

Doyle Town Planning and Urban Design

Fire (reasonable exception) statement

London Plan Guidance: Planning Fire Safety Strategy Policy D.12

London Plan Policy D12 on fire safety requires all developments to achieve the highest standards of fire safety. Major developments are required to submit a Fire Statement. The associated Fire Safety London Plan Guidance reiterates that the fire safety of developments needs to be considered from the outset. Planning officers are not expected to be experts in fire safety with the Applicant required to demonstrate compliance with the London Plan fire safety policies.

Site: Flat 1, 28 Canfield Gardens NW6 3LA

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Role: Planning Consultant

Category of development: Extension of an existing flat at ground and existing basement level. This is within Non-major development (Table 3.1 and para 4.2.3 of the Fire Safety LPG).

Description of development: The property is a former single dwelling house currently arranged as flats. The proposal is to extend an existing flat.

Reasonable exception: The applicant considers parts of or all of policy D12A is not relevant. Fire safety measures are appropriate to the future use.

The proposed development will not alter the fire safety of the building. All current fire safety measures associated with flats will be maintained unaltered and will not be negatively affected by the development. Further mitigation measures over and above building regulations residential fire safety standards are not needed. The development will provide additional means of escape and ground and basement level (via light wells/external staircase)

Non-major development: The proposed development will not create additional units or alter the materials on the external walls or alter the internal or external communal areas that support the evacuation strategy for the property and does not include a lift (Form 3 demonstrating compliance with London Plan Policy D5(B5) is not required) Existing external materials (bricks) to be retained and new elements to match.

Space provisions for fire appliances and assembly points -D12A criteria 1: Information on space provisions for fire appliances and assembly points. No alterations to main flat access/egress are being introduced as part of the development and the layout and design of the site will continue to ensure that unobstructed access can be provided for fire appliances to access the dwelling, and for evacuation of the proposed single dwelling. There is no plan to identify suitable positioned unobstructed outside space for a Fire Appliance. However, any appliance will be directly positioned outside on the main road in very close proximity. The hose-length criteria will therefore be met.

Passive and active safety measures (D12A criteria 2): The proposed flat has been designed to incorporate features to reduce the risk to life. Passive and Active protection in accordance with current Building Regulations (RES).

Information and data on construction products and materials (D12A criteria 3)

New building work will be constructed to minimise the risk of fire spread to the surrounding areas in accordance with current Building Regulations.

Information on means of escape and evacuation strategy (D12A criteria 4):

The proposed extended flat provides multiple suitable and convenient means of escape and associated evacuation strategy. Occupants will be able to escape via windows and/ or fire resistance compartment walls and fire doors.

Given the scale and nature of the development a detailed evacuation strategy appears disproportionate.

Information on access and equipment for firefighting:

Access and equipment for firefighting is not required on this project and will not be provided apart from the local fire brigade in an emergency situation. An adequate firefighting water supply will always be provided by the Fire Appliances (RES).

Building Regulations: The project site and all works will comply with the minimum Fire Safety Standards of the national Building Regulations requirements.

Michael Doyle

May 2024