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For the attention of: Gareth Davies – Case Officer

Merthyr Tydfil County Borough Council

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

20th November 2025

Dear Mr Davies

Re: Planning application P/25/0298

Convert builders yard office to 2no. flats at Former Builders Yard at Former Builders Yard, Elwyn Drive, Twynyrodyn

Thank you for your notification of 14 November 2025 seeking the views of the Coal Authority (trading as the Mining Remediation Authority) on the above.

The Coal Authority is a non-departmental public body sponsored by the Department for Energy Security and Net Zero. As a statutory consultee, the Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas.

The Coal Authority response: **Material Consideration**

I have reviewed the site location plan, the proposals and supporting information submitted and available to view on the LPA website and can confirm that majority of the application site falls within the defined Development High Risk Area.

The Coal Authority's information indicates that majority of the site lies in an area where historic unrecorded underground coal mining is likely to have taken place at shallow depth. Voids and broken ground associated with such workings may pose a risk to ground stability and public safety.

In addition, the Coal Authority's Public Safety & Subsidence team has in the past been called upon to deal with an off-site surface hazard incident within 50m of the application site.

As you will be aware, the Coal Authority's general approach in cases where development is proposed within the Development High Risk Area is to recommend that the applicant obtains coal mining information for the application site and submits a Coal Mining Risk Assessment to support their planning application.

However, you will also be aware from the Exemptions List included in the Coal Authority's Guidance for Local Planning Authorities – Wales (Version 8 – January 2025), that there are some development proposals which, due to their application type or nature, do not need to be supported by a CMRA even though they are located within the DHRA. One such exemption is where a change of use is taking place with minimal groundworks/foundations.

It would appear in this case that the proposed change of use of the builders yard to flats and the external alterations proposed would not appear to require substantial groundworks or foundations and would fall onto our exemptions list. Therefore, the Coal Authority's Planning & Development Team does not consider that a Coal Mining Risk Assessment is required to support the proposal in this particular case and we **DO NOT OBJECT** to this planning application.

However, we do recommend that, should planning permission be granted for this proposal, the following wording is included as an Informative Note on any planning permission granted:

Majority of the application site lies within an area that has been defined by the Mining Remediation Authority as containing coal mining features at surface or shallow depth. These features may include: mine entries (shafts and adits); shallow coal workings; geological features (fissures and break lines); mine gas and former surface mining sites. Although such features are seldom readily visible, they can often be present and problems can occur, particularly as a result of new development taking place.

Any intrusive activities which disturb or enter any coal seams, coal mine workings or coal mine entries (shafts and adits) requires a Mining Remediation Authority Permit. Such activities could include site investigation boreholes, excavations for foundations, piling activities, other ground works and any subsequent treatment of coal mine workings and coal mine entries for ground stability purposes. Application forms for Mining Remediation Authority permission and further guidance can be obtained from The Mining Remediation Authority's website at: www.gov.uk/get-a-permit-to-deal-with-a-coal-mine-on-your-property

What is a permit and how to get one? –

<https://www.gov.uk/government/publications/permit-process/permit-process>

If any coal mining feature is unexpectedly encountered during development, this should be reported immediately to the Mining Remediation Authority on 0800 288 4242. Further information is available on the Mining Remediation Authority website at: <https://www.gov.uk/government/organisations/mining-remediation-authority>.

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

Yours sincerely

Bradley Shelton

Bradley Shelton

Apprentice Town Planner

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.