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For the attention of: Sarah Papaleo – Case Officer
Cumberland Council (Copeland area)

[By email: Development.Control3@cumberland.gov.uk]

16 November 2026

Dear Sarah

Re: 4/26/2316/0F1

Proposed extension to existing storage building; Whitehaven Golf Club, Red Lonning, Whitehaven – FURTHER INFORMATION RECEIVED

I refer to the email from the applicant's agent (Kenneth Thompson) dated 2 November 2026, which includes a letter dated 1 November 2026, the content of which seeks to address the concerns raised in our initial consultation response letter dated 22 October 2026.

The Coal Authority records indicate that the site has been subject to recorded underground coal mining at shallow depth and is also likely to have been subject to unrecorded underground coal mining at shallow depth. In terms of the recorded workings, our records indicate that a worked coal seam underlies the site at shallow depth (<30m) with an extraction thickness of 1.82m. Voids and broken ground associated with such workings can pose a risk of ground instability and may give rise to the emission of mine gases.

The applicant previously submitted a Coal Mining Risk Assessment (8 October 2026, prepared by Coniston Consultants Ltd). However, the Coal Authority did not consider that the report adequately addressed the impact of coal mining legacy on the proposed development, specifically regarding the risks posed by both the shallow coal mine

workings, which we have recorded underlying the site and potential unrecorded shallow workings. The report failed to identify the recorded workings or make any cross reference to them.

New development and construction activity clearly has the potential to trigger ground movement and for the reasons set out above, the Coal Authority objected to the proposal, and we considered that the applicant needed to revise and resubmit the report to the LPA.

In terms of Mr Thompson's submitted letter, the content again fails to acknowledge the recorded shallow coalmine workings, which we know underlie the site or make any assessment of the stability risks they pose. Despite conveying my concerns both in a telephone conversation with him, and in an email to him dated 3 November 2026, no subsequent rebuttal has been forthcoming.

The content of the letter appears to discount any undue stability implications on the subject site, based solely on ground conditions identified on those other parts of the site, which have been developed, but which are not affected by the recorded workings. Consequently, Mr Thompson has failed to demonstrate that the site is safe and stable or is capable of being made safe and stable to accommodate the proposed development. The Coal Authority **therefore maintains its objection to this planning application, specifically on the grounds that the proposals fail to satisfy policies L2 and P2 of the National Planning Policy Framework.**

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

Yours sincerely

Chris MacArthur

Chris MacArthur B.Sc. (Hons), DipTP, MRTPI
Planning Liaison Manager

General Information for the Applicant

Under the Coal Industry Act 1994 any intrusive activities, including initial site investigation boreholes, and/or any subsequent treatment of coal mine workings/coal mine entries for ground stability purposes require the prior written permission of The Coal Authority, since such activities can have serious public health and safety implications. Failure to obtain permission will result in trespass, with the potential for court action. In the event that you are proposing to undertake such work in the Forest of Dean local authority area our permission may not be required; it is recommended that you check with us prior to commencing any works. Application forms for Coal Authority permission and further guidance can be obtained from The Coal Authority's website at:

https://www.gov.uk/get-a-permit-to-deal-with-a-coal-mine-on-your-property

Disclaimer

The above consultation response is provided by The Coal Authority as a Statutory Consultee and is based upon the latest available coal mining 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.