

APPEAL REFERENCE: APP/F5540/X/25/3365277

**IN THE MATTER OF AN APPEAL PURSUANT TO SECTION 195 OF THE TOWN AND
COUNTRY PLANNING ACT 1990 CONCERNING:**

**THE FIRS LODGE, 289 – 291 BATH ROAD,
HOUNSLOW TW3 3DB**

**STATUTORY DECLARATION OF SATINDER PAL KAUR
TOOR**

I, Mrs Satinder Pal Kaur Toor, [REDACTED] **of** [REDACTED]

[REDACTED] DO SOLEMNLY AND SINCERELY DECLARE THAT:

1. I am the sole owner and director of The Firs Lodge Ltd, a company registered and operating at 289–291 Bath Road, Hounslow, TW3 3DB. Please see the certificate of incorporation attached below.
2. I initially commenced my business as a Bed and Breakfast (B&B) at 289 Bath Road, Hounslow, TW3 3DB, around August 2000, operating as a sole trader. Please see the official title registry documents attached below.
3. Between the years 2002 and 2003, I acquired leasehold for 291B, 291C, and 291D of 291 Bath Road and incorporated them into the B&B operations. Please see the title registry documents attached. The internal layout for 291B, 291C, 291D was modified by converting the kitchen into a bedroom, and by installing en-suite shower and toilet facilities to enhance guest accommodation. For 291B, Room 23A was changed from kitchen to bedroom. For 291C, Room 21 was changed from Living to bedroom. For Room 18, an on suite was added,

for room 20, sitting room was changed to bedroom. In 2012, I built a bridge between 289 and 291 to connect and make the first floor assessable to the guests. On the ground floor, we had partitions in between the buildings that we removed in 2004 and maintained it as a corridor. The fire safety records as attached below from 2008 also demonstrates it being used as a bed and breakfast.

4. I advertised the B&B services through various means including Yellow Pages, Talking Pages, and business cards offering rooms to let. Additionally, I received bookings through the British Hotels Reservation Centre (BHRC).
5. From approximately 2003 to 2004, I entered into arrangements with the UK Home Office under the Refugee Arrival Project (RAP) to provide temporary accommodation for asylum seekers at the Firs Lodge. This collaboration with the Home Office continued for two years.
6. Simultaneously, I received regular bookings from 2004 via multiple local authorities, including but not limited to London Boroughs of Sutton, Hounslow, Richmond, Kingston, Merton, and Ealing, temporary accommodation at daily chargeable rates predominantly for homeless people.
7. Private guests were also accommodated at the property.
8. In the year 2012, I formally incorporated my business under the name The Firs Lodge Ltd, registered with Companies House, and began accepting bookings through major online travel agencies such as Booking.com, Expedia, Late Rooms, Agoda, and Hotels.com.
9. During the Covid-19 pandemic (from March 2020 to May 2024), the London Borough of Hounslow engaged the Firs Lodge for the temporary accommodation of homeless individuals. Furthermore, in 2022 I bought the 291A from Adda Hotels and adapted two front rooms as part of the B&B. This particular flat was purchased without having any cooking facility as it was used by Adda Hotels for temporary staff accommodation on a constant rotation basis. The staff would eat at 293 and 295 where Adda hotel had their

kitchen and dining facilities. I have attached the information as supplied by Stamford estate agents who organised the sale of this unit.

Later, I converted Room 66 of 291A which was bathroom to store and Room 64 which was living previously to bedroom.

293 housed 42 staff members of Adda Hotels and [REDACTED] sold 293, 291A to ADDA Hotel which was Rowe's guest house in a (C1) Use and was continued as a C1 use when ADDA bought it as well.

10. Throughout the period of operation, I have continuously and diligently fulfilled all relevant statutory and tax obligations, including but not limited to the payment of VAT, Corporation Tax, and Business Rates. Not knowing that I would need all these old records, some have been lost.
11. I currently have 5 staff including my daughter who still works in the property as she manages booking, invoices and is actively involved.
12. On 2018, there was a tribunal case with me and Adda hotel where this was an application for an order that a breach of condition in the lease has occurred. We reached an agreement outside the court. This case entered on our use of 291 B, C and D as a B&B. As evidenced by [REDACTED] we had been using the property as a bed and breakfast during 2018 as well. Please see his witness statement attached below.
13. The use of the property as a Bed and Breakfast has been long-standing, consistent, open, and uninterrupted since its inception. At no point has there been any cessation or closure of the B&B operations that could be interpreted as an abandonment or change of use of the premises.
14. To the best of my knowledge, information, and belief, the continuous use of the property for B&B purposes has been lawful, transparent, and in accordance with applicable regulations.

AND I make this solemn declaration conscientiously believing the same to be true and by virtue
of the Statutory Declarations Act 1835



.....
Signature of the Declarant

Declared at:



10/1/2025
This August 2025

Before me;



CERTIFICATE OF INCORPORATION

File Copy



CERTIFICATE OF INCORPORATION OF A PRIVATE LIMITED COMPANY

Company No. [REDACTED]

The Registrar of Companies for England and Wales, hereby certifies that

THE FIRS LODGE LTD.

is this day incorporated under the Companies Act 2006 as a private company, that the company is limited by shares, and the situation of its registered office is in England and Wales

Given at Companies House, Cardiff, on 10th December 2012



N08324527I



THE OFFICIAL SEAL OF THE
REGISTRAR OF COMPANIES



Companies House

— for the record —

The above information was communicated by electronic means and authenticated by the Registrar of Companies under Section 1115 of the Companies Act 2006

TITLE REGISTRY DOCUMENTS

The electronic official copy of the register follows this message.

Please note that this is the only official copy we will issue. We will not issue a paper official copy.



Official copy of register of title

Title number NGL536127

Edition date 23.11.2022

- This official copy shows the entries on the register of title on 24 JUN 2025 at 11:47:19.
- This date must be quoted as the "search from date" in any official search application based on this copy.
- The date at the beginning of an entry is the date on which the entry was made in the register.
- Issued on 24 Jun 2025.
- Under s.67 of the Land Registration Act 2002, this copy is admissible in evidence to the same extent as the original.
- This title is dealt with by HM Land Registry, Wales Office.

A: Property Register

This register describes the land and estate comprised in the title.

HOUNSLOW

- 1 (30.09.1985) The Freehold land shown edged with red on the plan of the above Title filed at the Registry and being 291 Bath Road, Hounslow (TW3 3DB).
- 2 The land has the benefit of a right of way over the roadway at the rear leading into St. Paul's Close.

B: Proprietorship Register

This register specifies the class of title and identifies the owner. It contains any entries that affect the right of disposal.

Title absolute

- 1 (23.11.2022) PROPRIETOR: THE FIRS LODGE LTD (Co. Regn. No. 08324527) of 289 Bath Road, Hounslow TW3 3DB.
- 2 (23.11.2022) The price stated to have been paid on 2 November 2022 was £135,000.
- 3 (23.11.2022) The Transfer to the proprietor contains a covenant to observe and perform the covenants referred to in the register and of indemnity in respect thereof.

C: Charges Register

This register contains any charges and other matters that affect the land.

- 1 The part of the roadway at the rear included in the title is subject to rights of way.
- 2 A Transfer of the land in this title dated 17 March 1987 made between (1) Alicia Mary Ellen Bannon (Vendor) and (2) Joginder Singh Ubi (Transferee) contains the following covenants:-

"The Transferee hereby covenants with the Vendor for the benefit and protection of the Transferors adjoining premises Numbers 293 and 295

C: Charges Register continued

Bath Road, Hounslow that the Transferee and his successors in title will not carry on or suffer to be carried on on the property hereby transferred or any part thereof any trade or business whatsoever and will not use or permit to be used the property hereby transferred for any other purpose than a private dwellinghouse or flats each in single family occupation"

- 3 The parts of the land affected thereby are subject to the leases set out in the schedule of leases hereto.
The leases grant and reserve easements as therein mentioned.

Schedule of notices of leases

| | Registration date and plan ref. | Property description | Date of lease and term | Lessee's title |
|---|---------------------------------------|--|--|-------------------|
| 1 | 25.04.1988 1 (part of) : 2 : 3 | Flat 1, 291 Bath Road (Ground Floor Flat) : Garden Ground : Parking Space | 18.03.1988 125 years from 25.12.1987 | AGL2705 |
| 2 | 10.05.1988 1 (part of) : 4 | Flat 3, 291 Bath Road (First Floor Flat) : Garden Ground, Parking Space | 08.03.1988 125 years from 25.12.1987 | AGL2900 |
| 3 | 21.07.1988 1 (part of) : 5 : 6 | Flat 4, 291 Bath Road (First Floor Flat) : Garden Ground : Parking Space | 10.06.1988 125 years from 25.12.1987 | AGL3843 |
| 4 | 21.04.1989 1 (part of) | Flat 2, 291 Bath Road (Ground Floor Flat) | 28.04.1989 125 years from 25.12.1987 | AGL8943 |
| 5 | 06.02.2003 7 | Garage at the back of Flat 2, 291 Bath Road | 30.12.2002 125 years from 25.12.1987 | AGL112555 |

End of register

The electronic official copy of the register follows this message.

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Official copy of register of title

Title number NGL536127

Edition date 23.11.2022

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- This title is dealt with by HM Land Registry, Wales Office.

A: Property Register

This register describes the land and estate comprised in the title.

HOUNSLOW

- 1 (30.09.1985) The Freehold land shown edged with red on the plan of the above Title filed at the Registry and being 291 Bath Road, Hounslow (TW3 3DB).
- 2 The land has the benefit of a right of way over the roadway at the rear leading into St. Paul's Close.

B: Proprietorship Register

This register specifies the class of title and identifies the owner. It contains any entries that affect the right of disposal.

Title absolute

- 1 (23.11.2022) PROPRIETOR: THE FIRS LODGE LTD (Co. Regn. No. 08324527) of 289 Bath Road, Hounslow TW3 3DB.
- 2 (23.11.2022) The price stated to have been paid on 2 November 2022 was £135,000.
- 3 (23.11.2022) The Transfer to the proprietor contains a covenant to observe and perform the covenants referred to in the register and of indemnity in respect thereof.

C: Charges Register

This register contains any charges and other matters that affect the land.

- 1 The part of the roadway at the rear included in the title is subject to rights of way.
- 2 A Transfer of the land in this title dated 17 March 1987 made between (1) [REDACTED] (Vendor) and (2) [REDACTED] (Transferee) contains the following covenants:-

"The Transferee hereby covenants with the Vendor for the benefit and protection of the Transferors adjoining premises Numbers 293 and 295

C: Charges Register continued

Bath Road, Hounslow that the Transferee and his successors in title will not carry on or suffer to be carried on on the property hereby transferred or any part thereof any trade or business whatsoever and will not use or permit to be used the property hereby transferred for any other purpose than a private dwellinghouse or flats each in single family occupation"

- 3 The parts of the land affected thereby are subject to the leases set out in the schedule of leases hereto.
The leases grant and reserve easements as therein mentioned.

Schedule of notices of leases

| | Registration date and plan ref. | Property description | Date of lease and term | Lessee's title |
|---|---------------------------------------|--|--|-------------------|
| 1 | 25.04.1988 1 (part of) : 2 : 3 | Flat 1, 291 Bath Road (Ground Floor Flat) : Garden Ground : Parking Space | 18.03.1988 125 years from 25.12.1987 | AGL2705 |
| 2 | 10.05.1988 1 (part of) : 4 | Flat 3, 291 Bath Road (First Floor Flat) : Garden Ground, Parking Space | 08.03.1988 125 years from 25.12.1987 | AGL2900 |
| 3 | 21.07.1988 1 (part of) : 5 : 6 | Flat 4, 291 Bath Road (First Floor Flat) : Garden Ground : Parking Space | 10.06.1988 125 years from 25.12.1987 | AGL3843 |
| 4 | 21.04.1989 1 (part of) | Flat 2, 291 Bath Road (Ground Floor Flat) | 28.04.1989 125 years from 25.12.1987 | AGL8943 |
| 5 | 06.02.2003 7 | Garage at the back of Flat 2, 291 Bath Road | 30.12.2002 125 years from 25.12.1987 | AGL112555 |

End of register

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Official copy of register of title

Title number AGL2705

Edition date 25.11.2022

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- Issued on 24 Jun 2025.
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- This title is dealt with by HM Land Registry, Wales Office.

A: Property Register

This register describes the land and estate comprised in the title. Except as mentioned below, the title includes any legal easements granted by the registered lease but is subject to any rights that it reserves, so far as those easements and rights exist and benefit or affect the registered land.

HOUNSLOW

- 1 (25.04.1988) The Leasehold land shown edged with red on the plan of the above Title filed at the Registry and being 291a Bath Road, Hounslow (TW3 3DB).
- NOTE: As to the part tinted blue on the title plan only the Ground floor flat is included in the title.
- 2 (25.04.1988) Short particulars of the lease(s) (or under-lease(s)) under which the land is held:
 Date : 18 March 1988
 Term : 125 years from 25 December 1987
 Rent : £100 and insurance rent
 Parties : (1) [REDACTED]
 (2) [REDACTED]
- 3 (25.04.1988) There are excepted from the effect of registration all estates, rights, interests, powers and remedies arising upon, or by reason of, any dealing made in breach of the prohibition or restriction against dealings therewith inter vivos contained in the lease.
- 4 The landlord's title is registered.
- 5 Unless otherwise mentioned the title includes any legal easements granted by the registered lease(s) but is subject to any rights that it reserves, so far as those easements and rights exist and benefit or affect the registered land.

B: Proprietorship Register

This register specifies the class of title and identifies the owner. It contains any entries that affect the right of disposal.

Title absolute

B: Proprietorship Register continued

- 1 (25.11.2022) PROPRIETOR: THE FIRS LODGE LTD (Co. Regn. No. 08324527) of 289 Bath Road, Hounslow TW3 3DB.
- 2 (17.06.1992) The covenants implied under section 24(1)(a) of the Land Registration Act 1925 in the Transfer to the proprietor are modified
- 3 (25.11.2022) The price stated to have been paid on 2 November 2022 was £290,000.

C: Charges Register

This register contains any charges and other matters that affect the land.

- 1 (25.04.1988) A Transfer of the freehold estate in the land in this title and other land dated 17 March 1987 made between (1) [REDACTED] and (2) [REDACTED] (Transferee) contains the following covenants:-

"THE Transferee hereby COVENANTS with the Vendor for the benefit and protection of the Transferors adjoining premises numbers 293 and 295 Bath Road, Hounslow that the Transferee and his successors in title will not carry on or suffer to be carried on on the property hereby transferred or any part thereof any trade or business whatsoever and will not use or permit to be used the property hereby transferred for any other purpose than a private dwellinghouse or flats each in single family occupation."
- 2 (03.12.1990) By a Transfer dated 19 November 1990 made between (1) [REDACTED] (Second Transferor) and (2) Lynton Hotel Investments Limited the covenants in the Transfer dated 17 March 1987 referred to above were expressed to be released.

The following are details of the terms of release:-

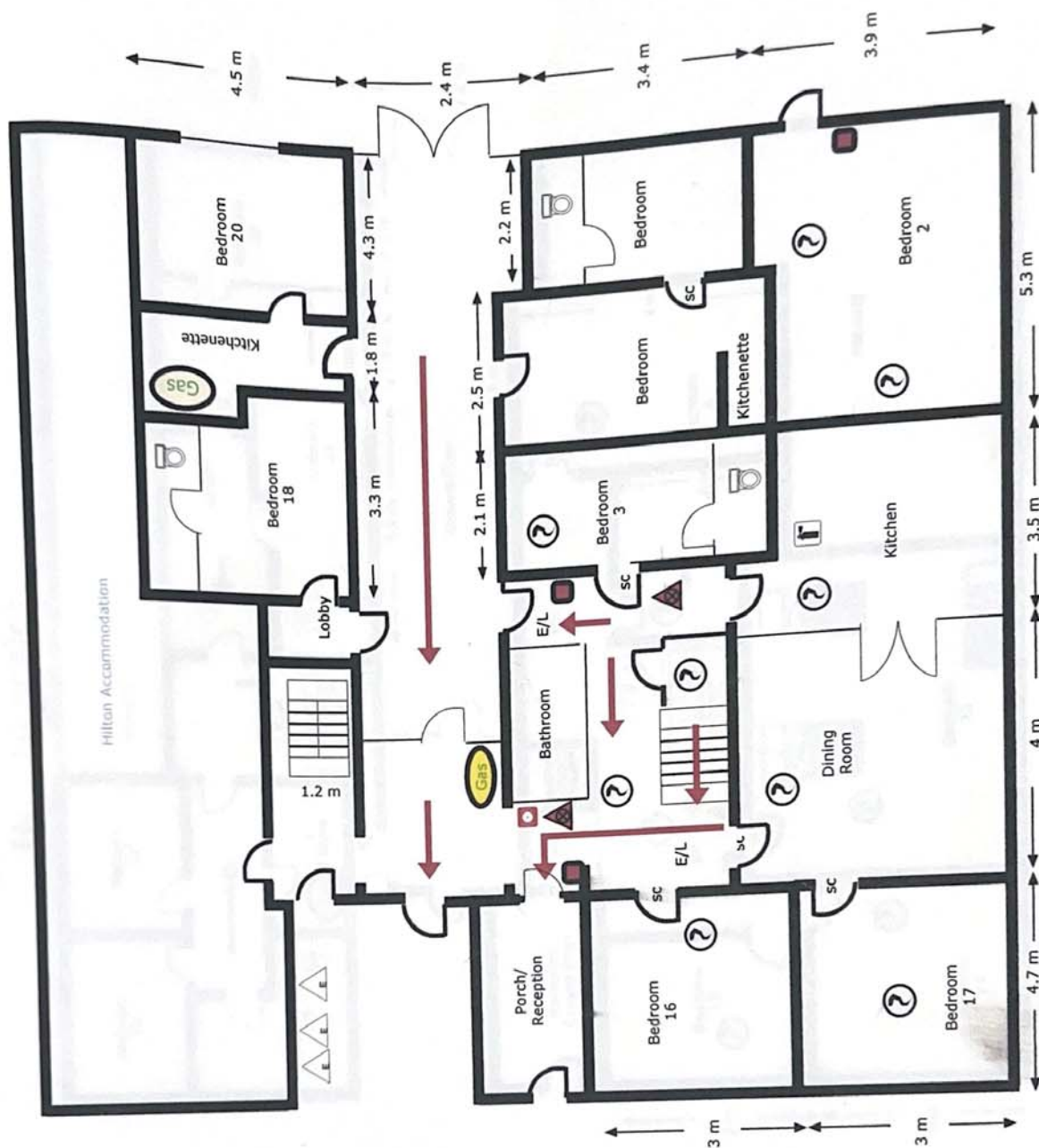
"The Second Transferor hereby releases the Transferee and its successors in title and the property comprised in Title Number AGL2705 from the covenant referred to in entry number 1 of the Charges Register of Title Number AGL2705"

End of register

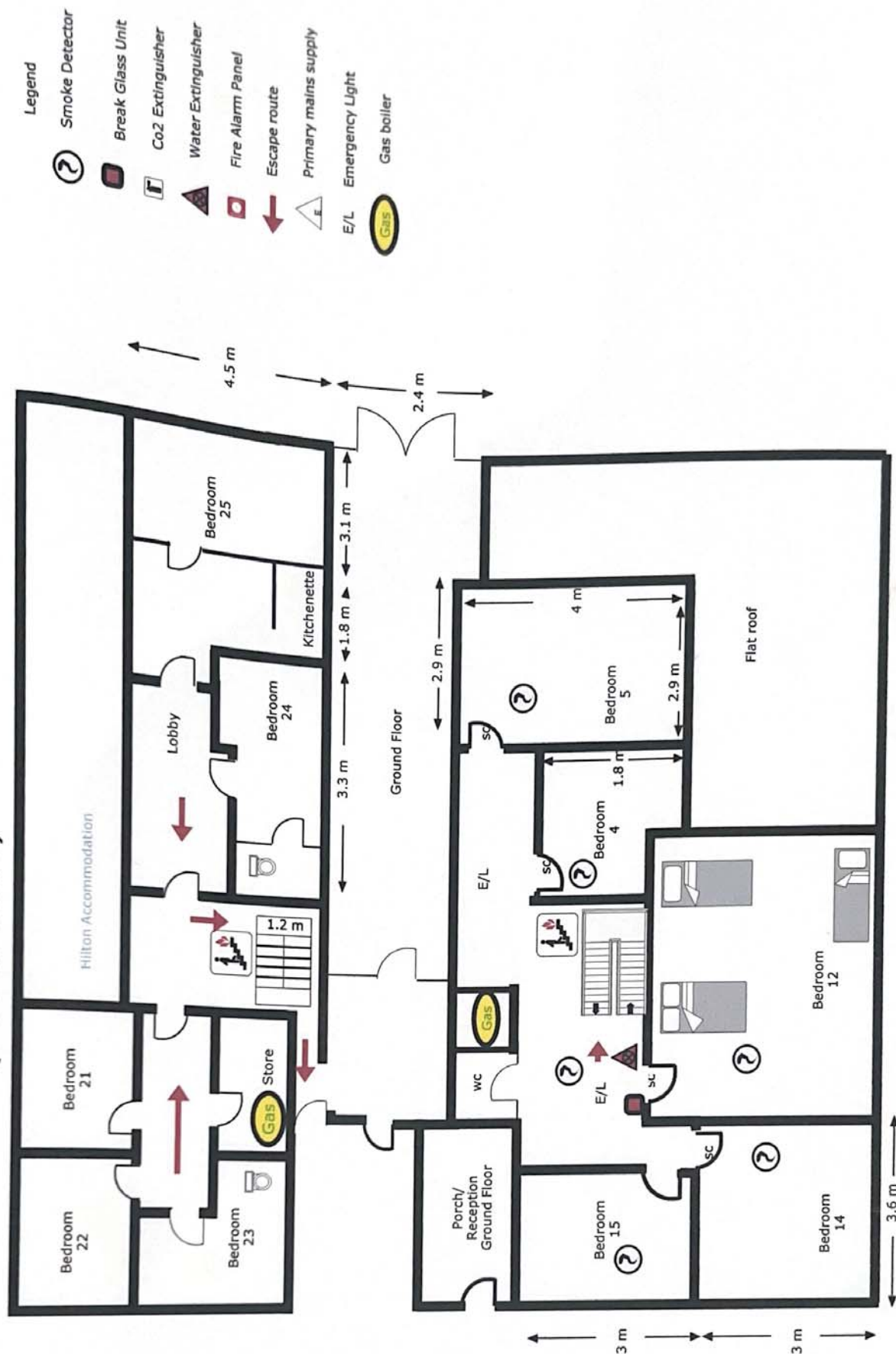
**FIRE SAFETY RECORD FROM
2008**

The Firs Lodge Ground Floor Plan

- Legend
- Smoke Detector
 - Break Glass Unit
 - Co2 Extinguisher
 - Water Extinguisher
 - Fire Alarm Panel
 - Escape route
 - Primary mains supply
 - Emergency Light
 - E/L
 - Gas mains supply
 - Gas Boiler




The Firs Lodge First Floor Plan (Not to scale)



Record of Fire Risk Assessment

A fire risk assessment is intended to identify the hazards present within a workplace and then to assess the level of risk present, control measures are then applied which will wither control or remove the hazard and reduce the risk to acceptable levels.

The table below is for the responsible person(s) to record and identify when the last fire risk assessment was conducted. If you employ 5 or more employees the fire risk assessment must be in a documented format.

| Date | Review Date | Name Of Assessor | Signature | Comments |
|---------|--|-----------------------------|--|----------|
| 30/4/08 | Within 1 year or sooner if there are any changes to mode of operation. | UK Fire Consultants Limited |  | |
| | | | | |
| | | | | |

Fire Risk Assessment

For

The Firs Lodge,
289 – 291, Bath Road, Hounslow, Middlesex, TW3 3DB



Report for
Mr & Mrs Toor,
Proprietor, Pine Lodge

Report History

| Issue | Date | Notes | Prepared & reviewed |
|---------|---------------------------|-------------------|---------------------|
| Issue 1 | 04 th May 2008 | Issued for record | |

Current Issue:

Prepared by

Date of issue

Date: 04th May 2008

Limitations of Usage

This Fire Risk Assessment Report is intended to form part of a pro-active fire safety management strategy for The Firs Lodge Guest House, its staff, guests and others who may use the building. The content of this report should be used in conjunction with that compiled by competent persons that support the responsible person as deemed in law. The content, both descriptive and advisory, should be kept under constant review and updated as and when the use of the building changes or when there are other significant changes to the running of the facilities within the building.

The role of UK Fire Consultants Limited is to facilitate the conduct of a suitable and sufficient fire risk assessment. It remains the responsibility of the owners/occupiers to adopt the recommendations of this report and to maintain the adequacy of the fire precautions provided.

This report has been prepared based on the information available at the time. It is applicable only to the entitled project in accordance with the clients' instruction. It remains valid provided that UK Fire Consultants Ltd are notified of any further modifications to the design and/or construction of the scheme for which a reasonable opportunity has been given for comment and the updating of this report.

This report should not be reproduced without the prior written consent of UK Fire Consultants Ltd.

No part of this report should be extracted or taken out of its intended context.

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1 Executive Summary

This report contains the findings, observations, and recommendations from the Fire Risk Assessment facilitated by UK Fire Consultants Limited on behalf of the proprietor of The Firs Lodge, 289 – 291 Bath Road, Hounslow, Middlesex, TW3 3DB.

The building is located within a prime residential area and originally the premises were two separate Victorian Houses. By way of a temporary structure the two buildings have been joined and thus they cannot be risk assessed in isolation. We were unable to view any plans or drawings regarding the granting of a lawfulness certificate or Full Planning permission having been received. Structural Compartment walls have also been removed and the client is strongly advised to contact Building Control and seek appropriate approval.

There were several structures located in the rear garden and we were advised to Fire Risk Assess these. Therefore they do not form part of this report.

The main body of this report contains the detail of the observations and associated recommendations. The recommendations are then summarised in Section 7 and the Action Plan in Annex 2.

Annex 1 contains information on how to interpret the scoring system used in the main body of this report.

The level of risk present at the time the assessment was carried out is considered to be high for sleeping accommodation premise of this size. Generally there appeared to be some controls in place to manage the risk associated with the activities conducted within the accommodation at 291 The Firs Lodge but the self contained apartments at 289 present a risk to both structures..

There were a number of areas where the potential risk could be reduced and these include areas that fall within the control of the proprietor: management of the Fire Alarm system, Building maintenance, housekeeping, Electrical & Gas Safety compliance, signage and extinguishing equipment inclusive of fire stopping issues that require attention.

2 Introduction

The Firs Lodge Guest House is located at 289 – 291 Bath Road, Hounslow, Middlesex, TW3 3DB, in the London Borough of Hounslow. It is occupied by a number of guests and staff as overnight sleeping accommodation. The building was originally used for residential purposes and subsequent planning permission was received by its current owners to change its use to that of a Hotel / Bed & Breakfast.

The main building was constructed around 1890 and now consists of a ground and first floor that is used as a guest house. The adjoining building is primarily used as first floor and part ground floor accommodation let as self contained flats. They can both be accessed via two entrance doors that no longer remain independent of each other. Both houses have parking for 3 cars outside them.

There are two primary staircases that serve the upper level of both buildings and as you enter the buildings by there main entry points the staircase is located to the right.

This report has been prepared for the proprietor of the Guest House and sets out the findings of a Fire Risk Assessment survey carried out on **30th April 2008**.

A copy of this report and its annexes should be kept on site for inspection by the Fire Service or Fire Safety Inspector, when they visit the building to carry out their routine inspections under the Regulatory Reform (Fire Safety) Order 2005.

This report contains the findings and observations relevant on the day of the inspection and contains recommendations to improve the level of safety for all occupants. The building is a live environment and the use of space and the characteristics of the occupants are continually changing. This Fire Risk Assessment should be kept under review and updated from time to time as the building and its occupants change. This Fire Risk Assessment should be reviewed at least once per year.

2.1 Information Provided

This report is based on the following information provided by Mr & Mrs Toor and her staff on behalf of The Firs Lodge Guest House.

- Operation & Maintenance Manual for the premise was unavailable.
- The assessor received no building plans and the assessment was conducted on a visual inspection only.

Structural Drawings were not provided for our use, however ensuring structural integrity and maintenance rests with the owner.

Observations were made by Jas Sohal (Consultant, UK Fire Consultants Limited) during the site visit on the morning of 30th April 2008.

2.2 Description of the Building

The Main Building is primarily rectangular in plan shape. It consists of two storeys above ground. The original building is constructed of load bearing masonry and brick with a tiled roof. There is an extension to the rear of 291 Bath Road and this is equipped with a Flat roof. 289 Bath Road is made up of a number of flats and sub division. The ground floor is partially used by staff from the Hilton Group and the responsibility for that area remains with them to ensure they comply with the RRFSO.

The ground floors were served by one primary escape route each which would have been adequate for the structures. The current owner has however removed structural walls to create an additional communal area that now forms (and impacts upon) the means of escape. Additional escape is provided to Bedroom 20 on the ground floor via a patio door. Bedroom 2 enjoys independent access/egress via the rear garden.

All other escape ways lead into the main ground floor communal escape.

The upper level(s) are provided with windows that are not locked but primary escape would be via the 1m wide staircases.

The actual residence at 289 measures approximately 4.5m x 10m at ground floor and approximately 6m x 14m.

The actual residence at 291 measures approximately 7m x 17m at ground floor and approximately 6m x 14m.

Schematics (not to scale) are provided within this assessment. These allow for variances as the assessor was not furnished with scale drawings.

2.2.1 Compliance with Building Regulations and Other Legislation

For the main building confirmation that any structural alterations meet Building regulations will be provided by the owner. We were informed that the building had a Fire Certificate issued on the 19th June 2003, in accordance with the Fire Precautions Act 1971. The Fire Certificate is of particular value as it would clearly have shown the fire resisting construction which constitutes the primary escape routes from the building at that time and can be used to illustrate where walls and doors should be maintained to a fire resisting standard. Subsequent alterations should have been made with Building Control approval.

2.2.2 Occupancy

The estimated maximum number of guests within the Hotel complex is 15 sleeping persons at ground floor. The first floor has sleeping accommodation for 17 persons across both houses. The hotel has guests that are not mobility impaired. Provision for mobility impaired persons cannot be made.

The age ranges of guests may vary considerably from 1 - 65 years. Some occupants have been there for considerable time.

Overall guests are considered to be generally not familiar with the building layout and would need support to be able to escape in the event of a fire.

Mr Toor was able to confirm that the premise is managed and attended too by him or other members of staff. Other members of staff are fully conversant with the building layout.

2.2.3 Activities and Processes Carried on within the Guest house

The Guest house is managed by a small team for its guests only. External trade that is not resident within the hotel are not currently allowed to dine within the facility. There is a small kitchen located on the ground floor that has gas supply and this area is managed by the owner.

There are further kitchenettes in building 289 where the facilities are used by guests.

If use of the premise changes further then this Fire Risk Assessment should be reviewed to ensure that the risk associated is adequately addressed.

2.2.4 Furniture and Furnishings

The furniture, chairs are generally padded and in good condition. Random samples of chairs were inspected for compliance with the Furniture and Furnishing (Fire Safety) Regulations 1988. We were unable to view any labels that would have indicated their fire retardant nature. The manager advises that the furniture and curtains were purchased from the Hilton Group chain of hotels and they have assumed that the hotel chain would have ensured that the furniture met with legal requirements. Threadbare chairs in the communal escape should be disposed off immediately.

Beds were generally new and in good condition. Random sampling of mattresses produced evidence that they were of a flammable retardant nature.

As a minimum standard all furniture should comply with the Furniture and Furnishing (Fire Safety) Regulations 1988. Any upholstered furniture which has split, torn or threadbare coverings should be repaired or disposed of as the exposed padding can burn very rapidly and emanate highly toxic smoke gases. Generally furniture and curtains should carry signs that state "Carelessness causes fire". Furniture should be treated with Flame Retardant spray after it has been cleaned.

2.2.5 History of Fires or Fire Related Incidents

There have been no fire related incidents that Mr Toor was aware of and any such records must be maintained within the Fire Log Book.

3 Statutory Controls

This Fire Risk Assessment has been carried out to meet the requirements of the Regulatory Reform (Fire Safety) Order 2005.

The Regulatory Reform (Fire Safety) Order 2005 has been enacted to consolidate most of the existing fire safety legislation into a single legal vehicle. It replaces the Fire Precautions Act 1971 and the Fire Precautions (Workplace) Regulations 1997 as amended 1999. The Regulatory Reform (Fire Safety) Order 2005 is a risk based framework which requires owners and/or occupiers to carry out a fire risk assessment of the premises for which they are responsible. The fire risk assessment must address the needs of any person who might reasonably be in or around the building.

The responsible person must then put in place such measures as are reasonably required to mitigate against the risks identified by the fire risk assessment. The Regulatory Reform (Fire Safety) Order 2005 also requires that the owners or occupiers clearly identify certain key persons in the management of the building's fire safety:

The **"Responsible Person"** is the person who is in overall control of the building and who would in law be considered as the person who should exercise reasonable control over the way the building is operated. The "Responsible Person" should carry out the fire risk assessment or nominate a "Competent Person(s)" to carry out the fire risk assessment on their behalf. The "Responsible Person" is the person upon whom the Fire Service would serve any notices under the Regulatory Reform (Fire Safety) Order 2005.

The **"Competent Person(s)"** is any person who has such technical knowledge and/or skill as may be appropriate to a specific task relating to fire safety in the building. A person may be considered "competent" based on training or past experience.

A **"Nominated Person"** is any person nominated by the "Responsible Person" to assist them in preparing the fire risk assessment and carrying out the ongoing operation of the building. Any person nominated to perform a task or function as part of the fire safety plan for the building should be competent to carry out that task.

Responsible Person

The "Responsible Person" retains the ultimate responsibility for carrying out the fire risk assessment (even where a third party has been employed to conduct the assessment) and for ensuring that the fire precautions within the office are adequate.

- Mrs Toor, Proprietor, The Firs Lodge Guest House.

Competent Person(s)

The following "Competent Person(s)" or organisations have been nominated by the Proprietor to assist him in maintaining the standard of fire safety for the Ambassador Hotel and its occupants.

- UK Fire Consultants Limited – Appointed to facilitate a Fire Risk Assessment on behalf of the Proprietor.
- Safetech Fire will maintain portable Fire Extinguishing equipment and the manager will be responsible for daily visual checks.
- The proprietor will commence a Fire Alarm system maintenance contract with Safetech Fire and record details of maintenance within the fire log book.

4 Observations from Fire Risk Assessment Survey

This section sets out the assessment of fire risk based on the likelihood of an incident occurring and the potential consequence of that incident (see Annex 1). It contains recommendations, where appropriate, relating to possible methods of reducing the risk either by reducing the likelihood of the occurrence or by reducing the potential consequence of the incident.

4.1 Fire Protection Measures

Most of the visible fire precautions in a building can be described as fire protection measures. They are intended to ensure a reasonable standard of safety and mitigate the consequences of a fire in terms of the harm to occupants in the event of a fire occurring. This is the approach adopted by the Building Regulations and historically by the Fire Precautions Act 1971.

4.1.1 Means of Escape

| Observation | Likelihood of Occurrence | Consequence of Occurrence | Risk Control Measure | Residual Risk |
|---|--------------------------|---------------------------|----------------------|---------------|
| <p>The premise is provided with one staircase to either side which serves the upper level and an additional two exits from the ground floor.</p> <p>The escape routes would have been considered to be designed and constructed in accordance with the recommendations provided previously by Building Control.</p> <p>The travel distances from all areas are considered to be within those recommended in Approved Document B.</p> <p>The staff in the building are familiar with the building and the escape routes.</p> | 3 | 4 | 1 | 3 |
| <p>Existing Risk Control Measures</p> <p>Fire Detection is provided in building 291.</p> <p>Recommendations</p> <p>Client advised to remove threadbare furniture at ground floor level and to take out any electrical from the communal means of escape until additional fire detection is provided in this area along with Co2 extinguishers. The internal door should provide 30 minute fire separation as should the ceilings.</p> <p>Recommended time scale for implementing Recommendations</p> <p>Immediate.</p> | | | | |

4.1.2 Compartmentation

| Observation | Likelihood of Occurrence | Consequence of Occurrence | Risk Control Measure | Residual Risk |
|---|--------------------------|---------------------------|----------------------|---------------|
| <p>Structure, Walls, Floors:</p> <p>The structure of the building appeared to be in good order. The fire stopping measures have been compromised by the removal of two structural walls to allow for the build of the communal escape. Any fire at ground floor will see smoke rise rapidly into both buildings stairwells.</p> <p>Doors:</p> <p>The main bedroom doors throughout the building were found to be marked as self closing fire doors. The escape doors leading on to the means of escape at ground floor level require changing to ensure that there is at least 30 minute fire stopping. The gaps around the existing doors appeared to be outside tolerance levels. And should be reviewed.</p> <p>The main kitchen internal doors should be upgraded to fire doors as the use of the living room has not changed to bedrooms and where escape is from the bedroom to the open diner/kitchen there is increased risk.</p> <p>All doors at 289 require upgrading to 30 minute Fire Doors inclusive of clod/smoke intumescent seals and self closers.</p> | 3 | 3 | 2 | 3 |
| <p>Existing Risk Control Measures</p> <p>None in 289 – 30 minute Fire doors partially fitted in 291.</p> <p>Recommendations</p> <p>It is recommended that doors shown on the schematics in thick black as being in fire resisting walls should be constructed of suitable resistance in line with BS Code 476 – 20/23. Glass in Fire escape doors must conform to BS standards. The owner should ensure the doors are maintained and reviewed daily.</p> <p>Client to change kitchen and diner doors and ensure they are fitted with self closers and that frames also conform. All rooms in 289 to be changed to provided 30 minute Fire Resistance.</p> <p>Until the communal means of escape meet standards it is recommended that the party wall is reinstated or a 60 minute fire door be fitted.</p> <p>Recommended time scale for implementing Recommendations</p> <p>On going</p> | | | | |

4.1.3 Emergency Escape Lighting

| Observation | Likelihood of Occurrence | Consequence of Occurrence | Risk Control Measure | Residual Risk |
|--|--------------------------|---------------------------|----------------------|---------------|
| Emergency Escape Lighting is provided in the main escape routes within building 291. On visual inspection this appeared to be in good order. The responsibility of checking and maintaining the system rests with the proprietor. | 2 | 3 | 2 | 2 |
| <p>Existing Risk Control Measures</p> <p>The Emergency Lighting System should be designed to meet the recommendations of BS 5266 Part 1. This system is tested and maintained by the owner and appropriate documenting of this practice should commence.</p> <p>Recommendations</p> <p>Ensure testing records are held within the Fire Log Book. Additional lights to be fitted to the exterior of the building and within the communal escape and the communal staircases and walkthrough area in building 289. The dining room at 291 should also be fitted with an Emergency Light.</p> <p>Recommended time scale for implementing Recommendations</p> <p>Immediate.</p> | | | | |

4.1.4 Fire Safety Signage and Notices

| Observation | Likelihood of Occurrence | Consequence of Occurrence | Risk Control Measure | Residual Risk |
|---|--------------------------|---------------------------|----------------------|---------------|
| The fire escape routes were signed in Building 291. Fire doors need to be labelled with "Fire Door Keep Shut or Locked"/ "Fire Door Keep Clear" signs as appropriate. | 2 | 2 | 2 | 2 |
| <p>Existing Risk Control Measures</p> <p>The signage remains the responsibility of the owner.</p> <p>Recommendations</p> <p>Generally a minimum of one: Directional photo luminescent sign should be placed on each level. Fire Action Notices to be provided by Manual Call points. Fire signs depicting correct use of extinguishers should be placed above them at all locations. Keep Clear signs should be placed on the rear garden access/egress gate. Fire Policy to be provided within each room Building 289 requires signage in all communal areas.</p> <p>Recommended time scale for implementing Recommendations</p> <p>Immediate</p> | | | | |

4.1.5 Fire Detection and Alarm

| Observation | Likelihood of Occurrence | Consequence of Occurrence | Risk Control Measure | Residual Risk |
|--|--------------------------|---------------------------|----------------------|---------------|
| <p>The premise is occupied throughout the day and night. The likelihood of fire being detected by a person is high.</p> <p>The building is fitted with a number of smoke and heat detectors in 291 throughout the complex. The system appears overall to meet the L1 standard of detection as set out in BS 5839 Part 1 and is maintained by the owner by way of contract with Safetech Fire.</p> <p>The building is fitted with a (system of in built electrical sounders). These were not tested but appear to be located to provide warning to all areas of the building.</p> | 3 | 4 | 3 | 2 |
| <p>Existing Risk Control Measures</p> <p>The fire detection and alarm system is maintained by the proprietor and documented maintenance requirements were not accessible. There is a fault that has been outstanding for a considerable time.</p> <p>Recommendations</p> <p>Mrs Toor and her staff to carry out regular fire drills, to ensure that all staff are familiar with the procedures. The proprietor should test the system in a manner that staff can familiarise themselves with the alarm system sounders. The audibility test should be held within the Fire Log book and should indicate the level of sound at the bedstead. The current fault should be resolved a.s.a.p. The client should ensure that text descriptions match room numbers and names. Building 289 should have a L1 standard system introduced and there is capacity within the existing Fire Alarm panel. A sounder should be provided along with a beacon to the rear garden exit.</p> <p>Recommended time scale for implementing Recommendations</p> <p>Immediate action required.</p> | | | | |

5 Photographic Records



Picture 1

Shows the newly created communal escape route. All doors and windows opening on to this route should provide a minimum of 30 minutes fire resistance.

It is recommended that the doors are not key locked but other methods to ensure it can be opened are applied. A clear exit route of 1.2m should be maintained.



Picture 2

2. Shows the kitchen with items not PAT tested.

Ducting should be cleaned as appropriate.

An isolation switch should be provided for the gas supply in the kitchen and should be appropriately signed and accessible.



Picture 3

The bedrooms with kitchens should be provided with fire detection and physical separation of 30 minutes fire resistance as persons escaping the room would have to travel past a fire. This is inclusive of the ceiling. This can be achieved by applying fireline plasterboard.

Gas appliances to have Corgi certificates.





Picture 4

The electrical supply cupboard should be kept clear of items at all times.

The area should provide 30 minute fire resistance and an inspection and certification of the fixed supply should be undertaken immediately. It is recommended that an MCB installation is commissioned a.s.a.p.



Picture 5

Gas boilers to have carbon monoxide detectors installed and be housed in 30 minute fire resistance cabinets.



Picture 6

Cladding surfaces should be removed or treated with flame reduction spread compounds. Intumescent treatments are available from companies such as Bolloms.



Picture 7

Staff and guests should be aware of Fire precautions and ensure they do not park or block access to assembly areas. A clear path should be maintained for ease of access and egress.



Picture 8

A full electrical survey to be commissioned immediately.



Electrical items to be removed from the communal escape until additional detection, portable fire fighting equipment and PAT testing has taken place.

6 Contingency/Emergency Planning

This Fire Risk Assessment may not be adequate to ensure the safety of fire-fighters who may be involved in tackling a fire. However, the accommodation is considered to partially meet the functional requirements of Part B "Fire Safety" of the Building Regulations and therefore the provisions should be adequate to ensure a "reasonable" standard of safety for fire-fighters.

The recommendations in this report are primarily intended to ensure that a good standard of life safety is maintained for all employees and visitors to the premises. Following the advice and guidance contained herein should also ensure a reasonable standard of property protection and assist in business recovery/continuity following a fire related incident. It is noted that 80% of businesses that experience a fire either never resume trading or go out of business within 3 years of the incident. It is therefore recommended that property protection and business recovery be given serious consideration when developing the action plan to address the items identified within this report.

7 Conclusions and Recommendations

7.1 Conclusions

A detailed Fire Risk Assessment has been carried out for the accommodation at 289 -291 The Firs Lodge, Bath Road, Hounslow, Middlesex. This report documents the findings from the assessment survey and sets out recommendations, where appropriate, to maintain the existing control measures or further reduce the perceived level of risk.

The information contained herein is the professional opinion of the fire risk assessor based on observations made and information gathered in discussion with the occupants of The Firs Lodge Guest house accommodation.

The general level of fire risk is considered to be high for a premise of this type and there were generally some controls in place to address some of the potential risks at 291 Bath Road. However, there were a significant number of areas where the risk was perceived to be greater than necessary given the nature of the activity conducted within the premises. Additional control measures are advised to reduce these risks further and where practicable to bring these risks to a level which is considered to be "as low as reasonably practicable" (ALARP).

Following the advice and recommendations contained within this report will not guarantee that a fire will not occur but it should minimise the likelihood of a fire occurring and the affect of any such occurrence on the occupants and the fabric of the building.

7.2 Recommendations

The following is a summary of the recommendations contained within the main body of this report; they are listed in the order corresponding to the report and are not in any given priority:

- 1) The doors identified in the escape corridors and kitchen area should be fire (resisting) doors and maintained as such. This includes ensuring that the smoke seals around the doors remain in good order. The gap at the top of the door should be in accordance with regulations. A number of bedroom doors fall out of the tolerance levels.
- 2) Fire resisting doors should be kept shut when not in use. If it is necessary to hold fire resisting doors open for any length of time automatic hold open/release devices should be used.
- 3) Regular fire drills and practice evacuation exercises should be carried out to ensure that all occupants are familiar with the procedures. Annual hands on fire training should take place.
- 4) The fire extinguishers should be checked as part of the general building inspections to ensure that they do not become damaged between maintenance inspections. These should be tested by a competent party. A number of new fire extinguishers to be introduced.
- 5) The fixed electrical installation should be subject to periodic inspection to ensure that faults do not go undetected. An NIECC contractor should issued an inspection certificate and check each and every socket throughout the premise.
- 6) Wherever practicable multi-way extension leads should not be used. Where there is no reasonable alternative the extension lead should be portable appliance tested (PAT) regularly, at least annually. The load being drawn through the extension lead should be within the manufacturers recommended maximum (e.g. not greater than 13 amps, depending upon fuse

size) and each extension lead should be plugged directly into a switched wall socket power outlet. Under no circumstance should one extension lead be plugged into another.

7) High current electrical items and items containing electric motors should only be plugged directly into switched wall socket power outlets. For example: desk-top or floor standing fans, fan heaters, other electric heaters, shredders, photocopiers, kitchen appliances.

8) All portable electrical equipment should be portable appliance tested before it is connected to the electrical supply.

9) Electric fan heaters should not be used in the building. The owner should purchase portable radiators in the event that the heating fails instead of convector heaters.

10) Electrical equipment containing transformers should not be left energised when not in use.

11) The building should be non-smoking and any person wishing to smoke should be required to do so outside the building. Smoking receptacles should be provided.

12) Any waste should be held in the secure store located to the side of the building to prevent it being moved into a high risk location.

13) The owner should review the need for a lightning conductor.

14) The cleaning material should be stored in a locked cupboard.

15) Combustible materials should not be stored against electrical equipment so as to obstruct the air vents.

16) Contractors working in the building should be subject to tight controls and fully briefed on Fire Prevention expectations as well as receiving a briefing on how to raise the alarm and escape to a place of safety.

17) Contractors should be aware of maintaining compartmentation and all works should be inspected by a competent party.

18) Paints etc. should be stored within the shed in appropriate fire retardant storage compartments.

19) The electrical supply around the building should be reviewed as a matter of urgency by a qualified electrician. External Emergency lighting to be provided.

20) Guests should have a copy of the evacuation schematics made available to them within their rooms along with a brochure advising them on actions to be carried out when evacuating the hotel in the event of the Fire alarm activating.

21) Fire Log Book to be provided and maintained.

22) Fire extinguishing equipment and signage to be placed as advised.

23) Under staircase cupboard and boilers to be housed in 30 minute fire resistance construction.

24) Rear final exit to open outwards without a key.

25) Additional detection to be provided in all rooms. Manual Call points to be sited at the top of the staircase at 289.

- 26) Threadbare furniture and electrical items (TV) to be removed from the communal area.
- 27) Client to produce an emergency plan.
- 28) Client to arrange 60 minute fire door in the newly created gap at 289 and seek Building control approval for all works.
- 29) Client to remove unnecessary furniture that reduces the escape width in the main corridors.
- 30) Client to ensure that the furniture complies with regulations. After cleaning the seats and curtains they should be treated with flame retardant spray.
- 31) Schematic plan to be placed in a frame near the fire alarm panel. The panel has a fault on it and should be addressed immediately.
- 32) Client to fit twist locks to each bedroom to ease escape.
- 33) Kitchenettes and kitchen doors to be 30 minute fire resistance.

8 References

- BS 4422 Part 1: 1997, Glossary of terms associated with fire – Part 1: General terms and phenomena of fire. BSI London
- BS 5266 Part 1: 1999, Emergency Lighting – Part 1 Code of practice for the emergency lighting or premises other than cinemas and certain other specified premises used for entertainment. BSI London
- BS 5266 Part 7: 1999, (BS EN 1838: 1999), Lighting applications – Part 7: Emergency Lighting
- BS 5306 Part 8: 2000, Fire extinguishing installation and equipment on premises Part 8: Selection and installation of portable fire extinguishers – Code of practice. BSI London
- BS 5499 Part 4: 2000, Safety signs, including fire safety signs – Part 4: Code of practice for escape route signage. BSI London
- BS 5588 Part 11: 1997, Fire precautions in the design, construction and use of buildings – Part 11: Code of practice for shops, offices, industrial, storage and other similar buildings
- BS 5588 Part 12: 2004, Fire precautions in the design, construction and use of buildings – Part 12: Managing fire safety
- BS 5839 Part 1: 2002, Fire detection and fire alarm systems for buildings – Part 1: Code of practice for system design, installation, commissioning and maintenance. BSI London
- BS 7671: 2001, Requirements for electrical installations – IEE Wiring Regulations – Sixteenth edition. BSI London
- BS 7974: 2004, Application of fire safety engineering principles to the design of buildings. BSI London
- Building Regulations (England and Wales) 2000, Approved Document B Fire Safety 2000. The Stationary Office, London
- Regulatory Reform Act 2001, the Stationary Office, London
- Regulatory Reform (Fire Safety) Order 2005, the Stationary Office, London
- Health and Safety (Safety Signs and Signals) Regulations 1996, the Stationary Office, London
- BSI: PAS 79: 2007, Publicly Available Specification 79: Fire risk assessment – Guidance and a recommended methodology. BSI London
- Fire Safety Risk Assessment – Sleeping Accommodation, the Stationary Office, London

Stamford estate agent letter

Mrs Toor
291a Bath Road
Hounslow
Middlesex
TW3 3DB

23rd July 2025


Dear Mrs Toor

RE: 291a Bath Road, Hounslow

We write to confirm that when the above property was sold to yourselves, there was no kitchen at the property.

If you have any queries relating to this matter, please do not hesitate to contact us.

Yours sincerely



For and on behalf of
STAMFORDS
Residential Sales Division

A partner of
The Guild Of Professional Estate Agents
with a network of over 700 independent estate agents

Associated Office: 121 Park Lane, Mayfair, London W1K 7AG t 020 7318 7075

Witness statement by

[REDACTED]

[REDACTED]

**IN THE FIRST-TIER TRIBUNAL
(PROPERTY CHAMBER)**

REFERENCE NUMBER: LON/00AT/LBC/2018/0038

BETWEEN

ADDA HOTELS

Applicant

-v-

SATINDER KAUR TORR

Respondent

WITNESS STATEMENT OF [REDACTED]

I, [REDACTED] of Hilton London Heathrow Airport, Terminal 4, Hounslow, Middlesex TW6 3AF will say as follows:

1. I am the Area General Manager at Hilton. I am based in the South West London region.
2. A bundle of paginated documents is attached to this witness statement. References in this statement to page numbers is a reference to page numbers within that bundle.
3. I make this statement from the facts that are within my own knowledge and belief and from the papers which I have had sight of relating to this application save where otherwise indicated. Where facts are not within my own knowledge and belief, I have stated the source of my knowledge and they are true to the best of my knowledge and belief. I confirm that I am duly authorised to make this witness statement on behalf of the Applicant.
4. The Applicant is one of the companies within the Hilton group of companies ("Hilton Group"). The Applicant is (and has at all material times been) the freehold owner of property known as 291 Bath Road, Hounslow TW3 3DB (the "Building"). The Building is

divided into four flats (A, B, C and D), all of which are let on leases dated 18 March 1988 for a term of 125 years from 25 December 1987.

5. The current registered proprietor of the leasehold title to Flat A is Hilton International Hotels (UK) Limited ("Hilton International"), another company within the Hilton group of companies. Flat A is currently used as staff accommodation for Hilton Group employees.
6. The registered proprietor of the leasehold titles to Flats B, C and D (the "Flats") is the Respondent. He has been the owner of the Flats since 30 October 2002. The Flats are the subject of this application.
7. Copies of the relevant Land Registry copy entries and the leases are at pages 1 - 75.
8. My responsibility is to oversee the five hotels in this region (including Hilton Heathrow) and various other properties. These other properties include various residential properties owned by the Applicant and other companies within the Hilton group which are used for the purposes of providing staff accommodation for staff members who work unsociable hours in the hotels.
9. I have worked in this role for around seven years.
10. One of the properties that I oversee is the Building.
11. I am informed by [REDACTED] a paralegal in the Hilton Group who has day to day responsibility for this application, that on 23 January 2018 both the Applicant and Hilton International received a letter from the London Borough Hounslow which states that they had recently inspected the Building and they believed it was being used as a Bed and Breakfast in breach of the Town and Country Planning Act 1990. A copy of those letters are at pages 76 - 79.
12. I am further informed by [REDACTED] of Hamlins LLP, the Applicant's legal representatives in relation to this matter, that various emails and letters have been exchanged with the London Borough of Hounslow in relation to this potential breach of planning, including a request that the London Borough of Hounslow provide the

Applicant with its report and any photographs from the site inspection. Copies of those emails and letters are at 80 - 88.

13. I am also informed by [REDACTED] that on 28 February 2018 Hamlins wrote to the Respondent in relation to the Bed and Breakfast use. Copies of these letters are at 89 -

94. I am informed by [REDACTED] Hamlins have never received a written response to these letters but that she did receive a telephone call from Mr Torr on 15 May 2018 during which he denied using the Flats as a bed and breakfast but stated he was using them for short term lets/Air BnB purposes. I am informed by Ms Finch that, despite her request, he has failed to set out his case in writing.

14. As set out in the witness statement [REDACTED] (which I have read and agree with) we do not regularly inspect the Flats themselves because the leasehold interest in them is owned by the Respondent. When I visit the Building I inspect Flat A and I also have to walk through some of the common areas to reach Flat A. I have probably visited the Building approximately once every year for the last seven years and as far as I am aware it has always been used as a Bed & Breakfast during that time.

15. It seems fairly obvious to me that it is being used as a Bed and Breakfast, particularly from the sign outside the building (which reads Firs Lodge Bed & Breakfast) and various websites which advertise Firs Lodge Bed & Breakfast as 290-291 Bath Road, copies of which are at pages 95 - 104.

Statement of Truth

I confirm that the facts stated in this witness statement are true to the best of my knowledge and belief.

I am duly authorised to make this witness statement on behalf of the Applicant.

Signed [REDACTED]

Dated: 26th June 2018