Comments made by Richard Barson, Geotechnical Engineer, employed by Kirklees Council within the Highways Major Projects team on 29th September 2026.

Document 1 - Envireau Water Review of Geology and Proposed Drainage Concept Report dated 15th February 2018:

1) I previously reviewed this report prior to my initial feedback on 27th April 2026.
2) I agree with the report conclusions that there is sufficient rock cover above the mine-workings in the Blocking Coal beneath the site and no treatment/consolidation works are required.
3) However, there are numerous mine entries (shafts and bell-pits) throughout the site area which were used to access the mine-workings in the Blocking Coal and these do require treatment/consolidation works as part of the development. However, the presence of these mine entries would increase the permeability of the rock mass by providing additional connectivity as discussed by Envireau Water in Section 4.1.
4) The hydrogeological conceptual model developed for the site by Envireau Water is aligned with my assessment. There is a significant thickness of sandstone bedrock present at the surface and given the relatively flat-lying topography, the site conditions are favourable for soakaway drainage.
5) I agree with the report conclusions that the proposed use of soakaways will not increase flood risk to downstream properties and that the effectiveness of the proposed soakaways will not be affected by the presence of shallow mine workings at the site.
6) In my opinion, Envireau Water have underestimated the extent of mine workings throughout the site area as shown on Figures 3 and 4. I expect mine-workings to be present in the Blocking Coal throughout the majority of the site area. My assessment appears to be supported by the widespread presence of mine entries confirmed by the site soil stripping works carried out in 2018 and 2026.

Document 2 - Lithos Consulting Letter Report dated 28th May 2026:

1) The Lithos Consulting Letter Report presents the results of the new 2026 site strip along with the findings from the previous 2018 site strip. In total, 15 no. suspected mine entries have been identified within the site along with two areas of anomalous deep made ground. It is proposed to drill each of these suspected mining features to confirm their depth and the condition of their infill.
2) The report states that MF007 will likely be grouted or capped at rockhead. However, I consider this shaft may be close enough to the highway to warrant both grouting and a cap at rockhead. These requirements will be re-assessed following the exploratory drilling.
3) The report states that MF016 will likely be grouted or capped at rockhead. However, I consider this shaft may be close enough to the highway to warrant both grouting and a cap at rockhead. These requirements will be re-assessed following the exploratory drilling.

Document 3 - Lithos Consulting Specification for the investigation and treatment of shallow workings & mine entries report (ref: 5670/B) dated May 2026:

1) The proposed investigation and treatment works are considered adequate and in line with current industry practice.

Document 4 - Eastwood Consulting Engineers Technical Note dated 7th July 2026:

1) The Eastwood Technical Note provides a summary of Envireau Water's and Lithos' Report conclusions. There are some incorrect statements regarding the extent of mine workings throughout the site copied from the Envireau Water documents.
2) Regarding Appendix 1 The Coal Authority Consultation, page 3 of 4 is blank and the concerns/comments to be addressed are missing.

Document 5 - Envireau Water Technical Letter Regarding Minewater Reemergence dated 10th September 2026:

1) Section 1 states that the infiltration basin is in an area where no coal workings are expected to be present. This is incorrect as three mine entries have been found within the footprint of the infiltration basin (Lithos ref's: 002, 015 and 016). Consequently, intervening mine-workings are expected between and surrounding the mine entries at depth. Regardless, I concur with Envireau Water's conclusions that the mine workings would not affect the proposed soakaways.
2) Section 2 states that it is not anticipated that the proposed drainage scheme would increase the volume of water entering the mine workings. This is factually inaccurate. There are three mine entries in the location of the infiltration basin and therefore, some additional water would be expected to migrate vertically into the mine workings. The treatment works to the mine entries would significantly reduce the volume of water being transmitted however, some migration flow paths would remain. Nevertheless, the volume of water entering the mine workings would be nominal and this would have a negligible impact on the existing mine water drainage.
3) I agree with Envireau Water's summary that the coal workings beneath the site do not materially influence infiltration performance.
4) I agree with Envireau Water's summary that the proposed drainage scheme will not increase the risk of water re-emergence off site. Any increase in flow in Canker Dyke, located over 300m south-east of the site, is expected to be negligible.