LONDON PLAN FIRE STATEMENT

Horton Road, London

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Contents

LONDON PLAN FIRE STATEMENT

Project Horton Road, London

Address Horton Road, West Drayton, London UB7 8JL

Document London Plan Fire Statement

Version 01

Report Version History

		Prepared By	Checked and Reviewed By
		Purushottam Pulkute BTech, MSc Fire Engineer	**Dr. Harem Hussein** BSc, MSc, CEng, MIFireE, MIMechE, PMSFPE Chartered Fire Engineer
Version		Status	Date Issued
London Plan Fire Statement	01	DRAFT	05.09.2025

Reviewer of the Report	Dr. Harem Hussein – BSc, MSc, CEng, MIFireE, MIMechE, PMSFPE - Chartered Fire Engineer
Engineer's Profile	Harem has over 12 years of experience in fire safety engineering nationally and internationally, and a PhD in fire safety engineering. Harem is a Chartered Engineer with the Engineering Council through both the Institute of Fire Engineering (IFE) and the Institute of Mechanical Engineering (IMechE) as well as a Professional Member of the Society of Fire Protection Engineers (SFPE). Harem is familiar with the UK building regulations, codes and standards regarding fire safety. He was involved in developing many fire strategy reports for existing and new buildings and is well familiar with finding a robust fire engineering solution for complex buildings. He has authored and a peer reviewed many fire engineering reports and technical notes. Harem is actively working on investigating external walls for existing high-rise residential buildings according to the PAS9980 methodology and advises clients on a daily basis regarding their building external walls' safety and any necessary remedial works based on the FRAEW reports' outcomes. Harem is now working on various fire engineering and fire safety research projects to ensure a safer built environment for all.

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1.0 INTRODUCTION

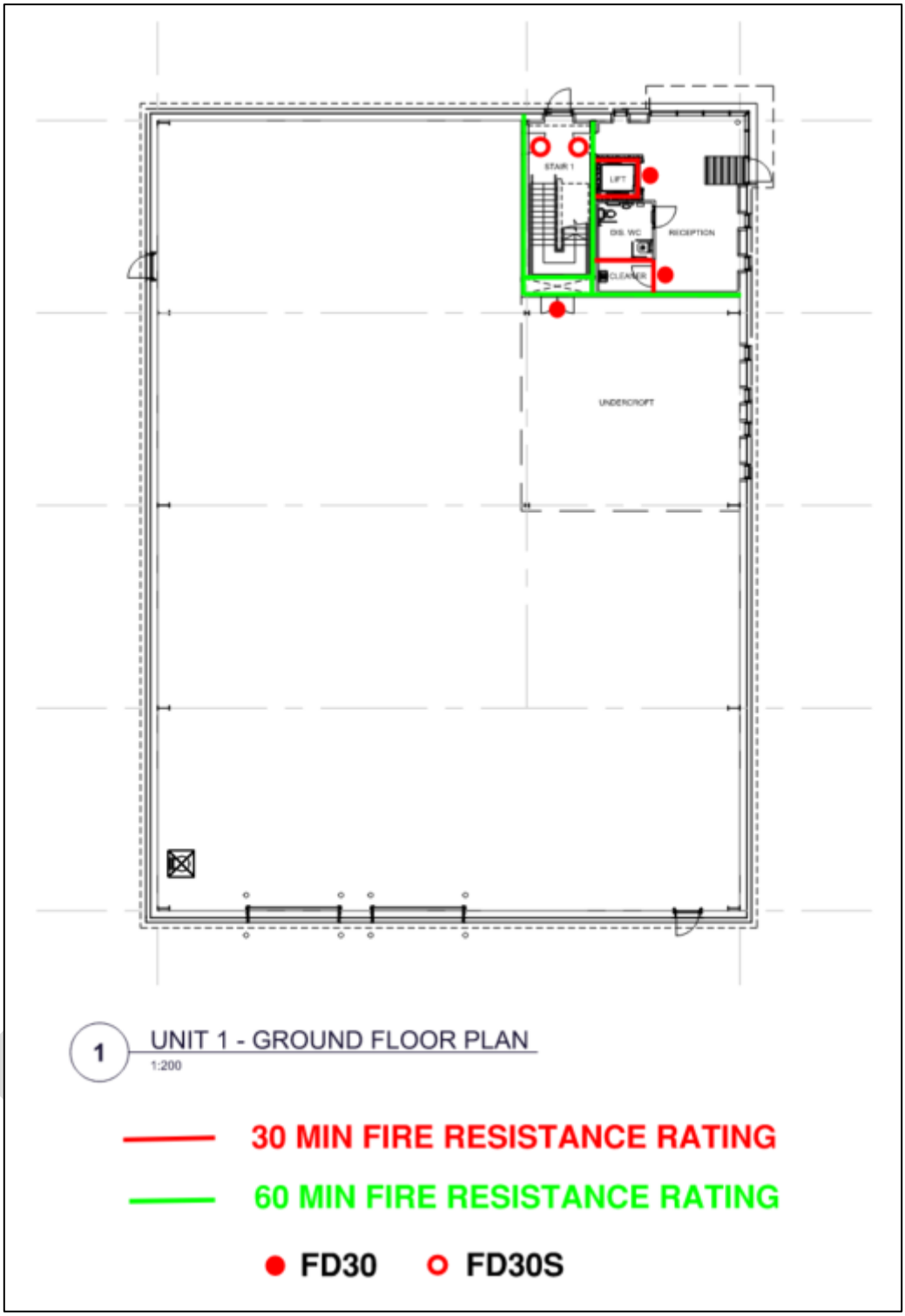
Octa Fire has been appointed by LMO Overseas Investment Ltd to produce the London Plan Fire Statement for the proposed industrial redevelopment located at Horton Road, West Drayton, UB7 8JL. The site forms part of the Orbital Industrial Estate and is situated within a Strategic Industrial Location (SIL) as designated by the London Plan and the Hillingdon Local Plan. The proposed scheme includes the demolition of thirteen outdated industrial units and the construction of two new light industrial/warehouse units (Use Classes B2, B8 and E(g)(iii)), with ancillary offices, service yards, parking facilities, and associated infrastructure. Unit 1 has a gross external area (GEA) of 1,170 m² with a clear internal height of 8 meters, while Unit 2 has a GEA of 2,229 m² and a 12-metre internal height, incorporating a mezzanine level. The buildings are arranged over ground and first floor levels. At this redevelopment, the top storey height for Unit 1 building is 4m and for Unit 2 building is 6.5m. Fig.1 has been added to illustrate the existing location plan and general layout of the redevelopment.

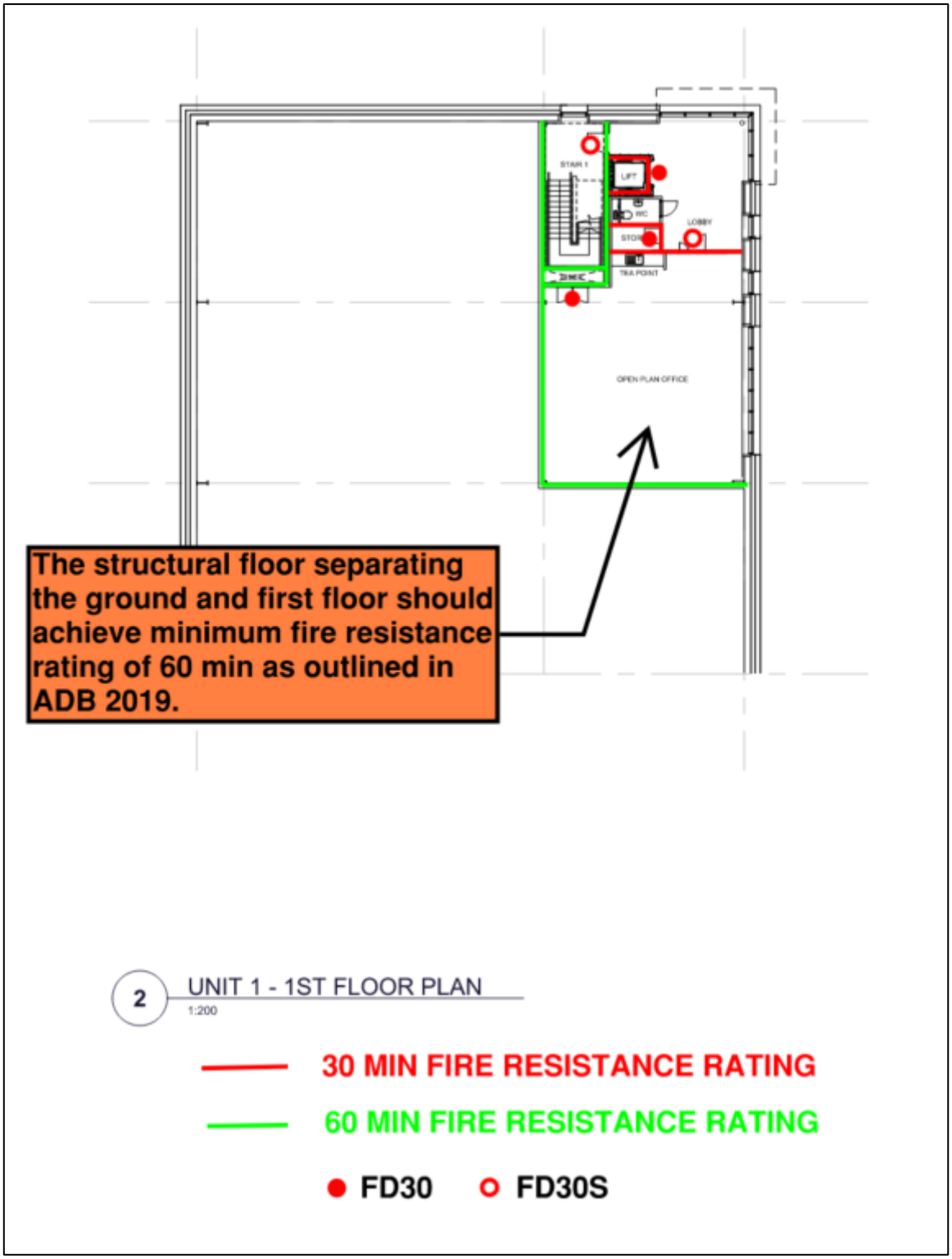
(A) (B)

Figure 1 – (A) Existing Location Plan; (B) Site Layout Redevelopment Plan

2.0 PROPOSED WORKS

The proposed scheme at the premises includes the demolition of thirteen outdated industrial units and the construction of two new light industrial/warehouse units (Use Classes B2, B8 and E(g)(iii)), with ancillary offices, service yards, parking facilities, and associated infrastructure. According to the submitted architectural package by LMO Overseas Investment Ltd, the new redevelopment of the premises comprises the two warehouses/industrial units arranged over ground and first floor levels. At this redevelopment, the top storey height for Unit 1 building is 4m and for Unit 2 building is 6.5m. Fig. 2 and 3 below indicate the new proposed scheme of fire strategy plans and elevations for the premises in Unit 1 and Unit 2 warehouses.





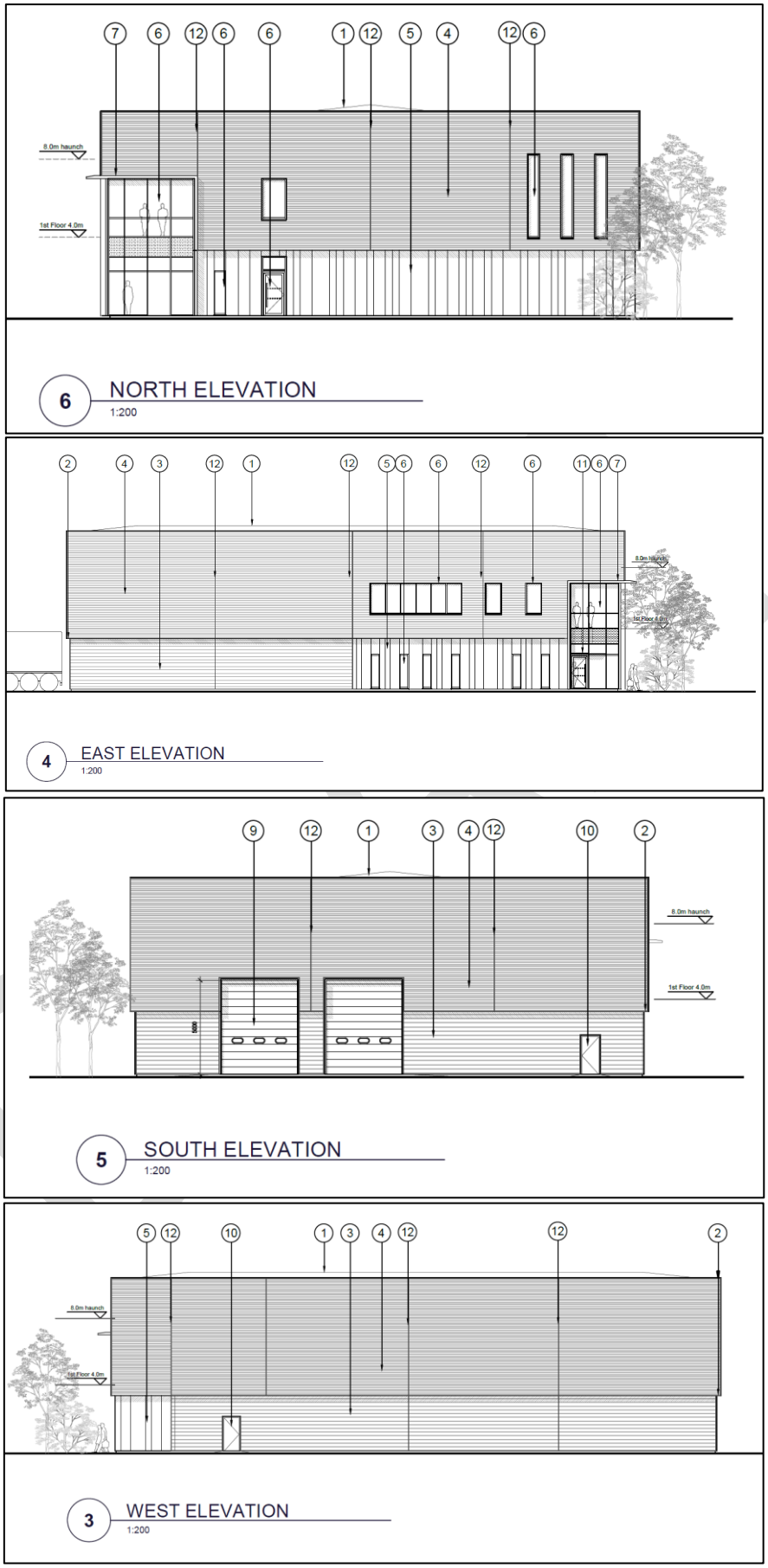
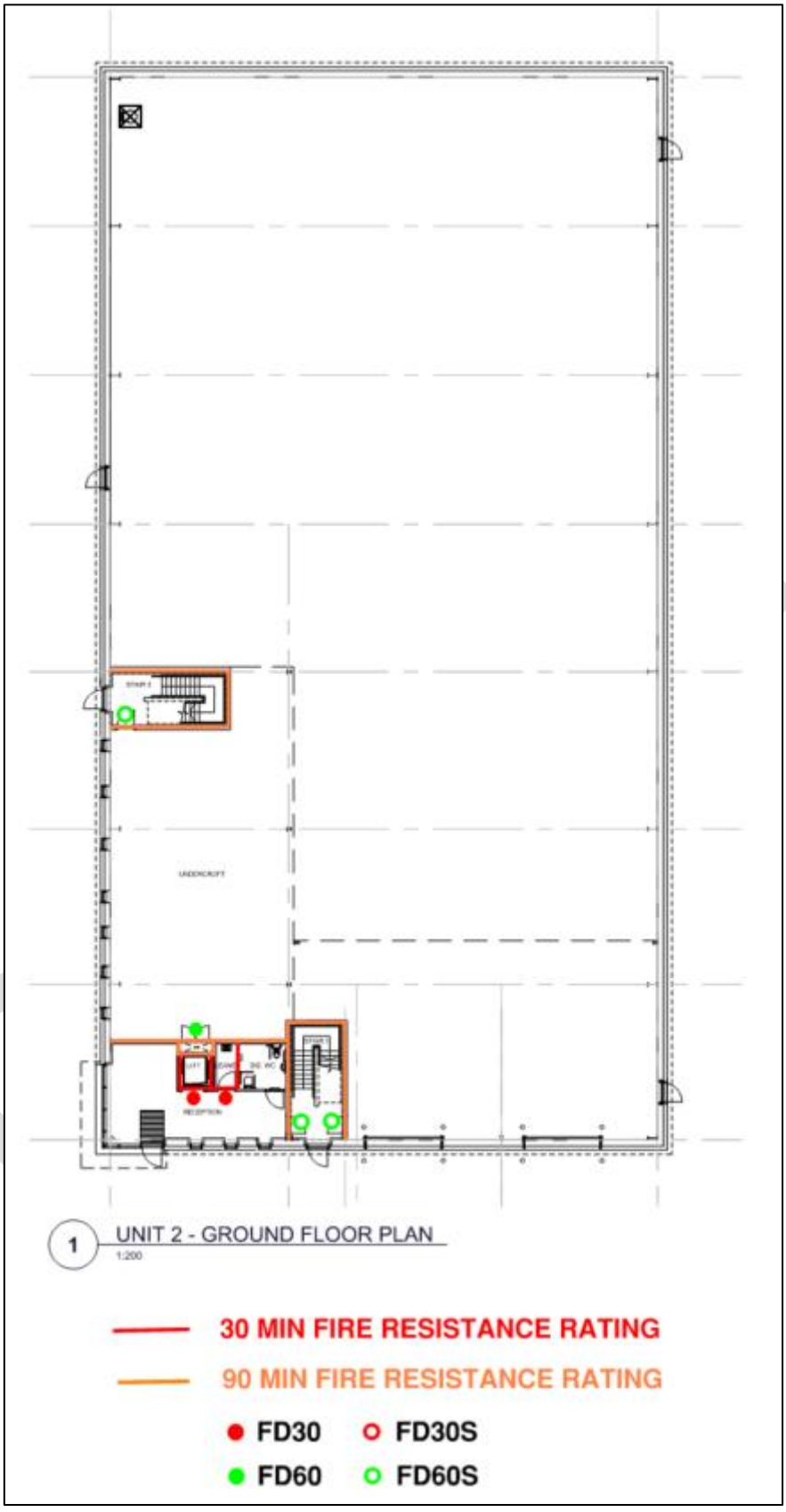
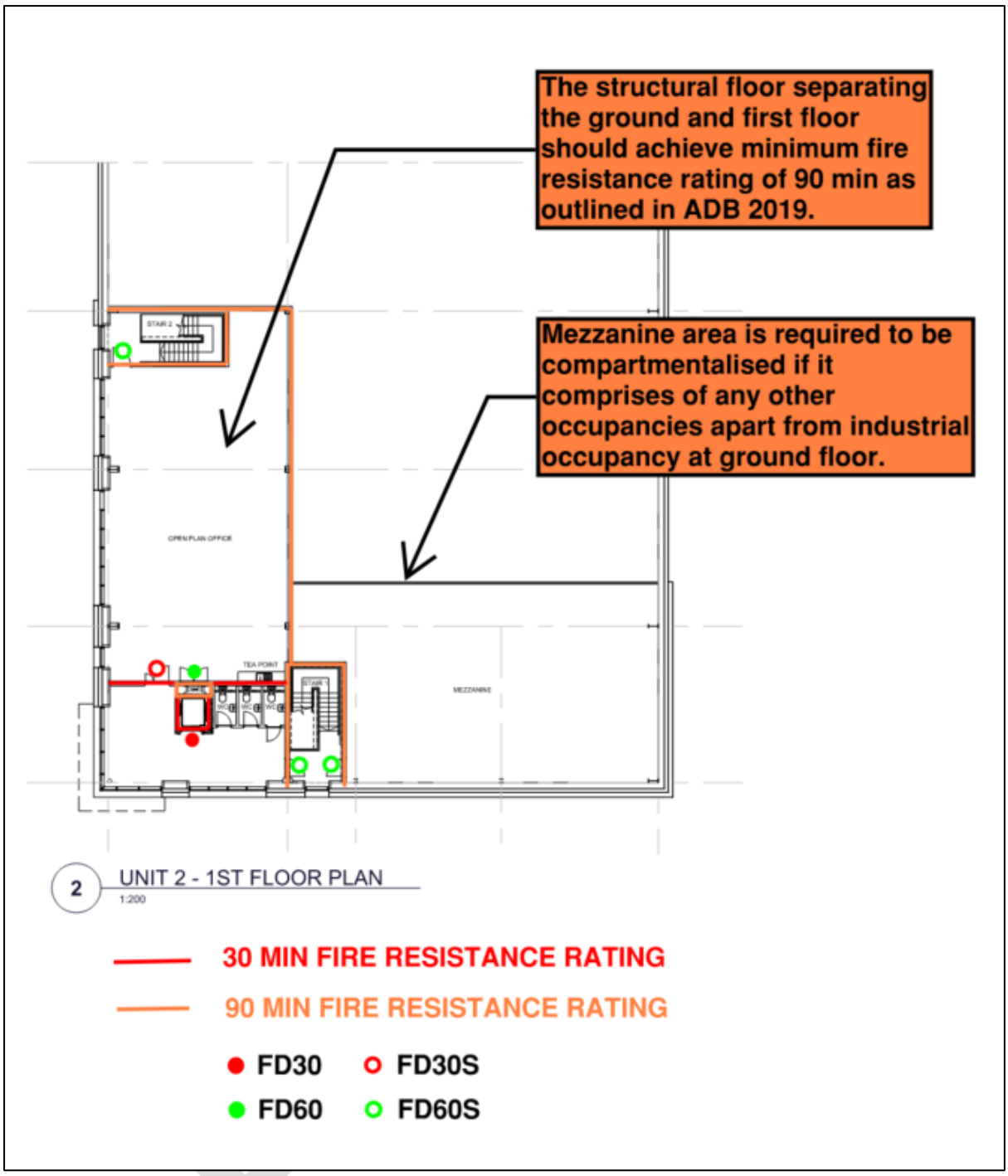


Figure 2 – Proposed new plans and elevations for Unit 1





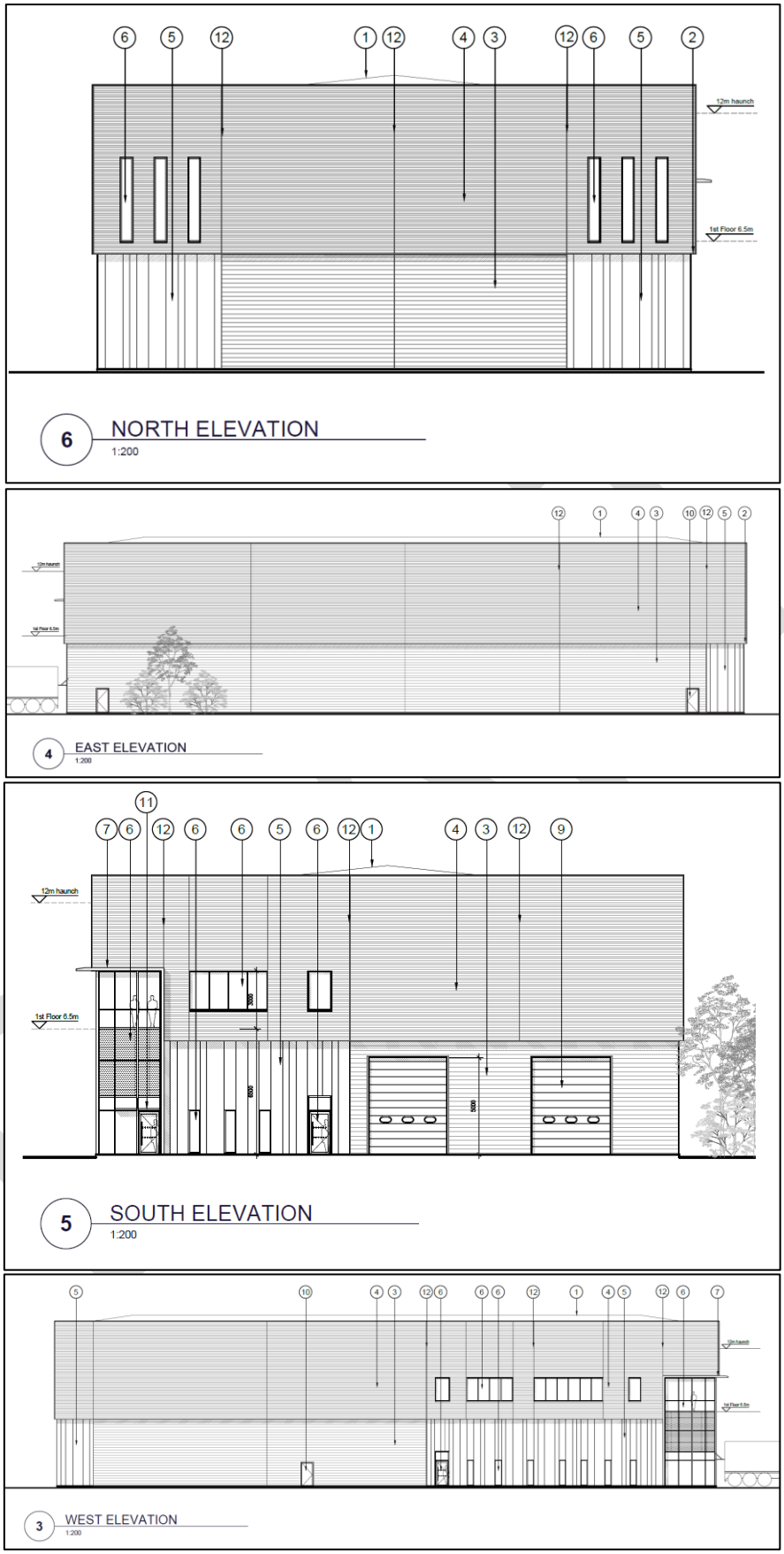


Figure 3 – Proposed new plans and elevations for Unit 2

3.0 FIRE STRATEGY

As a new-build development, the proposed Fire Strategy has been prepared in accordance with Approved Document B 2019, Volume 2 (including amendments of 2020, 2022, and 2025) and relevant British Standards to demonstrate compliance with the UK Building Regulations 2010 (as amended in 2018). The key fire safety elements are summarised in Table 1 below. It is to be noted that due to the current lack of clarity regarding the intended use of the units (the buildings), the fire strategy shall be modified in future in accordance with the provisions of ADB 2019 and other relevant standards once design progresses to next stage.

Table 1: The Fire Safety Elements of the Building

Fire Safety Design Element	Description
Evacuation philosophy	Simultaneous evacuation strategy shall be adopted across each unit. All occupants of the building should evacuate upon alarm activation via the nearest available exit leading to nearest assembly point.
Fire detection and alarm system	Category L2 system shall be installed throughout the building in accordance with BS 5839-1:2017, covering escape routes, offices, plant rooms, and high-risk areas. Manual call points shall be provided at final exits and route changes.
Means of escape (Maximum Travel Distance)	Means of escape from each point within the building should meet the requirements outlined in Table 2.1 of Approved Document B 2019 Vol 2. Maximum travel distances: a. One direction only ≤ 25m for normal hazard and 12m for higher hazard b. More than one direction ≤ 45m for normal hazard and 25m for higher hazard More onerous requirement of travel distances i.e. higher hazard travel distances requirement shall be considered in case of lack of clarity for hazard use. The width of escape routes and exits should meet the requirements outlined in Table 2.3 of ADB 2019. The protected stairway should lead to a final exit either directly or via an exit passageway.
Fire Suppression systems	The sprinkler system is not required for the building as per ADB 2019 Vol. 2. However, this is to be further confirmed once the intended specific use within two units is clear in the next stage of design. Provision is made in design to allow future fit-out (e.g., sprinklers to BS EN 12845) if required by tenant or insurer.
Fire mains	Fire mains are not required for the building as building height <18m. Since the total floor area for Unit 1 is less than 2000m^2, the fire and rescue vehicle access should be provided either to 15% of perimeter or within 45m of every point of the footprint of the building according to ADB 2019, Diagram 15.1, whichever is less onerous. As the total floor area for Unit 2 is more than 2000m^2, the fire and rescue vehicle access should be provided to at least 15% of perimeter according to ADB 2019, Table 15.1 and Diagram 15.1. Pump appliance access should be provided adjacent to the building for 15% of total perimeter.
Emergency lighting	Emergency lighting shall be installed in accordance with BS 5266-1 and BS EN 1838 and shall be provided in the common escape routes as well as open plan

	areas of more than 60m^2. Self-contained luminaires with ≥3-hour battery duration.
Exit signage	Exit signs shall be provided in accordance with BS 5499-4, BS ISO 3864-1, and BS 5499-5. Directional signs at all exits and changes in direction/level.
Fire Compartmentation	As per the drawings provided, the top storey height for Unit 1 building is 4m and for Unit 2 building, it is 6.5m. Based on these heights and ADB 2019, the compartment floors and walls are expected to have a 60-minutes fire resistance rating for Unit 1 building. Whereas, it is proposed to have 90-minutes fire resistance rating for compartment walls within Unit 2 building. Enclosure to protected stairway shall have 60 min and 90 min fire resistance rating for Unit 1 and Unit 2 respectively. The lift shaft shall have minimum of 30 min fire resistance rating, unless the enclosing walls are load-bearing wall in which case the fire resistance rating shall be 60 min for Unit 1 and 90 min for Unit 2. The construction that encloses places of special fire hazard shall have minimum fire resistance rating of 30 min.
Structural Fire Protection	In accordance with Table B1 and B2 of ADB 2019, the loadbearing elements of the structure (including the frame and the loadbearing walls) for Unit 1 building should have a minimum of 60 minutes fire resistance, whereas Unit 2 building should have 90 minutes of fire resistance rating.
External Fire Spread	The external walls of the building shall adhere to fire performance of Class B-S3, d2 or better for external surfaces which are less than 1000mm from the relevant boundary as per Table 12.1 of ADB 2019 to resist the spread of fire over the external walls and from one building to another. There are no requirements for external surfaces of the building which are more than or equal to 1000mm from the relevant boundary. All material coverings used on external roofs is recommended to achieve a minimum B_{ROOF} (t4) (European Class) for distance less than 6m from any point on relevant boundary when tested and classified under BS EN 13501-5. The roof coverings can achieve C_{ROOF} (t4) for distance of at least 12m from relevant boundary or D_{ROOF} (t4) for distance of at least 20m from relevant boundary.
Secondary power supplies	Secondary power supplies shall be provided to life safety systems, including the fire alarm system and emergency lighting. Fire alarm cables shall provide a minimum 30-minute fire resistance in accordance with BS 8491 and be installed to meet the requirements of BS 7671. Fire alarm control panels shall be equipped with integral battery backup, capable of maintaining system operation for a minimum of 24 hours in standby mode and 30 minutes in alarm mode. Emergency lighting systems shall also include battery backup. In the event of a failure of the main supply, alternate source of power shall be provided. In this case this can be achieved through battery systems or external generators.

4.0 LONDON PLAN POLICY D5 – INCLUSIVE DESIGN

Policy requirement D5 (Inclusive Design) requires as a minimum of one lift per core for an evacuation lift. An evacuation lift shall be provided within each unit/warehouse in accordance with BS 81-76.

It is expected that trained and competent personnel will be available during working hours to operate the lift and assist any occupants requiring use of the lift.

5.0 LONDON PLAN POLICY D12 – FIRE SAFETY

The proposed works meet the requirements of London Plan Policy D12 – Fire Safety as detailed in Table 2.

Table 2: London Plan Policy D12 – Fire Safety Compliance Check

POLICY D12 REQUIREMENT	PROPOSED DESIGN	COMPLIANT WITH POLICY D12
D12.A.1.a - 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 identify suitably positioned unobstructed outside space for fire appliance to be positioned on.	The site is served by a public street Horton Road, which provides vehicle access to the new proposed redevelopment via a private roadway leading to the new warehouses, where turning facilities and a no-parking area will be provided. The proposed works at this development will comply with the functional access requirements of Building Regulation B5 (Access and Facilities for the Fire Service) as per the proposed fire strategy report by Octa Fire.	Yes
D12.A.1.b - 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 identify suitably positioned unobstructed outside space appropriate for use as an evacuation assembly point.	The outside premises of the two new warehouses should be considered to provide the assembly point, which is considered to be achievable for this building site. Management policies and procedures to be developed by the building operator in accordance with their duties in terms of the Regulatory Reform (Fire Safety) Order 2005.	Yes
D12.A.2 – 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 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 features.	Appropriate fire alarm systems and passive and active fire safety features in the building shall be in place as per the proposed fire strategy report by Octa Fire Ltd. The proposed redevelopment will be in compliance with Approved Document B for all fire safety aspects, including the fire detection and alarm system and means of escape etc.	Yes
D12.A.3 – 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 are constructed in an appropriate way to minimise the risk of fire spread.	The proposed works will be constructed in accordance with Approved Document B and other applicable fire safety regulations. All works will incorporate appropriate measures to minimise the risk of both internal and external fire spread, maintaining the required fire resistance across walls, floors and compartment lines.	Yes
D12.A.4 – 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 provide suitable and convenient means of escape, and associated evacuation strategy for all building users.	The proposed developments will operate under a simultaneous evacuation strategy. The proposed evacuation policies are in line with the guidance to meet the functional requirements of the Building Regulations. All new works will comply with the functional requirements of the Building Regulations, particularly those outlined	Yes

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	in Approved Document B, Volume 2, to ensure safe and convenient means of escape for all users of the building.	
D12.A.5 – 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 develop a robust strategy for evacuation which can be periodically updated and published, and which all building users can have confidence in.	Regulation 38 of the Building Regulations require that fire safety information such as the fire safety strategy report be brought to the attention of building management and incorporated into the fire risk assessment. This will enable the building owner/operator to develop relevant evacuation procedures and related documentation in accordance with their duties in terms of the Regulatory Reform (Fire Safety) Order 2005.	Yes
D12.A.6 – 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 provide suitable access and equipment for firefighting which is appropriate for the size and use of the development.	Facilities for fire service will comply with the requirements set out in guidance to meet the functional requirements of the Building Regulations B5 (Access and Facilities for Fire Service) as per the proposed fire strategy report by Octa Fire.	Yes
D12.B.1 – 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 the building's construction: methods, products and materials used, including manufacturers' details.	This fire statement for the development is provided to meet the requirements here. The new works will be constructed in accordance with Approved Document B & other relevant current Building Regulations for all fire safety aspects.	Yes
D12.B.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 means of escape for all building users; suitably designed stair cores, escape for building users who are disabled or require level access, and associated evacuation strategy approach.	Means of escape for the proposed works at the premises will be designed to meet the functional requirements of Building Regulation B1 (Means of Warning and Escape). The horizontal and vertical means of escape shall be designed for simultaneous evacuation strategy in accordance with Approved Document B as per the proposed fire strategy report by Octa Fire.	Yes
D12.B.3 – 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 features which reduce the risk to life: fire alarm systems, passive and active fire safety measures and associated management and maintenance plans.	The proposed works at Horton Road development shall be in compliance with Approved Document B (particularly the functional requirements of the Building Regulations B1, B2, B3 and Regulation 38) for all fire safety aspects as per the proposed fire strategy report by Octa Fire, including the fire detection and alarm system, means of escape and other passive & active fire safety measures etc.	Yes

D12.B.4 – 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 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.	The proposed fire safety strategy and drawings for the new works will address these aspects. The documents will meet the functional requirements of the Building Regulations. The fire safety systems will be designed and installed in accordance with relevant British Standards and manufacturer's specifications. This package will form part of the information supplied at handover in terms of Regulation 38 of Building Regulations.	Yes
D12.B.5 – 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 how provision will be made within the curtilage of the site to enable fire appliances to gain access to the building.	The site is served by a public street Horton Road, which provides vehicle access to the new proposed redevelopment via a private roadway leading to the new warehouses, providing direct and unobstructed access for fire appliances. The vehicle access will comply with the requirements set out in guidance to meet the functional requirements of the Building Regulations B5 (Access and Facilities for Fire Service) as per the proposed fire strategy report by Octa Fire.	Yes
D12.B.6 – 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 ensuring that any potential future modifications to the building will take into account and not compromise the base build fire safety/protection measures.	Any potential future modifications will need to meet the Building Regulations applicable at that time.	Yes

6.0 CONCLUSION

Octa Fire has been appointed by LMO Overseas Investment Ltd to produce the London Plan Fire Statement for the proposed industrial redevelopment located at Horton Road, West Drayton, UB7 8JL, London in terms of the London Plan Policy D12 – Fire Safety and D5 Inclusive Design.

The proposed scheme at the premises includes the demolition of thirteen outdated industrial units and the construction of two new light industrial/warehouse units (Use Classes B2, B8 and E(g)(iii)), with ancillary offices, service yards, parking facilities, and associated infrastructure.

A proposed fire safety strategy summary is presented in this fire statement alongside the London Plan Policy D12 – Fire Safety and London Plan Policy D5 – Inclusive Design. It was concluded that the proposed works are compliant with Policy D12 and Policy D5.

7.0 LIMITATIONS

This report is solely compiled based on our opinion only.

Our advice is strictly limited to the scope of our current brief, i.e. to provide London Plan Fire Statement for the building site mentioned on the first page of this report. Complying with the recommendations of this document will not guarantee that a fire will not occur. This document is based on the drawings and supporting information issued to Octa Fire Ltd by the client.

Octa Fire Ltd have not reviewed any other issues within the project other than those identified in our report. We offer no comment on the adequacy or otherwise of any other aspects of the development (whether related to fire safety or any other issue) and any absence of comment on such issues should not be regarded as any form of approval. The advice should not be used for buildings other than that named in the title.

Octa Fire Ltd shall have no duty of care beyond that owing to the Client. Under no circumstances shall Octa Fire Ltd be liable for any reliance by any party, other than the client, on the information contained within this report. Nothing in this report confers or purports to confer on any third party any benefit or the acceptance of any third-party liability by virtue of the Contracts (Rights of Third Parties) Act 1999.

Octa Fire does not manufacture, design or install any specialist fire rated systems. Furthermore, we do not approve/sign-off or certify any designs or install works, but only offer comments (professional fire engineering opinion) with respect to relevant supporting test evidence/reports supplied to us for review, as well as confirmation statements provided by client on the quality of works and materials/system specification proposed for use. The statutory role for approval sits with Building Control Bodies (BCB's) such as the local authority, or an approved inspector. It is crucial that the proposed fire resistant systems, along with any materials used as part of those systems are verified and approved by the product manufacturer/supplier to be adequate and robust for the end installation, and to provide the required fire performance in accordance with the applicable building regulations and the requirements put forward by the design team before being installed onsite. This review report does not represent type approval or certification of the use of the product/system within the end application.

Octa Fire do not serve as UKAS accredited fire testing facility and therefore do not assess systems or produce reports in accordance with BS EN 15725, as detailed under Appendix B of Approved Document B, performance of materials, products and structures, Vol.2, 2019 edition. The supporting evidence provided in this report (by the client) has been used to substantiate the statements made within its content.

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