Project No: EAL.126.25
Date: 28th July 2026

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Technical Addendum to the Coal Mining Risk Assessment - Outline Planning Application AVA/2026/0463 Proposed Redevelopment of Seals Fodder Room, High Street, Swanwick, Derbyshire

Reply to Mining Remediation Authority Consultation Response dated 24 July 2026

1. Introduction
This Technical Addendum has been prepared by ERDA Associates Ltd in response to the Mining Remediation Authority's consultation response dated 24 July 2026.

The purpose of this note is to clarify the approach adopted within the submitted Coal Mining Risk Assessment (CMRA) and to address the comments relating to the potential presence of a buried opencast highwall within the western part of the application site.

2. Coal Mining Risk Assessment
The submitted CMRA identified two principal mining legacy hazards that may affect the site:

- potential instability associated with historic recorded and probable unrecorded shallow coal workings; and
- potential settlement associated with historic surface mining activities, including the possible presence of buried opencast highwalls.

The CMRA concluded that intrusive site investigation comprising rotary boreholes and targeted trial trenching should be undertaken to establish the presence, extent and engineering significance of these potential constraints prior to detailed development design.

The Mining Remediation Authority's consultation response concurs with the findings of the assessment and similarly supports the recommendation for intrusive site investigation.

3. Buried Opencast Highwall
The CMRA identifies the potential for a buried opencast highwall to be present within the western part of the site based upon available historical mining information. The possible presence of such a feature has therefore been appropriately identified as a potential development constraint requiring further investigation.

However, at this stage there is no confirmed evidence regarding:

- whether a buried highwall is present;
- its precise location;
- its orientation;
- its geometry; or
- its engineering characteristics.

The intrusive investigation recommended within the CMRA is specifically intended to establish these matters.

Accordingly, it is not currently possible to prepare a detailed engineering solution for a feature that has not yet been confirmed and whose characteristics remain unknown. Any such design would necessarily be speculative and unsupported by site-specific ground investigation data.

4. Outline Planning Context
It is also important to recognise that the current application is submitted in outline, with matters relating to layout, scale, appearance and landscaping reserved for subsequent approval.

Consequently, the precise siting of individual dwellings has not yet been determined and remains subject to detailed design.

The objective of the CMRA at outline stage is therefore to demonstrate that potential mining legacy constraints have been appropriately identified, that suitable site investigations have been recommended and that there are no known mining-related constraints that would preclude the principle of development.

The recommended intrusive investigations form the next stage of this process and will provide the information necessary to inform both the detailed site layout and any subsequent foundation or geotechnical design.

5. Engineering Approach
Should the recommended intrusive investigations confirm the presence of a buried highwall capable of influencing the proposed development, the findings would be incorporated into the detailed design process.

The engineering response would be proportionate to the site-specific conditions encountered and may include, where appropriate:

- refinement of the development layout to avoid areas of elevated geotechnical risk where reasonably practicable;
- foundation solutions designed to accommodate the confirmed ground conditions;
- localised ground improvement or remediation where justified by the investigation findings; and/or
- other appropriate geotechnical measures recommended by the project geotechnical and structural engineers.

The selection of any mitigation measures must necessarily be informed by the results of the intrusive investigation and cannot reasonably be predetermined in the absence of those findings.

6. Conclusions
The submitted CMRA has appropriately identified the mining legacy hazards that may affect the application site and recommends a proportionate programme of intrusive investigation to establish the presence and significance of both shallow coal workings and any buried opencast highwall.

ERDA Associates Ltd considers that this represents the appropriate staged assessment process for an outline planning application.

Whilst the Mining Remediation Authority has requested additional commentary regarding potential engineering solutions, it is considered that the preparation of detailed mitigation measures at this stage would be premature, as neither the presence nor the engineering characteristics of any buried highwall have yet been established through site investigation. Furthermore, the final layout of the proposed development remains reserved for subsequent approval and may be refined to reflect the findings of those investigations.

Following completion of the recommended intrusive investigations, any confirmed mining-related constraints can be addressed through detailed engineering design as part of the subsequent development process. ERDA Associates Ltd therefore considers that the recommendations contained within the submitted CMRA remain appropriate and sufficient to demonstrate that the identified coal mining risks are capable of being satisfactorily investigated and, where necessary, mitigated.

Yours Sincerely



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