Consultation Response from: KC Environmental Health (Pollution & Noise Control)		
2022/92437 - Kirklees College, Halifax Road, Dewsbury, WF13 2AS		
Discharge of condition 16 (Remediation Strategy) of previous permission 2021/91508 for demolition of part of former college buildings and erection of police station, including conversion of Oldroyd Building and erection of new buildings comprising police custody suite, associated support services buildings, decked and surface car parking, vehicle access point, boundary treatments and landscaping		
Date Responded: **26th October 2022**	**Responding Officer:** **Natalie Heaney**	**Responding Ref:** **WK/202224600**

Condition 16 - Remediation Strategy
Since our previous response on 12th October, an Asbestos Remediation Technical Note by Waterman Infrastructure & Environment Limited dated October 2022 (ref: WIE12951-103-R-18.1.2-Asb) has been submitted in support of discharging Condition 16. The report includes geotechnical information, which is outside the remit of Environmental Health, this consultation response therefore only relates to the land contamination aspect of the report.

The document clarifies the works undertaken to date and includes a revised risk assessment. The report advises that a 'significant number of structures have been demolished at the Site between February 2022 and June 2022' and asbestos removal works have been underway at the site. In May 2022, during enabling works, asbestos was identified in the embankment area. An additional investigation was undertaken to assess the extent of asbestos contamination and 'asbestos impacted soils were removed from Site to an appropriately licenced waste management facility' in August and September 2022. Verification of the remaining site surface following the removal of the asbestos-impacted soils in the embankment was undertaken and the results have been provided in the appended information.

Asbestos-impacted soils were also identified below Block C during the main investigation and the surrounding soils were further identified as containing asbestos. An additional ground investigation identified the requirement to remove the soils from this area and this is scheduled for removal as previously undertaken elsewhere onsite.

The document states that 'all asbestos impacted soils in Area A and Area C as identified in the Lucion Asbestos Management Plan have been removed from Site. Asbestos impacted soils formerly beneath the Block C slab have been exposed to the air by the removal of the slab, but have otherwise not been disturbed and are cordoned off preventing access to this area of the Site.' In Table 2, an updated conceptual site model is presented.

Later in Section 9, an awareness of Condition 17 is demonstrated. The report elaborates on the contingency measures for any unforeseen contamination or unusual/unanticipated ground conditions that may be encountered during the remediation.

Finally, the report concludes that a significant quantity of asbestos-impacted soils have been removed and the updated risk assessment further recommends that 'asbestos removal works proceed to reduce potential risks to construction workers and neighbouring site users.'

We can confirm we accept the Asbestos Remediation Technical Note by Waterman Infrastructure & Environment Limited dated October 2022 (ref: WIE12951-103-R-18.1.2-Asb). In addition, following further correspondence from Waterman Infrastructure & Environment Limited on 26th October 2022 regarding clean cover, we confirm that the documents satisfy the requirements of the condition.

Recommendations

Condition 16 - Remediation Strategy

We accept the previously submitted Site Remediation Strategy by Waterman Infrastructure & Environment Limited, dated August 2022 (ref: 6BKD1-WSL-ZZ-ZZ-RP-C-00010 P05) and Asbestos Remediation Technical Note by Waterman Infrastructure & Environment Limited dated October 2022 (ref: WIE12951-103-R-18.1.2-Asb). Together these documents satisfy the requirements of Condition 16. Therefore, we recommend that Condition 16 is discharged.