

Reasonable Exception Statement for Heat Pump Installation – Fire Safety Strategy

Victoria MacBean
23 Lammas Road
Richmond
Surrey
TW10 7YD

To:
Richmond Borough Council
Civic Centre,
44 York St,
Twickenham,
TW1 3BZ

Dear Sir/Madam,

My name is Sam Harris, and I am a Smart Tech Specialist at Octopus Energy Services in their Heat Pumps department. I am the point of contact for Victoria MacBean, who is seeking to install an Air Source Heat Pump (ASHP) at the above address. Please consider this as her official Reasonable Exception Statement for a Fire Safety Strategy, to be submitted as part of planning application **24/3065/HOT**, as per **Action 2** in the letter of invalidity provided by your office.

This application seeks permission for the installation of one air source heat pump (ASHP), Victoria MacBean, TW10 7YD. The justifications are outlined below.

Nature of the Development

The installation of the ASHP does not involve significant alterations to the building's structure or its occupancy type. London Plan Policy D12(B) states that "all major development proposals should be submitted with a Fire Statement." However, this is not a major development, and the installation will not increase the complexity of the building's fire safety measures or occupancy loads. The ASHP operates as a standalone system and does not significantly impact existing fire safety protocols.

Limited Fire Risk

The operational characteristics of an Air Source Heat Pump present a low fire risk compared to other systems. ASHPs do not utilize combustible fuels and operate at lower temperatures, thereby minimizing potential ignition sources that could lead to fire hazards. Therefore, the stringent requirements outlined in **Policy D12A** regarding fire safety information and strategies may not be necessary in this instance.

Furthermore, prior to moving forward with the installation, an ENA application was submitted to, and approved by, the District Network Operator, UKPN. One of the purposes of this application is to ensure that the property can safely handle the additional electrical load of the ASHP, further reducing any potential risks.

Existing Safety Measures

The building is already equipped with fire safety measures that comply with current regulations. The addition of the ASHP will not interfere with or compromise these existing safety protocols. The system will be installed in adherence to all relevant health and safety standards, ensuring that it does not introduce new risks to the property.

Conclusion

In light of the above points, we respectfully request that the planning authority accept this Reasonable Exception Statement as justification for not submitting extensive fire safety documentation, as stipulated in **London Plan Policy D12A** and **London Plan Policy D12B**. We believe that the specific nature of this installation warrants an exemption from standard fire safety requirements, while still ensuring a balanced approach between regulatory compliance and practical implementation. This RES may be tailored further based on the specific details of the project and any additional local context or regulations that apply.

We are committed to providing our customer with the best possible experience while adhering to relevant guidelines and assisting in maintaining the high standards of living in the Richmond Borough that you work hard to uphold.

If you require any additional information regarding this application, please do not hesitate to contact me. I look forward to your response.

Kind regards,

Samuel Harris

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