



200 Lichfield Lane
Mansfield
Nottinghamshire
NG18 4RG

T: 01623 637 119 (Planning Enquiries)

E: planningconsultation@coal.gov.uk

W: www.gov.uk/coalauthority

For the attention of: Mr Gareth Davies, Case Officer
Merthyr Tydfil County Borough Council

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

10th September 2026

Dear Gareth

Re: Application P/25/0085

Discharge of Condition 21 of P/23/0053 Ground treatment; Dragon Parc, Abercanaid, Merthyr Tydfil, RECONSULTATION.

Thank you for your notification of 2nd September 2026 seeking the further views of the Coal Authority on the above. Condition 21 states:

'Prior to the occupation of any dwelling, in those areas identified on the submitted Mining Risk Zones and Mitigation Plan (Figure 5) prepared by Integral Geotechnique that requires remedial works and/or mitigation measures, a signed statement or declaration prepared by a suitably competent person, confirming that the site is, or has been made, safe and stable for the approved development shall be submitted to and approved in writing by local planning authority. This document shall confirm the completion of the works necessary to address the risks posed by past coal mining activity.'

The applicant has provided a letter prepared by consultant Terra Firma dated 1st September 2026, ref. DE/17970/WILLOW PIT. This letter refers a technical matter to ourselves; stating that in their view given the available *'information it is the opinion of TFW Group Limited that a Geogrid system across the shaft is not necessary provided the no-build zone is adhered to. We would recommend liaising with the Mining Remediation Authority*

(formerly the Coal Authority) to confirm their position in relation to this condition.' That shaft being our ref. 305204-031 located centrally to the development site.

I referred the matter to our engineering team here at the MRA and the response is set out below:

The development shows that there will be footpaths, gardens and access roads located in the zone of influence of the mineshaft.

[TGN02](#) Section 10. Covers the existing protection measures and what would be required from an applicant to demonstrate suitability for their retention. CIRIA C758D discusses reuse and reliance on existing shaft treatments but clarifies that this should be subject to suitable confirmatory investigation, proving and appraisal of the treatment. This would generally, include but not necessary be limited to, determining if it is adequately founded, obtaining knowledge of its condition, construction, dimensions and strength.

Reuse of an existing mine entry treatment could be considered appropriate however this would need to be demonstrated via investigation and calculation to show that the treatment is fit purpose. If so, then we would be in a position to accept that the geogrid is not necessary across the aforementioned shaft.

There is no formal requirement for such a submission just a written confirmation from TFW Group that such an assessment has taken place and the outcome confirmed, if that is the case.

Just as a reminder should there be a need to conduct any works that has the potential to intersect or disturb the mine entry that will require obtaining an MRA permit before those works are commenced.

We look forward to TFW Groups response.

It is our assumption that this was a technical referral to the specific point not an attempt to have Condition 21 discharged. **We therefore we await further statement by reply.**

If you would like to discuss this matter further, please contact me on the above number.

Yours sincerely,

Leigh Sharpe

Geotechnical & Development 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 the electronic consultation records held by the Coal Authority since 1 April 2013. The comments made are also based on the information provided to the Coal Authority by the Local Planning Authority and/or information that has been published on the Council's website for consultation purposed 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 advisors for this development in relation to ground conditions and the acceptability of development.