

Consultation Response from: KC Environmental Health (Pollution & Noise Control)

2026/92329 Agrosmart Ltd, Red Doles Lane, Leeds Road, Huddersfield, HD2 1YF

Discharge of details reserved by condition 6 (Phase I Desk Study Report) on previous permission 2024/93250 for erection of warehouse extension for storage of product containers/pallets

Responding Date:
02/10/2026

Responding Officer:
KB

Responding Ref:
WK/202628036

Further to our response dated 13th April 2026 (Our Ref: WK/202607732) we acknowledge receipt of a revised Contaminated Land Phase One Desk Study for proposed Commercial Storage Building on land at Red Doles Lane, Leeds Road, Huddersfield, HD2 1YF. July 2026 1 Report No: 2846-2. The report has been reviewed alongside the Grouting Validation Report previously submitted and prepared by Lyons CMC (Ref: GVR 00372, dated 4th March 2026) and included in the appendices as part of this application.

These reports include geotechnical information, which is outside the remit of Environmental Health, this consultation response therefore only relates to the land contamination aspects of the reports.

Martin Environmental Solutions Ltd. Revised Contaminated Land Phase One Desk Study for proposed Commercial Storage Building on land at Red Doles Lane, Leeds Road, Huddersfield, HD2 1YF. July 2026 1 Report No: 2846-2

The report presents an updated Preliminary Risk Assessment (PRA) for the proposed commercial storage building at Red Doles Lane. The report has been revised following previous comments and now provides a more detailed assessment of the site's historical development, environmental setting and potential contamination risks.

The desk study reviews historical mapping, environmental database information and mining records. Historic land uses identified within the wider area include textile-related industrial uses, mills, dye works, brick works, waste management activities, historic landfill sites and areas of former coal mining. The report considers these features as potential sources of contamination and evaluates their relevance to the proposed development.

Potential pollutant linkages associated with made ground, historical industrial land uses, historic landfill activities and the former mining legacy have been identified. Attention is given to the presence of shallow historical coal workings beneath the site. The report acknowledges that ground gas migration associated with historical mining activities represents a potential contaminant pathway and incorporates this within the conceptual site model (CSM). The assessment concludes that risks associated with the mining legacy have been substantially reduced through the completion of remedial grouting works undertaken at the site, included as Appendix 4 and reviewed separately below.

The report concludes that no significant contamination risks have been identified that would require further intrusive contaminated land investigation. However, the report recommends a precautionary approach through the installation of a gas protection membrane beneath the proposed development together with the implementation of a watching brief during

construction works to identify any unforeseen or unexpected contamination encountered during development.

Appendix 4. Grouting Validation Report by Lyons CMC. Ref: GVR 00372. Dated 4th March 2026.

The appended grouting validation documentation relates to remedial works undertaken to address risks associated with historical shallow coal workings beneath the site. Whilst these works are principally relevant to Condition 13 (Intrusive Investigation) attached to planning permission 2024/93250 and are therefore matters for consideration by the Mining Remediation Authority, they are also of relevance to contaminated land due to the potential for ground gas migration associated with historical mine workings.

The validation report confirms that intrusive investigation works identified shallow workings requiring treatment and that a programme of pressure grouting was subsequently completed. The stated purpose of the grouting works was to stabilise voids and weakened ground associated with the historical mine workings, thereby reducing risks to the proposed development from ground instability. The report records the treatment locations, grout volumes and validation procedures undertaken during the remediation programme.

The report concludes that the identified treatment areas were successfully grouted and that the remedial works were completed in accordance with the recommended mining remediation strategy. The applicant considers the mining-related risks to have been appropriately addressed through the completed works.

The grouting validation report informs the conclusions of the revised Preliminary Risk Assessment. The applicant relies on the completion of the grouting works as evidence that the risks associated with shallow mine workings, including potential ground gas migration pathways, have been significantly reduced. On this basis, the revised Phase 1 assessment concludes that a separate ground gas risk assessment is not required, although the incorporation of a precautionary gas protection membrane beneath the proposed development is still recommended.

Comments

Environmental Health has reviewed the revised Preliminary Risk Assessment and information that has been submitted relating to Condition 6 (Phase I Desk Study Report).

The revised submission has addressed several of the concerns raised in the previous consultation response. In particular, the report now correctly describes the proposed development, provides an updated conceptual site model and includes consideration of potential ground gas risks associated with the mining legacy. The report also references the completion of intrusive investigations and grouting works undertaken to address risks associated with shallow historical coal workings.

However, the revised submission identifies historic landfill sites within the vicinity of the development and includes landfill gas as a potential contaminant source within the conceptual site model. It then concludes that a separate ground gas risk assessment is not required, relying principally on the completion of the mining investigation and grouting works.

Environmental Health does not consider that sufficient justification has been provided for this conclusion.

The submitted grouting validation report demonstrates that remedial works have been completed to address risks associated with shallow coal workings and land instability. However, the report does not constitute a ground gas risk assessment and does not adequately characterise potential risks associated with landfill gas generation or migration. Whilst the grouting works may have implications for gas migration pathways associated with mining features, they do not provide evidence that potential risks arising from nearby historic landfill sites have been suitably assessed.

As such, Environmental Health is not satisfied that the potential ground gas risks associated with the identified landfills and ground gas have been adequately characterised. In the absence of a robust assessment demonstrating that landfill gas does not represent a credible pollutant linkage, it has not been demonstrated that all potential contamination risks have been satisfactorily assessed as required by Condition 6.

Recommendation

It is our recommendation that Condition 6 (Phase I Desk Study Report) must remain until further information is received.