

From: [Jonathon Parr](#)
To: [Rachel Carney](#)
Cc: [Development Management](#)
Subject: RE: Hopwood Hall
Date: 25 July 2025 14:18:52
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)

Hi Rachel.

I have been through these this morning. The revised remediation strategy and asbestos management plan in your email to me dated 24th July 2025 can be considered the agreed remediation strategy for both applications (25/00519/FUL and 25/00541/FUL) which will require implementing to ensure safe and appropriate development for the site.

Obviously when remediation is complete, we will need to see a final verification report outlining that the remediation undertaken conforms to the strategy.

I know you are off today, and I will send something more formal for your planning records later, but just in case the applicant does need informing ASAP and one of your planning colleagues is looking after it for you, I thought I would email in the first instance.

Thanks

Jon

Jonathon Parr

Environmental Health Senior Officer (Environment Prot)

Public Health



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From: Rachel Carney

Sent: 24 July 2025 10:22

To: Jonathon Parr

Subject: FW: Hopwood Hall

Importance: High

Hi Jon,

Apologies, it appears the documents I sent yesterday were wrong again. Please see attached for hopefully the final and correct set!

Thanks again

Rachel

Rachel Carney

Principal Planning Officer (Growth)

Economy



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 rachel.carney@rochdale.gov.uk

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From: Adam Davis <Adam.Davis@willmottdixon.co.uk>

Sent: 23 July 2025 14:19

To: Rachel Carney <Rachel.Carney@Rochdale.Gov.UK>; Martin Simpson

<Martin.Simpson@willmottdixon.co.uk>

Cc: Sophie McGeough <Sophie@planred.co.uk>; Richard Purser <richard@planred.co.uk>; Marie

Hughes-Jones <Marie.Hughes-Jones@willmottdixon.co.uk>; Kate Hardeley

<Kate.Hardeley@willmottdixon.co.uk>

Subject: RE: Hopwood Hall

Importance: High

You don't often get email from adam.davis@willmottdixon.co.uk. [Learn why this is important](#)

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Hi Rachel,

Apologies, I have confused things even further here!

The attached are the most up to date set of these documents. @Martin Simpson can you please call the CLO, apologise and discuss the matter?

Thanks

Adam

From: Adam Davis <adam.davis@willmottdixon.co.uk>

Sent: 23 July 2025 12:35

To: rachel.carney@rochdale.gov.uk

Cc: Sophie McGeough <Sophie@planred.co.uk>; Richard Purser <richard@planred.co.uk>; Marie

Hughes-Jones <Marie.Hughes-Jones@willmottdixon.co.uk>; Kate Hardeley

<Kate.Hardeley@willmottdixon.co.uk>

Subject: RE: Hopwood Hall

Hi Rachel,

Please find attached updated information for remediation etc. which hopefully addresses all of your queries.

Thanks

Adam

From: Rachel Carney <Rachel.Carney@Rochdale.Gov.UK>

Sent: 17 July 2025 10:43

To: Richard Purser <richard@planred.co.uk>

Subject: Hopwood Hall

Hi again Richard,

Sorry, I forgot to mention some additional comments I'd received from EH looking for clarification on a few matters (copied below). They've also suggested a condition, requiring the works to be undertaken in accordance with the submitted remediation strategy/asbestos management plan, so it seems it is just clarification that's needed.

Remediation Strategy

1. *It is recommended that “450mm clean environmental cover soils” is provided in Public Open Space areas. How was this thickness derived? It is not mentioned within the remediation strategy or the previous reports submitted and undertaken by Tier Environmental Ltd. If it is professional judgement/experience, which is acceptable, then this should be stated.*
2. *DPM tested for and discussed within TE1880-TE-00-XX-RP-GE-006-V02 is not mentioned within the remediation strategy. Does this need to be included?*
3. *Therefore, does the remediation strategy take account of the updated asbestos risk assessment within TE1880-TE-00-XX-RP-GE-006-V02 with regards to potential further locations to be identified/concentrations?*
4. *I would also suggest that drainage measures (which are not discussed within the remediation strategy) should be implemented to prevent site water run-off into any surface water drainage which is extant/working during any remedial works.*

Asbestos management strategy

5. *DPM tested for and discussed within TE1880-TE-00-XX-RP-GE-006-V02 is not mentioned within the asbestos management strategy. The DPM should be included to indicate how site workers are to be protected.*
6. *Section 3.5.1 says that “In dry conditions, made ground materials will be regularly damped. For prolonged activities, control measures to keep the soils saturated and mitigate the release of fibres will be implemented”. Appendix 3.8.4 says “If dust is noticed, the engineer/site manager will immediately stop the process causing dust and implement further control measures before work commences.” Would it not be more effective to monitor work areas (assuming this is referring to areas of excavation) as they are being worked for soil moisture content so that, instead of waiting for dust to be released, it can be actively managed before dust, and the potential asbestos fibres it contains, are released? I assume standard working practices as on most sites rely on getting clearance for plant to move to ensure no risk to workers from plant movement, etc, will be in operation, even if only by a banks person over radio. Clause 3.8.4 can then be limited to haul roads/stockpiles, etc. I understand simple hand held devices can be used to monitor soil moisture content. Either that or, given the propensity to drier summers, that made ground materials should be damped throughout the time that they are worked. Obviously, this would be up to the applicant, but would this count as too onerous under ALARP? However, notwithstanding that, I agree with the procedures outlined within 3.8 and 3.9.*
7. *Appendix C says “Where fibre concentrations are approaching the HSE clearance indicator of 0.01f/ml, appropriate additional mitigation measures will be implemented.” What constitutes “approaching” 0.01 f/ml and who determines? The asbestos surveyor as required in 3.3.1 of the asbestos management strategy? Section 3.8.10 says “Background air monitoring of airborne respirable fibres must not exceed the UK clearance indicator concentration of 0.01 f/ml”, especially given comment 8. One part refers to breaching the clearance indicator, one part refers to approaching the clearance indicator. Clarification of which is to be followed would be appreciated.*

General

8. *It is worth reminding the applicant that CIRIA C733 in Section 8.1.3 says that “In order to avoid subsequent civil liabilities, mitigation measures need to prevent exposure of neighbouring residents and the public to levels, which might be deemed ‘significant’ in the*

future.” The level referred to as ‘background’ in buildings is 0.0005f/ml and that exposures to levels above that benchmark pose a “significant” risk of mesothelioma developing as per the Industrial Injuries Advisory Council CM3467 report. Outdoor background for note is between 0.000001f/ml (rural background) and 0.0001f/ml (urban background). Therefore lowering the clearance indicator concentration should be considered to prevent future litigation. The ACOP for CAR 2012 states that the clearance indicator threshold “should be taken only as a transient indication of site cleanliness ... and not as an acceptable, permanent environmental level. (paragraph 453)” Although exposure to the public is considered not an issue should the measures recommended be implemented, and one I tend to agree with the above notwithstanding, on site monitoring of asbestos fibres (and dust, if appropriate) as discussed within the asbestos management strategy should be able to detect asbestos at such concentrations. Such concentrations as the UKCI are still capable of exposing people to many hundreds of fibres, the ALARP principle does apply.

9. Appendix C says “If the risk from fibres being released increases to moderate risk ...” Who determines if the risk changes? Would this be the asbestos surveyor as required in 3.3.1 of the asbestos management strategy? This is not clear.

Thanks

Rachel

Rachel Carney

Principal Planning Officer (Growth)

Economy



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