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Date: 21st July 2025

Our ref: LKR241042

Land at Hopwood Hall College, St Mary's Gate, Rochdale, OL12 6RY
LK Response to Local Authority Queries

Dear Rachel,

Introduction

LK was commissioned by Willmott Dixon Construction Ltd (Willmott Dixon), to produce the following documents which were submitted to Rochdale Borough Council as part of the planning application for the proposed development of Hopwood Hall College, Rochdale:

- Remediation Strategy & Build Phase Verification Plan for Hopwood Hall College, Rochdale. Ref LKC251085 dated
- Asbestos Management Plan and Risk Assessment for Asbestos Impacted Soils at Hopwood Hall College. Ref LKR241014 dated 24th April 2025.

Remediation Strategy Queries

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*

450mm is the typical industry-accepted standard for public open space areas/ shared landscaping areas and is accepted by most local authorities. It is considered suitable to mitigate contact of contaminated land with site users for all, but deep construction related excavations, where health and safety controls would be required.

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?*

Noted. The remediation strategy was written prior to the Teir Supplementary Soils Waste Classification Report for Hopwood Hall College (ref TE1880-TE-00-XX-RP-GE-006-V01 dated

May 2025) being issued. The Remediation Strategy has been updated, and a revised copy is attached. LK consider the DPM to be lower-risk than cement-bound ACMS, which are covered in the Remediation Strategy.

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?*

Yes, we can confirm that the remediation strategy covers the risk from asbestos.

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.*

Drainage design doesn't form part of the remediation strategy. However, surface water run-off during the construction phase is to be controlled as per the RAMS and the Construction Environmental Management Plan. To help we have added a section into the remediation strategy (Section 2.2.7 Control of Water).

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.*

Noted. The asbestos management plan was written prior to the Teir Supplementary Soils Waste Classification Report for Hopwood Hall College (ref TE1880-TE-00-XX-RP-GE-006-V01 dated May 2025) being issued. The asbestos management plan has been updated, and a revised copy is attached.

A JWIG assessment has been completed (results included in the asbestos management plan) which demonstrates that the DPM poses a low risk to site works. LK consider the DPM to be lower-risk than cement-bound ACMS.

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.

Section 6.4 of the Teir Supplementary Soils Waste Classification Report for Hopwood Hall College (ref TE1880-TE-00-XX-RP-GE-006-V01 dated May 2025) states the following:

“The release of airborne asbestos is also strongly influenced by soil moisture content, with additional of 5% moisture reducing potential asbestos by 80% to 95%, with no fibres being detracted at above 15% moisture content (as described on page 65 of CIRA C773). The average moisture content of the samples obtained across the site was reported as 22.99%. It is not unreasonable to assume as a worst-case scenario that the soils could lose half their natural moisture content, i.e. the soils drying out to c 11.5% in the summer months, close to the surface. This has the effect of reducing the potential airborne asbestos (ci) by a minimum of 80% which would equate to 0.006 f/ml.”

From LK’s previous experience for soils to dry out to half their natural moisture content a prolonged period of dry weather would be required. During in these periods LKR as standard procedure would have the ability to adequately wet soils and this would be undertaken as and when required. Our experienced site managers who have been doing the job for many years are able to determine when dust suppression is required.

LK regard regular testing of soil moisture contents on a daily basis as unnecessary and unfeasible and it would have a significant impact on cost and programme length.

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.*

The Asbestos Management Plan has been amended to state in all sections where the asbestos analyst identifies fibre concentrations exceeding 0.01 f/ml, they will notify the site manager who will stop works in the impacted areas.

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.

Noted.

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.*

The risk change would be determined by re-running the JWIG model based on findings of air monitoring, additional chemical sampling results being made available or a planned change of works. Appendix C has been amended to make this clearer.

We trust that this provides sufficient clarification to address the points raised.

Yours Sincerely

William Fitzpatrick
Remediation Manager
For and on behalf of LKR