

Our Ref C5076/25/E/7735  
12<sup>th</sup> February 2026

Northern Design Partnership,  
The Chapel,  
Millmoor Road,  
Meltham,  
Holmfirth  
HD9 5JU



**For the attention of Paul Briggs,**

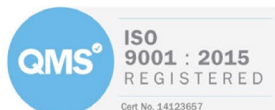
Ref: Consultation Response to Coal Mining Risk Assessment.

Dear Paul,

Further to the issue of our Coal Mining Risk Assessment (C5076/25/E/7735, dated March 2025), the Coal Authority have subsequently issued a Consultee Response via the Kirklees Planning Portal. The response issued under planning application 2024/62/9347/W on the 29<sup>th</sup> January 2026 states there is fundamental concern with reference to the proposed development. Whilst recognising that our CMRA states that further investigation must be undertaken to conclusively determine the presence/absence of this mine entry, they have immediately advised that building over, or within the zones of influence, of mine entries should be avoided wherever possible, even after they have been treated. Whilst RGS accept this to be good practice, the client has yet been able to prove the absence or presence of this feature. Indeed, the adit is recorded to have a departure of 10m. Referring to CIRIA C758, this would suggest potential plotting inaccuracies in the records, in terms of both location and even the presence. Moreover, this area has been developed over previously with no apparent record of movement or historic record of an entry being found.

The Coal Authority go on to state that they “*expect a plan to show the position of the mine adit feature and its departure distance in the context of the specific scheme of development to be provided. The Planning team acknowledges that there already exists a building above the plotted position of the adit and, as such, it may have already been built over. Nevertheless, we would expect justification to be provided by the applicant as to why the adit feature cannot be avoided within the detailed layout of the proposed scheme.* RGS suggest it would be more appropriate for the latter sentence to be readdressed once further investigation is undertaken. Indeed, should the adit be found to be absent all together, then there would be no requirement to consider this feature moving forward. If say the adit had a recorded position, then it is considered the latter would be more reasonable. However, for planning purposes it would seem more appropriate at this stage to retain current plans until investigation has been completed.

RGS have produced three plans, all of which are attached. On the first two plans, the recorded adit location is plotted, in addition to a 10m departure zone (yellow circle). The first plan shows an overlay of the proposed development. As can be seen there is a potential for the adit to be present within either Plot 18 or 19. The second plan shows the satellite imagery; it should be noted that the redline boundary is indicative. The third plan reveals the area within the planning boundary that will require investigation.



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It is of note that the CMRA recommended a grid of dynamic probes. However, it is suggested that this be revised to a grid of shallow rotary boreholes as dynamic probes could refuse on obstructions. Indeed, in addition to the adit, there may be a potential for shallow mine workings also, albeit again this is considered to be restricted to the area of Plots 18 and 19. Nevertheless, rotary boreholes would be a more suitable investigative method.

We trust that this information is of interest and should you have any other requirements do not hesitate to contact us.

For Rogers Geotechnical Services Ltd,

Yours Faithfully

**Rob Palmer** MSc FGS ACIEH  
Engineering Director

Attached: 3 plans





414417-001

**Legend**

- 414417-001
- Investigation Area



Google Earth

30 m

