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For the attention of: Mr L. Byng – Case Officer
Neath Port Talbot County Borough Council

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

21 May 2026

Dear Mr Byng

Re: Planning application P2026/0262

Construction of clubhouse and associated works at Pontrhydyfen Rugby Football Ground, Oakwood Avenue, Pontrhydyfen, Neath Port Talbot, SA12 9SD

Thank you for your notification of 11 May 2026 seeking the views of the Coal Authority (trading as the Mining Remediation Authority) on the above planning application.

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

The application site falls partly within the defined Development High Risk Area (DHRA). This is on the basis that several coal seams outcrop at or close to the surface across the site, which may have been worked in the past, and due to the potential zones of influence of two mine entries (adits) encroaching into the north eastern corner of the site. This coal mining legacy can pose a risk to surface stability and public safety.

However, it is evident from the Proposed Site Plan that the part of the site where the clubhouse is proposed lies outside the DHRA, i.e. is in the Development Low Risk Area.

Those elements of the scheme which are proposed within the DHRA (including paving and a bin store) would appear to require only minimal groundworks. As such, we would not expect the submission of a Coal Mining Risk Assessment in support of the application.

Nevertheless, we note that the application is accompanied by a Tier 1 Geoenvironmental & Geotechnical Report (March 2026, prepared by Terra Firma) which includes a Preliminary Coal Mining Risk Assessment at Section 3, that focuses on the main clubhouse building. Based on a review of coal mining and geological information, the assessment concludes that *'The overall risk to surface stability arising from potential recorded or unrecorded legacy mining features is assessed as negligible.'*

In light of the above and based on the submitted information, the Coal Authority's Planning & Development Team wishes to raise **NO OBJECTION** to this planning application. However, we request the inclusion of the following Informative Note on any planning permission granted:

The proposed development lies within a coal mining area which may contain unrecorded coal mining related hazards. If any coal mining feature is encountered during development, this should be reported immediately to the Mining Remediation Authority on 0800 288 4242.

Further information is also available on the Mining Remediation Authority website at: www.gov.uk/government/organisations/mining-remediation-authority.

Mine Gas

It should be noted that wherever coal resources or coal mine features exist, 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 the gas hazards that may exist, and appropriate measures to be implemented, from technically competent personnel.

SuDS

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.

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

Yours sincerely

James Smith

James Smith BSc. (Hons), Dip.URP, MRTPI

Planning and 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.