

REASONABLE EXCEPTION STATEMENT

Fire Safety — London Plan (2021) Policy D12

Site Address	153 Dowsett Road, Tottenham, London N17 9DN
Applicant	Bruce Grove Ltd
Proposal	Construction of a double storey rear extension.
Application Type	Householder Planning Permission
Author	Shahid Ali BSc (Hons) PGDip (Arch), Design Studio E17
Relevant Requirements	London Plan (2021) Policy D12; Town and Country Planning (DMPO) (England) Order 2015, as amended (1 August 2021)
Drawing Ref.	26–1035–HH01
Date	July 2026

1.0 Introduction and Purpose

1.1 This Reasonable Exception Statement has been prepared by Design Studio E17 in support of a householder planning application at 153 Dowsett Road, Tottenham, London N17 9DN. It addresses the fire safety requirements of the development plan — in particular Policy D12 (Fire safety) of the London Plan (2021) — and the statutory provisions for fire statements under the Town and Country Planning (Development Management Procedure) (England) Order 2015, as amended with effect from 1 August 2021.

1.2 Its purpose is to demonstrate that the development is reasonably excepted from the requirement to submit a detailed Fire Statement, while confirming that the proposal achieves the highest standards of fire safety required by Policy D12(A). It should be read alongside the submitted drawing 26–1035–HH01 and the accompanying Planning and Design & Access Statement.

2.0 The Proposed Development

2.1 The application property is an existing two-storey mid-terrace dwelling house (Use Class C3) with a converted loft, fronting onto Dowsett Road. The proposal comprises the construction of a double storey rear extension continuing the line of the existing rear outrigger, providing an enlarged kitchen and dining room at ground floor and an additional bathroom at first floor.

2.2 The development creates no additional dwellings and involves no change of use; the property remains a single private dwellinghouse. The building is two storeys in height with a converted loft, which is substantially below 18 metres and fewer than seven storeys. It is a single dwelling and is not a building containing two or more dwellings.

3.0 Policy and Statutory Context

3.1 Statutory Fire Statement. Under the Development Management Procedure Order (as amended from 1 August 2021), a Fire Statement must accompany applications for the development of, or development within the curtilage of, a relevant building — defined as a building containing two or more dwellings, or educational accommodation, that is 18 metres or more in height, or 7 or more storeys. The application building does not meet this definition.

3.2 London Plan Policy D12. Part A requires all development proposals to achieve the highest standards of fire safety. Part B requires major development to submit a detailed Fire Statement prepared by a competent, suitably qualified and independent third party.

3.3 Reasonable exception. The Mayor's London Plan Guidance on Fire Safety (2022) distinguishes between major development, non-major development and householder development. It is established practice across London boroughs that householder and certain non-major applications may submit a Reasonable Exception Statement in place of a full Fire Statement, where the development does not adversely affect the fire safety of the building. This Statement is provided on that basis.

4.0 Reasonable Exception — Justification

4.1 The development falls within the householder category. The fire safety position is set out below.

Consideration	Response
Development type	Householder application — double storey rear extension to an existing single private dwellinghouse.
Relevant building? (DMPO)	No. The building is a single dwelling, two storeys plus a converted loft, well below the 18m / 7-storey threshold. A statutory Fire Statement is not required.
Major development? (Policy D12(B))	No. The proposal is householder development. A third-party Fire Statement under Policy D12(B) is not required.
Current fire safety measures appropriate and not adversely affected?	Yes. The dwelling remains a single private dwellinghouse with simultaneous (non 'stay-put') evacuation. Access for fire and rescue appliances from Dowsett Road is unchanged, and the rear garden provides an external place of relative safety.
Will fire safety measures be altered?	The ground and first floors are extended to the rear off the existing circulation arrangement; the existing stair enclosure and escape route to the front entrance are retained. Detailed fire precautions, including escape windows to first floor habitable rooms where required, will be designed and verified under Approved Document B at Building Regulations stage.

5.0 Fire Safety Approach — Policy D12(A)

5.1 Although a full Fire Statement is not required, the proposal achieves the highest standards of fire safety. The relevant Policy D12(A) considerations are addressed below, in proportion to a double storey householder extension:

Site layout and access for fire appliances (D12A.1). Existing access from the public highway at Dowsett Road is retained and unaffected. The retained rear garden provides an external place of safety for occupants. No assembly point provision beyond this is necessary for a single dwelling.

Passive and active fire safety measures (D12A.2). The extension will be constructed with fire-resisting separation appropriate to a domestic dwelling, and the property will be served by an interlinked smoke and heat alarm system designed to BS 5839-6, in accordance with Approved Document B.

Construction products and materials (D12A.3). The extension employs conventional, low fire-risk domestic construction — masonry walls in facing brick with a tiled roof to match the existing dwelling. The building is below 11 metres in height and is a single dwelling, so the restrictions on combustible

materials in external walls do not apply. Full product data will be provided at Building Regulations stage.

Means of escape and evacuation (D12A.4 & D12A.5). As a single dwellinghouse, a simultaneous evacuation strategy applies. Escape from the upper floors is via the existing stair enclosure, with escape windows to first floor habitable rooms where required; at ground floor, direct escape is available to the rear garden and onward to the front entrance. The extended accommodation is served by the existing, unaltered escape route.

Access and equipment for firefighting (D12A.6). Firefighting access from the adopted highway is unchanged. The low-rise, domestic nature of the extension presents no additional demands on the fire and rescue service.

6.0 Conclusion

6.1 The application building is a single-family, two-storey dwellinghouse with a converted loft, well below the 18-metre / 7-storey relevant building threshold, and the proposal is householder development rather than major development. A detailed Fire Statement under the Development Management Procedure Order and London Plan Policy D12(B) is therefore not required, and a reasonable exception applies.

6.2 Notwithstanding the exception, the proposal achieves the highest standards of fire safety required by Policy D12(A). The existing means of escape is retained and the extended accommodation will comply fully with Approved Document B of the Building Regulations, including interlinked smoke and heat detection and escape windows where required. The current fire safety measures of the dwelling are appropriate and will not be adversely affected by the development.

6.3 This Statement is submitted to satisfy the fire safety requirements of the development plan for a householder application of this scale and is provided for the local planning authority's validation and determination of the application.

Prepared by:

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For and on behalf of Design Studio E17

2nd July 2026