

REF: 2520/PB/Queries/mjs

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24th June 2022

Dear Sirs,

RE: HILLCROFT, PENTRE BYCHAN, WREXHAM: P/2022/027

Regarding the above planning application, we have been forwarded your objection to the development, and Sharon Holman, the case officer for Wrexham County Borough Council has asked that we liaise directly with yourselves to address your concerns

To help we have presented your objections below.

Condition 10 requires that:

10. Prior to submission of the reserved matters, a scheme of intrusive site investigations for the on-site mine entry, shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall include submission of a report of findings, including any gas monitoring undertaken, submission of a layout plan identifying zones of influence for the recorded mine entry and off site mine entry and submission of a scheme of treatment for the on site recorded mine entry. The development hereby approved shall be carried out and implemented in accordance with the approved details and remedial works identified in the approved site investigations scheme.

The Coal Authority was previously unable to comment on this planning application, specifically as only the Supporting Statement for the Coal Authority by independent Structural Engineer (Letter from Andrew Hannett Limited dated 17 March 2022) was

available from the Council's website. The Mining Investigation Report, as referred to, did not appear to be available.

The Coal Authority now notes the enclosed letter (dated 25 May 2021) from Groundsolve Ltd (i.e. the Mining Investigation Report, as previously referred to) and has considered this within the context of the proposed development layout. The letter indicates that the footprint of the dwelling would be within the zone of influence of the shaft, which is unacceptable to the Coal Authority and contrary to our policy on building over, or within close proximity of mine entries (see below). On the basis that the content of the letter goes on to indicate that the shaft has not been remediated to a standard that would reflect the end use now proposed, and that only bespoke foundations, which ultimately may render the scheme economically unviable, could mitigate those significant risks, the Coal Authority **objects to this planning application**.

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

We would reply that the shaft has been capped with a significant sized cap (6m x 6m) designed by Wardell Armstrong a reputable firm of engineers. We would be surprised if the shaft hasn't been grouted, however, the Coal Authority does not possess any records of this being undertaken. Especially, as the onus would have been on the Coal Authority to permit this work and ensure it was undertaken to current standards.

We would also point you towards Section 14.10 of the recently published Abandoned mine workings manual, which states, *"Although it should be avoided where possible, in exceptional circumstances and with regulatory agreement and planning conditions resolved, construction can take place over shafts or within the designer's exclusion zone (and indeed can be preferable to building adjacent to a shaft and possibly line loading the cap) providing a suitable robust engineering solution is designed and constructed. This often involves ring beams and piled foundations for the overlying structure to make it independent from the shaft below"*.

Since this is what our report recommended, we would expect the foundation design to be submitted to the Coal Authority for approval. However, we understand that at present the foundations have yet to be designed as planning is still at Reserved Matters stage.

It would therefore be useful for the Coal Authority to indicate at this early stage, what piling and ground beams they would consider adequate to address the risks, bearing in mind this shaft will have a significant liner down to bedrock at least.

Once the foundations have been agreed, our client can then decide if the cost of foundations renders the scheme economically unviable.

Our client has been informed that the position of the proposed property is restricted due to the position of the adjacent properties. Therefore, the client has always considered a robust foundation solution would be required.

Should you have any queries please call Mike Scott on 01244 661361.

Yours sincerely,

Mike Scott

BSc (Hons), MSc, FGS, C.Geol