

Fire Safety D12(A) London Plan – Reasonable Exception Statement (RES)

Proposal: Listed Building Consent for “Works to Band Practice Hall comprising repair works to cracking to external walls; underpinning works; localised repair works to slate roof; and internally removal of internal back wall, introduction of new structural truss and structural tie, and raising the existing ties by 800mm.”

Site: Kneller Hall, Royal Military School Of Music, Kneller Road, Twickenham, TW2 7DU

Justification for Exception

1. General Exceptions

The objective of the proposal is to secure listed building consent for internal and external maintenance works and internal alterations to the Band Practice Hall only. These works are of a minor nature that are all required to repair and restore the listed building to enhance the external appearance and help ensure their long term protection. They are also necessary as part of the buildings’ ongoing maintenance.

The works comprise of:

- Remedial repair works to visible cracking to Band Practice Hall existing external masonry walls;
- Underpinning works to Band Practice Hall;
- Localised repair works to slate roof and removal of chimney;
- Removal the internal back wall within the Band Practice Hall;
- Introduction of new structural truss and structural tie, where Band Practice Hall internal back wall has been removed; and
- Raising the ties by 800mm.

None of the above works will alter the existing fire safety arrangements in place at the site, nor the existing fire strategy that is in place.

The application has been submitted in addition to a more comprehensive planning and listed building consent application for development across the full site which is currently under consideration (ref. 22/3004/FUL and 22/3005/LBC). These applications are to facilitate the use of the entire site as a senior school and a Fire Statement has been provided as part of that application.

2. Exceptions to Schedule D12(A) Expected Policy Information

Set out below is the criteria that part A of policy D12 of the London Plan requires consideration to be given to, as part of an application. We have set out below our response to why each of the criteria is not considered relevant to this application.

- Criteria 1. Information on space provisions for fire appliances and assembly points

Response: The Proposal has no impact on existing space provisions for fire appliances and assembly points. It is therefore exempt from any further information being needed.

- Criteria 2. Information on passive and active safety measures

Response: The Proposal has no impact on existing passive and active safety measures. It is therefore exempt from any further information being needed.

- Criteria 3. Information and data on construction products and materials

Response: The works relate to internal and external repair and maintenance works and internal alterations to the Band Practice Hall only. Full details are included within our submitted Planning, Design and Heritage Statement. These works are of a minor nature that are all required to repair and restore the building. It is therefore exempt from any further information being needed.

- Criteria 4. Information on means of escape and evacuation strategy

Response: The proposal has no impact on the existing means of escape and evacuation strategy. It is therefore exempt from any further information being needed.

- Criteria 5. A robust evacuation strategy, that can be updated and is available to all building users.

Response: The proposal has no impact on the existing evacuation strategy nor how the building is used. It is therefore exempt from any further information being needed.

- Criteria 6. Information on access and equipment for firefighting

Response: The proposal has no impact on existing access and equipment for firefighting. It is therefore exempt from any further information being needed.

Conclusion

Based on the general exception points above and the responses to the specific criteria, we consider that it is reasonable and justified, as requested in D 12(A), for the whole of this policy not to be applicable to this application and therefore a Fire Strategy or Fire Statement is not required for this application.

DWD – September 2024