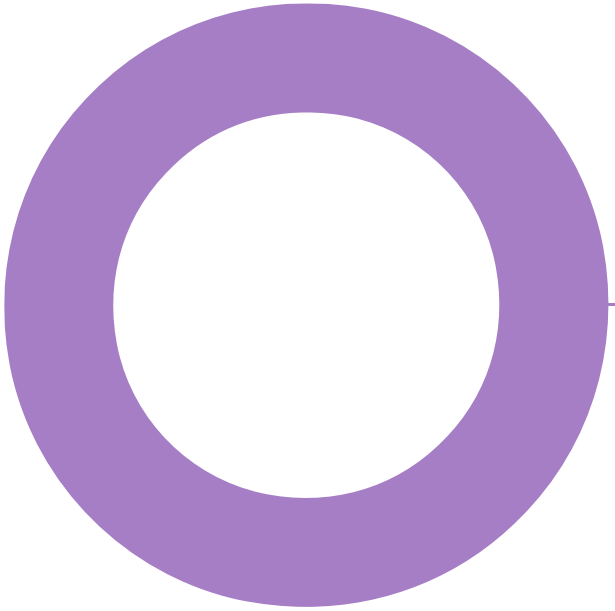
HOARE LEA

Hayes Park West.
London.
Shall Do Hayes Developments Ltd.

FIRE ENGINEERING
FIRE SAFETY STATEMENT

REVISION 01 – 30.10.2025



Audit sheet.

Rev.	Date	Description of change / purpose of issue	Prepared	Reviewed	Authorised
00	29.09.2025	First issue for comment.	NW	JW	-
01	30.10.2025	Revision to include design team review comments and updated planning drawings.	NW	JW	-

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Contents.

1. Introduction.

This report has been prepared in support of the detailed planning application being submitted by Shall Do Hayes Developments Ltd ('the Applicant') to the London Borough of Hillingdon ('the Council') for the proposed residential development at Hayes Park West, Hayes Park, Uxbridge, UB4 8FE ('the site').

This application seeks full planning permission for the following description of development:

"Partial demolition and redevelopment of the existing multi storey car park to provide new homes (Use Class C3), landscaping, car and cycle parking, and other associated works."

The proposed development has evolved through an extensive pre-application and wider stakeholder consultation process, which has included collaborative discussions with the council, Greater London Authority ('GLA'), Historic England ('HE'), and a number of other key stakeholders.

The proposed development provides the opportunity to make sustainable use of a redundant, disused car park, and deliver a high-quality residential development that can enhance the setting of the adjacent listed buildings. The proposed development includes the provision of a high proportion of family homes, which is a significant planning benefit that directly addresses the council's priority housing need.

From the outset, the Applicant has taken a carefully informed design approach, proposing a new building of outstanding architectural quality. The objective has been to enhance the setting of the adjacent listed buildings, providing a contextual architectural response and significantly improving the landscape setting.

The proposed development will deliver a range of planning benefits, completing the wider transformation of the Hayes Park estate and this unique new community.

This fire safety statement has been prepared by Hoare Lea to accompany the planning application for the Hayes Park West development in London and address The London Plan (March 2021) Policy D5 (Inclusive Design) and D12 (Fire Safety). The intention of this fire safety statement is to address the main fire safety principles and provide an overview of the requirements and recommendations that the scheme will meet.

2. Proposed development.

The planning description for the Hayes Park West development is as follows:

"Partial demolition and redevelopment of the existing multi storey car park to provide new homes (Use Class C3), landscaping, car and cycle parking, and other associated works."

In summary, this application is seeking to deliver the following:

- The partial demolition of the existing multistorey car park and construction of new 4 storey residential development.
- 52 new homes (Class C3) comprising a mix of 1-bedroom and 3-bedroom homes.
- A high proportion of open space and amenity space across the site totalling 3599 sqm, including the provision private gardens, terraces and balconies, new play spaces, internal ancillary facilities, and extensive communal areas surrounding the building. This includes:
  - 49 sqm internal communal amenity
  - 1733 sqm external communal amenity
  - 1655sqm private external amenity
  - 161 sqm play space (doorstep play for children aged 0-4 years)
- The proposed development will seek to promote sustainable modes of transport and will provide the following:
  - 107 cycle parking spaces allocated as follows:
    - 97 cycle parking spaces allocated to the new homes.
    - 10 cycle parking spaces allocated to visitors to the site.
  - 52 vehicle parking spaces allocated as follows:
    - 52 (49 standard and 3 accessible) vehicle parking spaces allocated to the new homes.

The application site plan is shown in Figure 1.

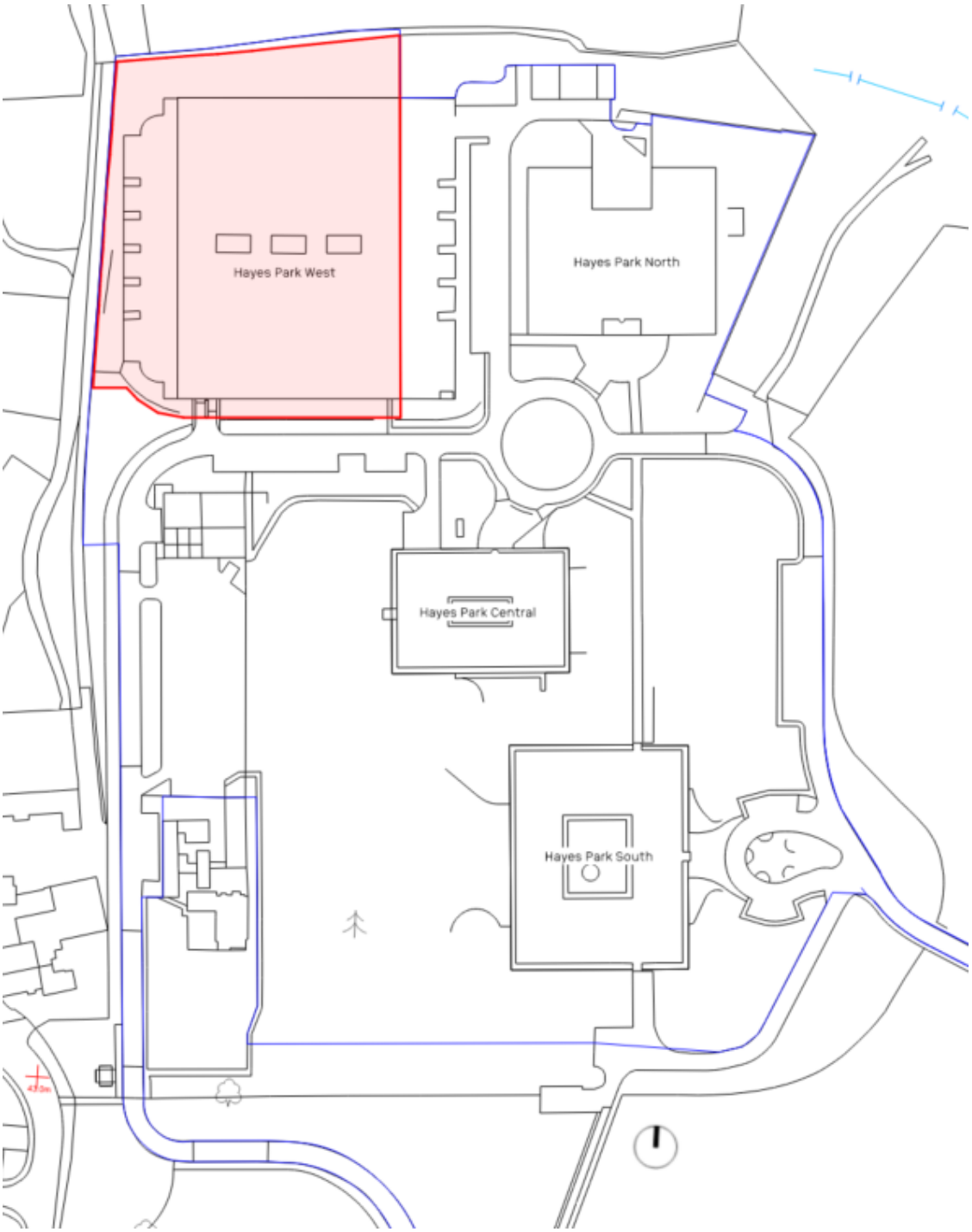

Figure 1: Application site plan; Hayes Park West (HPW) boundary in red highlight – subject to this statement. Hayes Park masterplan boundary in blue line.

3. Site description.

Hayes Park West ('the site') is located within the Charville Ward of the London Borough of Hillingdon ('the Council'), who will be the relevant Local Planning Authority for the application. The site sits within a wider former business park known as 'Hayes Park'.

The Hayes Park estate comprises a historically significant office campus in West London, situated in Hayes, and bounded by a structured, pastoral landscape. The estate is framed by the buildings known as Hayes Park North ('HPN'), Hayes Park Central ('HPC'), and Hayes Park South ('HPS'), both positioned within a broader landscape setting originally envisaged by architect Gordon Bunshaft as a modernist business park set in parkland. HPC and HPS are Grade II* listed due to their architectural and historic interest.

In recent years, the character and context of Hayes Park estate has undergone a fundamental shift from office use to residential, which following a series of planning applications is delivering 188 new homes. The relevant applications are as follows:

- Hayes Park North ('HPN') – a three-storey, early 2000s office building, was granted Prior Approval in 2022 for conversion to 64 homes (Ref: 12853/APP/2021/2202), followed by permission for external enhancements to the building (Ref: 12853/APP/2023/3720). These works are now on-site and being delivered.
- Hayes Park Central ('HPC') and Hayes Park South ('HPS') – both mid-century, listed office buildings, were granted full planning permission and listed building consent in early 2024 for conversion into 124 homes, with associated landscape enhancements (Ref: 12853/APP/2023/1492).

Hayes Park West is bound to the north and west by dense trees planting and open parkland, which is private land owned by the Church Commissioners. To the east the site is bound by HPN, and to the south by the listed HPC and HPS owned by Marson.

The entirety of the site and much of the surrounding land is located within the Green Belt. Beyond that, there are large areas of low-density terraced housing. There is a wide selection of parks and leisure facilities in the area, including the Hayes End Recreation Ground, Park Road Green and the Belmore Playing Fields. The nearest town centres are located at Hillingdon Heath Local Centre, 1.6km to the southwest, and at Uxbridge Road Hayes Minor Centre, 3.3km to the southeast.

The new Hayes Park West development will comprise four storeys, featuring a mix of dwelling types arranged in a U-shaped formation with an adjoining open-sided covered car park, the roof of which forms a podium level.

All dwellings are accessed directly from the outside, with no internal common areas provided throughout the development other than ancillary spaces such as the refuse and cycle stores. A summary of dwelling types is presented in Table 1.

Table 1: Building description summary.

Dwelling type	No. of occupied storeys	Height to top occupied floor	Building height(1)
Open-plan apartments	1 (Lower ground)	n/a	12.5m
Dwellinghouse 1	3 (Ground, first, second)	6m(2)	
Dwellinghouse 2	4 (Lower ground, ground, first, second)	9m(3)	

Note:
(1) For the purposes of determining the appropriate fire safety provisions, the development as a whole extends over four storeys (Lower ground to second levels). Measurement shown, from top of parapet to adjacent ground level.
(2) When measured from ground (podium) level.
(3) When measured from adjacent ground level (at lower ground).

4. Statutory guidance.

4.1 The Building Regulations 2010 (as amended)

The building will be subject to the requirements of the Building Regulations 2010 (as amended). It will be necessary, therefore, for it to meet the requirements of Schedule 1 of the Regulations relating to:

- B1 (Means of warning and escape),
- B2 (Internal fire spread (linings)),
- B3 (Internal fire spread (structure)),
- B4 (External fire spread),
- B5 (Access and facilities for the Fire Service).

In England guidance on how to satisfy these functional requirements can be found in Approved Document B (AD-B) Volume 2 – Buildings other than Dwellinghouses. However, whilst AD-B provides guidance for some of the more common building arrangements, there is no obligation to adopt any particular solution contained in the document, as alternative solutions are acceptable, provided that an equivalent level of fire safety to that provided by the standard solutions can be demonstrated.

4.2 The London Plan

The policies from The London Plan relevant for this planning statement are provided in the sections below. These items are detailed in this planning statement for the Hayes Park West development.

4.3 Policy D12 (Fire Safety).

1. The London Plan – Policy D12 states that in the interests of fire safety and to ensure the safety of all building users, all development proposals must achieve the highest standards of fire safety and ensure that they:
    a. Identify suitably positioned unobstructed outside space:
        i. For fire appliances to be positioned on
        ii. Appropriate for use as an evacuation assembly point
    b. Are designed to incorporate appropriate features which reduce the risk to life and the risk of serious injury in the event of a fire; including appropriate fire alarm systems and passive and active fire safety measures;
    c. Are constructed in an appropriate way to minimise the risk of fire spread;
    d. Provide suitable and convenient means of escape, and associated evacuation strategy for all building users;
    e. Develop a robust strategy for evacuation which can be periodically updated and published, which all building users can have confidence in; and
    f. Provide suitable access and equipment for firefighting which is appropriate for the size and use of the development.
2. All major development proposals should be submitted with a Fire Statement, which is an independent fire strategy, produced by a third party suitably qualified assessor. The statement should detail how the development proposal will function in terms of:
    a. The building's construction: methods, products and materials used, including manufacturers details;
    b. The means of escape for all building users: suitably designed stair cores, escape for building users who are disabled or require level access, and the associated evacuation strategy approach;

c. Features which reduce the risk to life: fire alarm systems, passive and active fire safety measures and associated management and maintenance plans;

d. Access for Fire Service personnel and equipment: how this will be achieved in an evacuation situation, water supplies, provision and positioning of equipment, firefighting lifts, stairs and lobbies, any fire suppression and smoke ventilation systems proposed, and the ongoing maintenance and monitoring of these;

e. How provision will be made within the site to enable fire appliances to gain access to the building; and

f. Ensuring that any potential future modifications to the building will take into account and not compromise the base build fire safety/protection measures

4.4 Policy D5 (Inclusive design)

1. Boroughs, in preparing their Development Plans, should support the creation of inclusive neighbourhoods by embedding inclusive design, and collaborating with local communities in the development of planning policies that affect them.
2. Development proposal should achieve the highest standard of accessible and inclusive design. They should:
   a. Be designed taking into account London's diverse population;
   b. Provide high quality people focused spaces that are designed to facilitate social interaction and inclusion;
   c. Be convenient and welcoming with no disabling barriers, providing independent access without additional undue effort, separation or special treatment;
   d. Be able to be entered, used and exited safely, easily and with dignity for all;
   e. Be designed to incorporate safe and dignified emergency evacuation for all building users. In all developments where lifts are installed, as a minimum at least one lift per core (or more subject to capacity assessments) should be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the building.
3. Design and Access Statements, submitted as part of the development proposals, should include an inclusive design statement.

5. Competency statement.

In accordance with Regulation 11F of the Building Regulations 2010 (as amended) any organisation involved in the design of buildings must have the organisational capability to carry out the design work such that the building work to which the design relates, if built, would be in accordance with all the relevant requirements. In terms of the fire strategy design the relevant requirements are described in Section 4.

All Hoare Lea design projects are headed by highly trained engineers, supported by a team of chartered engineers across the UK, with proven experience on a wide range of fire safety consultancy projects.

Hoare Lea staff have appropriate expertise and experience of fire safety design on a wide range of complex buildings, not only in the UK, but also world-wide. Hoare Lea take all reasonable steps to ensure the design work carried out by the Hoare Lea team is planned, managed and monitored so that the design is such that if the building work to which the design relates were built in accordance with that design the building work would be in compliance with all relevant requirements, as described in Section 4.

The Hayes Park West development is a residential development. The Hoare Lea fire engineering design team for this project has prior experience and expertise working on this type of development and has the relevant skills knowledge and experience to advise on the fire safety design. The Hoare Lea project team consists of the following individuals:

Project Director – Stephen Buckley (Director), BEng (Hons). CEng, MIFireE, C.Build E MCABE, ARICS.

Stephen is a director at Hoare Lea and is responsible for overseeing the fire engineering group and provides approval of the fire strategy documents which have been reviewed by others. Stephen has worked in fire engineering consultancy for over 30 years and is a chartered fire engineer with the Institute of Fire Engineers. Stephen has been providing technical leadership within the fire team for a number of years, and more recently has been involved with Hoare Lea's response to the Building Safety Act. Stephen has extensive experience working on the fire safety design of residential buildings. Projects Stephen has been involved with include:

- NT02-04, Red Bank Manchester - mixture of low- and high-rise residential towers across 3 plots, with commercial and ancillary accommodation at lower levels
- Greengate, Salford - Greengate is an inner-city suburb of Salford in Greater Manchester, England. The Greengate development is a collective group of three residential apartment buildings each with a storey height of approximately 150m.
- One Blackfriars Road – Large, prestigious, residential tower in Southwark, which also includes three basement levels with residential amenity facilities, hotel and commercial building.
- Bolton Central, Bolton- Masterplan development which included two residential blocks under 18m and multiple smaller buildings consisting of stacked duplexes.
- Oceanview, Cornwall – Six storey sloped site residential building

Project Lead - Jonathan Weightman (Principal Fire Engineer), MSc(Hons), AIFireE.

Jonathan is responsible for leading the project. Jonathan has nearly 6 years' experience working in the Fire Engineering industry in the UK. Prior to that he spent nearly five years working as a Technical Safety Engineer in the Oil & Gas industry. Jonathan has a bachelor's degree in mathematics, a master's degree in Fire and Explosion Engineering and has experience working on the fire safety design of residential buildings. Projects Jonathan has been involved with include:

- King's Cross S4, London – twelve-storey high rise residential building
- The Old Soapworks, Bristol – residential building with 21-storey tower
- Pydar St, Truro – multiple mid-rise residential buildings with large-shared basement car park

Reviewer – Leo Girling (Associate Director) BEng (Hons), CEng, MIFireE.

Leo is responsible for reviewing the fire strategy. Leo has over 15 years' experience working in the Fire Engineering industry, predominantly in the UK but also internationally. Leo is a chartered fire safety engineer with the Institute of Fire Engineering and has a degree in Fire and Explosion Engineering from the University of Leeds. Leo has extensive experience working on the fire safety design of residential buildings. Projects Leo has been involved with include:

- Embassy Gardens, Nine Elms, London
- Gasholder Triplets, Kings Cross, London
- Park Modern, Bayswater, London
- Camberwell Green, London
- Station Hill, Reading
- McArthur's Yard, Bristol

Report Author - Nicholas Wingfield (Fire Engineer), MEng (Hons), AIFireE.

Nicholas is responsible for producing the fire strategy. Nicholas has three years' experience working in the Fire Engineering industry in the UK. Prior to that, he spent over five years working in fire risk assessing and fire safety consultancy. Nicholas holds a first-class master's degree in Fire Engineering and has experience working on the fire safety design of residential buildings. Projects Nicholas has been involved with include:

- Finsbury Park, London - A new mixed-use development with three residential towers ranging from seven to twenty storeys.
- Devonshire Gardens, Cambridge - A new mixed-use masterplan development with low rise residential buildings with commercial use at ground.
- NatWest House, Borehamwood - The extension of an existing residential building, increasing it from three to seven storeys.

6. Fire safety overview.

6.1 Building construction (D12: B1)

- The building is to be constructed with concrete GRC cladding to SFS frame.
- To limit the spread of fire within the buildings, all wall and ceiling linings will satisfy the appropriate classification stated within Clause 26.1 of BS 9991:2024.
- External fire spread analysis has been completed (presented in the Stage 2 Fire Strategy). The results confirm that, given the compartment dimensions and distances to site or notional boundaries, additional fire resistance to the external walls is not required.
- The development does not have any storey exceeding 11m in height. Therefore, either the external walls shall satisfy the performance criteria described in BRE Report BR 135, or the external wall surfaces shall satisfy the surface spread of flame classification requirements of BS 9991. Additionally, cavity barriers shall be provided in any external wall cavity in accordance with BS 9991.
- Balconies shall have achieve a European classification A2-s1, d0 or Class A1 and be designed in accordance with Annex E of BS 9991.
- Roof coverings shall meet the recommendations of Section 24.6 of BS 9991.

6.1.1 Construction, Design and Management regulations

- Design projects undertaken in the UK are subject to the requirements of the Construction (Design and Management) Regulations 2015, the objective of which is to ensure that health and safety issues are properly considered during a project's design and development so that the risk of harm to those who have to construct, use and maintain the building is reduced.
- As a designer, in accordance with Regulation 9 of the CDM regulations, Hoare Lea will take into account the general principles of prevention in the preparation of this report and where reasonably practicable, eliminate, minimise and/or control foreseeable hazards associated with the design. Where elimination is not reasonably practicable, Hoare Lea will be required to provide 'pre-construction' information in respect of any significant and/or unusual project-specific hazards that remain.

6.2 Means of escape provisions (D12: B2)

- In the event of a fire, occupants of the affected dwelling are expected to evacuate without undue delay. Occupants of other, unaffected dwellings are not required to evacuate unless directly affected, they choose to leave or are instructed to do so by the fire service.
- Residential ancillary areas shall operate a simultaneous evacuation strategy.
- The development is proposed to include both single-level apartments and dwellinghouses with three or four storeys. Each dwelling is accessed directly from the exterior, with no internal communal access provided anywhere within the development.
    - The apartments shall all be open-plan design, each with a floor area less than 12m x 16m with ceilings not less than 2.25m from finished floor level. Cooking facilities will be located remotely from escape routes, aligning with the dimensions provided in Clause 5.6 of BS 9991.
    - The internal stairway of each dwellinghouse shall be constructed as a protected stairway, connecting the ground and all upper storeys, and deliver directly to a final exit.
- Ancillary area travel distances shall meet the recommend limitations outlined within Table 16 of BS 9991.
- The development does not include any common internal stairs or evacuation lifts, as all dwellings are accessed directly from the exterior.

- The ground floor podium provides alternative means of escape, comprising a semi-enclosed stair bounded by two dwellings (descending to lower ground communal courtyard) and a walkway (connecting the podium to the highway at the same level), located on opposite sides of the podium. The three-storey dwellinghouses terminate at podium level, requiring occupants to traverse the open-air podium to access either escape route to reach a place of ultimate safety.
- Access and egress from the roof for ad hoc maintenance and repair will be provided via a cherry picker or similar plant, as there is no common stair access within the development. All personnel accessing the roof are expected to be capable of self-evacuation. Access is also expected to be subject to risk assessments and method statements (RAMS) or other appropriate safe systems of work.

6.3 Features incorporated to reduce the risk to life (D12: B3)

- An independent Category LD1 smoke/ heat alarm system shall be provided within each dwelling, designed and installed in accordance with BS 5839-6:2020.
- A Category L4 fire detection and warning system shall be provided throughout the ancillary areas, designed and installed in accordance with BS 5839-1:2025.
- Smoke ventilation shall be provided in the areas noted below. Smoke ventilation and/or clearance is not required elsewhere, as the development does not include any common internal stairs, corridors or basement levels, and all other ancillary areas are accessed directly from outside.
  - A refuse store lobby which shares an access corridor with a plant room shall be provided with at least 0.2m^2 (geometric free area) permanent ventilation.
  - The covered car park shall be provided with a smoke and heat ventilation system (having the objective of clearing smoke during a fire and/or after a fire has been suppressed) designed in accordance with BS 7346-7:2013.
- An automatic water sprinkler system shall be provided in each dwelling.
  - In the absence of a fire main, the sprinkler coverage shall comprise a Category 2, 3 or 4 system, designed and installed to BS 9251:2021, and corresponding Table 2, Footnote B) or C) of the BS.
- All loadbearing elements of structure are to achieve at least 60 minutes fire resistance (R60).
- Compartmentation and fire resisting elements shall achieve the criteria outlined in Table 2.

Table 2: Compartmentation and fire resisting elements.

Area of accommodation	Minimum required fire resistance period (minutes)(1)	Method of exposure	Fire door rating
Any wall separating a dwelling from another part of the building/ one another.	REI 60	Each side separately	n/a(1)
Protected stairs within each dwellinghouse.	REI 30	Each side separately	E30
– Cycle store (including pedal bikes with battery charging facilities). – Communal areas. – Refuse store lobby (where adjoined to the plant room corridor).	REI 30	Each side separately	E30Sa
– Plant rooms. – Refuse store. – Sprinkler pump room. – Car park (where adjoined to the building).	REI 60	Each side separately	E60Sa
Any room containing life safety equipment.	REI 120	Each side separately	E120Sa
Energy supplier substation(2)	REI 120	Each side separately	E120Sa
External escape routes	EI30	From inside the building	n/a
Re-entrant corners	EI60	From inside the building	n/a

Note:
(1) Where stated, "R" rating applies to load-bearing elements only.
(2) Dwelling entrance doors are not required to achieve a prescribed level of fire resistance, as each opens directly to the outside and there is no passing risk - occupants do not need to pass by another dwelling in the event of a fire.
(3) The fire resistance of the substation should be confirmed with the provider as they may have higher requirements.

- The external wall of the lower ground ancillary areas, within 1800mm of the exits from the dwellinghouses, shall provide the required level of fire resistance (see Table 2) up to a height of 1100mm above the walking surface.
- The external walls of the 3- and 4-storey dwellinghouses form an internal angle of less than 135°. The distance between any openings in the external walls of adjoining dwellinghouses shall be not less than 1m. Additionally, the external wall within this 1m separation should provide the required level of fire resistance (see Table 2).

6.4 Firefighting access to the building (D12: B4)

- Access for fire service vehicles to shall be provided via the internal estate road network, which is entered from the public highway. To achieve fire service access to the dwelling houses atop the podium, a fire appliance will need to be driven onto the podium.
- Access is available to within 90m of all parts of every single-level apartment (all on lower ground level – no floor more than 4.5m above ground level) and within 75m of all parts of every dwellinghouse (with floors

more than 4.5m above ground level) on a route suitable for laying a hose. Rising fire mains are, therefore, not required as all dwellings are sprinkler protected.

  - Fire hydrants should be provided within 90m of an entry point to the building and not more than 90m apart (on a route suitable for laying a hose). The existing hydrant locations, and operational status, shall be confirmed in the following phases of design.

- All access routes (illustrated in Figure 2) will meet the specifications for the pumping appliance outlined in Table 3.

Table 3: Access routes and hardstanding requirements for fire service appliances.

Appliance type	Min. width of road between kerbs [m]	Min. width of gateways [m]	Min. turning circle between kerbs [m]	Min. turning circle between walls [m]	Min. clearance height [m]	Min. carrying capacity [t]
Pump	3.7	3.1	16.8	19.2	3.7	14(1)

Note:
(1) 12.5t in accordance with BS 9991; however, 14t in accordance with the LFB Fire safety guidance Note, *Access for Fire Appliances, GN29*.

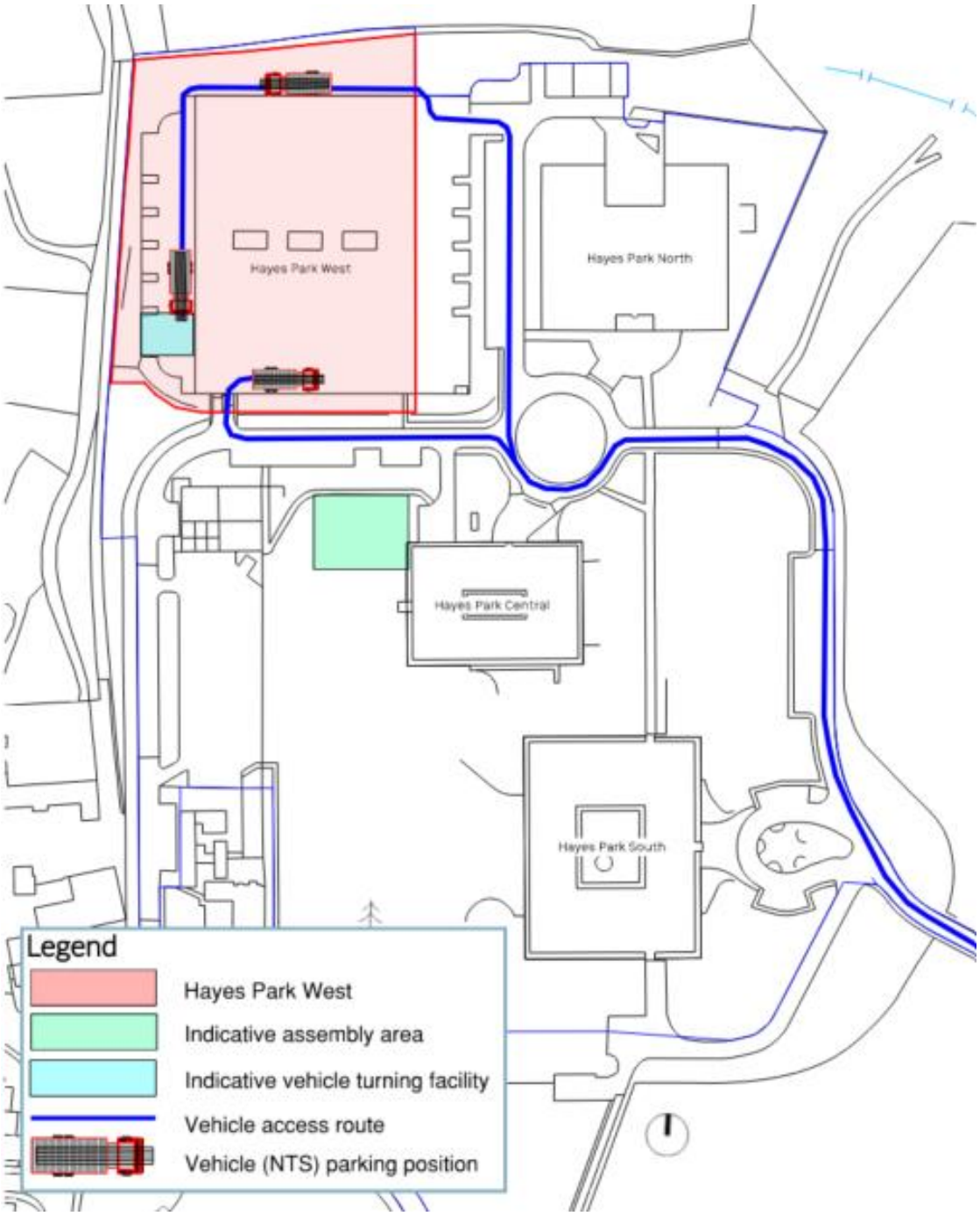

Figure 2: Fire service access.

6.5 Firefighting access within the building (D12: B5)

– Every area of the development (dwellings and ancillary) can be reached directly from outside from the vehicle parking positions.

6.6 Measures to protect the base build fire safety strategy (D12: B6)

– A fire safety strategy report will be developed as the design progresses to demonstrate compliance with the functional requirements of the Building Requirements 2010 (as amended).

Regulation 38 of the Building Regulations requires that fire safety information be given by the person carrying out works to the responsible person for the building to assist them in operating and maintaining the building with reasonable safety. Therefore, the final fire safety strategy report will need to form part of this package of fire safety information to be issued to the responsible person. This will form part of the necessary handover of information to the responsible person. The rest of the fire safety information required to be given as part of Regulation 38 is defined in Approved Document B.

- In addition, any future modifications to the scheme or fit-out that will be subject to Building Regulations approval and should consider the base build fire safety strategy developed, such that the existing fire safety measures are not compromised within the modifications.
- Management strategies associated with the fire safety of the building will be developed as the design progresses.

6.7 Evacuation lifts (D5: B5)

- No evacuation lifts are proposed within this development, as all dwellings are accessed directly from the exterior and there are no internal common areas or upper storeys requiring vertical evacuation via lifts.

7. Conclusion.

This fire safety statement has been prepared to outline the approach and provisions relating to fire safety for the Hayes Park West development for compliance with The London Plan Policy D5 and D12.

This statement demonstrates that the proposals have considered fire safety at the earliest stage, and the further development of the fire strategy will be based upon these principles. The fire strategy will be further developed for submission to the Approving Authority at the appropriate time and will meet the functional requirements of the Building Regulations 2010, taking recommendations from BS 9991:2024 and the requirements of Policy D5 and D12 of The London Plan.

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