887-R7-Rev A). January 2021. Having reviewed the report noted above, there are parts that suggest that no shallow mine workings have been identified yet there is a full methodology indicating that a substantial period of drilling and grouting will be required. This methodology includes areas of the former Manox site where underground voids are known to exist and there is not reference to how these will be managed. Additionally, the report notes to other voids being potentially present under the site; none of the previous investigations have made mention of these features.

Condition 19(a): Mine Entry Works

As per our previous response letter, the EA have no objection to the discharge of condition 19(a) attached to planning permission 125596/FO/2019.

Document Reviewed: - Coal Mining Risk Assessment & Specification for the Consolidation of Abandoned Mine Workings (ref. 13-887-R7-Rev A). January 2021.

The coal mining reports addresses the known coal mining shaft entrance into the former Bradford Colliery system and identifies an acceptable method of pressure grouting.

Condition 55: Remediation Phasing Plan

As submitted they are unable to recommend the discharge of condition 55 attached to planning permission 125596/FO/2019.

Document Reviewed: - E3P Remediation & Enabling Works Phasing Plan. Report Ref: 13-887-R8.

Date: April 2021

They remain concerned, from a pollution prevention aspect, that the remediation methods detailed in other reports could pose an increased risk to sensitive receptors during the lifetime of the remediation process if they are introduced to the site.

Condition 56 Outline Remediation Scheme

As submitted, they are able to recommend the discharge of condition 56 attached to planning permission 125596/FO/2019.

Document Reviewed: - Outline Remediation Strategy and Options Appraisal Report Reference: 13-887-R5- 4. Date: April 2021.

They welcome the revision to this report (dated April 2021) further to the previous version they reviewed (dated Dec. 2021).

They advise that they are reasonably happy to recommend the discharge of this condition as the report makes reference to the need for additional ground investigation and assessment on both the former Manox site and proposed sectors associated (I – N). They have, however, identified, under a separate cover to the developer that without this additional work efforts to later discharge other conditions associated may prove difficult, notably conditions 58, 59 and 63.

Condition 57 Ground Investigations

As submitted they are unable to recommend the discharge of condition 57 attached to planning permission 125596/FO/2019.

Documents Reviewed: - Specification for Supplementary Site Investigation and Remediation Treatment Trial/ Pilot Study. Report Reference: 13-887-L2-Rev 1. November 2020. - Outline Remediation Strategy and Options Appraisal Report Reference: 13-887-R5- 4. Date: April 2021.

Having considered the larger part of the information which has been submitted to date they are largely satisfied that additional ground investigation of Zone 7 is unnecessary.

Additional/revised reporting will still be required to satisfy the wider requirements of this condition.

Condition 58 Risk Assessment

As submitted, they are unable to recommend the discharge of condition 58 attached to planning permission 125596/FO/2019. Additional ground investigation work is required. A fuller assessment

of risks needs to be undertaken to with the wider available data set. However, at this time having considered the larger part of the information which has been submitted to date they are largely satisfied that additional risk assessment of Zone 7 is unnecessary. Please note that the EA have not undertaken a review of latest report submitted in support of this condition as it is their understanding that this relates to human health solely and is outside the planning focus of the EA (controlled waters). They have advised that their further review of this latest report, E3P Human Health Risk Assessment (reference: 13-887-R6-3, March 2021), should be undertaken by Manchester City Council's (MCC) Environmental Health Department if not already done so.

Condition 60 Ground Stabilisation Works Plan

As submitted, they are unable to recommend the discharge of condition 60 attached to planning permission 125596/FO/2019. Documents Reviewed: - E3P Coal Mining Risk Assessment & Specification for the Consolidation of Abandoned Mine Workings (ref. 13-887-R7-Rev A). Date: January 2021 - E3P Ground Stability Letter Report. Ref: 13-887-L4. Prepared by e3p Ltd. Date: March 2021.

Thank you for the submission of a letter report for supporting the ground stabilisation works plan. Whilst questions remain outstanding from condition 18(a) of this permission the plan, as has been laid out in the letter report is, in principle, acceptable. As previously advised, due to the linkage between this condition and condition 18(a), they remain concerned regarding the grouting of other voids notably within the Manox site area. It has been identified that additional ground investigation is needed. Further to the above, they also note and would like make the applicant aware that application of the plan is and will be intrinsically linked to the application to discharge condition 63 of the planning permission (Verification). Where they consider the plan has not been enacted and relic features remain, they will be minded not to recommend the discharge of condition 63 which, in turn, is linked to the occupation of properties on site.

Condition 66 (Piling)

As submitted, they are able to recommend the discharge of condition 66 attached to planning permission 125596/FO/2019. Document Reviewed: - Pile Design Contaminated Land Risk Assessment, Miles Platting. Reference: 13- 877-R10-1. Date: February 2021.

As they have identified under a separate cover, recent work on another site with coal mining, ground gas and vapours, the use of a vibro-stone column is not advisable as the column could give rise to a pressure gradient and facilitate gas migration. This choice of column should be confirmed with MCC's Environmental Health Department. They advise consideration of using a Continuous Flight Auger (CFA) methodology.

Condition 59 Options appraisal and remediation strategy

As submitted, they are able to recommend the discharge of condition 59 attached to planning permission 125596/FO/2019 for plots I-N (Phase 1 and 5) only.

Document Reviewed: - E3P Outline Remediation Strategy and Options Appraisal Report Reference: 13- 887-R5-4. Date: April 2021.

Given their comments in respect of the outline remediation strategy (condition 56) and the need for additional ground investigation they are able to be able to recommend to the local planning authority the partial discharge of this condition at this time.

The submission for this particular application refers to Phases 1-5 which includes sectors AH which are the former Manox site and this, from the outline remediation strategy has yet to be developed.

Condition 63 Verification Plan

As submitted, they are unable to recommend the discharge of condition 63 attached to planning permission 125596/FO/2019. Document Reviewed: - E3P Outline Remediation Strategy and Options Appraisal Report Reference: 13- 887-R5-4. Date: April 2021 . At this time insufficient reporting has been submitted to address the requirements of this condition.

Condition 67 Previously Unidentified Contamination

The E3P technical synopsis, submitted as part of the most recent submissions has made mention to this condition. They understand from the wording of this discharge application and initial Avison Young covering letter provided for CDN/21/0111 that the discharge of this condition is not currently being sought at this time. They would remind the applicant/agent and their environmental consultants that the discharge of this condition cannot occur until planned remedial works have concluded and there is satisfactory evidence to indicate that no previously unforeseen contamination remains which warrants additional remedial action to be taken.