

FIRE SAFETY STATEMENT

Reasonable Exception Statement pursuant to London Plan Policy D12 — Ground Floor Flat A, 95 Broadwater Road, London N17 6EP

Site Address	Ground Floor Flat A, 95 Broadwater Road, London N17 6EP
Proposal	Erection of a single storey side and rear wraparound extension, installation of two rooflights and internal reconfiguration to enlarge the existing ground floor flat from a 1-bed 2-person unit to a 2-bed 3-person unit (Use Class C3(a)).
Applicant	Mr S Patel
Agent	Design Studio E17 – Architecture & Interior Designs, 140 Normanshire Drive, London E4 9HD
Local Planning Authority	London Borough of Haringey
Job Reference	26-1047
Supporting Drawings	26-1047-PL01
Date	August 2026

1.0 Introduction and Purpose

- 1.1 This Reasonable Exception Statement has been prepared by Design Studio E17 in support of a full planning application at Ground Floor Flat A, 95 Broadwater Road, London N17 6EP, to address London Plan (2021) Policy D12(A), which requires all development proposals to achieve the highest standards of fire safety.
- 1.2 The proposal comprises a single storey side and rear wraparound extension and internal reconfiguration of an existing ground floor flat. The host building is an existing two-storey mid-terrace property comprising two self-contained flats. It is not a 'relevant building' for the purposes of the Town and Country Planning (Fire Statements) (England) Regulations 2021 — it is neither 18m nor seven storeys in height — and the application is not for major development to which Policy D12(B) applies. A full fire statement is accordingly not required, and this statement provides a proportionate, reasonable-exception response to Policy D12(A).
- 1.3 Detailed fire safety design will be secured under the Building Regulations (Approved Document B, Volume 1: Dwellings) at the construction stage; nothing in the proposal prejudices compliance.

2.0 The Building and the Proposal

- 2.1 The ground floor flat has its own independent entrance at ground level directly accessed from Broadwater Road. The proposal is confined to ground floor level and comprises a 19.3 sqm single storey extension and internal reconfiguration providing two bedrooms, a bathroom, and open-plan kitchen/dining and living accommodation. The separately owned first floor flat and its means of escape are unaffected.

3.0 Response to London Plan Policy D12(A)

Construction methods and materials (identify suitably positioned unobstructed outside space / suitable materials)

- 3.1 The extension is of traditional loadbearing masonry construction. External walls are of facing brickwork; roof coverings are concrete tiles and built-up felt on a flat roof concealed behind a masonry parapet. No external wall cladding system is proposed. Internal linings and construction will achieve the reaction-to-fire and resistance performance required by Approved Document B, including 30-minute fire resistance to the existing separating floor/compartimentation between the two flats where affected by the works, and fire-stopping at all service penetrations and junctions.

Means of escape

- 3.2 The flat retains its own independent final exit at ground floor level. All habitable rooms are accessed directly off the entrance hall, which leads to the final exit without passing through risk rooms; travel distances within the single-storey flat are short and compliant. The bi-folding doors to the living room provide a direct secondary exit to the rear garden, Bedroom 2 retains its front-facing window providing emergency egress provision, and Bedroom 1 is served by a glazed door to the external courtyard, in accordance with Approved Document B requirements for ground storey dwellings. The rear garden connects back to the highway.

Features that reduce the risk to life

- 3.3 A new interlinked fire detection and alarm system will be installed throughout the enlarged flat to BS 5839-6 (minimum Grade D1 / Category LD2), with detection to the hallway, kitchen/dining and living areas. The kitchen remains within an open-plan arrangement served by the alarm system and rooflight/window ventilation. Automatic suppression is not required for a development of this nature and scale.

Access and facilities for the fire service

- 3.4 Fire appliance access is unchanged: Broadwater Road is a conventional adopted street providing pump appliance access within 45m of the flat entrance, and existing hydrant provision in the highway is unaffected. The single storey extension does not increase the building height or introduce any additional access requirement.

Evacuation strategy

- 3.5 As a self-contained dwelling with its own final exit, the evacuation strategy is immediate and independent evacuation directly to open air and the public highway. No evacuation lift, refuge or phased strategy is necessary. The strategy for the first floor flat is unchanged.

Future development and maintenance

- 3.6 The fire safety measures are simple, robust domestic provisions (masonry construction, protected escape route, interlinked detection) readily maintained by the occupier without specialist management, and the layout does not prejudice any future modification of the building.

4.0 Conclusion

- 4.1 The proposal achieves the highest standards of fire safety proportionate to a minor domestic extension: non-combustible principal construction, short protected escape routes with a direct final exit, emergency egress windows, interlinked detection to BS 5839-6 and unchanged fire service access. The development therefore satisfies the objectives of London Plan Policy D12(A),

and it is respectfully requested that this Reasonable Exception Statement be accepted as a proportionate response for this minor application.

Prepared by:

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