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For the attention of: Ms S. Holman - Case Officer
Wrexham County Borough Council

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

22 January 2026

Dear Ms Holman

Re: Planning application P/2025/0946

Outline application for erection of dwelling (all matters reserved) at Land to the rear of 11 and 11a Stanley Road, Ponciau, Wrexham

Thank you for your notification of 22 January 2026 seeking the views of the Coal 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: SUBSTANTIVE CONCERN

The application site falls within the defined Development High Risk Area. Therefore, within the site and surrounding area there are coal mining features present at surface or shallow depths. The risk these features may pose should be considered as part of the planning process.

Our records indicate that the site lies in area where coal mining has taken place at shallow depth and where further historic unrecorded shallow coal mining is likely to have occurred. Voids and broken ground associated with such workings can pose a risk to surface stability and public safety.

In addition, our records indicate that that two mine entries (shafts 329346-158 and 329346-581) are present to the north and north east of the site, with their potential zones of influence extending into the site. Due to potential plotting inaccuracies, the actual positions of these features could depart/deviate from their plotted positions by several metres, such that shaft 329346-581 could potentially be present within the site. We hold no details of any past treatment of the shafts. An untreated or inadequately treated mine entry and its resultant zone of influence pose a significant risk not only to surface stability but also public safety

We take this opportunity to highlight that any form of development over or within the influencing distance of a mine entry can be dangerous and raises significant safety and engineering risks and exposes all parties to potential financial liabilities. We have adopted a policy where, as a general precautionary principle, the building over or within the influencing distance of a mine entry should wherever possible be avoided. Our adopted policy on the matter can be found at: www.gov.uk/government/publications/building-on-or-within-the-influencing-distance-of-mine-entries.

The applicant has submitted a Coal Mining Risk Assessment report (ref.1942/2, dated 17 January 2026, prepared by NKC Geotech Ltd) to accompany their planning application; however, the Coal Authority's Planning & Development Team does not consider that this adequately addresses the impact of coal mining legacy on the proposed development. We therefore **OBJECT** to the application.

Based on a review of coal mining and geological information, along with the results of previous investigations carried out by the report author in the surrounding area, the report identifies a potential risk to the stability of the site from mine workings in the Main Coal seam. It goes on to recommend the undertaking of a borehole investigation to confirm the depth of the Main Coal and the amount of overlying rock cover in order to establish whether remedial drilling and grouting works are required to stabilise these workings.

We note the professional opinions expressed in the submitted report and welcome the recommendation for the undertaking of investigations in respect of shallow coal mining legacy. However, we must highlight that the report fails to identify the presence of shafts 329346-158 and 329346-581 close to the site and therefore provides no assessment of the risk these features pose to the proposed development. It may be the case that these were missed as the boundary for 'Site 1942/2' shown on the 'Geological plan of the locality' appended to the report does not reflect the current application site boundary.

The applicant should be advised of our objection and requested to submit a revised report which addressed the above matter. We would be pleased to receive for further consultation and comment any additional information submitted in this regard.

Please do not hesitate to contact me if you wish to discuss the above matters 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 on the date of the response, and electronic consultation records held by The Coal Authority since 1 April 2013. The comments made are also based upon only the information provided to The Coal Authority by the Local Planning Authority and/or has been published on the Council's website for consultation purposes 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 advisers for this development in relation to ground conditions and the acceptability of development.