



Simon Merrony Architects Co. Limited

SIMON MERRONY ARCHITECTS

REASONABLE EXCEPTION STATEMENT

My Ref: 2024/08/RES

RE: Loft extension, at 219 Staines Road, Twickenham, TW2 5AY

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 roof extension to form a rear facing dormer with internal alterations, and 3no. front facing rooflights. The proposed dwelling house does not exceed 1000m² in floor area, so does not qualify as a major development, under Annex 6 of the London Plan 2021. The dwelling house does not contain a lift.

2. Competence

This statement has been prepared by Simon Merrony Architects and as our scheme is a minor Householder planning 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 house fronts Staines Road, a public highway which is accessible by a rescue service pumping appliance. All areas of the dwelling will be reachable within 45m of the appliance.

b) Evacuation Assembly Point on the public footpath to Staines Road. The site is also large enough to accommodate an Evacuation Assembly Point to the rear garden, should exit to the front of the house be obstructed. The rear EP shall be kept clear and accessible throughout the construction period and is at least a distance away from the house 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. Kitchen will have interlinked heat detector/alarm.

Passive - Where services pass through floors & walls, intumescent collars will be installed. Any new windows to FF will have fire escape hinges allowing emergency egress. 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 glazed units shall be incorporated, and we will avoid using combustible materials in its external walls. Any exposed steel beams & column will be coated with intumescent paint

- providing 60 min's fire rating.
4. Means of Escape
Design - The scheme will comply with the Building Regulations Part B1 for this 3-storey single family dwelling house.
Proposed Means of Escape - This proposed structure is described under Part B1 as a single protected stair building with one upper floor above 4.5m above ground level. Primary escape is via the protected stairwell.
 5. Evacuation Strategy
The homeowners 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 house is within 90m of a fire hydrant.

Kind regards,

Sam Gill
BA(hons)
Simon Merrony Architects