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

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

3rd December 2025

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 20th November 2025 seeking the further views of the Coal Authority on the above.

As you may be aware we last responded in relation to this application on 16th April 2025 at which time we referred to a draft version of a Validation Drilling and Grouting Report prepared by consultant Terra Firma, dated September 2024 Report Ref. D&G-260924-17970-01 which ultimately concluded that the authors were '*satisfied that the validation works have confirmed the absence of shallow workings within influencing distance of the sites surface.*'

We note that the applicant has now submitted a letter report prepared by consultant Terra Firma (dated 19th November 2025, ref. DE/17970/DRILL AND GROUT). This report principally addresses the discrepancy highlighted in our last consultation response that the validation report does not give any explanation as to the difference in workings extent between recorded from Coal Authority held abandonment plans within the area drilled. Within the letter report Terra Firma indicate based on the representation on the plans worked areas

differ in their demarcation and that these likely denote differences in nature of those workings or they are at separate levels. We welcome Terra Firma's re-examination of the information and whilst there is no definitive explanation the author does not conclude either that further works are necessary or raise any concerns with the works undertaken. The letter confirms that:

'TFW Group are therefore satisfied that the Drill and Grout works were performed to sufficient depth to investigate and treat the Four Foot Coal Seam.' It goes on to further reassure and conclude that:

'A total of 95 No. drill and grout boreholes were performed within the treatment area and no significant anomalies were encountered.'

In respect to installation of a geo-matress the Terra Firma report states that *'Davies Homes will shortly be installing within the Drainage Channel base and embankments as it passes through Risk Zone A to address the subsidence risk beyond the housing area'* posed by offsite mine entries to those areas of the development. This will be as detailed in Integral Geotechnique's Coal Mining Risk Assessment, dated February 2023.

Condition 21, is a prior occupation condition and its wording requires that the signed statement or declaration, provided by the relevant competent person, confirms that all remedial/mitigation measures have been completed. So, whilst we welcome the work being undertaken, these **necessary works remain ongoing and as a consequence full compliance with Condition 21 has not yet been demonstrated**. We welcome further consultation once a suitable completion statement has been received. It should of course refer to all elements of the remediation/mitigation works, across the site as a whole noting that works in accordance with the agreed strategy have been fully implemented.

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.