



FLAIR ENVIRONMENTAL

FIRE | LEGIONELLA | ASBESTOS



REFURBISHMENT SURVEY (WITH MA + PA)

LOCATION:

First floor, 54 Swanley Center, Swanley, Kent BR8 7TQ

SURVEYED ON:

9 Oct 2025

JOB NUMBER:

J003685

UPRN:

N/A

Flair Environmental Limited

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1. Asbestos Register & Executive Summary
2. Contract Review
3. Introduction - Purpose, Aims and Objectives
4. Desk Top Review and Survey Planning
5. Survey Method
6. Exclusions and Caveats
7. Sampling and Analysis
8. Survey Results - Interpretation
9. Recommendations

APPENDICES - Survey Results

Appendix 1 - Survey Data Sheets

Appendix 2 - Areas Surveyed

Appendix 3 - Analysis Certificates

Appendix 4 - Plans

1.0 Asbestos Register:

Asbestos containing materials have been identified during the Refurbishment Survey (with MA + PA) and the specific materials are listed below in order according to the initial Material & Priority Assessment made by Flair Environmental.

| Item Reference | Building | Floor | Room | Item Description | Position | Item Comments | Conclusion | Extent | Photo | Recommended Action |
|----------------------|---------------------------------|-----------|---------|----------------------|----------|---|---------------------------|---------------------------|---|---|
| 3 | First Floor - 54 Swanley Center | 1st Floor | Office | Acoustic sink pad | Sink | Presumed, unable to access beneath sink due to building debris in way | Chrysotile | 1no. |  | Remove if affected by refurbishment works |
| Sample Number | | | | | | | Material Assessment Score | Priority Assessment Score | | |
| P Visual | | | | | | | 3 | 4 | | |
| Item Reference | Building | Floor | Room | Item Description | Position | Item Comments | Conclusion | Extent | Photo | Recommended Action |
| 4 | First Floor - 54 Swanley Center | 1st Floor | Landing | Eternite window sill | Window | | Chrysotile | 6lm |  | Remove if affected by refurbishment works |
| Sample Number | | | | | | | Material Assessment Score | Priority Assessment Score | | |
| SP As DP000413 | | | | | | | 4 | 6 | | |
| Item Reference | Building | Floor | Room | Item Description | Position | Item Comments | Conclusion | Extent | Photo | Recommended Action |
| 8 | First Floor - 54 Swanley Center | 1st Floor | Office | Eternite window sill | Window | | Chrysotile | 16lm |  | Remove if affected by refurbishment works |
| Sample Number | | | | | | | Material Assessment Score | Priority Assessment Score | | |
| SP As DP000413 | | | | | | | 4 | 6 | | |

| Item Reference | Building | Floor | Room | Item Description | Position | Item Comments | Conclusion | Extent | Photo | Recommended Action |
|----------------------|---------------------------------|-----------|----------------------|----------------------------------|----------|---------------|---------------------------|---------------------------|---|---|
| 7 | First Floor - 54 Swanley Center | 1st Floor | Lobby | Eternite window sill | Window | | Chrysotile | 2lm |  | Remove if affected by refurbishment works |
| Sample Number | | | | | | | Material Assessment Score | Priority Assessment Score | | |
| SP As DP000413 | | | | | | | 4 | 6 | | |
| 6 | First Floor - 54 Swanley Center | 1st Floor | WC | Eternite window sill | Window | | Chrysotile | 3lm |  | Remove if affected by refurbishment works |
| Sample Number | | | | | | | Material Assessment Score | Priority Assessment Score | | |
| SP As DP000413 | | | | | | | 4 | 6 | | |
| 5 | First Floor - 54 Swanley Center | 1st Floor | Toilet Lobby & Store | Insulating board lining to shelf | Shelf | N/A | Chrysotile + Amosite | 1m ² |  | Remove if affected by refurbishment works |
| Sample Number | | | | | | | Material Assessment Score | Priority Assessment Score | | |
| S DP000415 | | | | | | | 6 | 4 | | |
| 1 | First Floor - 54 Swanley Center | 1st Floor | Office | Eternite window sill | Window | Damaged | Chrysotile | 3lm |  | Remove if affected by refurbishment works |
| Sample Number | | | | | | | Material Assessment Score | Priority Assessment Score | | |
| S DP000413 | | | | | | | 4 | 6 | | |

Executive summary:

PRESUMED ASBESTOS/NO ACCESS AREA

Asbestos Containing Materials have been presumed as being present to the following areas where access could not be gained. Areas which have not been accessed should be presumed to contain asbestos until proven otherwise. Further details for locations of no access & presumed ACM's in provided in appendix 1.

| Building | Floor | Room/Area | Item Description | Recommendation |
|------------------------------|-------|-----------|------------------|----------------|
| There were no results found. | | | | |

Building Notes:

Surveyors Comments: N/A

External notes: N/A

2.0 Contract Review:

| | | | |
|--------------------------|---|------------|-----------------------|
| Client Name | Sleek Direct London Limited | | |
| Client Address | 17 Hanover Square, Mayfair, London | | |
| Site Address: | First floor, 54 Swanley Center, Swanley, Kent BR8 7TQ | | |
| Client contact: | | | |
| Type of survey: | Refurbishment Survey (with MA + PA) | | |
| Date of survey: | 9 Oct 2025 | | |
| Report Revision Number: | 1 | | |
| Job number: | J003685 | | |
| Lead surveyor[s]: | Harry Cottey | Signature: | <i>Harry Cottey</i> |
| Assistant surveyor: | | Signature: | |
| Technically reviewed by: | Megan Oldfield | Signature: | <i>Megan Oldfield</i> |
| Report issue date: | 23 Oct 2025 | | |

3.0 Introduction/Objectives:

Scope of Works

Refurbishment Survey to commercial premises approx 90m² as per client supplied plans which includes redecoration & changes to layouts

Flair Environmental received an order of confirmation to undertake a Refurbishment Survey (with MA + PA) from Sleek Direct London Limited. This order has been accepted on the basis of the original quotation and our terms and conditions of business.

The survey was carried out in accordance with our documented in-house technical procedures, which are based on HSE Guidance note HSG264.

HSG264 has been prepared by the Health and Safety Executive to help people carrying out asbestos surveys and those with specific responsibilities for managing the risks from asbestos in non-domestic premises under regulation 4 of the Control of Asbestos Regulations 2012 (CAR 2012). It is also designed to provide guidance in situations where surveys may be carried out for other purposes, eg for 'managing' asbestos in domestic premises under wider health and safety legislation and for meeting the requirements of the Construction (Design and Management) Regulations 2015 (CDM). It complements and supports other guidance on managing asbestos.

The survey has included the completion of priority assessment in accordance with HSG227. However it is recommended that the duty holder undertakes their own priority assessment.

3.1 Purpose of Survey

The purpose of this Refurbishment Survey (with MA + PA) is to locate & describe, so far as reasonably practicable, all asbestos containing materials (ACMs) in the building prior to the buildings major refurbishment or demolition. This will by its nature involve partial destruction of the building's fabric so that access can be gained to all areas. A full sampling programme is undertaken identify possible ACMs & estimate the extent of those recorded.

3.2 Aim of Survey

The aim of the survey was to;

1. Locate and record the location, extent, and product type as far as reasonably practicable of known or presumed ACM's.
2. Inspect and record information on the accessibility, condition and surface treatment of know or presumed ACM's
3. Make material & priority assessments as to the potential for ACMs to release airbourne fibres
4. Determine and record the asbestos type based on sampling or by making a presumption based on product type and appearance

3.0 Introduction/Objectives

3.3 Type of Survey – Refurbishment Survey

The purpose of this refurbishment survey is to identify ACM's to be removed prior to any work being carried out. This type of survey is used to locate and describe as far as is reasonably practicable all ACM's in the building that are likely to be disturbed by the site specific scope of works.

Refurbishment surveys are intended to locate all asbestos that are likely to be disturbed by the site specific scope of works. It is a disruptive, fully intrusive survey that involves destructive inspection techniques that penetrate the building structure extensively. This involves breaking into floors, through walls, into wall voids ceilings, cladding, boxing, as necessary to gain access to all areas, including the inner fabric of the building. A full sampling programme is undertaken to identify possible ACM's and estimate their quantities.

The survey is designed to be used to help the tendering process, and should be used to start generating a specification for tendering the removal of ACM's from the building prior to major refurbishment.

Whilst all asbestos materials have been identified as far as is reasonably practicable, some asbestos materials may remain unidentified buried within the fabric of the building during the survey. Asbestos shuttering buried within concrete slabs, asbestos hidden by structural supports, asbestos hidden behind other asbestos products, and building structures which are unsafe to fully access are potential locations.

It must be presumed that asbestos may remain unidentified to these type of areas and if suspect materials are uncovered during major refurbishment then samples should be taken for analysis

The survey report can be used as to assist with an asbestos management plan to help prioritise actions, but in itself does not constitute a management plan as required under CAR 2012.

In order for the building occupier under regulation 4 of CAR 2012 they must implement a management policy and plan for confirmed or presumed asbestos containing materials.

This refurbishment survey includes a material assessment & a priority assessment of the identified or presumed ACM's which relates to their condition and their potential to release fibres. This material & priority assessment will provide the duty holder with an initial guide to the priority for managing ACM's as it will identify those ACM's which will most readily release fibres if they are disturbed.

4.0 Desk Top Review and Survey Planning:

Details of information requested from the Duty Holder by Flair Environmental in order to carry out a desk top review and plan the survey in accordance with HSG 264 were recorded on our pre-survey questionnaire, along with details of all the information that were provided by Sleek Direct London Limited

The Information provided was assessed during the desktop review and a survey plan, and risk assessment was produced for the survey of:

First floor, 54 Swanley Center, Swanley, Kent, BR8 7TQ

The survey plan considered the following:

- | The scope and extent of areas to be included in the survey.
- | Agreed start and completion dates
- | Any areas to be excluded.
- | The type of survey
- | Any possible or known ACMs at the site
- | The survey procedure (eg how it will be conducted) and sampling strategy
- | The material assessment method and the parameters to be assessed.
- | The information to be recorded and the method and format to be used.
- | The quality assurance checks and procedures to be undertaken.
- | Any known area where access will not be possible.
- | Site safety procedures and requirements. The survey was carried out to areas as referenced in Appendix 3.

The following areas were excluded from the 'Asbestos Management Survey': [Exclusions]

Where information was provided regarding the presence of known or presumed asbestos materials then this has been validated during the course of the survey, and recorded within this report.

Utilities and services were still live at the time of the survey.

Access equipment for working at heights was not required.

The survey did not involve confined space working.

An appropriate exchange of information has occurred between and Flair Environmental to enable survey planning in accordance with 'HSG264 Asbestos: The Survey Guide'.

5.0 Survey Method:

This survey has been undertaken in accordance with the following:

- | HSE Guidance document HSG 264: Asbestos' The Survey Guide.
- | In-house documented technical procedures.
- | Project risk assessments and method statements.
- | Project survey plan

Refurbishment investigations included access to all readily accessible areas of the site defined within the scope of survey.

The survey has been carried in so far as was reasonably practical, to gather information on the nature, extent and condition of suspect ACMs. Where suspect ACMs were encountered a Material & Priority Assessment was made. The survey was carried out in a methodical and systematic manner to all areas include in the agreed scope of works, where safe and reasonable access could be made.

5.1 This survey has been undertaken in accordance with HSG264 and Flair Environmental in house procedures.

5.2 Clients of Flair Environmental that have signed our terms and conditions are deemed to have agreed, and accepted, our surveying approach, our sampling strategy, and our standard planning, surveying and reporting format unless they have made specific requests to the contrary.

5.3 Photographs of suspected ACM's will be taken at the time of the survey unless the client expressly requests otherwise. Sampling points and suspected ACM's will not be identified with labels unless the client expressly requests otherwise.

5.4 All fibrous materials and item will be included in the survey unless, in the surveyors professional opinion, these items can be excluded (eg. Wood, wallpaper, man-made mineral fibre). Samples of all thermoplastic floor coverings will be taken unless, in the surveyors professional opinion, such items can be excluded. All textured coatings and novel bituminous will be sampled.

5.5 Areas that could not be accessed were presumed to have ACM's present until proven otherwise. Each area requiring further inspection is documented within the Executive summary (Inaccessible areas). Inaccessible areas are also shown on the plan drawings (Appendix 4)

5.6 Materials that are not sampled but, in the surveyors opinion, have a similar appearance, location and function as a previously sampled material will be strongly presumed to be similar to the sampled material.

5.7 The quantity of samples taken may have been minimised by using 'strongly presumed' as defined above. Materials that are 'strongly presumed' to be similar to a material that has already been sampled will be recorded in the comments section of the survey and referenced against the original sampled material.

5.8 Non fibrous materials and item known not to contain asbestos (eg Breeze block, plaster, plasterboard plastics and non textured paints) will be excluded from the survey unless the surveyor suspects that these materials have been contaminated with asbestos from other sources or specifically requested by the client.

5.9 Older electrical equipment, which cannot be shown to contain ACM's, has been presumed to have ACM's present unless, in the surveyors professional opinion, such items can be excluded.

6.0 Exclusions and Caveats:

This document should not be used as a bill of quantities or to scope and specify asbestos remedial works.

Specific agreed restrictions that have been imposed on the scope and extent of the survey have been confirmed with the client prior to the commencement of the site works. The specific survey requirements, agreed scope of works and exclusions are detailed with our quotation / project plan document.

All reasonable attempts were made to access all areas within the scope of the survey. Areas not accessed are reported in the executive summary, non accessible areas register.

Typical exclusions from the survey are documented below. It should be noted that the list is not exhaustive:

- | Live plant and equipment
- | Fixed ceilings, internal wall linings & general wall cavities was restricted to avoid excessive damage to surface finishes
- | Behind known ACMs
- | Gaskets within pipework and equipment, representative assessments have been made only
- | Ventilation ducts

Where areas have been designated as 'no access' or 'restricted access', unless further inspection/sampling proves otherwise, the presumption should be made that these areas contain ACMs.

For safety reasons it is not possible to inspect internal areas of plant and machinery.

During the course of the survey it may not have been possible to access all areas of the site. Details of areas requiring further access are identified within the Data Sheets of this report. In accordance with HSG 264, asbestos is presumed to be present within these areas and should be treated accordingly until further inspection and analysis of building fabric and services proves otherwise.

Where areas have been designated as 'no access' or 'restricted access', unless further inspection/sampling proves otherwise, the presumption has been made that these structures/areas contain asbestos materials.

During the course of the survey it may not have been possible to access all areas of the site. Details of areas requiring further access are identified within the Data Sheets of this report. In accordance with HSG 264, asbestos is presumed to be present within these areas and should be treated accordingly until further inspection and analysis of building fabric and services proves otherwise.

Residual asbestos material may be present beneath re-lagged services and cannot be detected unless the re-lagging is systematically removed. Caution should therefore be taken when working on such materials for the potential presence of asbestos residue.

Textured Coatings such as "Artex" may contain a trace quantity of Chrysotile asbestos. Due to this low asbestos content, applications of this product may be non-homogenous and may elicit both positive and negative samples. Where both positive and negative samples are obtained the client should presume that the textured coating contains Chrysotile throughout even though a non-detected result has been obtained.

It was agreed with the client that access above or behind known ACM's was not required within the survey.

Underground services were not included in the survey.

7.0 Sampling and Analysis:

7.1 The object of bulk sampling is to identify the nature and extent of any visible ACM.

7.2 Bulk sampling is undertaken inline with the recognised safe procedures in order to cause minimal possible nuisance and potential risk to health of the building occupants and visitors. Bulk samples are taken in accordance with documented in house procedures, following guidelines detailed in HSG264 'The Survey Guide' and HSG248 'The Analyst Guide'. The quantity of samples taken will be minimised by using 'strongly presumed'. Materials that are 'strongly presumed' to be similar to a material that has already been sampled will be recorded in the comments section of the survey record and referenced against the original sampled material.

7.3 Bulk samples are returned to the appointed bulk analysis laboratory with the appropriate sample / report reference number. Where appropriate; a label will be left on site adjacent to the sample location.

7.4 The label will indicate the sample number and the date taken. This label can be used along with the report for cross reference purposes.

7.5 Bulk sample analysis is carried out a UKAS accredited laboratory in accordance with HSE document HSG 248 'The Analysts Guide'. Samples are examined under a low magnification stereomicroscope and the fibres teased apart. The fibres are then mounted in liquids of known refractive indices and examined under high magnification using polarised light and dispersion staining in accordance with HSG 248 'The Analysts Guide'.

7.6 The bulk sample description and analysis results can be found in Appendix 4 of this report – The analysis certificate.

Key to Analysis Results:

Chrysotile - White Asbestos

Amosite - Brown Asbestos

Crocidolite - Blue Asbestos

Tremolite - Rare Asbestos

Actinolite - Rare Asbestos

Anthophyllite - Rare Asbestos

8.0 Survey Results & Analysis:

Material & Priority Risk Assessment Scores

The results of the survey inspections and sampling undertaken are recorded on the Asbestos Register, enclosed Survey Data Sheets (Appendix 1). Where asbestos containing material have been identified or presumed to be present then a Material Assessment Algorithm & a Priority Assessment Algorithm has been calculated as detailed in HSG 264.

In the material assessment process, the main factors influencing fibre release are given a score which can then be added together to obtain a material assessment rating.

| Risk | Score Range | Fibre Release Potential | Recommendation | Management Action |
|--------|--|--|---|---|
| High | Material Assessment Score of 10 and above Priority Assessment between 18 & 24 | Asbestos in poor condition, or asbestos debris/contamination has been identified. It is recommended that risk assessment (s) are undertaken to ensure that Regulation 4, Regulation 10, Regulation 11 & Regulation 16 of the Control of Asbestos Regulations 2012 are complied with. | Restrict access to the area until ACM has been repaired Presumed to contain asbestos | ACM's in this category require immediate attention or further investigations of areas that were inaccessible at time of survey |
| Medium | Material Assessment Score Between 7 & 9 Priority Assessment Score between 12 & 17 | Asbestos containing materials, which are unsealed or damaged. It is recommended that remedial work to seal or remove these materials is undertaken as a priority and that air monitoring is carried out within adjacent areas in order to assess airborne fibre levels. | Remove Remove if affected by refurbishment works Encapsulate Inspect periodically | ACM's in this category should be prioritised to reduce the risk of fibre release |
| Low | Material Assessment Score of 6 or below Priority Assessment Score of less than 11 | Asbestos Containing Materials have been identified which are in good condition, A management policy and plan need to be implemented to manage these materials safely. The materials require labelling and the condition of these materials re-inspected at 12 monthly intervals. | Manage in situ Inspect periodically | ACM's in this category should be managed as per your asbestos management plan |
| None | N/A | None | None | Items in this category have been sampled & confirmed to be NADIS or no ACM's have been visually identified relating to the scope of works |

8.0 Survey Results - Interpretation:

Material Risk Assessment Algorithm

Product type [or debris from product]

| Score | Examples of scores |
|-------|---|
| 1 | Asbestos reinforced composites [plastics, resins, mastics, roofing felts, vinyl floor tiles, semi-rigid paint, decorative finishes and asbestos cement etc] |
| 2 | Asbestos insulating board, mill boards, other low-density boards, textiles, gaskets, ropes and woven materials and asbestos paper. |
| 3 | Thermal insulation [e.g. pipe and boiler lagging], sprayed asbestos, loose asbestos, asbestos mattresses and packing. |

Extent of damage/deterioration

| Score | Examples of scores |
|-------|---|
| 0 | Good condition: no visible damage |
| 1 | Low damage: a few scratches or surface marks, broken edges on boards or tiles, etc. |
| 2 | Moderate damage: significant breakage of materials or several small areas where material has been damaged exposing fibrous edges. |
| 3 | High damage or deterioration of materials, sprays and thermal insulation. Visible asbestos contamination by debris or residues. |

Surface treatment

| Score | Examples of scores |
|-------|--|
| 0 | Composite materials containing asbestos, reinforced plastics, resins, vinyl tiles |
| 1 | Enclosed sprays or insulation, AIB [with exposed face encapsulated], cement sheets, etc. |
| 2 | Unsealed AIB, encapsulated insulation and sprays. |
| 3 | Unsealed insulation and sprays. |

Asbestos Type

| Score | Examples of scores |
|-------|--|
| 1 | Chrysotile |
| 2 | Amphibole asbestos (excluding Crocidolite) |
| 3 | Crocidolite |

Priority Risk Assessment Algorithm

| Assessment Factor | | Score | Examples of score variables | | |
|----------------------------------|-------------------------------|-----------------------------------|---|--|---|
| Normal occupant activity | Main type of activity in area | 0 1 2 3 | Rare disturbance activity (e.g. little used store room) Low disturbance activities (e.g. office type activity) Periodic disturbance (e.g. industrial or vehicular activity which may contact ACMs) High levels of disturbance, (e.g. fire door with asbestos insulating board sheet in constant use) | | |
| | Secondary activities for area | As above | As above | | |
| Likelihood of disturbance | Location | 0 1 2 3 | Outdoors Large rooms or well ventilated areas Rooms up to 100m ² Confined spaces | | |
| | | Accessibility | 0 1 2 3 | Usually inaccessible or unlikely to be disturbed Occasionally likely to be disturbed Easily disturbed Routinely disturbed | |
| | | | Extent/amount | 0 1 2 3 | Small amounts or items (e.g. strings, gaskets) ≤10m ² or ≤10m pipe run >10m ² to ≤50m ² or >10m to ≤50m pipe run >50m ² or >50m pipe run |
| | Number of occupants | | | 0 1 2 3 | None 1 to 3 4 to 10 >10 |
| | | Frequency of use of area | | 0 1 2 3 | Infrequent Monthly Weekly Daily |
| | | | Average time area is in use | 0 1 2 3 | <1 hour >1 to <3 hours >3 to <6 hours >6 hours |
| | Maintenance activity | | | Type of maintenance activity | 0 1 2 3 |
| | | Frequency of maintenance activity | | | 0 1 2 3 |

Where ACMs have been identified or presumed the duty holder should carry out their own priority assessment in accordance with HSE Guidance Note HSG 227: A Comprehensive guide to Managing Asbestos in Premises, to enable the preparation of an Asbestos Management Plan in compliance Regulation 4 of the CAR 2012.

An Asbestos Management Plan must include adequate measures for the following:

- 1 Ensuring any asbestos or any such substance is properly maintained or where necessary safely removed; and ensuring that information about the location and condition of any asbestos or any such substance is provided to every person liable to disturb it, and made available to the emergency services.
- 1 The duty holder must ensure that the plan is reviewed and revised at regular intervals, and without delay if there is reason to suspect that the plan is no longer valid, or there has been a significant change in the premises to which the plan relates
- 1 The measures specified in the plan are implemented
- 1 The measures taken to implement the plan are recorded

9.0 Recommendations:

9.1 To comply with and ensure that the requirements of section 2 & 3 of the Health and Safety at Work Act (as amended) 1974, the Management of Health and Safety at Work Regulations 1999, the Control of Asbestos Regulations 2012 and the Control of Substances Hazardous to Health 2002 are met, the following recommendations should be implemented:

9.2 Undertake suitable and sufficient Risk Assessments of identified asbestos containing materials against normal occupation and maintenance operations, in compliance with Regulations 3 of the Management of Health & Safety at Work Regulations 1999 and Regulation 6 of the Control of Asbestos Regulations 2012.

9.3 The findings of the survey be brought to the attention of those persons who are likely to come in contact with asbestos, in compliance with Section 2 and 3 of the Health and Safety at Work Act (as amended) 1974 and Regulation 10 of the Control of Asbestos Regulations 2012.

9.4 Implement an Asbestos Management Policy, Plan and review process in compliance Regulation 4 of the Control of Asbestos Regulations 2012.

9.5 Instigate regular inspections, to record and update details of retained asbestos containing materials.

9.6 Review the arrangement under the management plan in accordance with regulation 4 of the CAR 2012.

9.7 During the course of the survey it may not have been possible to access all areas of the site. Details of areas requiring further access are identified within the Data Sheets of this report. In accordance with HSG 264, asbestos has been presumed to be present within these areas and should be treated accordingly until further inspection and analysis of building fabric and services proves otherwise.

9.8 Where asbestos debris or asbestos in poor condition has been found it is recommended that access is restricted and or controlled to these areas in accordance with Regulation 11 and Regulation 16 of the Control of Asbestos Regulations 2012.

9.9 If we have identified asbestos materials in poor condition, it is recommended that air monitoring is carried out within a number of areas where asbestos materials have been identified in order to assess airborne fibre levels within adjacent occupied areas in relation to the clearance indicator, as documented by HSG 248 the Analyst Guide.

9.10 All identified asbestos to be appropriately identified and subject to risk assessment, management, and re-inspection.

9.11 Site specific recommendations in respect to the location and condition of asbestos materials identified during the course of this inspection are detailed in the Survey Data Sheets and Asbestos register. In considering the management of asbestos materials identified to date, these recommendations should be taken into consideration.

9.12 In accordance with the Control of Asbestos Regulations 2012 the removal of ACM's fall into one of the three categories below:

Licensed Asbestos Removal

Is defined as any work, which is undertaken on a friable asbestos product or which is likely to exceed the control limit of 0.1f/cm³. A licensed asbestos removal contractor must undertake this work and a 14-day notice must be given to the HSE prior to the commencement of the work.

Notifiable Non Licensed Works

If work on an ACM causes the deterioration of the matrix material in which the asbestos fibres are firmly linked, then these works are Notifiable Non Licensed Work (NNLW). Work of this type does not require an asbestos removal licence, but the company undertaking the work must have the following:

- | Notification of the work to the relevant enforcing authority prior to the work commencing.
- | Medical examinations to assess each worker's state of health to be carried out, before any possible – exposure to asbestos. Then re-examinations every three years.
- | Insurance for working with asbestos containing materials.
- | A register of work to be kept by the employer for each employee exposed to asbestos.

Non Notifiable Non Licensed work

Non-Licensed Works Is defined as any work, which involves short, non-continuous maintenance activities, during which only nonfriable materials are removed. It can also involve the removal of non-friable materials for refurbishment purposes. However, work of this type is only applicable where the matrix material in which the asbestos fibres are firmly linked remains intact.

If a non-licensed contractor is appointed to undertake the removal works on the above materials, the following points must be adhered to:

- | All operatives undertaking work on the material must have asbestos awareness training and practical asbestos training.

9.13 It is recommended that further intrusive investigations and sampling be carried out in accordance with HSG.264, where any major refurbishment, maintenance, installation or similar activity may expose asbestos materials that have remained inaccessible during the survey. This should be as a refurbishment/demolition survey as documented in HSG264.

9.14 The findings of this report should not be solely relied upon in obtaining costs for proposed asbestos abatement work. Any proposed abatement/removal of the asbestos should be undertaken against a detailed specification.

Appendix 1 – Survey Data Sheets

| | | | |
|-------------------------------|---|---------------------------------|---------------------|
| Service Type | Refurbishment Survey | | |
| Report Revision Number | 1 | Surveyors | Harry Cottey |
| Flair Job Number | J003685 | Survey Date | 9 Oct 2025 |
| Site Address: | First floor 54 Swanley Center Swanley Kent BR8 7TQ | Bulk Analysis Laboratory | Scopes |
| | | Sample Analysis Date | 10 Oct 2025 |

| Sample Location | | Sample Details | |
|---|---------------------------------|---------------------------|-------------------------------|
| Building | First Floor - 54 Swanley Center | Inspection Number | 1 |
| Floor | 1st Floor | Sample Date | 10/10/2025 |
| Room | Office 101 | Sample Reference Number | DP000413 (S) |
| Item Description | Eternite window sill | Item Comments | Damaged |
| Position | Window | Sample Analysis Comments | |
| Qty | 3lm | Material Assessment | |
| Level of Identification | Identified | Normal Occupant Activity | |
| Sample Image | | Main | Low disturbance |
|  | | Secondary | Low disturbance |
| | | Likelihood of Disturbance | |
| | | Location | Rooms up to 100m ² |
| | | Accessibility | Easily disturbed (2) |
| | | Extent / Amt | 3lm |
| | | Human Exposure Potential | |
| | | Occupants | 4 to 10 |
| | | Frequency of use | Daily |
| | | Average Time in use | 1 to 3 hours |
| Material Assessment | | Maintenance Activity | |
| Product Type | Well Bound Material (1) | Type of maintenance | Low disturbance |
| Condition | Low Damage (1) | Frequency of maintenance | <1 per year |
| Surface Treatment | Surface Sealed (1) | Priority Assessment Score | 6 |
| Asbestos Type | Chrysotile (1) | Total MA & PA Score | 10 |
| Material Assessment Score | 4 | | |
| Recommended Action | | | |
| Remove if affected by refurbishment works | | | |

| Sample Location | | Sample Details | |
|---|---------------------------------|---------------------------|------------------------|
| Building | First Floor - 54 Swanley Center | Inspection Number | 2 |
| Floor | 1st Floor | Sample Date | 10/10/2025 |
| Room | Office 101 | Sample Reference Number | DP000414 (S) |
| Item Description | Damp proofing | Item Comments | Around exposed doorway |
| Position | Wall | Sample Analysis Comments | |
| Qty | 6lm | Material Assessment | |
| Level of Identification | Identified | Normal Occupant Activity | |
| Sample Image | | Main | N/A |
|  | | Secondary | N/A |
| | | Likelihood of Disturbance | |
| Material Assessment | | Location | N/A |
| Product Type | N/A | Accessibility | N/A |
| Condition | N/A | Extent / Amt | 6lm |
| Surface Treatment | N/A | Human Exposure Potential | |
| Asbestos Type | No Asbestos Detected | Occupants | N/A |
| Material Assessment Score | N/A | Frequency of use | N/A |
| | | Average Time in use | N/A |
| | | Maintenance Activity | |
| | | Type of maintenance | N/A |
| | | Frequency of maintenance | N/A |
| | | Priority Assessment Score | N/A |
| | | Total MA & PA Score | N/A |
| Recommended Action | | | |
| No further action required | | | |

| Sample Location | | Sample Details | |
|---|---------------------------------|---------------------------|---|
| Building | First Floor - 54 Swanley Center | Inspection Number | 3 |
| Floor | 1st Floor | Sample Date | |
| Room | Office 101 | Sample Reference Number | Visual (P) |
| Item Description | Acoustic sink pad | Item Comments | Presumed, unable to access beneath sink due to building debris in way |
| Position | Sink | Sample Analysis Comments | |
| Qty | 1 no. | Material Assessment | |
| Level of Identification | Presumed | Normal Occupant Activity | |
| Sample Image  | | Main | Rare disturbance |
| | | Secondary | Rare disturbance |
| | | Likelihood of Disturbance | |
| | | Location | Rooms up to 100m ² |
| | | Accessibility | Usually inaccessible or unlikely to be disturbed (0) |
| | | Extent / Amt | 1 no. |
| | | Human Exposure Potential | |
| | | Occupants | 1 to 3 |
| | | Frequency of use | Daily |
| | | Average Time in use | <1 hour - toilets |
| Material Assessment | | Maintenance Activity | |
| Product Type | Sink pad (1) | Type of maintenance | Low disturbance |
| Condition | Low Damage (1) | Frequency of maintenance | Unlikely |
| Surface Treatment | Completely Sealed (0) | Priority Assessment Score | 4 |
| Asbestos Type | Chrysotile (1) | Total MA & PA Score | 7 |
| Material Assessment Score | 3 | | |
| Recommended Action | | | |
| Remove if affected by refurbishment works | | | |

| Sample Location | | Sample Details | |
|---|---------------------------------|---------------------------|-------------------------------|
| Building | First Floor - 54 Swanley Center | Inspection Number | 4 |
| Floor | 1st Floor | Sample Date | |
| Room | Landing 102 | Sample Reference Number | As DP000413 (SP) |
| Item Description | Eternite window sill | Item Comments | |
| Position | Window | Sample Analysis Comments | |
| Qty | 6lm | Material Assessment | |
| Level of Identification | Strongly Presumed | Normal Occupant Activity | |
| <p style="text-align: center;">Sample Image</p>  | | Main | Low disturbance |
| | | Secondary | Low disturbance |
| | | Likelihood of Disturbance | |
| | | Location | Rooms up to 100m ² |
| | | Accessibility | Easily disturbed (2) |
| | | Extent / Amt | 6lm |
| | | Human Exposure Potential | |
| | | Occupants | 4 to 10 |
| | | Frequency of use | Daily |
| | | Average Time in use | <1 hour - toilets |
| Material Assessment | | Maintenance Activity | |
| Product Type | Well Bound Material (1) | Type of maintenance | Low disturbance |
| Condition | Low Damage (1) | Frequency of maintenance | <1 per year |
| Surface Treatment | Surface Sealed (1) | Priority Assessment Score | 6 |
| Asbestos Type | Chrysotile (1) | Total MA & PA Score | 10 |
| Material Assessment Score | 4 | | |
| Recommended Action | | | |
| Remove if affected by refurbishment works | | | |

| Sample Location | | Sample Details | |
|---|----------------------------------|---------------------------|--|
| Building | First Floor - 54 Swanley Center | Inspection Number | 5 |
| Floor | 1st Floor | Sample Date | 10/10/2025 |
| Room | Toilet Lobby & Store 103 | Sample Reference Number | DP000415 (S) |
| Item Description | Insulating board lining to shelf | Item Comments | N/A |
| Position | Shelf | Sample Analysis Comments | |
| Qty | 1 m ² | Material Assessment | |
| Level of Identification | Identified | Normal Occupant Activity | |
| Sample Image  | | Main | Rare disturbance |
| | | Secondary | Rare disturbance |
| | | Likelihood of Disturbance | |
| | | Location | Rooms up to 100m ² |
| | | Accessibility | Usually inaccessible or unlikely to be disturbed (0) |
| | | Extent / Amt | 1m ² |
| | | Human Exposure Potential | |
| | | Occupants | 1 to 3 |
| | | Frequency of use | Weekly |
| | | Average Time in use | <1 hour - toilets |
| Material Assessment | | Maintenance Activity | |
| Product Type | Insulating Board (2) | Type of maintenance | Medium disturbance |
| Condition | Low Damage (1) | Frequency of maintenance | <1 per year |
| Surface Treatment | Surface Sealed (1) | Priority Assessment Score | 4 |
| Asbestos Type | Chrysotile + Amosite (2) | Total MA & PA Score | 10 |
| Material Assessment Score | 6 | | |
| Recommended Action | | | |
| Remove if affected by refurbishment works | | | |

| Sample Location | | Sample Details | |
|---|---------------------------------|---------------------------|-------------------------------|
| Building | First Floor - 54 Swanley Center | Inspection Number | 6 |
| Floor | 1st Floor | Sample Date | |
| Room | WC 104 | Sample Reference Number | As DP000413 (SP) |
| Item Description | Eternite window sill | Item Comments | |
| Position | Window | Sample Analysis Comments | |
| Qty | 3lm | Material Assessment | |
| Level of Identification | Strongly Presumed | Normal Occupant Activity | |
| <div style="text-align: center;">Sample Image</div>  | | Main | Low disturbance |
| | | Secondary | Low disturbance |
| | | Likelihood of Disturbance | |
| | | Location | Rooms up to 100m ² |
| | | Accessibility | Easily disturbed (2) |
| | | Extent / Amt | 3lm |
| | | Human Exposure Potential | |
| | | Occupants | 4 to 10 |
| | | Frequency of use | Daily |
| | | Average Time in use | <1 hour - toilets |
| Material Assessment | | Maintenance Activity | |
| Product Type | Well Bound Material (1) | Type of maintenance | Low disturbance |
| Condition | Low Damage (1) | Frequency of maintenance | <1 per year |
| Surface Treatment | Surface Sealed (1) | Priority Assessment Score | 6 |
| Asbestos Type | Chrysotile (1) | Total MA & PA Score | 10 |
| Material Assessment Score | 4 | | |
| Recommended Action | | | |
| Remove if affected by refurbishment works | | | |

| Sample Location | | Sample Details | |
|---|---------------------------------|---------------------------|-------------------------------|
| Building | First Floor - 54 Swanley Center | Inspection Number | 7 |
| Floor | 1st Floor | Sample Date | |
| Room | Lobby 105 | Sample Reference Number | As DP000413 (SP) |
| Item Description | Eternite window sill | Item Comments | |
| Position | Window | Sample Analysis Comments | |
| Qty | 2lm | | |
| Level of Identification | Strongly Presumed | | |
| Sample Image | | Material Assessment | |
|  | | Normal Occupant Activity | |
| | | Main | Low disturbance |
| | | Secondary | Low disturbance |
| | | Likelihood of Disturbance | |
| | | Location | Rooms up to 100m ² |
| | | Accessibility | Easily disturbed (2) |
| | | Extent / Amt | 2lm |
| | | Human Exposure Potential | |
| | | Occupants | 4 to 10 |
| | | Frequency of use | Daily |
| Average Time in use | <1 hour - toilets | | |
| Material Assessment | | Maintenance Activity | |
| Product Type | Well Bound Material (1) | Type of maintenance | Low disturbance |
| Condition | Low Damage (1) | Frequency of maintenance | <1 per year |
| Surface Treatment | Surface Sealed (1) | Priority Assessment Score | 6 |
| Asbestos Type | Chrysotile (1) | Total MA & PA Score | 10 |
| Material Assessment Score | 4 | | |
| Recommended Action | | | |
| Remove if affected by refurbishment works | | | |

| Sample Location | | Sample Details | | |
|---|---------------------------------|---------------------------|-------------------------------|-----------------|
| Building | First Floor - 54 Swanley Center | Inspection Number | 8 | |
| Floor | 1st Floor | Sample Date | | |
| Room | Office 106 | Sample Reference Number | As DP000413 (SP) | |
| Item Description | Eternite window sill | Item Comments | | |
| Position | Window | Sample Analysis Comments | | |
| Qty | 16lm | Material Assessment | | |
| Level of Identification | Strongly Presumed | Normal Occupant Activity | | |
| <p style="text-align: center;">Sample Image</p>  | | Main | | Low disturbance |
| | | Secondary | | Low disturbance |
| | | Likelihood of Disturbance | | |
| | | Location | Rooms up to 100m ² | |
| | | Accessibility | Easily disturbed (2) | |
| | | Extent / Amt | 16lm | |
| | | Human Exposure Potential | | |
| | | Occupants | 4 to 10 | |
| | | Frequency of use | Daily | |
| | | Average Time in use | 1 to 3 hours | |
| Material Assessment | | Maintenance Activity | | |
| Product Type | Well Bound Material (1) | Type of maintenance | Low disturbance | |
| Condition | Low Damage (1) | Frequency of maintenance | <1 per year | |
| Surface Treatment | Surface Sealed (1) | Priority Assessment Score | 6 | |
| Asbestos Type | Chrysotile (1) | Total MA & PA Score | 10 | |
| Material Assessment Score | 4 | | | |
| Recommended Action | | | | |
| Remove if affected by refurbishment works | | | | |

| Sample Location | | Sample Details | |
|---|---------------------------------|---------------------------|------------|
| Building | First Floor - 54 Swanley Center | Inspection Number | 9 |
| Floor | 1st Floor | Sample Date | |
| Room | Office Store 107 | Sample Reference Number | Visual (P) |
| Item Description | No suspect materials found | Item Comments | N/A |
| Position | | Sample Analysis Comments | |
| Qty | N/A | Material Assessment | |
| Level of Identification | | Normal Occupant Activity | |
| Sample Image | | Main | N/A |
|  | | Secondary | N/A |
| | | Likelihood of Disturbance | |
| Material Assessment | | Location | N/A |
| Product Type | N/A | Accessibility | N/A |
| Condition | N/A | Extent / Amt | N/A |
| Surface Treatment | N/A | Human Exposure Potential | |
| Asbestos Type | N/A | Occupants | N/A |
| Material Assessment Score | N/A | Frequency of use | N/A |
| | | Average Time in use | N/A |
| | | Maintenance Activity | |
| | | Type of maintenance | N/A |
| | | Frequency of maintenance | N/A |
| | | Priority Assessment Score | N/A |
| | | Total MA & PA Score | N/A |
| Recommended Action | | | |
| No further action required | | | |

| Sample Location | | Sample Details | |
|---|---------------------------------|---------------------------|--------------|
| Building | First Floor - 54 Swanley Center | Inspection Number | 10 |
| Floor | External | Sample Date | 10/10/2025 |
| Room | External E01 | Sample Reference Number | DP000416 (S) |
| Item Description | Putty to window panes | Item Comments | N/A |
| Position | Windows | Sample Analysis Comments | |
| Qty | Throughout | Material Assessment | |
| Level of Identification | Identified | Normal Occupant Activity | |
| <div style="text-align: center;">Sample Image</div>  | | Main | N/A |
| | | Secondary | N/A |
| | | Likelihood of Disturbance | |
| | | Location | N/A |
| | | Accessibility | N/A |
| | | Extent / Amt | Throughout |
| | | Human Exposure Potential | |
| | | Occupants | N/A |
| | | Frequency of use | N/A |
| | | Average Time in use | N/A |
| Material Assessment | | Maintenance Activity | |
| Product Type | N/A | Type of maintenance | N/A |
| Condition | N/A | Frequency of maintenance | N/A |
| Surface Treatment | N/A | Priority Assessment Score | N/A |
| Asbestos Type | No Asbestos Detected | Total MA & PA Score | N/A |
| Material Assessment Score | N/A | | |
| Recommended Action | | | |
| No further action required | | | |

| Sample Location | | Sample Details | |
|---|---------------------------------|---------------------------|-------------------------------------|
| Building | First Floor - 54 Swanley Center | Inspection Number | 11 |
| Floor | External | Sample Date | 10/10/2025 |
| Room | External E01 | Sample Reference Number | DP000417 (S) |
| Item Description | Putty to door and window frames | Item Comments | Sample taken from various locations |
| Position | Door & windows | Sample Analysis Comments | |
| Qty | Throughout | | |
| Level of Identification | Identified | | |
| Sample Image | | Material Assessment | |
|  | | Normal Occupant Activity | |
| | | Main | N/A |
| | | Secondary | N/A |
| | | Likelihood of Disturbance | |
| | | Location | N/A |
| | | Accessibility | N/A |
| | | Extent / Amt | Throughout |
| | | Human Exposure Potential | |
| | | Occupants | N/A |
| | | Frequency of use | N/A |
| | | Average Time in use | N/A |
| Material Assessment | | Maintenance Activity | |
| Product Type | N/A | Type of maintenance | N/A |
| Condition | N/A | Frequency of maintenance | N/A |
| Surface Treatment | N/A | Priority Assessment Score | N/A |
| Asbestos Type | No Asbestos Detected | Total MA & PA Score | N/A |
| Material Assessment Score | N/A | | |
| Recommended Action | | | |
| No further action required | | | |

Appendix 3 - Areas Surveyed

| Building | Floor | Room No: | Room Type | Item |
|--|-----------|----------|----------------------------|---|
| First Floor - 54 Swanley Center | External | E01 | External | Brick and rendered walls, modern felt flat roof with thick layer of foam insulation below. Metal window frames and sills. All other areas excluded from scope of work. Surveyed from existing scaffolding only. |
| First Floor - 54 Swanley Center | 1st Floor | 101 | Office | Carpet over concrete, modern plaster finishes to the masonry and plasterboard walls and a modern plaster finish to the concrete ceiling. Metal window frame. Eternite window sill. Slate tiled infills below. Timber doors and frames. Timber constructed units and kickstands. Stainless steel sink and drainer. General building debris present throughout room. |
| First Floor - 54 Swanley Center | 1st Floor | 102 | Landing | Carpet over concrete, modern plaster and decorative paper finishes to the masonry and plasterboard walls and a modern plaster finish to the concrete ceiling. Metal window frames. Eternite window sills. Timber doors and frames. |
| First Floor - 54 Swanley Center | 1st Floor | 103 | Toilet Lobby & Store | Quarry tiles over concrete, modern plaster finishes to the masonry walls and a modern plaster finish to the concrete ceiling. Timber doors and frames. Electrics with associated timber backboard and plastic wrapped cables. Plastic water cylinder with associated metal pipework. Timber shelf with insulating board lining below. |
| First Floor - 54 Swanley Center | 1st Floor | 104 | WC | Quarry tiles over concrete, modern plaster and ceramic tile finishes to the masonry and plasterboard walls and a modern plaster finish to the concrete ceiling. Metal window frames. Eternite window sills. Timber doors and frames. Ceramic sanitary ware with associated metal and plastic pipework. Metal pipework housed within timber boxing. Metal downpipe to corner of room (no rope seal visible). |
| First Floor - 54 Swanley Center | 1st Floor | 105 | Lobby | Carpet over concrete, modern plaster and decorative paper finishes to the masonry and plasterboard walls and a modern plaster finish to the concrete ceiling. Metal window frame. Eternite window sill. Timber doors and frames. Timber boxing to corner housing metal pipework within. |
| First Floor - 54 Swanley Center | 1st Floor | 106 | Office | Carpet over concrete, modern plaster and decorative paper finishes to the masonry and plasterboard walls and a modern plaster finish to the concrete ceiling. Metal window frames. Eternite window sills. Timber doors and frames. |
| First Floor - 54 Swanley Center | 1st Floor | 107 | Office Store | Carpet over concrete, modern plaster finishes to the masonry and plasterboard walls and a modern plaster finish to the concrete ceiling. Timber door and frame. |



CERTIFICATE FOR IDENTIFICATION OF ASBESTOS FIBRES

| | |
|-----------|--------------------------|
| STANDARD | <input type="checkbox"/> |
| PREMIUM | <input type="checkbox"/> |
| EMERGENCY | <input type="checkbox"/> |

| | |
|-----------------------|---|
| Client: | FLAIR ENVIRONMENTAL |
| Address: | 3C HOLBOROUGH ROAD SNODLAND KENT ME6 5NL |
| Attention: | TECHNICAL MANAGER FIRST FLOOR – SWANLEY CENTRE |
| Site Address: | |
| Date sample taken: | 09/10/25 |
| Date sample received: | 10/10/25 |
| Date of Analysis: | 10/10/25 |

| | | | |
|---------------------|-------------|----|---|
| Analysis Report No. | SCO/25/9420 | | |
| Report Date. | 10/10/25 | | |
| Site Ref No. | J003685 | | |
| Page No: | 1 | Of | 1 |
| No. of Samples: | 5 | | |
| Obtained: | DELIVERED | | |

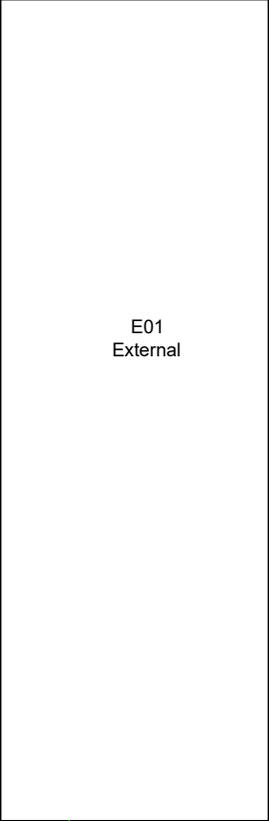
Samples of material, referenced below, have been examined to determine the presence of asbestos fibres, using Scopes Asbestos Analysis "in house" method of transmitted/polarised light microscopy and centre stop dispersion staining, based on HSE's HSG248. If samples have been DELIVERED the site address and actual sample location is as given by the client at the time of delivery. Scopes Asbestos Analysis Services Limited are not responsible for the accuracy or competence of the sampling by third parties. Under these circumstances Scopes Asbestos Analysis Services Limited cannot be held responsible for the interpretation of the results shown. Results relate only to the items tested.

| SCOPE SAMPLE No. | CLIENT SAMPLE No. | Sample Location | Fibre Type Detected |
|------------------|-------------------|-------------------------------|---------------------|
| 1 | DP413 | 1.01 -ETEMITE SILL | CHRYSOTILE |
| 2 | DP414 | 1.01 – DAMP PROOFING | NADIS |
| 3 | DP415 | 1.03 – INSULATING BOARD SHELF | AMOSITE/CHRYSOTILE |
| 4 | DP416 | E.01 – PUTTY | NADIS |
| 5 | DP417 | E.01 – PUTTY | NADIS |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |

KEY: NADIS – No Asbestos Detected in Sample

Note: All samples will be retained for a minimum of six months. Reports & Records are retained for a minimum of 5 years.
 Note: This Certificate for Identification of Asbestos Fibres shall not be reproduced except in full without the written approval of the Laboratory.
 Note: All Analysis is performed in House on the registered premises (below).
 Note: Where an 'A' appears at the end of the analysis report number this means an amendment has been made to the original report. Information that has been amended will be marked with an *

| | | | |
|-------------------------------------|----------|-----------------------|--------------------------------|
| Analysed by: | J PALMER | Authorised signatory: | |
| | | Print name: | C.BOLTON – DEPUTY Q.C.M |
| BULK 001-VER 8 14-JUN-22-QCM | | | |



E01
External

10
11

External

Job Number: J003685

Sheet Number: 02 of 02

Client Name: Sleek Direct

Site Address: First floor,
54 Swanley Center,
Swanley,
Kent BR8 7TQ

Floor/Area: External

Created By: Harry Cottey

Date: 21/Oct/2025

Version :Original

Date revised:

Key

ASBESTOS

RED

NON-ASBESTOS (sampled)

GREEN

VISUAL INSPECTION

BLACK

NO ACCESS

BLUE

NOT TO SCALE



3c Holborough Road, Snodland, Kent,
ME6 5NL
info@flair-enviromental.co.uk
01892 577125

Job Number: J003685

Sheet Number: 01 of 02

Client Name: Sleek Direct

Site Address: First floor,
54 Swanley Center,
Swanley,
Kent BR8 7TQ

Floor/Area: First Floor

Created By: Harry Cottey

Date: 21/Oct/2025

Version :Original

Date revised:

Key

ASBESTOS

RED

NON-ASBESTOS (sampled)

GREEN

VISUAL INSPECTION

BLACK

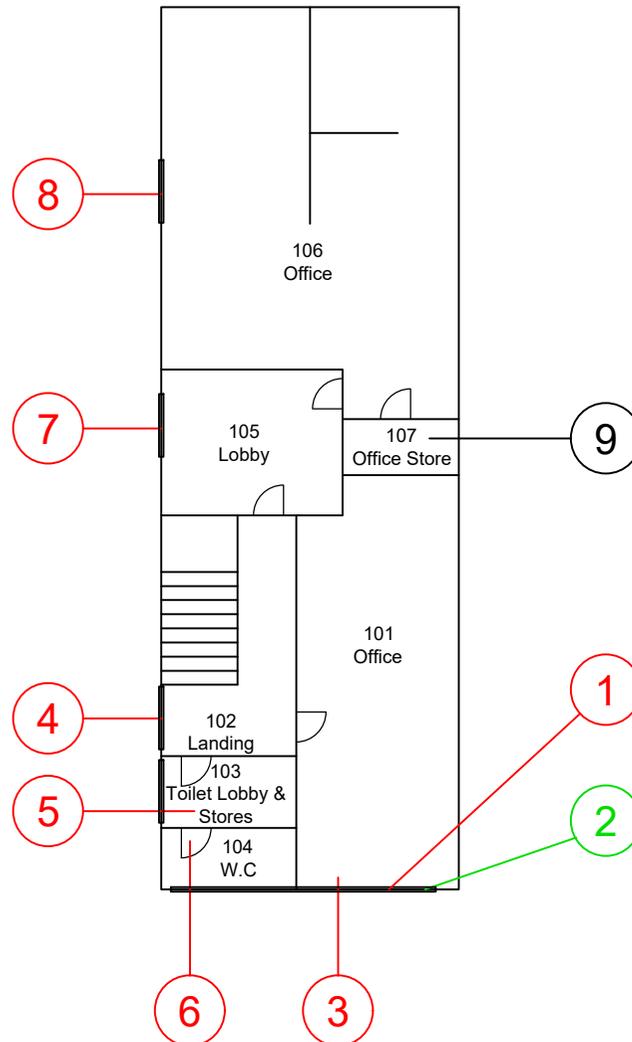
NO ACCESS

BLUE

NOT TO SCALE



3c Holborough Road, Snodland, Kent,
ME6 5NL
info@flair-enviromental.co.uk
01892 577125



First Floor