SYMETRI

PART OF ADDNODE GROUP



BEYOND THE REGULATOR:

THE NEXT PHASE OF BUILDING SAFETY COMPLIANCE AND APPLICATION APPROVALS





SESSION SPEAKER

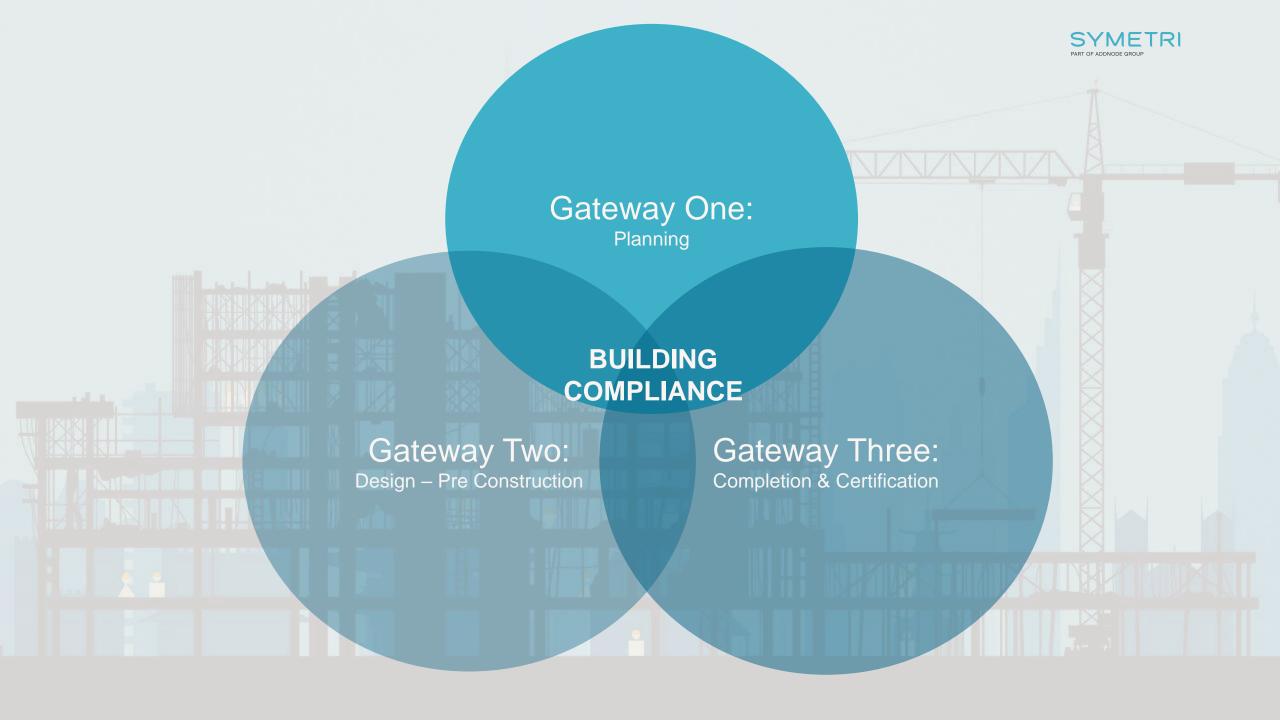


STEVE RUDGE
Head of Consulting





Building Safety Act 2022











Information Type

Colour Fill

Primary Legislation

Statutory Instruments

Guidance

Fact Sheet

Policy Paper

Independent Report

Research and analysis

Consultations

Building Regulation Approved Document

Government Web source Outline Colour

Department of Levelling Up and Communities (DLUC)

Health & Safety Executive (HSE)

Building Safety Regulator (BSR / HSE)

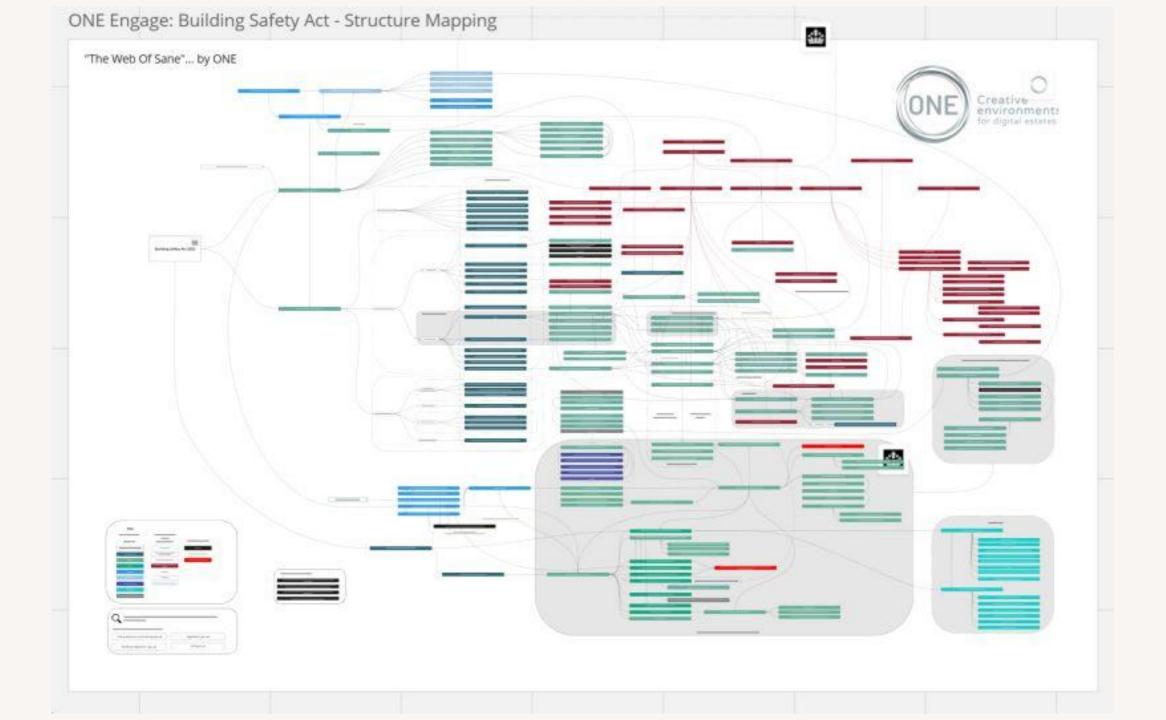
Website

Home Office

Other Site Sources

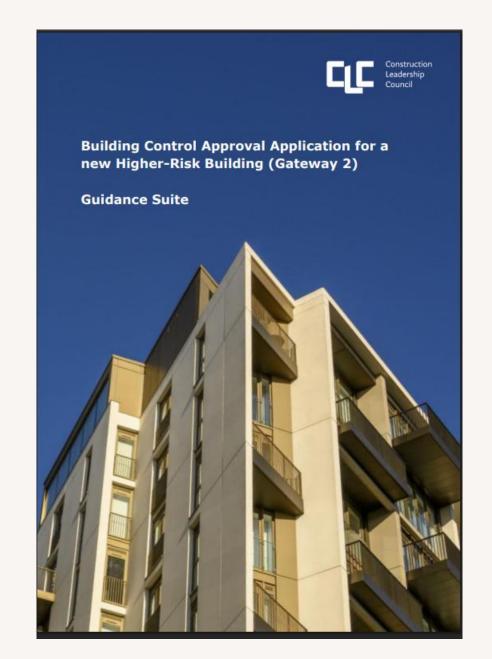
Non Government / Misc. Source

National Fire Chiefs Council (NFCC)











2025 UPDATES





MHCLG



MARCH 2025 UPDATES

THE MARCH 2025 UPDATE TO APPROVED DOCUMENT B (FIRE SAFETY) BY THE UK GOVERNMENT INCLUDES THE FOLLOWING KEY CHANGES:

- Sprinklers in Care Homes: All new care homes must now have sprinkler systems installed
- 2. Withdrawal of National Classes: Old UK fire performance classifications (e.g., BS 476) are no longer acceptable. Only European classifications (e.g., EN 13501) are permitted
- 3. Clarified Wall Requirements: Clarification of how certain cladding/fire resistance rules apply
- 4. Updated Guidance on Regulation 38: More detailed requirements for handing over fire safety information at building completion

KEY CHANGES TO REGULATION 38 (EFFECTIVE 2 MARCH 2025)

1. Timing of Fire Safety Information Handover: For building work involving the erection, extension, material alteration, or change of use of a relevant building

2. Content of Fire Safety Information:

For example, in the case of fire doors, the handover pack should include:

- The location and rating of every fire door in the building.
- The fire door certificate relevant to each installed fire door.
- Details of seals (intumescent, smoke, acoustic) fitted to the door or frame.
- Information about doorframes, hinges, closers, and other essential hardware.
- Maintenance information for each component, including inspection frequency. Fired

3. Acknowledgment of Receipt:

The responsible person must acknowledge receipt of the fire safety information and

confirm that it is sufficient for them to understand, operate, and maintain the building in respect of those works

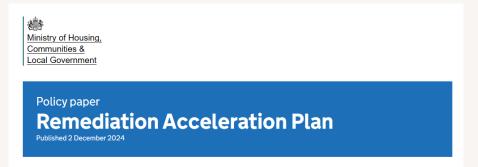
4. Notification to Building Control
Authorities: Where work is overseen by
the local authority, the person carrying out
the work must give notice to the local
authority within five days of completion or
occupation (whichever comes earlier) to
confirm that the fire safety information has
been handed over

5. Digital Format and the Golden Thread:

For higher-risk buildings, the fire safety information (part of the "golden thread") must be provided in a structured digital format. This ensures that the information retains its filing structure, including indexes and keys, and is in a format that enables the relevant person to read, keep, and update the information







CHANGES TO BUILDING CONTROL FOR HIGHER-RISK BUILDINGS

Stricter Oversight by the Building Safety Regulator (BSR)

From 27 March 2025, approval must be obtained from BSR before work begins on any:

- New higher-risk buildings
- Major alterations or changes of use

Applies to buildings ≥18m or 7+ storeys with 2+ dwellings, hospitals, and care homes

FINANCIAL MECHANISMS

Building Safety Levy Timeline

on all new residential buildings in England
Set to go live in Autumn 2026.

This is expected to raise around £3.4 billion over 10 years. Will help fund remediation for unsafe buildings. Technical regulations to be laid before Parliament later in 2025.

CLADDING AND REMEDIATION OVERSIGHT

Enforcement Action Update

Local authorities are actively enforcing safety via the Housing Act 2004. 537 buildings ≥11m tall are under enforcement due to unsafe cladding (as of March 2025). Buildings over 18 meters must be remediated by the end of 2029,

Cladding Safety Scheme (CSS) Progress

Ongoing assessments and project transfers from the Building Safety Fund. Focused on mid-rise buildings not previously covered.

CONSTRUCTION PRODUCTS STANDARD

A new Construction Products Standard, which is likely to be published this year.

This will enable the government to take action against construction product manufacturers.



KEY OBJECTIVES OF THE ACT

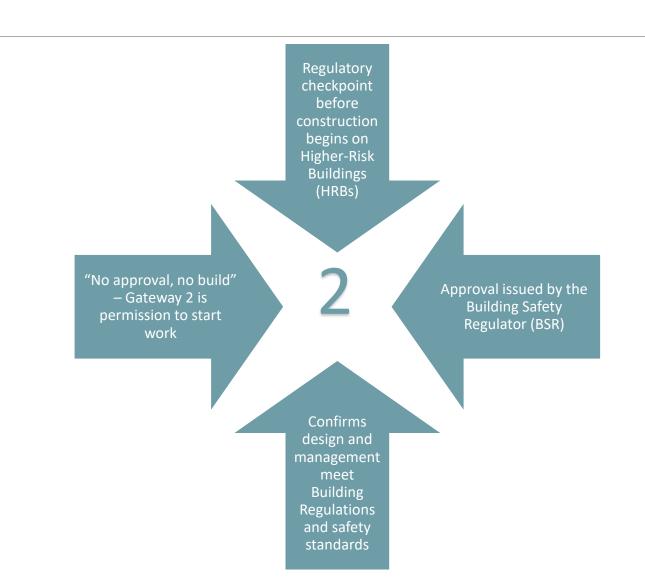
- Make our Buildings SafeWe build what we design.
- Enhancing Building Safety Standards
 Ensure compliance with Building Regulations.
- Establishing the Building Safety Regulator (BSR)
 A new regulatory body within the HSE.
- Protecting Leaseholders
 The Act ensures that leaseholders are shielded from bearing the costs.
- Introducing Accountability Measures

 The Act designates specific duty holders.
- Implementing the 'Golden Thread' of Information
 A digital record-keeping system.
- Extending Legal Recourse
 The Act extends the limitation period from six to fifteen years for future claims.



Navigating Gateway 2

What is Gateway 2?





Why It Matters

Verifies design is safe and compliant

Confirms dutyholder competence

Demonstrates
Change
Control and
Golden Thread
systems

Reduces regulatory risk and project delays



Statutory Framework

- Competence Declaration Sch. 1(2),
 Reg. 11E–11H: Confirms competence
- Construction Control Plan Sch. 1(3):
 Construction management approach
- Change Control Plan Regs. 18–21 &
 26–29: Notification and approval
- Compliance Statement Sch. 1(4):
 Design compliance with Building Regs
- Fire & Emergency File Sch. 1(5):
 Safety info
- Golden Thread Plan Reg. 31:
 Information management strategy

STATUTORY INSTRUMENTS

2023 No. 909

BUILDING AND BUILDINGS, ENGLAND

The Building (Higher-Risk Buildings Procedures) (England) Regulations 2023

CONTENTS

PART 1 Preliminary

- Citation, commencement, extent and application
- Interpretation

PART 2

Building control approval CHAPTER 1

- . Building control approval for HRB work or stage of HRB work
- 4. Building control approval applications for HRB work or stage of HRB work
- Building control approval applications for HRB work or stage of HRB work: validity and time limit
- Building control approval applications for HRB work or stage of HRB work: consultation
- Building control approval applications for HRB work or stage of HRB work: decisions
- 8. Regulator's power to require notifications etc for HRB work or stage of HRB work
- 9. Notice before starting on site and further notice when work is "commenced"

CHAPTER 2

- Notification of emergency repairs to existing HRB
- 11. Building control approval for work to existing HRB
- 12. Building control approval applications for work to existing HRB
- Building control approval applications for work to existing HRB: validity and time limit
- 14. Building control approval applications for work to existing HRB: consultation
- 15. Building control approval applications for work to existing HRB: decisions



Step 1 – Prepare Early

- Integrate Gateway 2 requirements from RIBA Stage 3
- Confirm competence using PAS 8671 / PAS 8672
- Draft Change Control and Golden Thread strategies early
- Identify Major, Notifiable, and Recordable changes upfront

PART 3

Changes before or during construction

Change control

18.—(1) This regulation applies where one or more of the following changes ("controlled change") is proposed—

- (a) a change to any current plans of any work or proposed work or the carrying out of work otherwise than in accordance with the current plans;
- (b) a change to any stage of HRB work, including adding or removing a stage;
- (c) a change to any strategies, policies or procedures described in any current agreed document.
- (2) Before any controlled change can be carried out, the client must ensure-
- (a) a record is made of the controlled change in accordance with regulation 19 (change control: record-keeping), and
- (b) a revised version of any agreed document affected by the controlled change is produced.
- (3) Where the controlled change is a notifiable change, the client must notify the regulator in accordance with regulation 20 (change control: notification requirements).

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(4) A notifiable change must not be carried out, and the work to which it relates must not start, until the notification referred to in paragraph (3) has occurred.

(5) Where the controlled change is a major change, the client must make an application for building control approval in respect of the change (a "change control application") to the regulator in accordance with regulation 21 (change control applications).

- (6) A major change must not be carried out, and the work to which it relates must not start, until the change control application is granted.
- (7) Paragraph (8) applies where two or more controlled changes are related to the same change to the building work ("related changes") and at least one of those controlled changes is a major change and at least one is a notifiable change.
- (8) Where this paragraph applies-
- (a) all the major changes which are related changes may be included in the same change control application,
- (b) any notifiable changes which are related changes may also be included in that change control application, and
- (c) in relation to any change which is a notifiable change, the requirements of regulation 20 (change control: notification requirements) are satisfied by providing details of the change as part of that application.

(9) Where two or more controlled changes are not related to the same change to the building work they must not be included in the same change control application.

(10) Paragraph (11) applies where a change control application has been submitted in relation to a proposed change ("the main change") and it is proposed another controlled change (excluding a change which is only a recordable change) is to be carried out which is consequential on the main



Step 2 – Assemble the Submission

- Case Study: Chobham Farm North
 - Change Control & Information Management Plan (451-FNH-XX-XX-RP-FN-1000 C01)
 - Compliance Statement revised after BSR feedback
 - Appointment of Key Dutyholders (Reg. 11E–11H)
- Outcome: Full compliance confirmed by the Regulator





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| Contents | |
|---|--|
| 1.0 Introduction | |
| 2.0 Project Directory | |
| 3.0 Purpose | |
| 4.0 Scope | |
| 5.0 Legal and Regulatory Basis | |
| 6.0 Definition and Changes Type | |
| 7.0 Change Control Procedure | |
| 8.0 Information Management | |
| 8.1 Data Stored and Exchange Formats | |
| 8.2 File Naming Convention | |
| 8.3 Codes in Naming Convention | |
| 8.4 Folder Structure and Purpose of Issue | |
| 9.0 Workflow for RFI and Drawings Release Procedure | |
| 9.1 Workflow samples | |
| 10.0 Golden Thread Compliance & Document Control | |
| 11.0 Risks & Escalation Measures | |



FNH 451 CHOBHAM FARM NORTH

Change Control and Information Management Plan



Document Number: 451-FNH-XX-XX-RP-FN-1000 Document Revision: C01

Information Management Plan 451-FNH-XX-XX-RP-FN-1000 Rev C01



5.0 Legal and Regulatory Basis

| Requirement | Reference |
|--|---|
| Mandatory notification of major changes | Building (Approved Inspectors etc.) Regulations 2010, Reg. 17F |
| Approval required for major changes | Building Safety Act 2022, Sections 32 and 38 |

Information Management Plan 451-FNH-XX-XX-RP-FN-1000 Rev C01



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| Design must reflect Gateway Two approval | Building Safety Act 2022, Section 88 |
|--|--|
| Golden Thread data management | Building Safety Act 2022, Part 4 |
| Design coordination duties | CDM Regulations 2015 (Regs. 5, 11, 13) |
| Fire safety risk re-assessment | Fire Safety Act 2021; Regulatory Reform (Fire Safety) Order 2005 |

6.0 Definition and Changes Type

| Change Type | Definition | BSR Notification | Design Re- submission |
|----------------|---|------------------------------------|--------------------------|
| Major | Change that affects structural/fire safety or deviates from Gateway Two design (e.g. new cladding type, system substitution) | Yes – Full submission via PD | Yes |
| Notifiable | Minor safety-affecting changes (e.g. access method, minor layout changes) | Yes Notify only | No |
| Recordable | No safety impact (e.g. like-for-like product, minor site sequencing updates) | No | No |



Step 3 – Verify Competence

- Client must take 'all reasonable steps' (Reg. 11E)
- Verify Skills, Knowledge, Experience, and Behaviors (SKEB)
- Check for prior enforcement or misconduct
- Use statutory Declaration of Truth:
- 'To the best of its knowledge and belief, the Client declares all appointed dutyholders are competent.'

Behavioural competence

- Honesty and integrity: I am truthful and transparent in all my work, ensuring all documentation and decisions are based on accurate information. I am minded that if there is a shortfall in the project, whether that be involvingly experience or skillate of an individual; or an error or mission within the design, that is the better highlighted early. This provides the opportunity to rectify at the earliest opportunity in the best. possible manner and accuracy, rather than it being a rushed and potentially inaccurate process.
- Compliance: I have a thorough understanding of the Building Safety Act and relevant regulations. I will apply
- Compliance: have a through understanding of the Building Safety Act and relevant regulation. I will apply
 this knowledges to ensure all proposed in movehed in other; banke to these.
 Speaking by It'l identify any reactions, malerials, or designs that could compromise building safety, I will
 not Healths or load exconorsis.
 Duty of Care I will actively promote a culture of safety awareness. This includes clear communication of
 potential risks and ensuring all partners involved understand their responsibilities in upstoding building.
- . Conflict of Interest: I will be mindful of any potential conflicts of interest and declare them promptly. My decisions will always prioritise public safety and ethical considerations over personal gain

A significant project example of this within the last five years that encompasses all of these behaviours would be the identification of building works of a higher risk building not being constructed in full accordance with the design

understanding of compliance, specific to the design in question, seeking confirmation of completed works rathe than assumption. My duty of case to the client required the raising of these technical issues to senior figures in the Dient's development operations, and the exploration of mitigation routes that would provide an equally complian

unioritaminent, via se du oriente mitinale de l'assertion et autre quantitation in outre la cuboley respect the whole, and apply the specifie protection to the STS frame where missing, before the maintain and framp indicatorist were re-constructed. Whilst this resultation is significant debay and unforeseen costs, the way in which this was notified as pormptly as possible and the level of assistance in resolving the sisse has been received very well by the Client, with new commissions being instructed since due to our attention to detail.

As a Director of BoonBrown I work by the mantra of leading by example with approach to safety being no differen

- opportunity. A full understanding at the earliest opportunity may uncover the ability to remove the risk entirely from a situation.
- Gathering the thoughts and opinions of those undertaking the works, particularly with regards to buildability. Those undertaking the design have a good understanding of what can and can't be achieved, but those physically undertaking the works may have contrary thoughts, or have experience that the

- One within and disen communication for all recipients planning procuring air implementing the disput. A through design plan assessment underhalbe by all design term constants, and reviewed codewidy by the planning of the can reinforce the issues and awareness of them.

I as an individual can only achieve what is required of me, if I have the appropriate knowledge, understanding and capability to do so. The most significant factor of this is understanding where there may be shortcomings in my knowledge, understanding and capability and determining a plan to improve. This is particularly important to understale prior to carrying out a task which calls upon those competencies.

Through organized educational events and course, or through proteoreading. The second will be through practical experience. Regardless of which, if further explanation is required, advise from others should be sought. I believe a sign of a good leader is alwaring the ability to review the capability of review present in other term, and seeking the advice and support from others to meet the requirement.

I strongly believe that if members of the team, whether it be within our own practice, or within the wider design and improvement, and act accordingly, this can encourage the rest of the team to do the same.

As part of this, I with others of the Director team at BoonBrown have created a new review and training regime to encourage self-assessment within the team, and the freedom to request the help of others when it is needed

Personal responsibility and accountability

An architect's role extends far beyond aesthetic design; it is fundamentally about creating safe and functional spaces. This encompasses a broad spectrum of responsibilities, from conceptualisation to project completio

As an architect, my primary responsibility is to design buildings that prioritise safety for both occupants and those

- adequate fire exits, structural intentity and accessibility for people with disabilities.
- Identifying potential hazards in the design process and implementing measures to minimize risks. This
 might include considering factors like wind loads, earthquake zones, and material flammability.

I am accountable for the safety implications of my design decisions. This mean

If a design flaw poses a safety risk, I am responsible for rectifying it promptly and effectively

sectors, scales, and complexities. In the past 20 years, BoonBrown have tackled 12 challenging projects exceeding 18m, all classified as Higher Risk Buildings. Notably, BoonBrown led the design process (RIBA stages 4-5) for these complex undertakings. This extensive experience translates into a highly skilled team, evidenced in 2023 by.

Out of 32 professional architectural staff team members

| 37% are ARB Registered | 28% have at least 12 months experience of RBA Stage 3-5 on buildings over 18m | 43% have at least 6 months experience of RIBA Stage 3-5 on buildings over 18m | | |
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| 2882 | 1111 | 1111 | | |
| 2::2 | 2222 | 2222 | | |
| 1111 | 2222 | 1111 | | |
| 1111 | 2222 | 1111 | | |
| 1111 | 1111 | 2222 | | |
| 1111 | 2222 | 2222 | | |
| 1111 | 1111 | 1111 | | |

Knowledge base

- . 12 architecturally registered professionals: These ARB registered architects bring a wealth of experience to the
- table ensuring your project meets all necessary design and construction standard 2 landscape architecture experts: From master plans to intricate garden details, these Landscape Institute-registered professionals can make your outdoor spaces truly shine.

- 2 skilled town planners: With RTPI registration under their belts, these individuals understand the bioget
- Supporting this core group are 26 additional team members: Architectural, landscape, and town planning staff. This dedicated group, including those pursuing professional
- registration, provides invaluable assistance across all project stages
- Technologists and technicians: These specialists leverage their technical expertise to bring your vision to life, tackling challenges big and small.

Behind the scenes, a robust technical leadership team keeps everything running smoothly

- . 2 experienced technical directors: Each with a diverse project portfolio, these individuals provide expert qui



Step 4 – Change Control in Practice

- Major Structural/fire safety impact | Notify: Yes | Resubmission: Yes
- Notifiable Minor safety-affecting |
 Notify: Yes | Resubmission: No
- Recordable No safety impact | Notify:
 No | Resubmission: No
- Major changes must not proceed without BSR approval (Reg. 21)
- Link all change logs to the CDE (ACC, etc.)



FNH 451 CHOBHAM FARM NORTH

Change Control and Information Management Plan



Document Number: 451-FNH-XX-XX-RP-FN-100 Document Revision: C01

451-FNH-XX-XX-RP-FN-100

| Change Type | Definition | BSR Notification | Design Re- submission |
|----------------|---|------------------------------------|--------------------------|
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| Notifiable | Minor safety-affecting changes (e.g. access method, minor layout changes) | Yes Notify only | No |
| Recordable | No safety impact (e.g. like-for-like product, minor site sequencing updates) | No | No |

7.0 Change Control Procedure

6.0 Definition and Changes Type

The following outlines the Change Control process to be followed throughout the project lifecycle:

Step 1 - Raising a Change Request

A Change Request form is raised via Asite under the Project Form table

The form is issued to the appointed Principal Designer to confirm the type of change (Recorded CC, Notifiable, or Major).

Step 2 – Design Review & Risk Assessment

Reviewed by Principal Designer with input from

Information Management Plar 451-FNH-XX-XX-RP-FN-1000 Rev C01



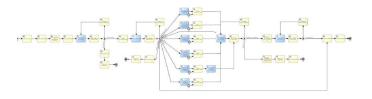


Step 5 – Golden Thread Integration

- Managed through a Common Data Environment (CDE)
- Controlled file naming, metadata, and version control
- Integrated RFI and drawing approval workflows
- Supports traceability and audit trail for BSR inspection

9.1 Workflow samples

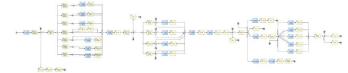
1. Drawing release workflow.



Information Management Plan 451-FNH-XX-XX-RP-FN-1000 Rev C01 Fairview NEW HOMES Ltd.

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2. RFI (Request for Information) workflow.



10.0 Golden Thread Compliance & Document Control

All changes logged in a Change Register (version controlled)

- · CRFs assigned unique IDs and retained digitally
- · Revised drawings/specifications filed with change description and revision history
- . BSR submissions and responses saved to project CDE (e.g. Asite)
- . Changes cross-referenced with QA/ITP Hold Points and verification records

All records retrievable at Gateway 3 and included in future Building Safety Case reports



What the Regulator Expects



Explicit statutory citations (Regs. 18–21, 26–29)



Clear roles for authorsing and notifying changes



Documented competence evidence



Integrated and auditable system



Version control across the submission pack



Best Practice Checklist



Use statutory phrasing exactly



Map each document to its Regulation number



Keep Change Control integrated in CDE



Verify competence early and log evidence



Maintain audit trail (Golden Thread)



Common Pitfalls

Missing references to Schedule 1 or Regs 18–21 Generic competence statements

No link between Change Control and Golden Thread

Inconsistent version numbering

Missing sign-offs or outdated documents



Gateway 2 Success Criteria



Verified competence (Reg. 11E–11H)



Embedded change control (Regs. 18–21)



Active Golden Thread system (Reg. 31)



Adherence to Schedule 1





GATEWAY 3 - CORE COMPLETION CERTIFICATE SUBMISSION (REGULATIONS 40–45)



Mandatory Documents and Declarations

- Application Form Completed Gateway 3 (Completion Certificate) application.
- Compliance Declarations Principal Designer and Principal Contractor statements confirming compliance with Building Regulations.
- Competence Declaration Client's declaration confirming all duty holders and contractors were competent (Schedule 1, para 1).
- Construction Control Plan (CCP) Demonstrates QA, inspection, and control procedures during construction.
- Change Control Log Record of all controlled, notifiable, and major changes (Regs. 18–26).
- Building Regulations Compliance Statement Narrative explaining how all works meet relevant Parts of the Building Regulations.
- **Fire and Emergency File** Final fire safety strategy, firefighting access, and evacuation arrangements (Schedule 1, para 5; Reg. 38).
- Partial Completion Strategy (if applicable) Plan for phased occupation of completed parts.
- As-Built Drawings and Specifications Verified as-built documentation for all disciplines.
- **Test and Commissioning Certificates** Evidence of functionality and compliance of fire, structure, MEP, and safety systems.
- Mandatory Occurrence Reports Full record and resolution of all MORs during construction.
- Golden Thread Information Dataset Final digital dataset linking all design, construction, and safety information (Reg. 31).
- Fire and Rescue / Sewerage Consultation Evidence Confirmation of statutory consultation and responses (Reg. 42).
- Occupation Prohibition Declaration Statement confirming the building will not be occupied until certification (Reg. 58).

GATEWAY 3 GOLDEN THREAD AND AS-BUILT INFORMATION (REGULATIONS 31, 38, AND SCHEDULE 1)



- Final approved and as-built designs for architectural, structural, MEP, and fire systems.
- Specifications and O&M manuals for materials, fire safety systems, and critical building elements.
- Structural safety verification and engineer signoffs.
- Materials register (FIREie) including test certificates and fire rating evidence.
- Inspection and QA records, test results, and photographic evidence.
- Fire strategy documentation (compartmentation, smoke control, evacuation).
- Operational information for fire detection, smoke control, lifts, and evacuation systems.
- **Digital Golden Thread dataset** (BIM or structured format), indexed, version-controlled, and accessible for the Accountable Person.



GATEWAY 3 POST-SUBMISSION OBLIGATIONS

BSR Inspections / Testing – Regulator may require additional verification prior to issuing a certificate (Reg. 43).

Handover Confirmation – Client must confirm all Golden Thread data transferred to the Accountable Person (Reg. 38).

Ongoing Data Maintenance – Accountable Person must maintain and update Golden Thread post-occupation (Reg. 59).



WHAT THE REGULATOR LOOKS FOR







CHANGE CONTROL
IN CDE

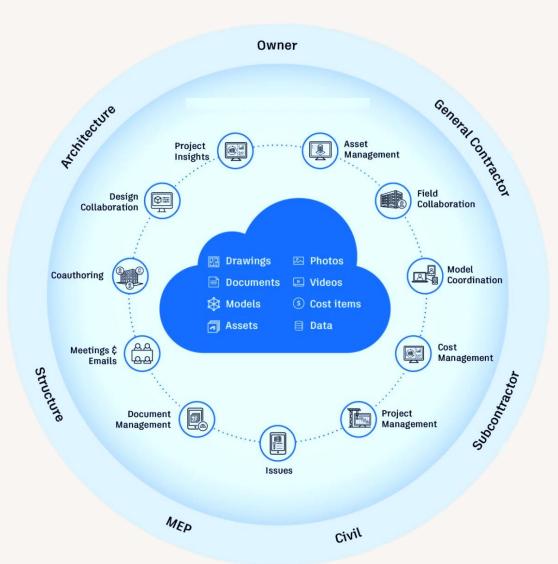
EVIDENCE OF DECISIONS

PHOTOGRAPHIC EVIDENCE





GOLDEN THREAD CDE















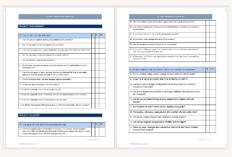




BSR INSPECTIONS / TESTING

Power BI Samples







Checklists / ITPs

Photos



As-Built Model/Drawings



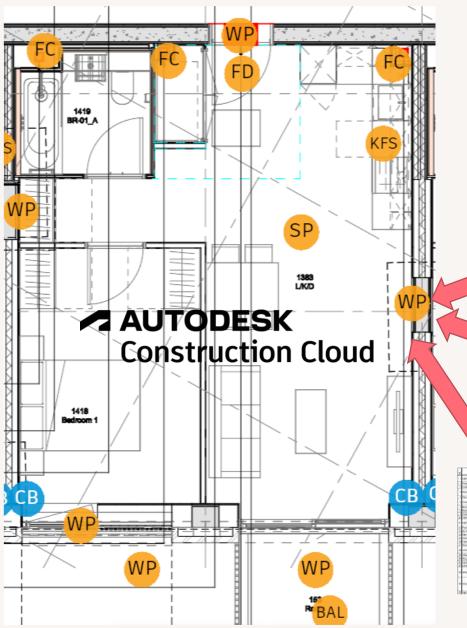


Reports



Certificates





Test Inspection Plan

WORK INSPECTION SHEET

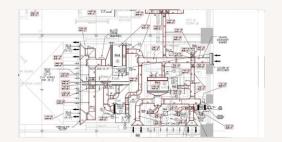
| Contra | ct | | | | Sheet No. | | |
|--------|--------------------------------------|----------------------------|---------------|----|-----------|--|--|
| ITEM | ITEM Fire Stopping – Floor Slab DWG. | | | | | | |
| LOCAT | ION: | | SUBCONTRACTOR | | RACTOR | | |
| NO. | | ITEM | SC | HG | COMMENTS | | |
| 1 | | Fire Stopping – Floor Slab | | | | | |

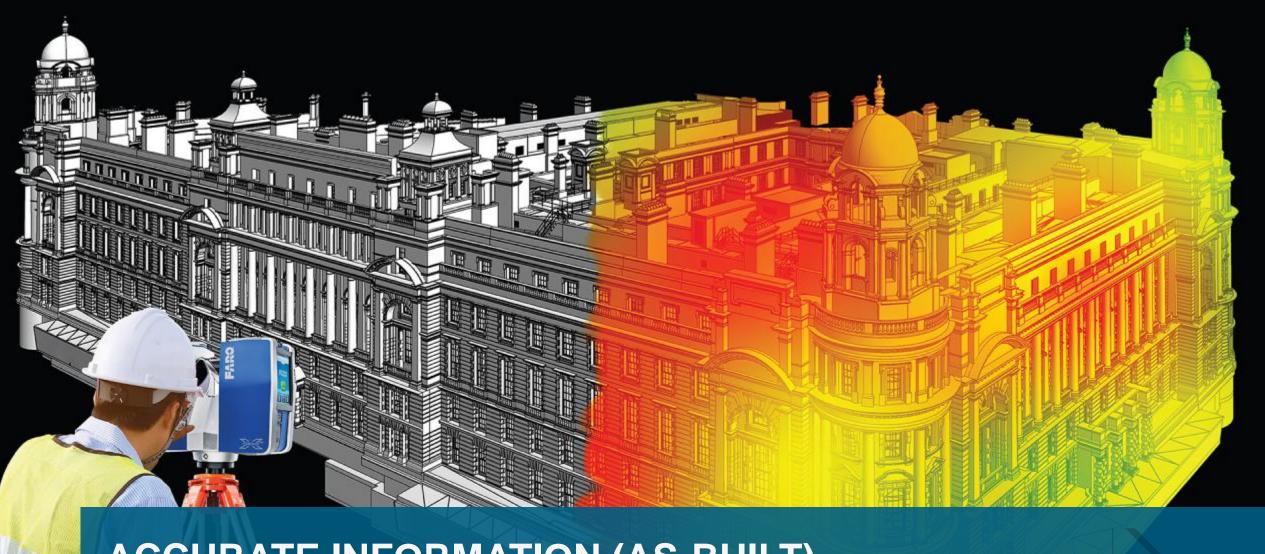
| NO. | ITEM | SC | HG | COMMENTS |
|-----|--|----|----|----------|
| 1 | Fire Stopping – Floor Slab | | | |
| 1.1 | Have all floor and soffit penetrations been firestop according to approved method? | | | |
| 1.2 | Was any ad-hoc method used? | | | |
| 1.3 | Was the Floor below checked for any spillage and/or cleaned? | | | |
| 1.4 | Area cleaned and ready for next trade | | | |

| Subcon Name | Signature | Date | |
|-------------|-----------|------|--|
| HG Name | Signature | Date | |



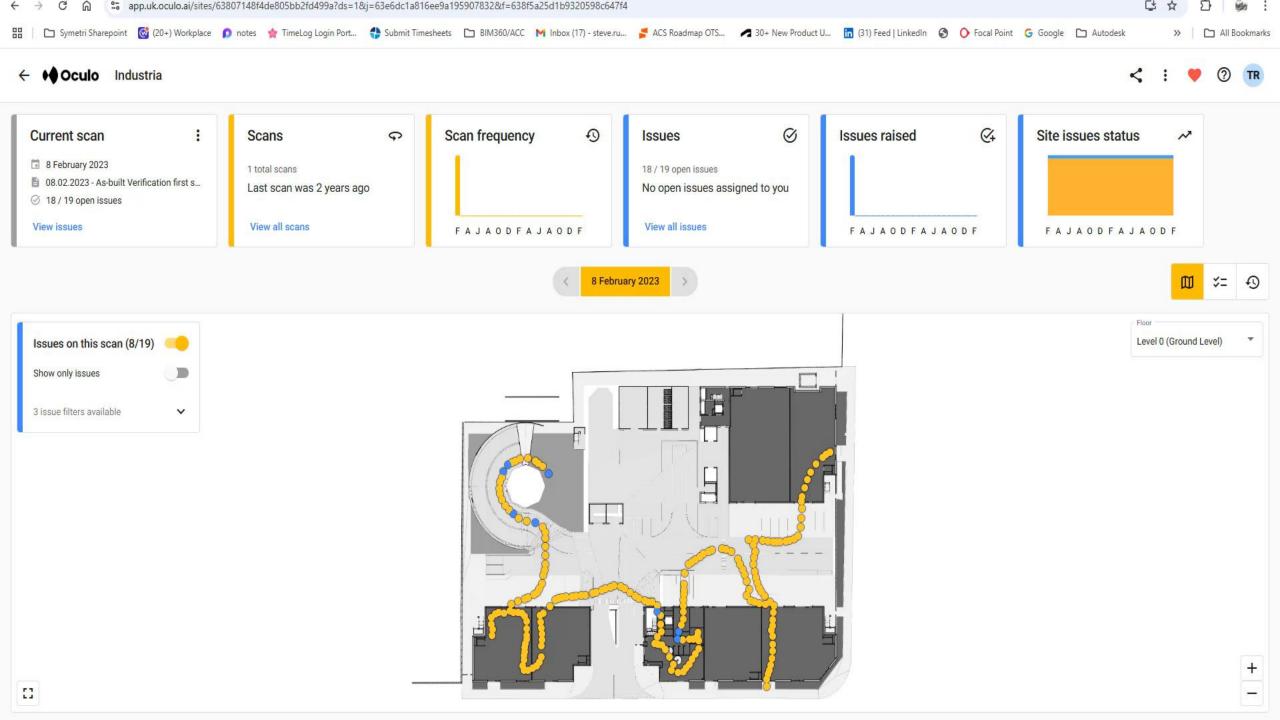
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