

Consultation Response from: KC Environmental Health (Pollution & Noise Control)
2026/90655 - Huddersfield Textile Training, Textile House, Red Doles Lane
Discharge of details reserved by conditions 6 (Phase I Desk Study Report), 13 (intrusive investigation), 14 (intrusive site investigations) on previous permission 2024/93250 for erection of warehouse extension for storage of product containers/pallets
Date Responded:
Monday, 13 April 2026

Responding Officer:
HK

Responding Ref:
WK/202607732

Overall Recommendation: Environmental Health do not recommend discharge of Condition 6 for the reasons outlined below.

Conditions 13 & 14 relate to coal mining/ground stability and are beyond the remit of Environmental Health.

Comments

Thank you for consulting Environmental Health on the above application. This response relates to conditions 6 (Phase I Desk Study Report on previous permission 2024/93250.

Condition 6 states:

Groundworks shall not commence until actual or potential land contamination at the site has been investigated and a Preliminary Risk Assessment (Phase I Desk Study Report) by a suitably competent person has been submitted to and approved in writing by the Local Planning Authority.

The applicant has submitted a Phase 1 Contaminated Land Desk Study, Ref: 2846-1, dated November 2024 authored by Martin Environmental Solutions Ltd. It is worth noting here that the submitted report is entitled "*Contaminated Land Phase One Desk Study for proposed residential dwelling on land at Red Doles Lane*". The accuracy of information presented in reports is of primary importance and is often the cause of re-submitted applications – we therefore raise this as something to be noted by the reports author, the applicant and their agent as this should have been noted prior to submission of the report.

The report identifies historical uses of the site as being "*part of larger agricultural fields*" until 1995 when it is noted that "*buildings are present on site. By 2009 these have been replaced with the larger building to the north and in place today with the remaining area shown as an asphalt carpark*" is identified by way of aerial photographs of the site.

The report goes on to state on page 12 that:

"Coal mining activities have been identified 261m west of the site at Fartown Colliery. The mine closed in 1869, operating for 14 years, properties are now located over the shaft. The interactive coal authority map suggests a shaft depth of 30m and the shaft has been treated. The site is not in an area of probable underground coal workings, it is located within a coal mining area as identified by the Coal Authority. The risk of mine gas is considered minimal".

This contradicts the information presented in the appended Groundsure report which states:

18.12 Coal mining

Records on site

1

Areas which could be affected by past, current or future coal mining.

Location	Details
On site	The site is located within a coal mining area as defined by the Coal Authority. A Consultants Coal Mining Report is recommended to further assess coal mining issues at the site. This can be ordered directly through Groundsure or your preferred search provider.

This data is sourced from the Coal Authority.

No reference is made to the above or to the potential presence for ground gas within the report.

Based on the errors and inaccuracies identified within the report, the information presented cannot be considered accurate, and the report requires further review and resubmission.

Conditions 13 & 14 relate to coal mining ground stability however, the Coal Mining Risk Interpretation Report Ref: SI 00324, dated 13th June 2025, prepared by Lyons CMC states that *"No fugitive gases were encountered during this investigation; however, some associated risks will exist given the shallow coal workings within the Hard Bed coal seam along with overlying sandstones and superficial material. It would therefore be prudent, in the absence of any further gas monitoring (note informative no. 3 in appendix 2), to include gas protection measures (such as a methane membrane for example) within future foundation designs"*.

The Grouting Validation Report, Ref: GVR 00372, dated 4th March 2026, prepared by Lyons CMC reproduces a reference contained within a previous report, which states:

Lyons CMC provided the client with a Coal Mining Risk Assessment for the site ref: CMRA 00372 dated 11th October 2024. The conclusion within this report from the shallow coal mining aspect was as follows:

Given the Shallow Mining position it is clear that there is potential for instability from old mining void migration to the surface given the shallow workings and limited firm overlying rock/strata above (not including the alluvial material). As the precise detail is somewhat uncertain (thicknesses of: firm overlying strata, coal seam/voids, fireclay) a limited site investigation of three or more water-flush boreholes to the base of the coal seam/workings across the extent of the proposed footprint from east to west should prove beneficial to better inform the likely further stabilisation works and foundation designs. The results of the investigation can then be presented to an appropriately qualified drilling and grouting specialist and structural engineer, in order to achieve a proposed solution to the agreement of the Coal Authority (as owners of the coal/workings). It should be noted that a permit from the Coal Authority should be secured prior to any investigation or grouting works.

The above statement provides further evidence of the presence of shallow mining and the potential for the presence of ground gases at the site.

Based on the errors and inaccuracies identified within the report, the information presented cannot be considered accurate, and the report requires further review and resubmission.

Recommendation

Conditions 6 (Phase I Desk Study Report), must remain until further notice.

Conditions 13 & 14 relate to coal mining/ground stability and are beyond the remit of Environmental Health.