

Fire Safety - Reasonable Exception Statement (RES)

Address: 42 Dover Road East, Gravesend, DA11 0RG

Date: February 24, 2026

Proposal: Loft conversion incorporating a hip-to-gable roof alteration and the construction of a rear dormer extension to provide 2 bedrooms and a shower room

Local Planning Authority: Gravesham Borough Council

1. Introduction

This statement has been prepared in support of the proposed loft conversion incorporating a hip-to-gable roof alteration and rear dormer extension to an existing mixed-use building comprising a ground floor shop and a self-contained residential unit above.

The proposal will provide two additional bedrooms and a shower room at loft level, forming a two-storey self-contained dwelling above the commercial premises.

This document outlines the fire safety strategy and provides justification where strict compliance with Approved Document B is not fully achievable due to existing building constraints.

2. Existing & Proposed Arrangement

Ground Floor:

- Commercial shop unit
- Separate rear entrance providing independent access to residential stair
- No internal connection between shop and residential unit

First Floor:

- Reception room
- Kitchen
- Bathroom
- One bedroom
- Protected stair continuing to loft level

Loft Floor (Proposed):

- Two bedrooms
- Shower room
- Stair discharging to first floor and continuing to final exit at ground floor

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The residential unit remains a single self-contained dwelling (not HMO).

3. Compensatory Fire Safety Measures

To mitigate this constraint, the following enhanced fire protection measures are proposed:

3.1 Protected Escape Route

- The stair enclosure will be upgraded to provide 30-minute fire resistance throughout.
- All habitable rooms opening onto the stair will be fitted with FD30S fire doors complete with:
 - Intumescent strips
 - Cold smoke seals
 - Self-closing devices

3.2 Fire Detection & Alarm System

A Grade D LD2 fire detection and alarm system will be installed, comprising:

- Mains-powered, interlinked smoke alarms in:
 - Ground floor stair enclosure
 - First floor landing
 - Loft landing
- Heat detector within kitchen
- Smoke detectors in circulation spaces

All alarms to include battery back-up.

3.3 Separation Between Shop & Residential

- A minimum 60-minute fire-resisting floor construction will be provided between the commercial and residential premises.
- Any service penetrations will be fire-stopped using tested proprietary systems.
- The residential stair remains fully independent from the shop unit.

3.4 Escape Windows

- All new loft bedrooms will be provided with escape windows compliant with Approved Document B where practicable.

3.5 Improved Layout

The proposed alteration improves the first floor arrangement by:

- Removing the bedroom access via the kitchen.
- Providing direct access from the protected stair landing.

This significantly enhances means of escape compared to the existing situation.

4. Conclusion

The proposed development achieves a reasonable and proportionate approach to fire safety within the constraints of the existing building.

The compensatory measures outlined above provide an acceptable level of protection to occupants and satisfy the intent of Approved Document B.

Accordingly, approval of this Reasonable Exception Statement is respectfully requested.