



The Coal
Authority



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For the Attention of: Rebecca Owens – Case Officer
Merthyr Tydfil County Borough Council

[By Email: planning@merthyr.gov.uk]

18 December 2023

Dear Rebecca

PLANNING APPLICATION: P/23/0251

Erection of extension to link rugby club building with existing shower block and other associated alterations; Dowlais Rugby Club, Blaen Dowlais, Dowlais - RECONSULTATION

Thank you for your consultation letter of 5 December 2023 seeking the views of the Coal Authority on the additional information submitted in support of the above planning application.

The Coal Authority Response: Material Consideration

The application site falls within the defined Development High Risk Area.

The Coal Authority records indicate that there is a mine entry (adit) on site with a currently recorded position under the existing building. We hold no treatment details for this feature and it is orientated in a north easterly direction. The site is also in an area of coal workings at shallow depth. These features pose a potential risk to surface stability and public safety.

The Coal Authority previously objected to this planning application in the absence of a Coal Mining Risk Assessment to satisfy National Policy requirements.

The Coal Authority now notes the submitted Coal Mining Risk Assessment (9 November, prepared by Blandford Consulting), which accompanies the planning application. The report acknowledges the stability risks posed by both recorded shallow coal mine workings and the mine adit. However, given both the extremely modest scale of the link extension

proposed and that it will be anchored to its two hosts, both of which are founded on rafts, the report concludes that any investigation would not be warranted and that such risks are very low. Consequently, and subject to the precautionary measures proposed during construction, which could potentially incur remediation of the adit, should it be encountered, the Coal Authority **withdraws its objection to this planning application.**

Mine Gas

It should be noted that wherever coal resources or coal mine features exist at shallow depth or at the surface, there is the potential for mine gases to exist. These risks should always be considered by the LPA. The Planning & Development team at the Coal Authority, in its role of statutory consultee in the planning process, only comments on gas issues if our data indicates that gas emissions have been recorded on the site. However, the absence of such a comment should not be interpreted to imply that there are no gas risks present. Whether or not specific emissions have been noted by the Coal Authority, local planning authorities should seek their own technical advice on.

The Coal Authority Recommendation to the LPA

The Coal Authority considers that the information submitted in support of this planning application is broadly sufficient for the purposes of the planning system and meets the requirements of the planning system in demonstrating that the application site is, or can be made, safe and stable for the proposed development.

The Coal Authority would expect the development to be carried out in accordance with the measures detailed on the final page of the Coal Mining Risk Assessment (9 November, prepared by Blandford Consulting)

The Coal Authority therefore **withdraws its objection** to this planning application on the basis of the information submitted.

Please do not hesitate to contact me if you would like to discuss this matter further.

Yours sincerely

Chris MacArthur

Chris MacArthur B.Sc. (Hons), DipTP, MRTPI
Planning Liaison Manager

Disclaimer

The above consultation response is provided by The Coal Authority as a Statutory Consultee and is based upon the latest available data and records held by The Coal Authority on the date of the response. The comments made are also based upon only the information provided to The Coal Authority by the Local Planning Authority and/or has been published on the Council's website for consultation purposes in relation to this specific planning application. The views and conclusions contained in this response may be subject to review and amendment by The Coal Authority if additional or new data/information (such as a revised Coal Mining Risk Assessment) is provided by the Local Planning Authority or the Applicant for consultation purposes.

In formulating this response The Coal Authority has taken full account of the professional conclusions reached by the competent person who has prepared the Coal Mining Risk Assessment or other similar report. In the event that any future claim for liability arises in relation to this development The Coal Authority will take full account of the views, conclusions and mitigation previously expressed by the professional advisers for this development in relation to ground conditions and the acceptability of development.