



200 Lichfield Lane
Mansfield
Nottinghamshire NG18
4RG T: 01623 637 119
(Planning Enquiries)

E: planningconsultation@coal.gov.uk

W: www.gov.uk/coalauthority

For the attention of: Nicole Helliwell, Case Officer
Kirklees Council

[By email: DC.Admin@kirklees.gov.uk]

10th November 2025

Dear Nicole,

Re: Application 2023/62/93067/E

Discharge of details reserved by conditions 4 (external materials), 5 (boundary treatments), 6 (Phase I Desk Study Report), 7 (Phase II Intrusive Site Investigation Report), 8 (Remediation Strategy), 11 (coal mine workings), 13 (bat roosting), 18 (landscaping) on previous permission 2023/93067 for demolition of existing equestrian building and erection of replacement dwelling; Land at, Jill Lane, Mirfield, WF14 0DR.

Thank you for your notification of 21st October 2025 seeking the views of the Coal Authority (Trading as the Mining Remediation Authority) on the above. Condition 11 is relevant to our comment and states;

11. No development shall commence until;

a) a scheme of intrusive investigations has been carried out on site to establish the risks posed to the development by shallow coal mine workings, and;

a)[sic] any remediation works and/or mitigation measures to address land instability arising from coal mining legacy, as may be necessary, have been implemented on site in full in order to ensure that the site is safe and stable for the development proposed.

The intrusive site investigations and remedial works shall be carried out in accordance with authoritative UK guidance.

We responded to application 2023/62/93067/E in July 2024 at which time we withdrew our objection based on reporting at the time which by way of a letter dated 17th June 2024 from ARP Geotechnical Limited that confirmed the undertaking of a further investigation for the shaft resulting in 90% of the error radius of the shaft having been investigated, the remaining 10% was identified to be beyond the planning boundary. At that time, we also noted that the risk from shallow mineworkings had not been investigated and determined and conditions were suggested to secure that, hence Condition 11 part (a).

The applicant has now submitted a letter report prepared by ARP Geotechnical Limited dated 13th December 2024 (ref. PRN/01/L17/WW). This report provides the results and outcome of a programme of drilling to assess the shallow mining risk beneath the site recommended by the ARP Stage 1 geo-environmental desk study, ref. PWS/o1r1. Three boreholes were drilled to depths ranging from 12 to 28m depth. Two seams were encountered, the shallower interpreted as the Middleton 11 Yard Coal and broken ground representing past workings was encountered in BH's 1 and 2, and soft ground within BH 3. The lower coal, the Blocking Coal was just 0.1m thick at 22.6m depth and was considered out of ratio due to competent rock cover above.

ARP comment that:

'...there is insufficient cover in BH1, BH2 and BH3 borehole locations for the recorded shallow workings of the Middleton 11 Yard Coal workings.' and give recommendations that:

'In the light of the above, coal mine workings identified from the rotary investigation do not have sufficient rock cover, across the whole site, and stabilisation treatment by injection of grout into a grid of boreholes (known as drilling and grouting) will be required. A 3m grid is recommended, continuing 3m beyond the proposed building footprint.'

ARP proceed to advise that foundations should:

'Once the workings have been treated, foundations in general (in addition to any measures identified to be necessary for the BH3 anomaly) will need to be reinforced. For a strip foundation, this will comprise two layers of B503 mesh within a 300mm thick footing - one near the bottom of the footing and one near the top.'

ARP note that there is the possibility of unrecorded mine entries and that a watching brief should be maintained.

None of the reporting supporting this application provides evidence that the recommended grouting investigations have been completed in the manner advised or that the additional precautionary foundations referred to in the ARP aforementioned letter

report have been duly constructed. Given this, we consider that **the applicant has yet to demonstrate satisfactory compliance with Condition 11**, in any part.

Whilst ARP note that a Validation Report on the works needs to be issued following completion, this relates to Condition 12 which is also coal mining related, but not the subject of this application but it is useful for the applicant to be reminded of this requirement.

Further remediation works in the manner recommended by ARP will require a Mining Remediation Authority Permit to be granted before the permissible works are carried out. All comments made herein are without prejudice to the determination and outcome of any such permit.

If you would like to discuss this matter further, please contact me on the above number.

Yours sincerely,

Geotechnical & Development Manager

Disclaimer

The above consultation response is provided by the Coal Authority as a statutory consultee and is based upon the latest available data and the electronic consultation records held by the Coal Authority since 1 April 2013. The comments made are also based on the information provided to the Coal Authority by the Local Planning Authority and/or information that has been published on the Council's website for consultation purposed in relation to this specific planning application. The views and conclusions contained in this response may be subject to review and amendment by the Coal Authority if additional or new data/information (such as a revised Coal Mining Risk Assessment) is provided by the Local Planning Authority or the applicant for consultation purposes.

In formulating this response the Coal Authority has taken full account of the professional conclusions reached by the competent person who has prepared the Coal Mining Risk Assessment or other similar report. In the event that any future claim for liability arises in relation to this development the Coal Authority will take full account of the views, conclusions and mitigation previously expressed by the professional advisors for this development in relation to ground conditions and the acceptability of development.

