

# London Plan Fire Safety Policy D12(A) - Reasonable Exception Statement Hammersmith Bridge pedestal stabilisation

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**Project:** Hammersmith Bridge pedestal stabilisation

**Our reference:** 105098-MMD-HSB-TN-SE-00007      **Your reference:** -

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**Approved by:** -      **Checked by:** -

**Subject:** London Plan Fire Safety Policy D12(A) – Reasonable Exception Statement

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## 1 Introduction

Works are proposed to the Grade II\* listed Hammersmith Bridge in order to stabilise its cast iron pedestals after significant cracking was discovered in 2019. This Reasonable Exception Statement sets out the reasons why the London Plan Fire Safety Policy D12(A) does not apply in this situation.

The Hammersmith Bridge pedestal stabilisation works consist of both permanent and temporary interventions including the addition of new strengthening elements and the removal of some original fabric.

These works will involve permanent interventions including the addition of new strengthening elements and the removal of some original fabric. The permanent interventions for each of the four pedestals comprise new steel saddle brackets and the filling of the pedestals with fibre-reinforced concrete & grout, as well as the permanent removal of the original existing rollers at the pedestals and their replacement with elastomeric bearings. Temporary removal of small areas of the original parapets and pedestal casings will also be required; these will be reinstated after the permanent intervention works are complete.

The other temporary (reversible) interventions comprise a series of flat jacks, steel cheek plate frames around the pedestals and hydraulic cylinders connecting the cheek plate frames to the saddle brackets. Temporary scaffold ramps will be provided to allow pedestrians to continue to use the bridge throughout the permanent intervention works, and temporary hoarding will be installed around the pedestals after the stabilisation works are complete.

Listed Building Consent applications for the Hammersmith Bridge pedestal stabilisation works were validated by the London Borough of Hammersmith & Fulham (LBHF) and the London Borough of Richmond upon Thames (LBRuT) in January 2022. The respective application reference numbers are 2021/03680/LBCHF and 21/3954/LBC, and the applicant is LBHF (with Mott MacDonald acting as agent).

According to the London Plan Fire Safety Policy D12(A), applicants for all development proposals (including Listed Building Consent applications) should submit a Planning Fire Safety Strategy (PFSS) to ensure the highest standards of fire safety. However, the applicant considers that the policy is not applicable for these proposed works, and so this Reasonable Exception Statement (RES) has been prepared as justification.

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## 2 Relevant policy criteria for Listed Building Consent applications

The London Plan Fire Safety policy D12(A) states that the following criteria are relevant for Listed Building Consent applications:

- Criterion 1: Information on space provisions for fire appliances and assembly points
- Criterion 2: Information on passive and active safety measures
- Criterion 3: Information and data on construction products and materials
- Criterion 4: Information on means of escape and evacuation strategy
- Criterion 6: Information on access and equipment for firefighting

Criterion 5 (development of a robust strategy for evacuation which can be periodically updated and published, and which all building users can have confidence in) is not listed as an expected policy information requirement for Listed Building Consent applications in the Fire Safety D12(A) London Plan Guidance.

## 3 Reasonable Exception Statement for the policy criteria

### 3.1 Criterion 1: Information on space provisions for fire appliances and assembly points

The application concerns a bridge, not a building, and so the requirement for provision of assembly points in the event of a fire on or near the bridge is not applicable. The existing bridge has no fire appliances or assembly points, and the proposed works will not substantially alter the structure such that dedicated fire appliances become required.

### 3.2 Criterion 2: Information on passive and active safety measures

The application concerns a bridge, not a building. Therefore, the requirement for passive safety measures such as compartmentalisation and fire doors is not applicable. Similarly, the requirement for active safety measures such as fire alarms, smoke detectors, sprinklers and ventilation systems is also not applicable.

There are no existing buildings immediately adjoining the bridge. The nearest buildings to the pedestals are located approximately 4.7m away (at the east pedestal at the Hammersmith end), and no safety measures are deemed necessary to protect these from fire during the construction phase. The other three pedestals are located even further away from existing buildings, and so the risks are even lower.

The scheme involves minimal site welding and cutting and any such activities will be performed within carefully controlled conditions under a hot works permit issued by the Principal Contractor supervising the works.

### 3.3 Criterion 3: Information and data on construction products and materials

No flammable materials will be used in the permanent works; the permanent works materials will comprise steel, fibre-reinforced concrete and elastomer.

The temporary works materials will comprise steel and timber. Timber will only be used for the scaffold ramps and pedestal hoarding, and will be treated with a fire-retardant coating.

The existing bridge materials are cast iron, timber and concrete, and the current tower bearings are elastomeric. The materials proposed as part of these works are thus very similar, and there will be no increase in the overall flammability of the bridge. Therefore, there is no need to provide further information to satisfy this criterion.

### 3.4 Criterion 4: Information on means of escape and evacuation strategy

The application concerns a bridge, not a building. There are also no accessible enclosed areas on the bridge. Therefore, building escape and evacuation strategy requirements are not applicable.

The proposed temporary scaffold ramps will not obstruct the existing evacuation or firefighting access for the residents of the buildings adjacent to the north-east pedestal. The other pedestals are located even further away from existing buildings, and evacuation and firefighting access here will also be unaffected by the proposed works.

### 3.5 Criterion 5: Information on evacuation strategy

Criterion 5 is not listed as an expected policy information requirement for Listed Building Consent applications, and as such is not applicable here.

During the construction stage, pedestrians can use the existing footways and temporary scaffold ramps to evacuate the bridge in the event of a fire. After the works are complete, the temporary scaffold ramps will be removed and pedestrians will use the existing footways to evacuate the bridge, as was the case prior to the works. The proposed permanent works will thus have no effect on the evacuation strategy in the long term.

### 3.6 Criterion 6: Information on access and equipment for firefighting

The application concerns a bridge, not a building. The existing bridge has no dedicated firefighting equipment, and the proposed works will not substantially alter the structure. The requirement for dedicated firefighting equipment to be provided is therefore not applicable.

The proposed works will not affect firefighting access to and from the bridge during construction or in the long term. Therefore, this part of the criterion is also not applicable.

The proposed temporary scaffold ramps will not obstruct the existing evacuation or firefighting access for the residents of the buildings adjacent to the north-east pedestal. The other pedestals are located even further away from existing buildings, and evacuation and firefighting access here will also be unaffected by the proposed works.

## 4 Applicant justification for authoring competency

The Fire Safety D12(A) London Plan Guidance recommends that the competency of the author of a PFSS/RES for Listed Building Consent applications should be justified by the applicant. The requirements of the London Plan Guidance Fire Statements D12(B) for author competency do not apply.

Furthermore, the proposed works concern a bridge, not a building, and thus the fire safety risks are much lower.

The author is a chartered engineer with the Institution of Civil Engineers (CEng MICE), and works as a designer on the proposed works. Since the proposed works will have no significant impact on the fire safety of the bridge, this is considered to be a suitable level of competency to write the Reasonable Exception Statement for this application.

## 5 Conclusions

Criteria 1, 2, 4 and 6 are not applicable as this application concerns a bridge, not a building, and the proposed works will have no impact on the existing fire strategy of the bridge and surrounding buildings. Information on the proposed construction products and materials is summarised in section 3.3, and there is deemed to be no significant change to the materials already used on the bridge – the requirement to provide more information under Criterion 3 is thus also not applicable. Finally, Criterion 5 is not applicable to Listed Building Consent applications, and there will be no significant changes to the current evacuation strategy as a result of the proposed works.

Overall therefore, the requirement to provide a Fire Statement/Planning Fire Safety Strategy in accordance with the London Plan Policy D12(A) is not applicable for the proposed Hammersmith Bridge pedestal stabilisation works.