



Simon Merrony Architects Co. Limited

SIMON MERRONY ARCHITECTS

REASONABLE EXCEPTION STATEMENT

My Ref: 2024/10/RES

RE: New pitched and flat roofs, insulated external render, at 1 Station Road, Teddington TW11 9AA

This statement is in response to the recently adopted Fire Safety Policy D12 from The London Plan 2021. This new Policy aims to incorporate the Fire Safety Strategy at the outset so that it has been considered prior to the planning application stage. This is an attempt to avoid leaving this to the Building Regulations stage, resulting in a “sub-optimal” solution, as there are currently significant concerns about the standards & effectiveness of the current Building Regulations Part B.

1. **Context**

The proposed development comprises a new slate and lead roof, insulated external render to the existing walls. The building does not exceed 1000m² in floor area, so does not qualify as a major development, under Annex 6 of the London Plan 2021. The building does not contain a lift.

2. **Competence**

This statement has been prepared by Simon Merrony Architects and as our scheme is a minor planning and Conservation area application, it falls under Applicant Justification as per Table A1.1 of the London Plan Guidance for Policy D12(A). Policy D12(B) is not applicable.

3. **Policy D12A Criteria**

1. **Fire Appliances & Assembly Points**

a) The building fronts Station Road, a public highway which is accessible by a rescue service pumping appliance. All areas of the building will be reachable within 45m of the appliance.

b) Evacuation Assembly Point on the public footpath opposite the building on Station Road. The site is not large enough to accommodate an Evacuation Assembly Point to the rear of the building, but there is a side access. The rear access pathway shall be kept clear and accessible throughout the construction period and is at least a distance away from the building which equals the height to the mid-point of the roof from existing ground level.

2. **Passive & Active fire safety systems**

Active - Proposed automatic fire detection & alarm system to Type LD2 to a minimum grade D1, to BS 5839: Part 6:2019. There is no kitchen.

Passive - Where services pass through floors & walls, intumescent collars will be installed. We will provide a 30 min fire rated escape route enclosing the stairwell, including FD30 doors. All new electrical wiring will meet current IET National Wiring Regulations to BS 7671. There are no unprotected windows along escape routes, closer than 1.0m to the boundary.

3. **Materials & Construction**

Traditional construction materials namely steel, concrete, masonry, plasterboard and insulated external render shall be incorporated, and we will avoid using combustible materials on the external walls.

4. Means of Escape.
Existing and Proposed Means of Escape - This existing and proposed structure is described under Part B1 as a single protected stair building with no upper floor above 4.5m above ground level. Primary escape is via the protected stairwell.
5. Evacuation Strategy
The building users shall be inducted into the operation and performance of the fire detection & alarm system and will be relied upon to maintain the integrity of the escape route by regular weekly testing of the alarm system and by ensuring that doors are closed along the escape route on a daily basis.
6. Fire Service Access
Since the building is not regarded as a major development, there is no requirement to provide any specialist fire fighting equipment. All locations will be accessible within 45m of the rescue service pumping appliance. The building is within 90m of a fire hydrant.

Kind regards,

Sam Gill
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Simon Merrony Architects