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For the attention of: Jenni Perkins – Case Officer
Wrexham County Borough Council

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

25th March 2026

Dear Ms Perkins

Re: Planning Application P/2025/0337

Demolition of two double classroom buildings and replacement with a new 4 classrom block for infants/new nursery (phase 1). Construction of new 4 block classroom for juniors (phase 2); Ysgol Id Hooson, Heol Caradoc, Rhosllanerchrugog, Wrexham, LL14 2DX - 3RD RECONSULTATION

Thank you for your notification of 16 March 2026 seeking the further views of the Coal Authority on (trading as the Mining Remediation Authority) regarding the above.

The Coal Authority response: **Material Consideration**

The Planning team previously commented on this application in a letter to the LPA dated 11th March 2026 and were requested to provide additional commentary in respect of shaft 328346-059 in light of the proposed drainage system on site. Furthermore, we reiterated our concerns regarding the inclusion of a new substation to the southwest of the existing car park that mat have potentially fallen within the zone of influence of shaft 328346-056 plotted on site.

We note that this application is now accompanied by a response document prepared by Mr Chris Eccles, of Eccles Associates Limited and dated 13th March 2026. This document has been produced in order to address the concerns we made in our previous response.

Mr Eccles comments that based on amended drawing IDH-ENA-XX-XX-D-C-5600 Rev P4 D2, the attenuation tank and its pipework lie beyond the calculated 12.25m radius zone of influence of mineshaft 328346-059.

Based on the assumption that shaft 328346-056 is in its plotted position and has been infilled and capped, Mr Eccles considers that the substation *"building is sufficiently distant from the shaft (outside the departure zone/potential collapse zone), and of a construction type that that the risk of damage from a void migrating to the surface is very low."* They go on to say, *"the risks to the proposed substation are therefore assed as so low as to be inconsequential and no further investigation can be justified on this basis."*

Mr Eccles goes on to conclude that *"the risk to the project from mining related risks are low and no specific mitigation is required as part of the development. However, a watching brief will be required during the site clearance and development stage and should any suspect features, such as unrecorded shafts"*

Whilst we wish to highlight that the calculation of the zone of potential collapse associated with shaft 328346-056 does not appear to have taken account of its departure, on the basis it is likely to be in it plotted position: Mr Eccles comments that the *"A GRP (reinforced plastic) structure substation building is proposed, on a raft. The loading is minimal and any small voids directly below the raft can be spanned."* We also acknowledge from anecdotal information, the shaft was likely to have been treated on the basis that the British Geological Society and National Coal Board records that works were undertaken at the same time as treatment for shaft 328346-059.

On the basis of the information now submitted, and the professional opinions of the report authors set out therein regarding the safety and stability of the site, the Planning team **withdraw its objection** to this planning application.

Mine Gas

It should be noted that wherever coal resources or coal mine features exist at shallow depth or at the surface, 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

We also note that 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.

The Coal Authority Recommendation to the LPA

Should planning permission be granted for this proposal, we also request that the following wording is included as Informative Notes on any decision notice:

1 - Ground Investigations

Under the Coal Industry Act 1994 any intrusive activities which disturb or enter any coal seams, coal mine workings or coal mine entries (shafts and adits) require the prior written permission of the Mining Remediation Authority since these activities can have serious public health and safety implications. Such activities could include site investigation boreholes, excavations for foundations, piling activities, other ground works and any subsequent treatment of coal mine workings and coal mine entries for ground stability purposes. Failure to obtain permission to enter or disturb our property will result in the potential for court action. Application forms for Mining Remediation Authority permission and further guidance can be obtained from our website at: www.gov.uk/get-a-permit-to-deal-with-a-coal-mine-on-your-property

2 - Shallow coal seams

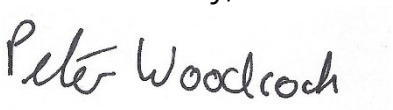
In areas where shallow coal seams are present caution should be taken when carrying out any on site burning or heat focused activities.

3- Requirement for Incidental Coal Agreements

If any future development has the potential to encounter coal seams which require excavating, for example excavation of building foundations, service trenches, development platforms, earthworks, non-coal mineral operations, an Incidental Coal Agreement will be required from the Mining Remediation Authority. Further information regarding Incidental Coal Agreements can be found here - https://www.gov.uk/government/publications/incidental-coal-agreement/guidance-notes-for-applicants-for-incidental-coal-agreements

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

Yours sincerely,



Peter Woodcock | *BSc (Hons), AssocRTPI*
Assistant 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.