

FIRE SAFETY STRATEGY

Reasonable Exception Statement — Means of Escape

13 Masson Avenue, Ruislip, HA4

Hip-to-Gable Loft Conversion — Building Regulations Submission

Project reference	2026-06-HA4
Site address	13 Masson Avenue, Ruislip, HA4
Date	23 July 2026

1. Purpose

This Statement supports the Building Regulations application for the hip-to-gable loft conversion at 13 Masson Avenue, Ruislip, HA4, which creates a third storey of habitable accommodation above 4.5m. It sets out the means-of-escape strategy proposed for the completed dwelling, identifies the specific point(s) at which the design departs from the prescriptive guidance in Approved Document B (ADB) Volume 1, and sets out the alternative provisions proposed to satisfy Functional Requirement B1 of Schedule 1 to the Building Regulations 2010 (as amended) by an equivalent, non-prescriptive route.

A 'reasonable exception' in this context is not a request to be excused from fire safety — it is a demonstration that the functional requirement (safe means of escape for all occupants in the event of fire) is met by a different, justified combination of measures than the one described in the prescriptive guidance. Building Control is entitled to expect that departure to be argued specifically, against the actual constraint on site, not asserted generally.

2. The Legal and Guidance Framework

Requirement B1 of Schedule 1 to the Building Regulations 2010 requires that the building shall be designed and constructed so that there are appropriate provisions for the early warning of fire, and appropriate means of escape in case of fire to a place of safety outside the building capable of being safely and effectively used. Approved Document B sets out one way, but not the only way, of satisfying that requirement; paragraph 0.11 of ADB confirms that there is no obligation to adopt a particular solution if the applicant can show that the requirement has been satisfied in another way. BS 9991:2015 (Fire safety in the design, management and use of residential buildings — Code of practice) is the standard most commonly relied on to justify an alternative, performance-based approach for houses of this kind.

2.1 The relevant prescriptive requirement

For a loft conversion converting an existing two-storey house into a three-storey house (i.e. where a floor of the new storey exceeds 4.5m above ground level), ADB Volume 1, Section 2 requires, in summary:

- A protected stairway serving all storeys, enclosed throughout its length in fire-resisting construction (walls and floors REI 30, doors FD30S self-closing);
- All doors from habitable rooms opening onto the stair to be FD30S fire doorsets with self-closing devices, including upgrading of existing doors where necessary;
- Mains-powered, interlinked smoke alarms in circulation spaces on every storey, and a heat alarm in the kitchen, meeting BS 5839-6 Grade D1, Category LD2 as a minimum;
- The full extent of the escape route — including parts of the existing dwelling not otherwise being altered — to be brought up to this standard, since ADB requires the whole route to be considered, not just the new work; and
- Because escape via a window is not considered a safe means of escape from above first-floor level, the protected stairway is treated as the primary escape route for the new storey, not the dormer window.

3. Existing Dwelling and Escape Arrangements

13 Masson Avenue is currently a two-storey semi-detached dwelling. The existing means of escape from the first floor is via the main staircase from the entrance hallway to the front door, serving a hallway, living room, dining room, lounge, kitchen and WC at ground floor, and three bedrooms and a bathroom at first floor. No protected stairway currently exists, as none is required for a two-storey house under ADB Volume 1.

4. Proposed Works and Their Effect on the Escape Strategy

The proposal converts the existing roof void into a third storey comprising a double bedroom, en-suite shower room, landing and storage area, accessed by a new staircase rising from the existing first-floor landing. This raises the floor level of habitable accommodation above 4.5m, which engages the full prescriptive requirements summarised in Section 2.1, applied to the entire escape route from the new bedroom down to the final exit at ground level — not solely to the new stair flight.

5. Identified Constraint (site-specific — confirm and retain one option only)

The following are the three most common reasons a loft conversion of this type cannot fully meet the ADB Volume 1 prescriptive route. Select the one that reflects the actual site condition, delete the other two, and add the specific dimensions/evidence referred to in square brackets.

6. Proposed Alternative Compliance Package

Subject to confirmation of which constraint in Section 5 applies, the following alternative package is proposed as achieving an equivalent standard of safety to the prescriptive route, and is put forward as the basis of the reasonable exception:

Prescriptive requirement (ADB Vol. 1)	Proposed alternative provision	How this compensates
Protected stairway enclosure throughout (REI 30 walls/floors)	Protected stairway achieved for the full route except at [insert location]; fire-resisting construction elsewhere upgraded as far as practicable	Limits fire spread into the escape route from all but the identified location
FD30S self-closing doors to all rooms off the stair	FD30S self-closing doors fitted to every habitable room door except [insert, if applicable]; existing doors upgraded or replaced	Delays smoke/fire ingress to the stair from the great majority of rooms
Mains smoke alarms, Grade D1 / Category LD2	Mains-powered, interlinked smoke alarms to Grade D1, Category LD1 (whole-dwelling coverage, including all habitable rooms, not just circulation space)	Provides earlier warning than the minimum standard, compensating for the reduced enclosure
Escape via protected stair only (window not relied upon above first floor)	Compliant escape window to the new bedroom provided as a secondary/backup route, in addition to (not instead of) the stair	Gives a second route of escape specific to the top-storey room most affected
Fire-resisting separation between storeys	Existing floor/ceiling construction upgraded to REI 30 between the loft and first floor, and first floor and ground floor, using [insert	Slows fire spread between storeys, extending available escape time

Prescriptive requirement (ADB Vol. 1)	Proposed alternative provision	How this compensates
	specification, e.g. additional layer of 12.5mm fireline plasterboard]	

7. Justification Against Functional Requirement B1

The combination of measures in Section 6 is put forward as satisfying Requirement B1 by a route other than full literal compliance with the ADB diagrams, on the basis that: whole-dwelling Grade D1/LD1 smoke and heat detection gives occupants earlier warning than the ADB minimum; FD30S doors are provided to substantially all of the escape route, with the single identified departure limited to [insert location/extent]; the compliant escape window gives a genuine secondary route from the room most affected; and the upgraded floor separation limits the speed of vertical fire spread. Taken together, these are considered to provide occupants of the new storey with a materially equivalent, and in some respects enhanced (whole-dwelling LD1 coverage versus the LD2 minimum), standard of warning and escape to that envisaged by the prescriptive guidance.

8. Conclusion and Request

It is requested that the London Borough of Hillingdon Building Control (or the appointed approved inspector) accept the alternative means-of-escape strategy set out in Section 6 as satisfying Requirement B1 of Schedule 1 to the Building Regulations 2010, in respect of the specific departure from Approved Document B Volume 1 identified in Section 5, subject to the detailed door, glazing and construction specifications being confirmed at technical design/Building Control application stage.