

Our Ref C4305/24/E/6828
11th June 2025

Barnes Homes
Victoria Spring Business Park
Wakefield Road
Heckmondwicke
WF15 6BU



For the attention of Alex Barnes,

Ref: Consultation Response – Coal Mining Risk Assessment (CMRA).

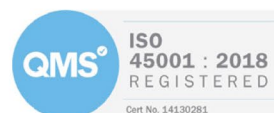
Dear Alex,

Further to the submission of our CMRA to the Kirklees Council planning portal, the Coal Authority has subsequently issued a consultation response; dated 4th June 2025, signed by Ashley Langrick. They have recognised that our CMRA states that the Top Lousey Coal seam is present within 30m of the site surface; the CMRA states this seam to be present at depths of between 15m and 20m below the site. Moreover, they have recognised that our CMRA states that at least 8.8m of competent cover is required to mitigate instability at the surface.

As the seam is likely to be present at 15m or deeper, we concluded in our CMRA that sufficient competent overburden shall be present.

The Coal Authority have subsequently stated they *would appreciate further commentary from the report author on reaching the conclusion that there is indeed sufficient competent rock cover to prevent any surface instability. The report appears to rely on an assumption that there is not a significant depth of superficial deposits.*

RGS appreciates that the report assumes that shallow rock will be prevalent in the area, and that the superficial deposits (i.e. weathered rock) will be minimal in thickness, thus not reducing the thickness of 'competent overburden'. No BGS borehole scans were included within the CMRA as the local boreholes were unable to penetrate to depths where the Top Lousey would be present. In hindsight, boreholes should have been included to demonstrate the typical level of rock in the area.



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With reference to the attached site plan, the M62 is present a short distance to the west of the site. It would appear that as part of a Highways Agency scheme, geological records were obtained at the top of the embankment. BGS records SE12SE890¹ (trial pit) and SE12SE865² (borehole) were positioned on strata which is stratigraphically and topographically similar to our client's application site. In the trial pit, clay was initially encountered before sandstone was recorded at 1.3m depth. In the trial pit, clay was initially encountered, before the top of the rockhead was recorded at 2.0m. Non-intact mudstone (stiff gravelly clay) was recorded to 3.2m. Intact mudstone and sandstone was then recorded to the base of the borehole.

It taking a worst-case scenario of 'rock head' at 3.2m, with the Lousey Coal seam at 15m, this would leave 11.8m of competent overburden. This is above the 8.8m of overburden required. As such, our conclusions within the CMRA still apply.

We trust this further information addresses the concerns raised by the Coal Authority. If any further clarification is required, then please do not hesitate to contact us.

For Rogers Geotechnical Services Ltd,

Yours Faithfully

Rob Palmer MSc FGS ACIEH
Engineering Director


¹ Sources: British Geological Survey <https://api.bgs.ac.uk/sobi-scans/v1/borehole/scans/items/18949951>

² Sources: British Geological Survey <https://api.bgs.ac.uk/sobi-scans/v1/borehole/scans/items/18949915>

Site Plan 1

Red line is site boundary.

Legend


 Approx locations of BGS records





Site Plan 2

BGS overlay

Legend

 Approx locations of BGS records

 SE12SE890

 SE12SE365

Halifax Rd

A649

M62

Brier Hill Ct



100 m