

Neal Hunter  
Squirrel Wood Properties  
Windsor House  
Cornwall House  
Harrogate  
United Kingdom  
HG1 2PW



Date: 2nd July 2025  
Our ref: CC-J-1260

Dear Neal,

### **Former Gowerton Primary School: Coal Mining Risk Assessment**

Following instruction from Squirrel Wood Properties ('client') and in accordance with Swansea Council planning requirements, this letter presents a Coal Mining Risk Assessment (CMRA) in support of the proposed development at former Gowerton Primary School, Swansea, SA4 3EL ('site').

### **Background and Context**

The site is understood to currently comprise a rectangular parcel of land 80m in length and 43m in width occupying approximately 3,250m<sup>2</sup>. The site is generally located within a low-density residential area and is occupied by the former Gowerton Primary School. The site is approximately 0.96ha and is gently sloping towards the northwest.

From the information supplied, it is understood that the development is to comprise the demolition of existing structures and the development of 15 assisted living units with associated carparking and soft landscaped areas. A development plan (HD5512-SK01) including the areas of development is provided in Appendix A.

The site has been identified to be located within a Development High Risk Area. As such, a CMRA is required to support development of the site.

### **Objectives**

With reference to Mining Remediation Authority (MRA) (formerly known as Coal Authority) guidance<sup>1</sup> and requirements of the National Planning Policy Framework, the purpose of this CMRA is to:

- Present a desk-based review of all available information on the coal mining issues which are relevant to this application site;
- Use that information to identify and assess the risks to the proposed development from its coal mining legacy;
- Set out appropriate risk mitigation measures to address the coal mining legacy issues affecting the site; and,

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<sup>1</sup> Risk Based Approach to Development Management. Guidance for Developers. Coal Authority. V4. 2017.

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- Demonstrate to the Local Planning Authority that the application site is, or can be made, safe and stable for the proposed development and meets with the requirements of national planning policy.

## Geology

The solid and drift geology of the site is illustrated upon the British Geological Survey (BGS) on-line mapping database and the BGS map of the district, Glamorgan, Sheet XIV, SW (1:10 560).

Superficial deposits are not indicated to be present beneath the site. The site is recorded to be entirely underlain by the Swansea Member a unit of the western half of the South Wales Coalfield. The Swansea Member comprises a sedimentary mudstone, siltstone and sandstone formed 309.5 to 308 million years ago during the Carboniferous Period.

The Swansea Member is noted to comprise predominately pennant sandstones with thin interbeds of mudstone, siltstone and mainly thin bands coal. The Swansea member is a subdivision of the Upper Coal Measures. Geological mapping indicates that the Swansea Six Feet seam outcrops adjacent to the southern boundary, and dips beneath, the site.

A number of other coal seams are also recorded outcropping in the vicinity of the site with the Swansea Five Feet to the north, and Swansea Three Feet and Swansea Two Feet also located to the south beyond the outcrop of the Swansea Six Feet. Details on the map record report a general dip of the coal seam to be 30.5° to the north based on information from historic mine shafts.

Based upon the above, the Swansea Six Feet Seam would be expected to be between 15 – 25m depth beneath the most southernmost buildings within the campus and increase in depth towards the north.

## Summary of Historical Mapping

A review of publicly available historical mapping has been undertaken. A summary of pertinent features is provided in Table 1.

**Table 1 Summary of Historical Maps**

Dates	Scale	On-site	Off-site
1969	1:10,560	School	Caedafydd Colliery - east Gowerton Colliery – east Old Workings - west
1964	1:10,000	School	Old Pit – west

## Summary of Available Coal Mining Data

The site is located above workings from the Caedafydd Coillery and Gowerton Coillery that date back to the 19<sup>th</sup> century. The site is within the zone of influence of only one coal seam (the

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Swansea Six Feet) last worked in 1899. The MRA have no records of mine related subsidence and there is no planned future extraction.

The MRA have no knowledge or records of damage caused by subsidence attributed to mining activity in the immediate area of the site. Furthermore, the MRA are not aware of damaged caused due to geological faults or other lines of weakness that have been affected by historic coal mining.

The MRA report states that there are no records of mine gas emission requiring action within 500m of the site.

## Risk Assessment and Discussion

Table 2 summarises the potential risks associated with coal mining legacy for the proposed development site which have been considered with reference to the available information summarised earlier in this report.

**Table 2 Potential Risks Associated with Coal Mining Legacy**

Coal Mining Issue	Yes	No	Risk Assessment
Underground coal mining (recorded at shallow depths)		x	<b>No reported records</b>
Underground coal mining (probable at shallow depths)	x		<b>Given the proximity of the outcrop of 6ft seam and the dip of 30.5° it is possible that the seam would be present 15mbgl and 25mbgl in the southern area of the site</b>
Mine entries (shafts and adits)		x	<b>No reported records</b>
Coal mining geology (fissures)		X	<b>No reported records</b>
Record of past mine gas emissions or potential		x	<b>No reported records</b>
Recorded coal mining surface hazard		X	<b>No reported records</b>
Surface mining (opencast workings)		X	<b>No reported records</b>

With reference to Table 2, a potential issue has been identified that is discussed in further detail with consideration of the potential impact on the proposed development.

The site is located above possible historical mine workings of the Swansea Six Feet seam. Should these be present they are inferred to be present at a depth of approximately 15 to 25m in the southern area of the site, increasing in depth towards the north. While no mine entries are recorded within 20m of the site boundary the presence of mine entries within the boundaries of the site cannot be discounted at the time given the history of mining in the area. No opencast mines have been reported within 500m of the site. No coal authority tips have been reported within 500m of the site boundaries.

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## Conclusions

On the basis of available desk-based information, there is a moderate risk to the proposed development associated with historical shallow coal mining beneath or within the vicinity of the site.

While there are no recorded instances of mine gas within 500m of the site a residual risk remains which should be considered further.

## Recommendations

In order to establish the presence or otherwise of features beneath the site and to inform the requirement for risk mitigation actions, if necessary, the following investigation strategy is recommended:

- Due to the risk of shallow mine workings it is recommended that 3N° rotary boreholes are drilled to a depth of 30m beneath the site. Following the intrusive investigation and dependant on the findings, development of a 3D ground model may assist in further assessment and management of the potential risks for future phases of development.
- During the ground investigation it would also be beneficial to install ground gas monitoring standpipe and carry out post-fieldwork monitoring to assess the risk posed by mine gas.
- Prior to intrusive activities on-site that may disturb or intersect any coal seams, coal mine shafts or adits a permit from the MRA will be required. The permit may require additional risk mitigation measures such as personal gas monitoring equipment.

Subject to implementation of the above recommendations, and depending on the findings of ground investigation, it may be necessary for risk mitigation to be undertaken to ensure that coal mining legacy issues have been satisfactorily addressed in line with requirements of national planning policy. A copy of this report should be provided to the Local Planning Authority.

If you have any further queries please do not hesitate to contact the undersigned.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Oliver Dustan', written in a cursive style.

**Oliver Dustan**  
**For T&P Regeneration Ltd**

Appendix A – Drawings  
Appendix B – Supporting Information

### T&P Regeneration Ltd

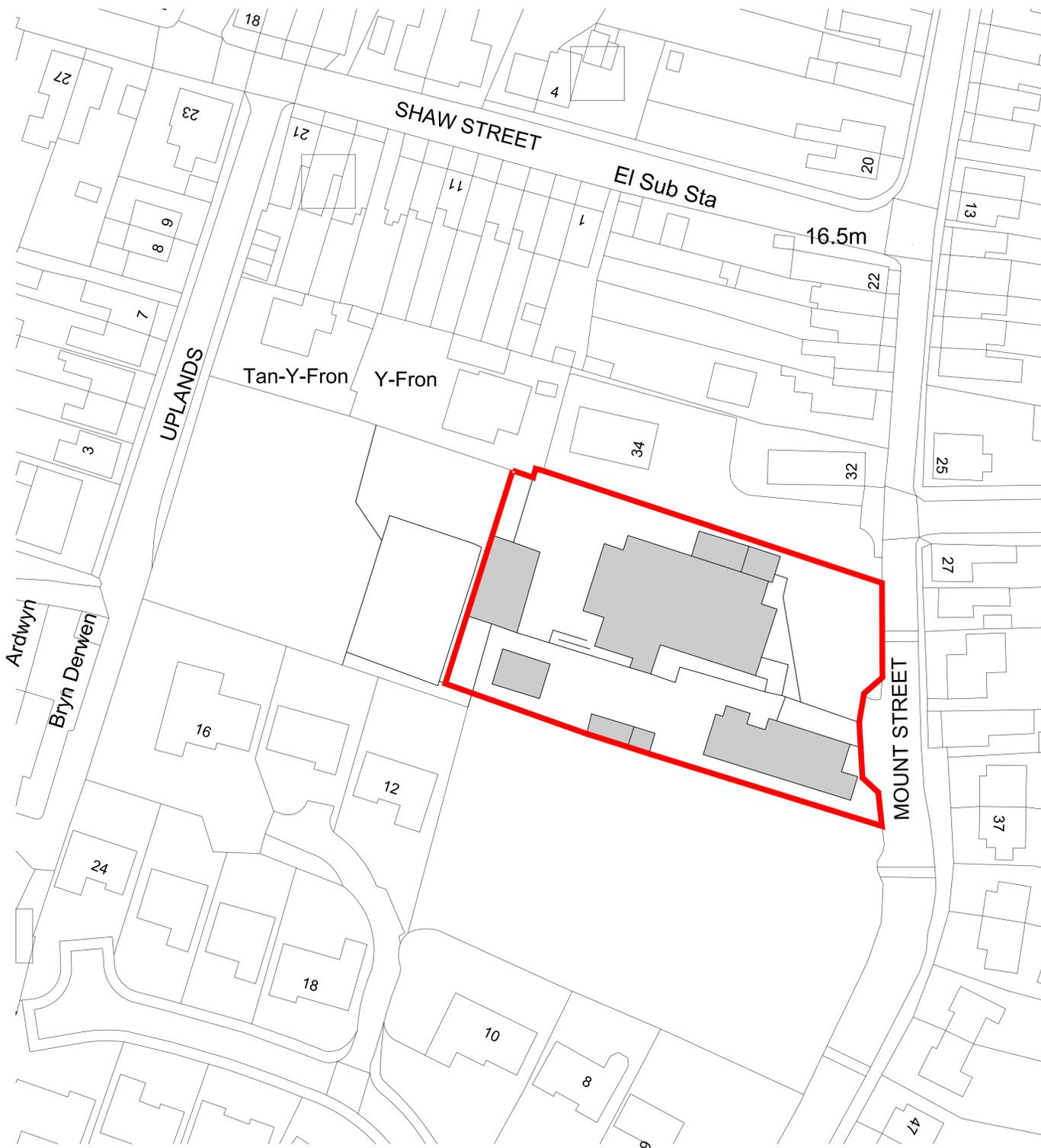
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## Appendix A – Drawings

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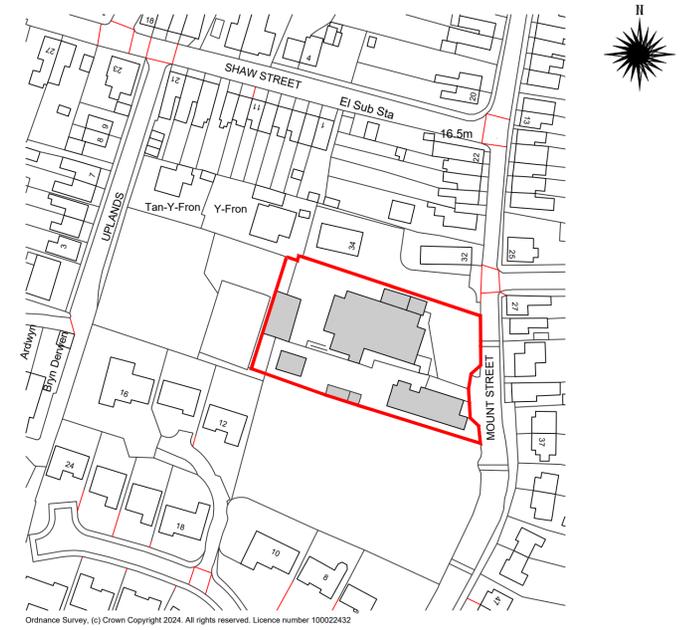




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Existing Site Location Plan

SCALE 1:500 @ A1



Existing Site Location Plan

SCALE 1:1250 @ A1



Ariel View



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Revisions:			
Rev	Date	Int	Description
A	14/10/24	CH	Planning Issue

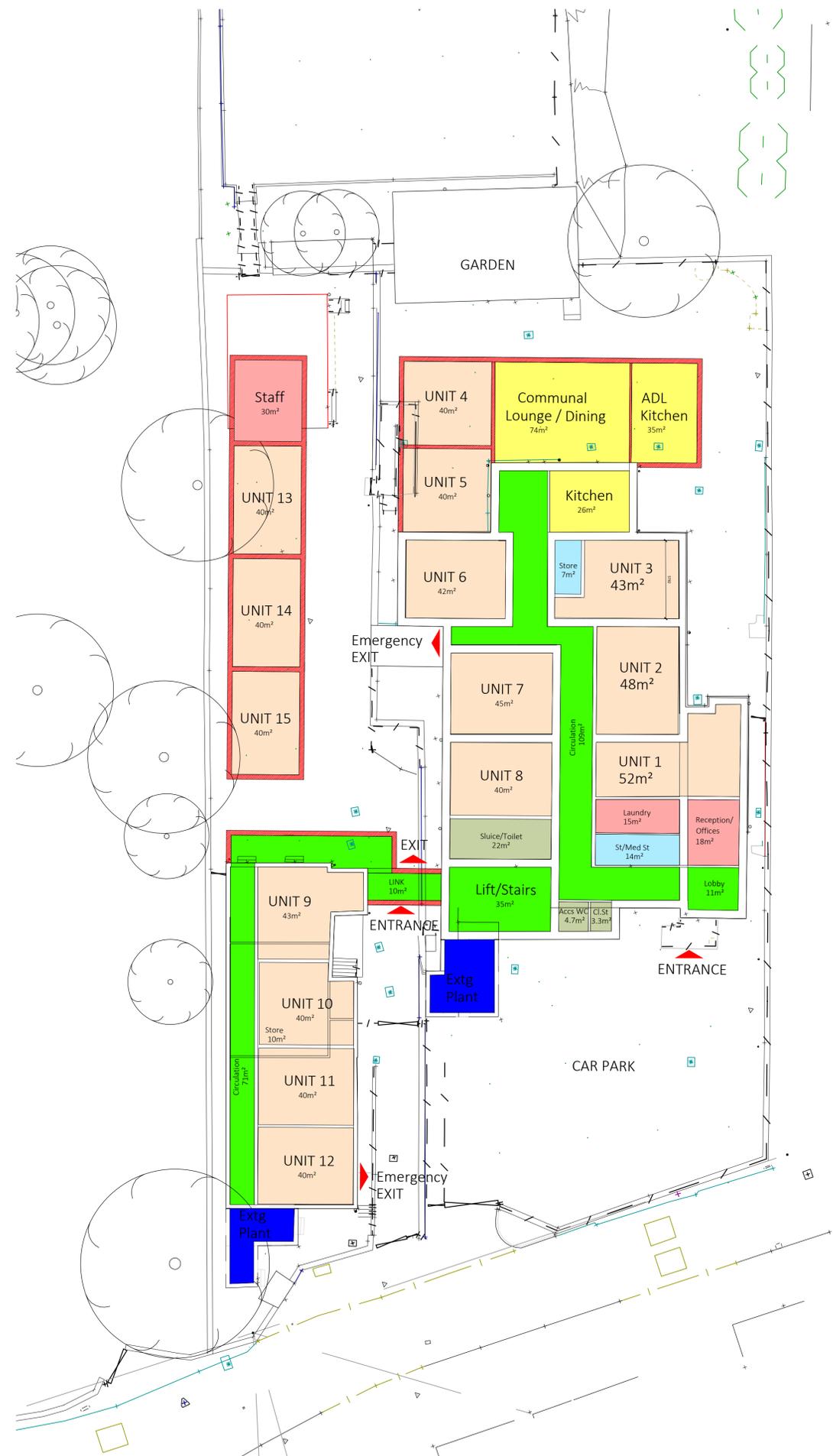
DRAWING STATUS:  
Planning

Drawing No:  
HD5512.AR.01.00.100

Rev:  
A

Client:  
Project: Tregewyr School Site, Mount Street, Gowerton. SA4 3EJ  
Title: Site Location Plan

Scale: As Shown  
Date: 04/07/2024  
Drawn: PH  
Checked:  
Approved:



Total GIA of Units = 633m<sup>2</sup>  
 Total GIA Circulation = 236m<sup>2</sup>  
 Unit Area Incl. Circulation = 633+236 / 12 = 72m<sup>2</sup>

 Extensions



**HURLEY & DAVIES**

contact@hurleyanddaves.co.uk  
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**DRAWING STATUS:**  
APPROVAL

**Client:** SWP  
**Project:** Gortown Primary School Assisted Living Conversion  
**Title:** Feasibility Plan

Drawing No.  
HD5512-SK01

Rev. C

**Revisions:**

Rev	Date	Int	Description
/	00/00/00	AA	First Issue
A	07/10/24	CH	Amended as / Client Comments
B	09/10/24	CH	Amended as / Client Comments
C	09/10/24	CH	Amended as / Client Comments

## Appendix B – Supporting Information

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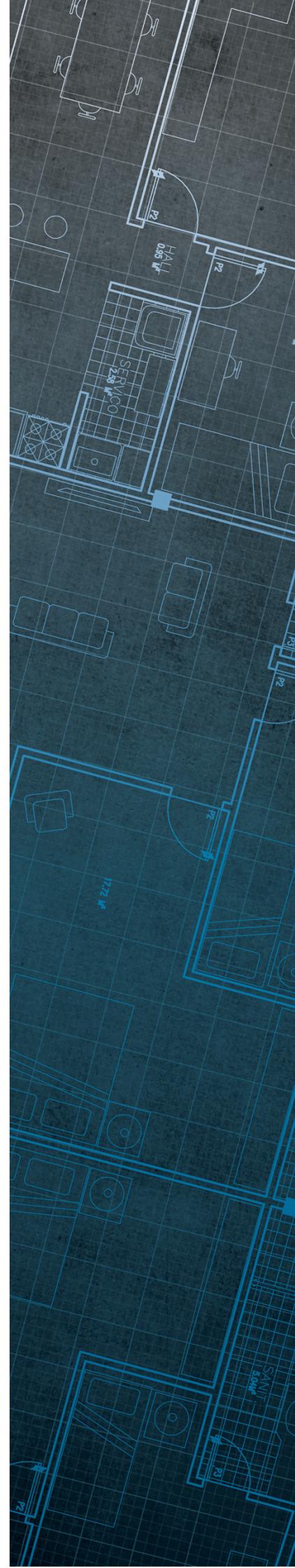
The Coal  
Authority

# Consultants Coal Mining Report

Former Gowerton Primary School  
Cmra  
Swansea  
SA4 3DR

Date of enquiry: 17 June 2025  
Date enquiry received: 17 June 2025  
Issue date: 17 June 2025

Our reference: 51003505908001  
Your reference: GS-WPS-YDE-S8P-6Q5



# Consultants Coal Mining Report

This report is based on and limited to the records held by the Coal Authority at the time the report was produced.

## Client name

GROUNDSURE LIMITED

## Enquiry address

Former Gowerton Primary School Cmra  
Swansea  
SA4 3DR

## How to contact us

0345 762 6848 (UK)  
+44 (0)1623 637 000 (International)

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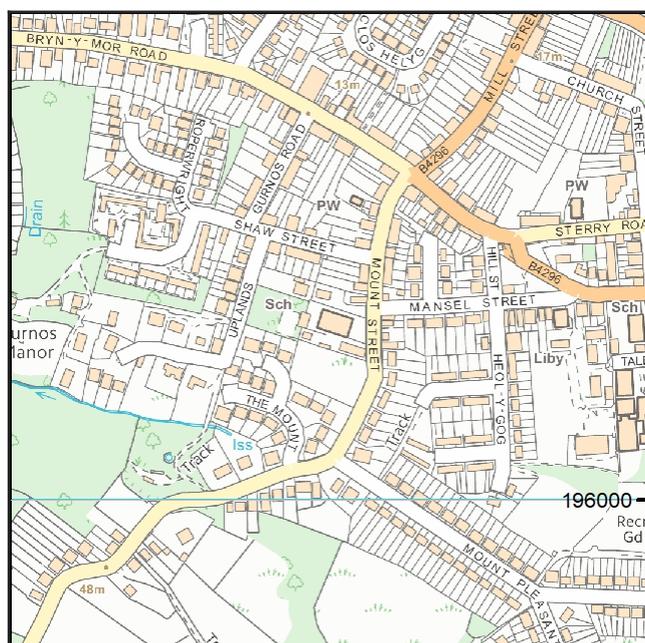
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 @coalauthority

 /company/the-coal-authority

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 /thecoalauthority



Approximate position of property



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# Section 1 – Mining activity and geology

## Past underground mining

Colliery	Seam	Mineral	Coal Authority reference	Depth (m)	Direction to working	Dipping rate of seam worked (degrees)	Dipped direction of seam worked	Extraction thickness (cm)	Year last mined
unnamed	SWANSEA NO.3	Coal	4ZZ3	50	Beneath Property	30.5	North-East	90	1894
unnamed	SWANSEA NO.3	Coal	4ZZ2	71	Beneath Property	30.5	North-East	90	1899

## Probable unrecorded shallow workings

None.

## Spine roadways at shallow depth

Distance to spine roadway (m)	Direction to spine roadway
Within	N/A

## Mine entries

None recorded within 100 metres of the enquiry boundary.

## Abandoned mine plan catalogue numbers

The following abandoned mine plan catalogue numbers intersect with some, or all, of the enquiry boundary:

4099	2198	SWR2776
2579	2579A	POO
2168		

**Please contact us on 0345 762 6848** to determine the exact abandoned mine plans you require based on your needs.

## Outcrops

Seam name	Mineral	Seam workable	Distance to outcrop (m)	Direction to outcrop	Bearing of outcrop
UNNAMED	Coal	Yes	22.0	South	110

**Geological faults, fissures and breaklines**

No faults, fissures or breaklines recorded.

**Opencast mines**

None recorded within 500 metres of the enquiry boundary.

**Coal Authority managed tips**

None recorded within 500 metres of the enquiry boundary.

## Section 2 – Investigative or remedial activity

Please refer to the 'Summary of findings' map (on separate sheet) for details of any activity within the area of the site boundary.

### Site investigations

Distance to site investigation (m)	Direction
0.9	South

See Section 4 for further information.

### Remediated sites

None recorded within 50 metres of the enquiry boundary.

### Coal mining subsidence

The Coal Authority has not received a damage notice or claim for the subject property, or any property within 50 metres of the enquiry boundary, since 31 October 1994.

There is no current Stop Notice delaying the start of remedial works or repairs to the property.

The Coal Authority is not aware of any request having been made to carry out preventive works before coal is worked under section 33 of the Coal Mining Subsidence Act 1991.

### Mine gas

None recorded within 500 metres of the enquiry boundary.

### Mine water treatment schemes

None recorded within 500 metres of the enquiry boundary.

## Section 3 – Licensing and future mining activity

### Future underground mining

None recorded.

### Coal mining licensing

None recorded within 200 metres of the enquiry boundary.

### Court orders

None recorded.

### Section 46 notices

No notices have been given, under section 46 of the Coal Mining Subsidence Act 1991, stating that the land is at risk of subsidence.

### Withdrawal of support notices

The property is not in an area where a notice to withdraw support has been given.

The property is not in an area where a notice has been given under section 41 of the Coal Industry Act 1994, cancelling the entitlement to withdraw support.

### Payments to owners of former copyhold land

The property is not in an area where a relevant notice has been published under the Coal Industry Act 1975/Coal Industry Act 1994.

## Section 4 – Further information

The following potential risks have been identified and as part of your risk assessment should be investigated further.

### Future development

If development proposals are being considered, technical advice relating to both the investigation of coal and former coal mines and their treatment should be obtained before beginning work on site. All proposals should apply specialist engineering practice required for former mining areas. No development should be undertaken that intersects, disturbs or interferes with any coal or coal mines without first obtaining the permission of the Coal Authority.

**MINE GAS:** Please note, if there are no recorded instances of mine gas within 500m of the enquiry boundary, this does not mean that mine gas is not present within the vicinity. The Coal Authority Mine Gas data is limited to only those sites where a Mine Gas incident has been recorded. Developers should be aware that the investigation of coal seams, mine workings or mine entries may have the potential to generate and/or displace underground gases. Associated risks both to the development site and any neighbouring land or properties should be fully considered when undertaking any ground works. The need for effective measures to prevent gases migrating onto any land or into any properties, either during investigation or remediation work, or after development must also be assessed and properly addressed. In these instances, the Coal Authority recommends that a more detailed Gas Risk Assessment is undertaken by a competent assessor.

### Development advice

The site is within an area of historical coal mining activity. Should you require advice and/or support on understanding the mining legacy, its risks to your development or what next steps you need to take, please contact us.

### Site investigations

The site is within an area of previous interest. It is close to where the Coal Authority has received information relating to past site investigations.

The site requires further investigation and may influence how you approach your risk assessment.

**For further information on specific site or ground investigations in relation to any issues raised in Section 4, please call us on 0345 762 6848 or email us at [groundstability@coal.gov.uk](mailto:groundstability@coal.gov.uk).**

## Section 5 – Data definitions

The datasets used in this report have limitations and assumptions within their results. For more guidance on the data and the results specific to the enquiry boundary, please **call us on 0345 762 6848** or **email us at [groundstability@coal.gov.uk](mailto:groundstability@coal.gov.uk)**.

### Past underground coal mining

Details of all recorded underground mining relative to the enquiry boundary. Only past underground workings where the enquiry boundary is within 0.7 times the depth of the workings (zone of likely physical influence) allowing for seam inclination, will be included.

### Probable unrecorded shallow workings

Areas where the Coal Authority believes there to be unrecorded coal workings that exist at or close to the surface (less than 30 metres deep).

### Spine roadways at shallow depth

Connecting roadways either, working to working, or, surface to working, both in-seam and cross measures that exist at or close to the surface (less than 30 metres deep), either within or within 10 metres of the enquiry boundary.

### Mine entries

Details of any shaft or adit either within, or within 100 metres of the enquiry boundary including approximate location, brief treatment details where known, the mineral worked from the mine entry and conveyance details where the mine entry has previously been sold by the Authority or its predecessors British Coal or the National Coal Board.

### Abandoned mine plan catalogue numbers

Plan numbers extracted from the abandoned mines catalogue containing details of coal and other mineral abandonment plans deposited via the Mines Inspectorate in accordance with the Coal Mines Regulation Act and Metalliferous Mines Regulation Act 1872. A maximum of 9 plan extents that intersect with the enquiry boundary will be included. This does not infer that the workings and/or mine entries shown on the abandonment plan will be relevant to the site/property boundary.

### Outcrops

Details of seam outcrops will be included where the enquiry boundary intersects with a conjectured or actual seam outcrop location (derived by either the British Geological Survey or the Coal Authority) or intersects with a defined 50 metres buffer on the coal (dip) side of the outcrop. An indication of whether the Coal Authority believes the seam to be of sufficient thickness and/or quality to have been worked will also be included.

### Geological faults, fissures and breaklines

Geological disturbances or fractures in the bedrock. Surface fault lines (British Geological Survey derived data) and fissures and breaklines (Coal Authority derived data) intersecting with the enquiry boundary will be included. In some circumstances faults, fissures or breaklines have been known to contribute to surface subsidence damage as a consequence of underground coal mining.

### **Opencast mines**

Opencast coal sites from which coal has been removed in the past by opencast (surface) methods and where the enquiry boundary is within 500 metres of either the licence area, site boundary, excavation area (high wall) or coaling area.

### **Coal Authority managed tips**

Locations of disused colliery tip sites owned and managed by the Coal Authority, located within 500 metres of the enquiry boundary.

### **Site investigations**

Details of site investigations within 50 metres of the enquiry boundary where the Coal Authority has received information relating to coal mining risk investigation and/or remediation by third parties.

### **Remediated sites**

Sites where the Coal Authority has undertaken remedial works either within or within 50 metres of the enquiry boundary following report of a hazard relating to coal mining under the Coal Authority's Emergency Surface Hazard Call Out procedures.

### **Coal mining subsidence**

Details of alleged coal mining subsidence claims made since 31 October 1994 either within or within 50 metres of the enquiry boundary. Where the claim relates to the enquiry boundary confirmation of whether the claim was accepted, rejected or whether liability is still being determined will be given. Where the claim has been discharged, whether this was by repair, payment of compensation or a combination of both, the value of the claim, where known, will also be given.

Details of any current 'Stop Notice' deferring remedial works or repairs affecting the property/site, and if so the date of the notice.

Details of any request made to execute preventative works before coal is worked under section 33 of the Coal Mining Subsidence Act 1991. If yes, whether any person withheld consent or failed to comply with any request to execute preventative works.

### **Mine gas**

Reports of alleged mine gas emissions received by the Coal Authority, either within or within 500 metres of the enquiry boundary that subsequently required investigation and action by the Coal Authority to mitigate the effects of the mine gas emission. Please note, if there are no recorded instances of mine gas reported, this does not mean that mine gas is not present within the vicinity. The Coal Authority Mine Gas data is limited to only those sites where a Mine Gas incident has been recorded.

### **Mine water treatment schemes**

Locations where the Coal Authority has constructed or operates assets that remove pollutants from mine water prior to the treated mine water being discharged into the receiving water body.

These schemes are part of the UK's strategy to meet the requirements of the Water Framework Directive. Schemes fall into 2 basic categories: Remedial – mitigating the impact of existing pollution or Preventative – preventing a future pollution incident.

Mine water treatment schemes generally consist of one or more primary settlement lagoons and one or more reed beds for secondary treatment. A small number are more specialised process treatment plants.

### **Future underground mining**

Details of all planned underground mining relative to the enquiry boundary. Only those future workings where the enquiry boundary is within 0.7 times the depth of the workings (zone of likely physical influence) allowing for seam inclination will be included.

### **Coal mining licensing**

Details of all licenses issued by the Coal Authority either within or within 200 metres of the enquiry boundary in relation to the under taking of surface coal mining, underground coal mining or underground coal gasification.

### **Court orders**

Orders in respect of the working of coal under the Mines (Working Facilities and Support) Acts of 1923 and 1966 or any statutory modification or amendment thereof.

### **Section 46 notices**

Notice of proposals relating to underground coal mining operations that have been given under section 46 of the Coal Mining Subsidence Act 1991.

### **Withdrawal of support notices**

Published notices of entitlement to withdraw support and the date of the notice. Details of any revocation notice withdrawing the entitlement to withdraw support given under Section 41 of the Coal Industry Act 1994.

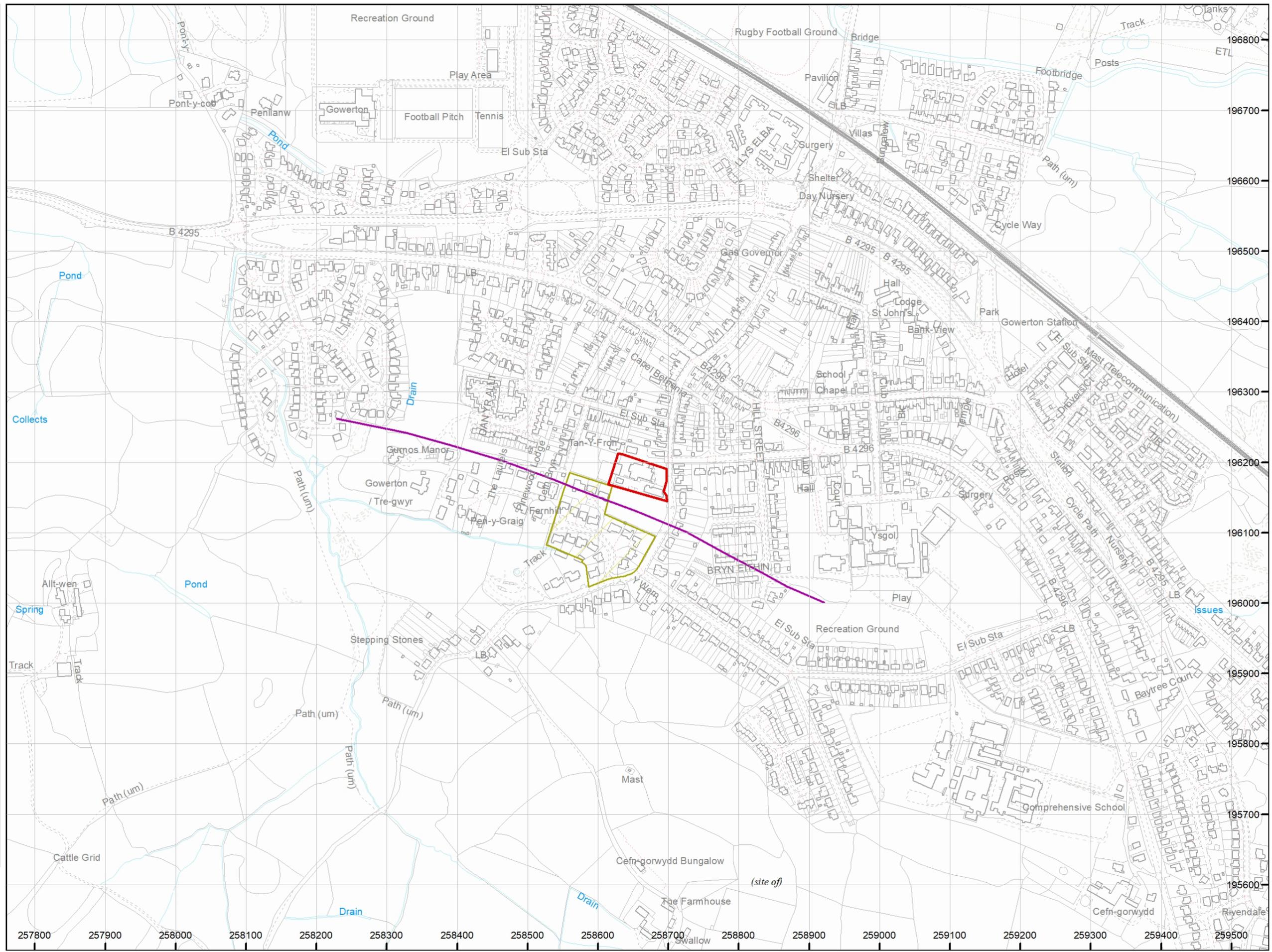
### **Payment to owners of former copyhold land**

Relevant notices which may affect the property and any subsequent notice of retained interests in coal and coal mines, acceptance or rejection notices and whether any compensation has been paid to a claimant.

The map highlights any specific surface or subsurface features within or near to the boundary of the site.

**Key**

- Approximate position of the enquiry boundary shown 
- Outcrop (Proven) 
- Site investigations 



**How to contact us**  
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