



**The Coal
Authority**

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For the attention of: Ms R. Owens – Case Officer

Merthyr Tydfil County Borough Council

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

31 March 2025

Dear Ms Owens

Re: Planning application P/24/0239

**Erection of dwelling with parking: land adjacent to Lle Hyfryd Mount Pleasant
Heolgerrig at land adjacent to Lle Hyfryd, Mount Pleasant, Heolgerrig – FURTHER
RECONSULTATION**

Thank you for your notification of 17 March 2025 seeking the further views of the Coal Authority (operating as the Mining Remediation Authority) regarding the above application.

The Coal Authority response:

The site falls within the defined Development High Risk Area.

The Coal Authority records indicate that there are two recorded mine entries (one shaft and one adit) within 20m of the site boundary; both recorded as being off-site. However, based on the historic source plans used to plot their current position, this could vary by several metres, and the mine entries could either be present within or much closer to the site. The Coal Authority hold no treatment details for these mine entries and therefore should be considered as untreated.

In addition, the site lies within an area of both recorded and probable unrecorded shallow coal mining. These coal mining features present a significant risk (public safety and surface stability) to the proposed development.

We previously highlighted that we previously commented on a previous application for the site reference P/23/0021. In our response dated 15th May 2023 we acknowledged our previous comments for the site in 2019 P/19/0169 and 2016 P/16/0099 for very similar applications, to which we raised no objection subject to the imposition of conditions to ensure the safety and stability of the site. This was as per the recommendations contained in the accompanying amended Mining Risk Assessment Report (June 2016, prepared by Terra firma). Although we noted that the current application was not supported by the Mining Risk Assessment Report, in order to prevent undue delay in the planning process we based our recommendations on the conclusions of the Report.

In our previous response we acknowledged the history of the site and our previous comments and made recommendations for relevant conditions on this basis. In light of this we recommended conditions be imposed on any grant of planning permission in order to secure the undertaking of investigations for both the mine entry and shallow coal workings, and the carrying out of any remedial works, or mitigation measures necessary based on these findings.

The Coal Authority now notes the amended Coal Mining Risk Assessment (March 2025, prepared by Terra Firma Ltd), the content of which provides commentary on the risks posed by the mine shaft, which could be within the site or within close proximity of it. However, and as opposed to the request made by my former colleague Peter Woodcock, the shaft is not annotated on the layout drawing, which shows a slightly enlarged site and the inter-relationship between it and the proposed development is undetermined. In the instance that the shaft is discounted from being within the site and presumed to be (worst-case scenario), on third party land, the indicated BGS drift thickness of 23.9m would mean that the zone of influence would encroach across the entire site, with the proposed building not being able to avoid it. Whilst this is of significant concern to us, given the historical planning context, we do not feel it reasonable to deviate away from our previous recommendation. **The comments made in our letter dated 31 October 2024 therefore remain valid.**

Notwithstanding the above, and given the potential severity of the situation, should the recorded mine entry be discounted from being within the site, then it will be for the Building Regulations process to ensure that appropriate foundations are incorporated in

the construction of the building to afford its structural integrity, specifically in the instance of any off-site collapse of the shaft.

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 coal mining data on the date of the response, and electronic consultation records held by The Coal Authority since 1 April 2013. 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.