

MEMORANDUM



From: Angela Guy
Contaminated Land Officer

To: Matthew Phillips
Planning Control Lead

Our Ref: P/2020/0700

Your Ref: P/2020/0700

Date: 23 March 2021

**No. of
Pages:** 1

TOWN AND COUNTRY PLANNING ACT 1990

P/2020/0700 Nantcol, 57 Bryn Glas, Rhosllanerchrugog, Wrexham, LL14 2EA

Discharge Conditions 4, 6 And 10 Attached To P/2018/1047

Thank you for your email dated 05 March 2021 enclosing two letters from GroundSolve both dated 23 February 2021, one is a mine gas risk assessment (the subject of this response) and the other provides further details on the mining risk assessments already undertaken.

The mine gas risk assessment that has been submitted does not provide all the elements suggested in my earlier Memo, in particular a cross section conceptual site model and reference to the borehole as a potential pathway. It is noted that some reliance is placed on the gas monitoring undertaken at the new borehole drilled on the 17th March 2020 and referred to in the Mining Study prepared by GroundSolve dated 17 June 2020. No details of the monitoring undertaken at the borehole were provided in the Study and the borehole log does not indicate that a well was installed to allow subsequent monitoring. It is not clear that this is a valid line of evidence that should be included in the risk assessment.

The need for radon mitigation measures is noted, and whilst it is not stated, having checked the submitted plans the borehole does not appear to be within the proposed footprint of a building (this could act as a pathway if it hasn't been decommissioned and sealed).

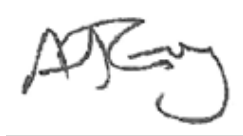
Nevertheless a gas risk assessment has now been provided and reports that the risks appear to be low, despite stating on the first page of the letter that *"it is... surprising that this area has not got a serious problem with mine gas."*

As stated previously my advice is provided to support the requirement of a comprehensive coal mining risk assessment being required, as per the Coal Authorities (CA) 'Policy for Building over or Within Influencing Distance of a Mine Entry', January 2012. This policy identifies that safety and environmental risk factors including gas and mine-water should be

assessed. Government advice on undertaking a Coal Mining Risk Assessment specifically states mine gas is a risk that should be given consideration and mitigation measures required as necessary.

Condition 4 was requested by the Coal Authority and I understand this matter falls within their remit. My advice is provided in good faith with the aim of ensuring mine gas is correctly considered. I have no further comments to make on the information submitted to date other than to recommend the opinion of the Coal Authority is sought on the gas risk element of the coal mining risk assessment, this being under the jurisdiction of the Coal Authority, reliance should not be placed on my comments alone.

Should you have any queries regarding the above then please contact me on Ext. 8771.

A handwritten signature in black ink, appearing to read 'Angela Guy', enclosed within a thin black rectangular border.

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Angela Guy
Contaminated Land Officer