

Dear Deb,

Heol Tewdwr – Planning Application P2023/0057

We are in receipt of your letter, dated 7th March 2023, to Neath Port Talbot County Borough Council relating to the above planning application for proposed works at 5 Heol Tewdwr which is currently an undeveloped plot.

The application relates to the construction of a split-level dormer bungalow.

Because the application has a built development aspect and because the site is within a Development High Risk Area (DHRA) as designated by the Coal Authority (TCA), it requires the support of a coal mining risk assessment (CMRA).

The CMRA produced by Envirosolutions Ltd (ES), dated 12th January 2023 attempts to mitigate potential risks from coal mining legacy to the proposed development, concluding that the risks associated with coal mining related issues are very low based on information from the Coal Authority and geological interpretation and can be suitably mitigated through informed professional practice and vigilance during construction.

Your letter dated 7th March raises a TCA concern regarding this conclusion and requests further clarification, which is provided below.

Dip Direction

The site lies on the southern slope of the valley surrounding the River Avon lying at an average elevation of 232m aOD. The surrounding topography slopes down towards the north. Using the proven outcrop location for the Thin Coal seam, the elevation of the outcrops has been estimated (see Figure 1) which lie downslope of the site.

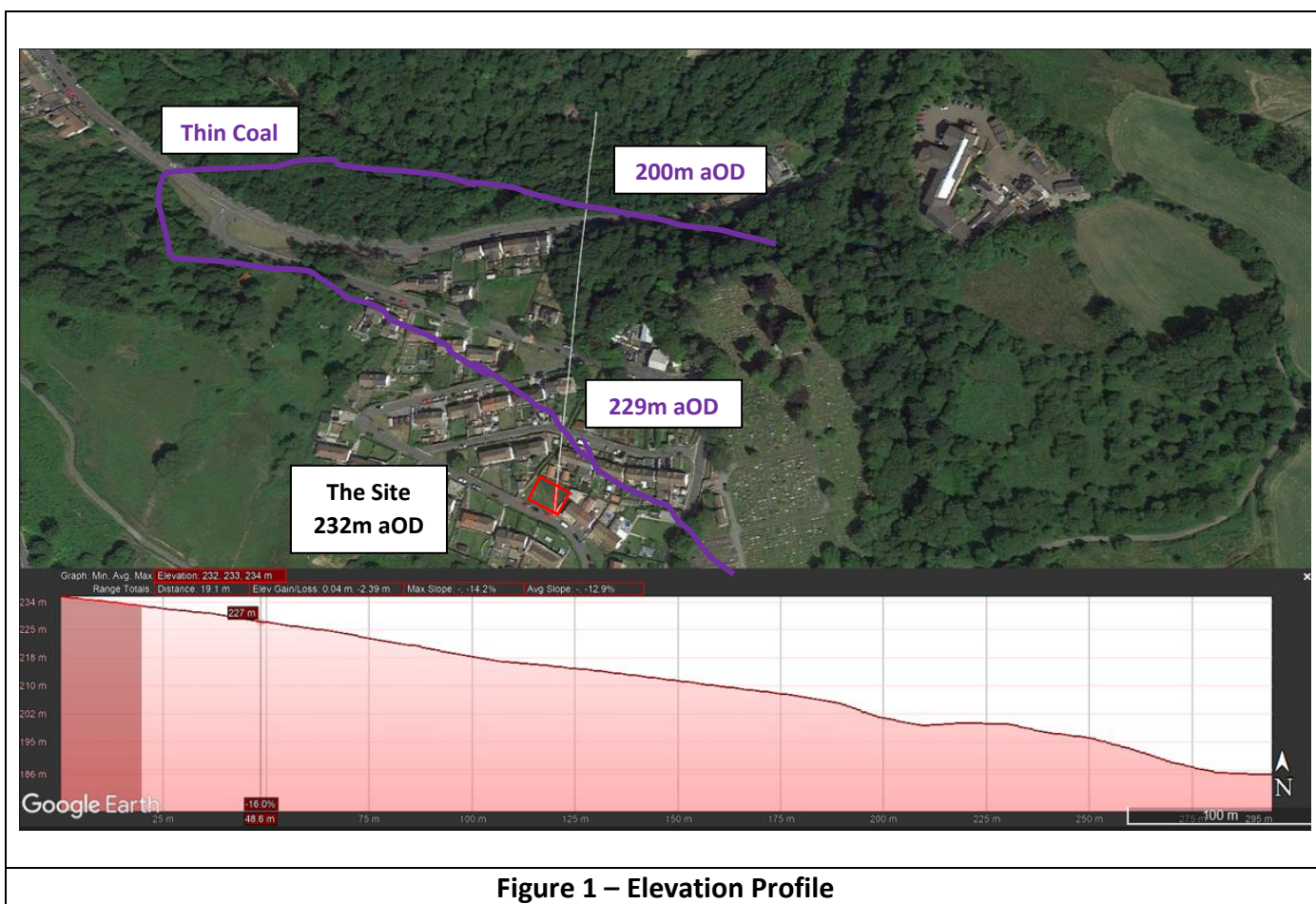
The BGS Map Sheet 248 shows a regional dip of 14° to the north, annotated approximately 300m north of the site on the BGS map. Additionally, the CA report shows records of recorded workings beneath the site which all dip towards the north, albeit at depths of greater than 284m bgl. The recorded dips fall between 6.8° and 10.7°.

The coal seam is shown to outcrop at two distinct elevations downslope of the site. If the seam was dipping to the south, this would not be possible without geological faulting.

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Unrecorded Workings

The proximate coal seam is the Thin Coal which we do not believe has any economic value and is unlikely to have been underground worked beneath the site. The Coal Authority report confirms this and states that there are no probable unrecorded shallow workings.

We hope that you find these comments helpful; however, should you require any further clarification, then please do not hesitate to contact us again.

Yours sincerely

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