



The Coal
Authority



INVESTOR IN PEOPLE



RTPI
Learning Partner

200 Lichfield Lane
Berry Hill
Mansfield
Nottinghamshire
NG18 4RG

Tel: 01623 637 119 (Planning Enquiries)

Email: planningconsultation@coal.gov.uk

Web: www.gov.uk/coalauthority

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

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

15 December 2023

Dear Rebecca

PLANNING APPLICATION: P/23/0216

**Extension to existing changing rooms and new boundary fence to lower pitch;
land at pavilion and changing rooms, Pantyffyn Road, Penyard -
RECONSULTATION**

Thank you for your consultation letter of 4 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 site falls within the defined Development High Risk Area and that a Coal Mining Risk Assessment is required to be submitted to support this application.

The Coal Authority records indicate that the site is likely to have been subject to historic unrecorded underground shallow coal mining. Voids and broken ground associated with such workings can pose a risk of ground instability and may give rise to the emission of mine gases. The site also lies within a Surface Coal Resource Zone.

In addition, the records indicate that a mine entry (shaft) lies close to the site's south eastern boundary which may or may not ultimately be within the application site boundary due to having no treatment details and due to plotting inaccuracies. An untreated or an inadequately treated mine entry and its resultant zone of influence pose a significant risk not only to surface stability but also 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 is therefore now pleased to note the submitted Coal Mining Risk Assessment (29 November 2023, prepared by Rhondda Geotechnical Services Ltd), which accompanies the planning application and which correctly identifies that the site is in an area of probable shallow coalmine workings. However, based on a review of appropriate coalmining and geological information, the report confirms that none of the shallow coal seams underlying the site are recorded to have been worked in the local area.

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.

SUDS

It should be noted that where SUDs are proposed as part of the development scheme consideration will need to be given to the implications of this in relation to the stability and public safety risks posed by coal mining legacy. The developer should seek their own advice from a technically competent person to ensure that a proper assessment has been made of the potential interaction between hydrology, the proposed drainage system and ground stability, including the implications this may have for any mine workings which may be present beneath the site.

The Coal Authority's Recommendation to the LPA

The Coal Authority considers that the content and conclusions of the Coal Mining Risk Assessment are sufficient for the purposes of the planning system in demonstrating that the application site is safe and stable for the proposed development. The Coal Authority therefore **withdraws its objection** to the proposed development.

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.