

Asbestos Remediation Strategy for 17-23 High Street, Ruislip

Introduction

Following a request from Dan Fyall of Macniven Quays Ltd. Strategic Risk Management (Asbestos) Ltd. have proposed an Asbestos Remediation Strategy for the property at 17-23 High Street, Ruislip, HA4 7AU.

This document has been written by Andrew Brown, AFOH, AFAAM of Strategic Risk Management (Asbestos) Ltd. and is dated 9th September 2021. This document is intended to discharge the pre-commencement element of planning condition 9 attached to planning permission ref. 72115/APP/2020/2688 (dated 24th February 2021).

1. Identification of Asbestos Containing Materials (ACMs)

To comply with Regulation 5 of the Control of Asbestos Regulations 2012, works must not be undertaken which expose or are liable to expose workers to asbestos fibres in their workplace.

This requires employers to carry out a suitable and sufficient assessment to determine the presence of asbestos, its type, the material(s) it is contained within and what condition it is in. This assessment is to determine if works can proceed without placing workers or any other persons at risk from asbestos fibres during the works.

The assessment may make use of existing asbestos records such as those prepared for compliance with Regulation 4 which will show the locations of previously identified ACMs.

Where works will be undertaken that disturb the building fabric it may be necessary to undertake more intrusive Asbestos Refurbishment Surveys.

If projects fall within the scope of the Construction (Design and Management) Regulations 2015 all existing records should be held in the Health and Safety file.

2. Existing Asbestos Records

An Asbestos Management Survey was undertaken of the property in February 2018 by Strategic Risk Management (Asbestos) Ltd. (reference. 152328). The Survey Report was submitted in support of planning application ref. 72115/APP/2020/2688.

This survey was undertaken to meet the obligations of Regulation 4 of the Control of Asbestos Regulations 2012 and included limited sampling of suspicious materials but did not utilise intrusive, destructive sampling techniques to examine within the building fabric. This survey identified small amounts of ACMs on the ground floor: 'Floor tile' (ref. IR019 presumed below IR018); and a presumption was made at high level to the exterior: 'Presumed soffits to roof' (ref. IR021).

The recommendation of all ACMs was to manage in-situ as their condition was determined to be acceptable at the time of the survey.



No other asbestos records are held on file for the property.

3. Identifying Areas of Potential Risk

In addition to the above two ACMs identified at the Site, the above survey report also identified the four areas below which were stated to fall outside the scope of the survey but must be presumed to contain asbestos until proven otherwise:

1. **Solid walls and floors (excluding surfaces and coatings)** - access within these would cause significant damage to the fabric of the building and they would not be accessed during the normal working occupancy of the building.
2. **Stud partition walls, fixed ceilings and fixed boxing** - access within these would cause significant damage to the fabric of the building and they would not be accessed during the normal working occupancy of the building.
3. **Live electrical boxes and equipment** - no electrician was provided by the client in order to gain safe access.
4. **Areas of plant and machinery** that can only normally be accessed during maintenance works – no engineer was provided by the client in order to gain safe access and/or plant was in use at the time of the survey.

In order to identify areas of potential risk of contamination from asbestos during the proposed works, a review of the proposed works plans against the above identified and presumed ACMs has been undertaken in consultation with the project architect. An assessment has been made as to the likelihood of disturbance of asbestos fibres. It has been concluded that ACMs could potentially be disturbed as a result of works proposed to the existing building fabric and consequently further Asbestos Refurbishment Survey(s) is recommended and will be carried out to the existing building fabric (see Section 4).

In addition to the building itself, the Site also includes external and external undercroft hard surfaced areas (hatched green on the plan at **Appendix 1**), within which some works are proposed. It is noted that it would not be practicable or recommended good practice for any further Asbestos Refurbishment Survey(s) of the Site to include survey of these external/undercroft ground areas (or the earth beneath them) within its scope. In addition, it is considered unlikely that any asbestos would be found below ground. It would be the responsibility of the contractor in line with good construction practice to monitor for any visible signs of asbestos at the time of undertaking those ground/below ground works. It is therefore concluded that any approved works in the areas highlighted green on the plan at Appendix 1, that would not result in any contact with (or physically impact upon) the existing building fabric, could commence without any requirement for further asbestos survey(s).

4. Additional Surveys

All asbestos surveying and sampling must be undertaken by competent persons and in accordance with the Control of Asbestos Regulations 2012 and guidance notes HSG264 and HSG248.

As the previous inspection was an Asbestos Management Survey it is advisable to undertake more intrusive inspections of the existing building. This type of survey utilises more intrusive,



destructive sampling techniques to locate any ACMs that would not normally be identified during a Management Survey.

Asbestos Refurbishment Survey or Surveys, will therefore be undertaken to the building. Such Asbestos Refurbishment Survey(s) may be scheduled within the program of works and do not need to be carried out at the same time. Thus, if some areas are unavailable, they may be scheduled at a more convenient time when they are vacant.

Due to the intrusive nature of Asbestos Refurbishment Surveys, it is normally not possible for surveys to go ahead when areas are occupied, they should only be carried out when areas are vacant and any stored items, furniture or fixtures and fittings are removed.

The findings of any such additional survey(s) will be reported to the Council alongside any associated proposed removal and/or remediation works at least 3 weeks prior to any proposed works being undertaken to relevant areas of the building.

Any identified (or remaining presumed) ACMs must be removed before works commence in relevant areas. Please see section 5 below.

5. Removal of Identified ACMs

If Asbestos Containing Materials (ACMs) are present that are likely to be disturbed by any planned works, it will normally be necessary to remove the ACMs from the area prior to the commencement of works in that area. Removal works must only be undertaken by competent workers using appropriate control measures and depending on the type of asbestos and the type of ACM some of these works may only be undertaken by Licensed Asbestos Removal Contractors.

Where removal works are recommended as a result of an Asbestos Survey the report will usually make a recommendation as to the category of works it will fall into. These are:

- a) Non-Licensed Works
- b) Notifiable Non-Licensed Works
- c) Licensed Works

Works that fall into the Notifiable Non-Licensed Works and Licensed Works require a notification to be sent to the enforcing authority. This must be done by the Asbestos Removal Contractor allowing adequate time before works commence.

Regardless of category, all asbestos removal works must be undertaken in accordance with the Control of Asbestos Regulations 2012 and guidance notes HSG247, HSG210. Any air monitoring or analytical works during the removals must be in accordance with HSG248.

6. Verification Plan

To ensure that works go ahead in a safe manner and the risk of asbestos exposure is minimised to an acceptable level, the methodologies used at all stages of the asbestos remediation and their outcomes must be verified.



To facilitate this, all aspects of the asbestos remediation must be recorded in the project file and this file should be made available to all parties and stake holders involved in the project, including contractors and the enforcing authority.

Each stage should be verified as complete and satisfactory by the Project Manager along with all documentation, project plans, method statements, risk assessments, specifications, survey reports, removal documentation, waste consignment documentation and analytical certification.

On completion of the project all aspects of the asbestos remediation will be clearly documented, and evidence will be made available to all parties to show that the property is safe for reoccupation. It is noted that planning condition 9 will not be fully discharged until verification information has been submitted for any proposed remedial works that may be proposed.



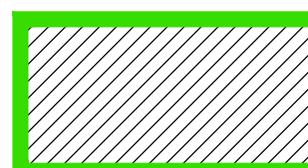
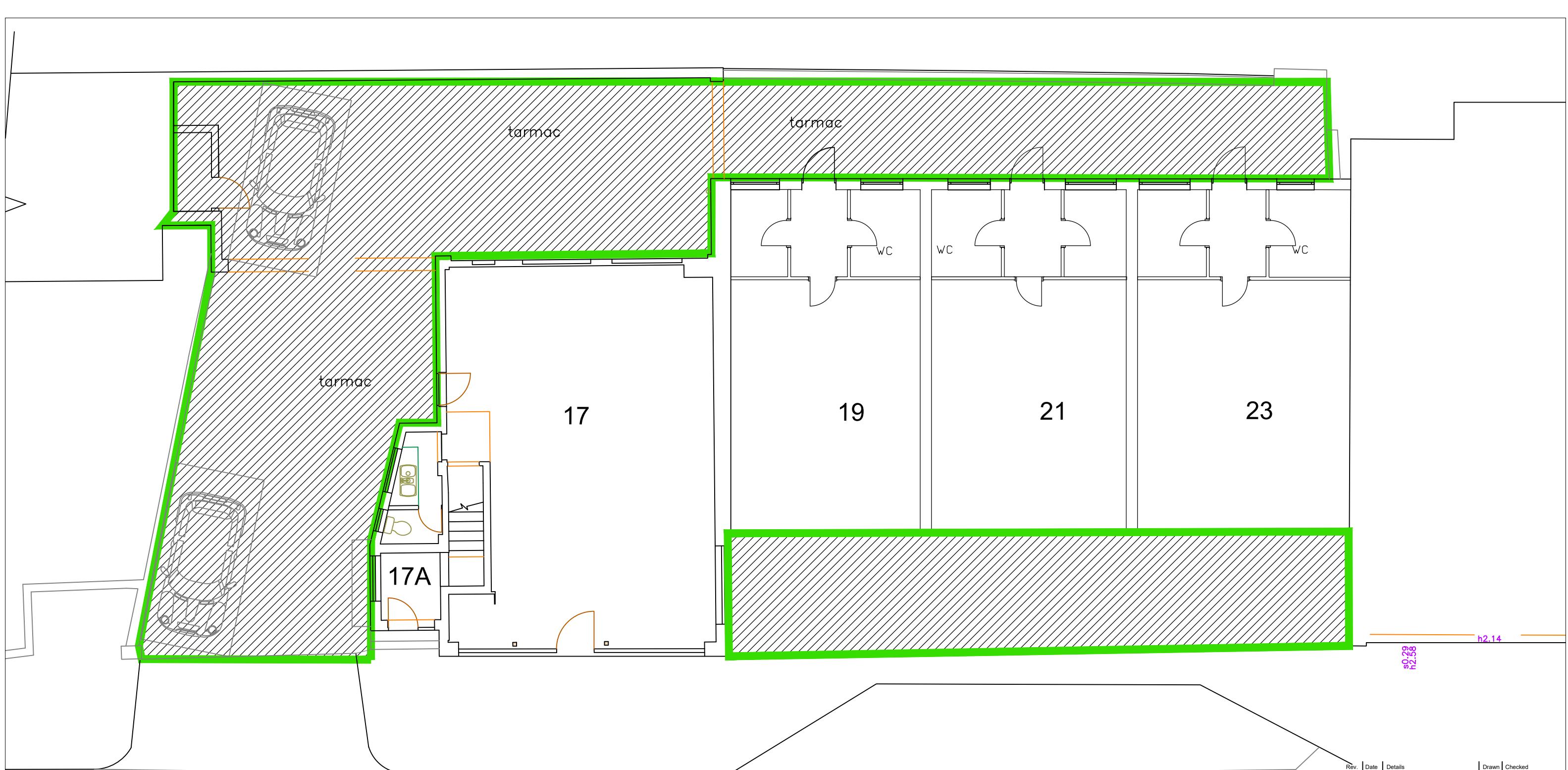
Further Reading:

1. Health & Safety at Work Act 1974
2. Construction Design & Management Regulations 2015
3. The Control of Asbestos Regulations 2012
4. Hazardous Waste Regulations 2005
5. HSG210 – Asbestos Essentials
6. HSG247 – Asbestos – The Licensed Contractors Guide
7. HSG248 – Asbestos – The Analysts Guide
8. HSG264 – Asbestos – The Survey Guide



APPENDIX 1 –
EXTERNAL/UNDERCROFT AREAS WHERE WORKS CAN COMMENCE WITHOUT FURTHER
ASBESTOS SURVEY (See Section 3)





EXTERNAL / UNDERCROFT AREAS AT
AND BELOW GROUND LEVEL WHERE
WORKS CAN COMMENCE WITHOUT
FURTHER ASBESTOS SURVEY

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