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13th Mary 2026

Registered in England 07068066

Parkhill
Wetherby
West Yorkshire
LS22 5DZ

T 01937 545 330
www.lithos.co.uk

Mr O Bottomley
Vivly Living
Principle House
Tandem Industrial Estate
Wakefield Road
Huddersfield
HD5 0AL

Dear Oliver

Gynn Lane, Honley – Planning Ref. 2025/91370

Further to your request, and receipt of Kirklees Council consultation response dated 22nd March 2026, with particular reference to the comments on coal mining, we respond as follows.

As you are aware, there is mining legacy beneath the site consisting of unrecorded shallow mine workings in the Halifax Soft Bed Coal which requires treatment via drill and grouting. In addition to the unrecorded shallow workings, there are two recorded adits (also known as a spine roadway) passing beneath the site, one orientated roughly north to south, and one east to west.

The E-W trending adit appears to originate from the west of site, where an adit and drift shaft are located. Details on the abandonment plan suggest this adit extended from Grove House in the west to Woodroyd Colliery in the east. The N-S adit appears to start at 'Gynn Day Hole' located in the northeast of the site, extending off site to the south to an area of recorded workings.

Mining Investigation

Analysing the data obtained from the 36 mining investigation probeholes undertaken by Lithos, it is apparent that:

- Two seams of coal underlie the site, these are the:
  - **Halifax Soft Bed Coal** – outcropping in the centre of the site, dipping east. Underlies about 1.4ha in the east. This was found to outcrop approximately 15m further east than that shown on BGS plans.
  - **Middle Band Coal** – outcropping in the far east of site, dipping east. Underlies about 0.3ha of the site in the far east. This was found to outcrop approximately 30m northwest of the outcrop shown on BGS plans.
- The Halifax Soft Bed coal was found to be on average 0.5m thick. The Middle Band Coal was found to be on average 0.3m thick.
- Evidence of workings was encountered in the Halifax Soft Bed Coal from depths of between 2.8m and 17.1m. The thickness of workings/broken ground within the Halifax Soft Bed Coal ranged from 0.6m to 1.8m (average thickness of workings of 1.1m).
- The shallow mineworkings in the Halifax Soft Bed Coal appear to the linked to an adit trending N-S recorded by the Coal Authority (discussed further below).
- None of the holes (probeholes and trial pits) advanced through the Middle Band Coal seam encountered evidence of workings, and based on the encountered thickness (0.3m to 0.4m) and depth (0.6m to 1.9m), is very unlikely to have been worked, however, it should be noted that due to Network Rail restrictions, only one hole (PH05) was advanced through the Middle Band Coal, and therefore, the possibility of shallow workings within this seam cannot be entirely discounted.

- The thickness of competent rock cover is less than 10 times seam thickness across an area of c.4,000m^2 in the centre of the site.
- Linear triangulation suggests the Soft Bed coal seam dips approximately 1.7° southeast.

Adit Investigation

The two adits recorded by the Mining Remediation Authority (MRA), aka the Coal Authority have the following references:

- CA Ref – 414412-010 trending roughly E-W through the centre of site.
- CA Ref – 414412-011 trending roughly N-S in the east of site.

Soft/broken ground was identified in PH09A between 4.5m and 6.9m depth. This is likely to be associated with adit ref. 414412-011 (N-S trending adit). This location was c. 7m west of the MRA position, and 11m west of the location recorded on the abandonment plan.

Mineworkings appear to extend from the line of the adit, making it difficult to confirm the depth and line of the adit, however, in any case, it is apparent that the both the adit and workings do not have enough competent cover, and therefore both will require drilling and grouting.

Adit ref. 414412-010 (E-W trending adit) was encountered in PH18F between 17.1m and 18.3m depth. Upon drilling, ochreous mine water was flushed out of the hole. In addition, the mine water rose through the surface water drainage systems of properties 18A & 18B Gynn Lane located c.60m west, flooding their gardens with ochreous mine water. Drilling of the adit 414412-010 was terminated to avoid further flooding, and gardens were cleaned.

The exact flow path and connectivity between the adit and surface water drainage is unknown, however, it assumed at this stage that the adit acts as drainage for either the higher ground to the east and or any mine workings also to the east. The adit may also be linked to the drainage systems associated with the former Mill.

Regardless of where the water originates, it is clear that a flow path exists beneath the site at depth in the adit, but it is also apparent that the flow is independent of any site activities, i.e. the flow will continue whether the site is developed or not.

Mining Risk Mitigation

Mitigation against the risk of subsidence associated with the shallow mineworkings and N-S adit will be required across about 15% of the site's total area. This will likely involve consolidation by drilling and grouting.

Due to the difficulty in undertaking further investigation of the E-W adit, and also the difficulty in undertaking any drilling and grouting given the apparent connectivity between the adit and surface water drainage, Lithos recommends all plots along its proposed line are reinforced with one layer of mesh, rather than undertaking any intrusive intervention which could alter the drainage flow paths/volumes.

Based on the findings of Lithos investigation and the anticipated nature of the workings in the east of the site associated with the N-S adit, it is considered that the necessary consolidation (grouting) would require drilling holes on a 3m grid. A viscous grout composed of appropriate proportions of OPC, PFA, sand or pea gravel would then be injected into the workings via these holes.

Surface Water Drainage

Based on the sloping nature of the site, soakaways will not provide a suitable drainage solution for surface water run-off. Therefore, following development, in which approximately 60% of the site will be impermeable (roads, driveways & roofs), surface water infiltration will reduce significantly when compared to current conditions.

The flow through the adit is likely to vary with the seasons, with flow expected to be higher in winter and spring, reducing in summer and autumn. These variations in flow will continue to occur regardless of the development.

Conclusion

The shallow mine workings associated with, and adjacent to, the N-S adit will be treated via drilling and grouting to remove the subsidence risk to the proposed development.

The E-W adit is to remain untouched to avoid altering the drainage flow path, with any mitigation dealt with by reinforcement in the foundations of any affected plots.

Surface water infiltration will reduce significantly following development, meaning that if any surface waters are currently entering into the adit via infiltration, they will be reduced post development.

Therefore, post development, any waters flowing through the adit and entering into the surface water drainage on Gynn Lane will continue unaffected, in fact, the water flow may even reduce slightly.

The variations in flow within the adit will likely follow fluctuation in prevailing weather, with flows peaking in winter and spring, and reducing in summer and autumn. These variations in flow will continue to occur regardless of the development.

We trust the above and enclosed satisfies your present requirements, but please contact the undersigned with any queries.

Yours sincerely

Adam Gombocz
Director
for and on behalf of
LITHOS CONSULTING LIMITED