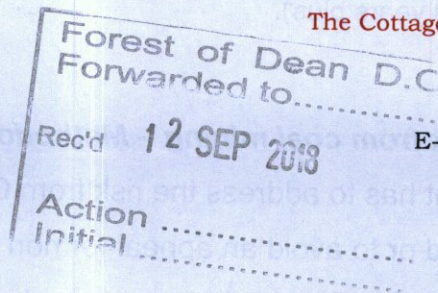


# BRIAN GRIFFIN PLANNING & COUNTRYSIDE CONSULTANTS LIMITED

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Reference: 632DavisG2  
Date: 15 August 2018

Dear Sirs

**Re Planning Application for erecting a detached dwelling with access improvements - Land off Lansdown Walk, Bream GL15 6LG – Mrs Joan Davis**

## **Planning Reference P1395/18/FUL COAL MINING RISK ASSESSMENT**

**1. Introduction** - An application has been submitted to erect one dwelling at Land off Lansdown Walk. The Forest of Dan District Council has requested a Coal Mining Report as it is a requirement of the Local Validation List. The applicant has however advised that generally residential development in this locality does not require a Coal Mining Report as the risk from Coal Mining in this area is known to be remote as the deeper worked coal seams did not come into this part of Bream.

**1.1** The Validation Checklist is a request list rather than mandatory list and advises at para. 2:

*Where an application is not accompanied by the information specified on the Local List, the applicant should provide a brief written justification with the application as to why it is not appropriate in the particular circumstances. In such cases the Council will not make the application invalid if there is no need for the information.*

**1.2** The Validation Checklist at para 4 gives a list of possible reports required. In respect of Coal Mining Risk it states:

*28 Coal Mining Risk Assessments In areas where coal mining activities have taken place applications must be supported by an assessment as to the risk to the development*



caused by previous mining activities. Further details on which areas are affected can be found <http://www.coal.gov.uk/services/planning/>.

- 1.3 The inclusion of Coal Mining Reports have been in the Validation Checklist for many years (10 years plus).

**2. The risk from coal mining – Methodology and Policy -** Accepting that the applicant has to address the risk from Coal Mining in order to get the application validated or to avoid an appeal for non validation, we have used the methodology of reviewing past recent applications in the close locality, i.e. within 100 m to review their Coal Mining Risk assessments and what information that provides. It may therefore be not necessary for the applicant to commission a Coal Mining Report for her site if a neighbouring site's report washes over her site.

- 2.1 The LPA's local plan covers mining risk in policy CSP.1 which says:

Policy CSP.1 addresses design, environmental protection and enhancement. This policy along with the SPD Alterations and Extensions provides the main policy considerations.

Policy CSP.1 - Design and environmental protection Policy CSP. 1 Design, environmental protection and enhancement (strategic objective: providing quality environments)

The design and construction of new development must take into account important characteristics of the environment and conserve, preserve or otherwise respect them in a manner that maintains or enhances their contribution to the environment, including their wider context. New development should demonstrate an efficient use of resources. It should respect wider natural corridors and other natural areas, providing green infrastructure where necessary. In achieving the above, the following will be considered:

**... The impact of the development on any land contamination or risk to the development from ground instability including the mining legacy- Proposals must undertake appropriate remediation measures and verification works where contamination and /or stability issues are identified**

- 2.2 Policy CSP.1 covers mining / subsidence / ground instability risk.



- 3. Review of applications for residential infill and Coal Mining Risk in the close locality** - By using the LPA's web listing of application site we found three recent applications all within 100 m of the application where residential infill applications had been received, validated and determined. These applications for residential infill are listed below and a site plan showing their location is forwarded.

*Land at Rose Cottage off Lansdown Walk*

*Ref. No: P1749/16/FUL*

*Status: Consent - 17 January 2017*

*No Coal Report submitted*

*Land Adjacent To Delmont, Lansdown Walk, Bream, Lydney, Gloucestershire, GL15 6NE  
P0070/07/OUT*

*Outline application for residential development*

*Granted permission 2009*

*No coal mining report required*

*Fernlea granted consent for an extension on 16 May 2018.*

*P0552/18/FUL*

*Erection of a single storey extension with associated works.*

*Demolition of existing conservatory.*

*Fernlea Brockhollands Road Bream Lydney Gloucestershire GL15 6ND*

*No coal survey in the application;*

- 3.1 However, there is a coal mining report for a nearby application, i.e. 35 m to the south west of the site which is:

*Outline application for the erection of one dwelling and alterations to existing access.*

*Land At Beech Way Bream Gloucestershire GL15 6JL*

*This application was granted consent on 14 July 2017*

*P0696/17/OUT*

- 3.2 The submitted Coal Report (Wilson Associates June 2016) which is available for viewing on the Council's web site specifically addresses that application site but their findings and conclusions wash over a wider area and with Mrs Davis' application site being just 35 m away the conclusions from the Wilson Associates Report are applicable to the current application site. We therefore forward a copy of that Report (to save the case officer having to look for it) and comment on their conclusions for the site at Beech Way.



**4. Comments on Coal Mining Risk** - By reference to the published Wilson Associates Report for the site 35 m to the south west of Mrs Davis' application site we find:

- i) The Wislon Associate's Report was a comprehensive report that was agreed with the Coal Authority. They undertook a review of all the available evidence including mining records, locally and Nationally.
- ii) Their Report states '*According to 'Geology of the Forest of Dean Coal & Iron-Ore Field' (Trotter, 1964) the Pennant Group is dominated by thick massive (unbedded) sandstones with subordinate shales, and three coal seams of workable thickness. The lower of these which also marks the base of the Pennant Group is the Coleford High Delf (CHD) seam, which at 1.05-1.5m thickness and of bright bituminous quality is the principal seam in the forest, and has been widely exploited both along crop and at depth. Some 70-100m of massive sandstones separate this from the top seam the Yorkley (2'9"), with the middle seam the Whittington (0.9m) roughly midway between the two.*

iii)

*As shown on drawing 4058/2, large-scale geological mapping shows the conjectured (dashed) outcrop of the Whittington seam trending north-west to south-east and passing some 30m northeast of the site, whilst the parallel outcrop of the CHD seam (also conjectured) lies 25 m to the southwest. Given the north-easterly dip the latter seam underlies the site at an estimated depth of some 23m (c34m below the proposed building footprint at the closest point), further underlain at greater depth (100m) by the Trenchard seam which crops further to the southwest. The Whittington seam crops beyond the site and dips away from it, and is thus of no potential concern. A single abandoned mineshaft is plotted some 490m southeast of the site, noted to have been sunk to the Trenchard seam (at 33m depth); several others, some named, are shown mainly to the remote north and north-east e.g. Knockley Tump and Bowson.*

- iv) *A site-specific Coal Mining Consultants Report has been obtained (as attached), which identifies the outcrop of the CHD some 22.3m to the*



*southwest, though records no past underground mining in that or any other seam. Probable unrecorded coal workings are expected at shallow depth, although this is not expected to include spine roadways. All other standard enquiries have been answered in the negative. There are no recorded mine entries in or within close proximity of the site.*

- 4.1 In summary the Coleford High Delf coal seam (the main Forest Coal seam) dips 1:1 beneath this part of Bream at a depth of 35 m, is overlain with sandstone and in addition there is no recorded covering of superficial deposits, and the nearest records of previous ground investigation (some 785m to the west) are too distant to be of relevance. The Yorkley seam to the east does not reach the application site. The projected (i.e. supposed and not proven) outcrop of the Whittington seam based on the forwarded map does just reach the site but at a thickness of between 0 and 3 feet. It is a shallow superficial deposit, i.e. it would have been be worked from the surface.
- 4.2 There are three properties close to the application site, being Brandon Cottage, Rowan House and a Chapel. The Chapel appears to be the oldest property and none of these three properties show signs of subsidence when viewed externally.
- 4.3 The Wilson Associates Report found no risk from mining at the neighbouring site but recommended use of reinforced floor slabs for construction, and a similar condition could be applied at this site.
- 4.4 In addition the other neighbor residential developments(all of which were approved) did not require a Coal Mining Report.
- 4.5 Mrs Davis and her sisters grew up at Brandon Cottage and their mother continued to live there until her death. They recall that from at least 1940, the plot was diligently and permanently cultivated as a vegetable garden (to feed the family) for at least 50 years. During this time no coal was dug up and no coal workings were found.

**BRIAN GRIFFIN FRICS FAAV**

**PP MRS J DAVIS**