

MAYOR OF LONDON

London Plan Guidance

Fire Safety Policy D12(A)

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Table of contents

1	About this document	5
1.1	Fire safety information	5
1.2	Life of the development and the 'Golden Thread' of information	5
2	Planning Fire Safety Strategy	6
2.1	Demonstrating compliance with Policy D12(A)	6
2.2	How should the PFSS be presented?	6
2.3	What should a PFSS include?	6
2.4	What qualification is required to write the PFSS?	10
3	Guidance on Policy Criteria for London Plan policy D12(A)	10
Appendix 1	Planning Applications and Information Requirements for D12 (A).....	14
Appendix 2	Example condition	20

London Plan Policy

[Policy D12\(A\) Fire Safety](#)

Planning Application type and how it will be applied

All development as set out in Appendix 1¹.

Major development will need to include the information required by London Plan Policy D12(A) in a Fire Statement, as required by London Plan Policy D12(B).

Where the applicant considers parts of or the whole policy do not apply, this should be justified in a **Reasonable Exception Statement (RES)**.

This guidance should be read in conjunction with London Plan Guidance for London Plan Policies D12(B) and D5(B5).

Who is this London Plan Guidance for?

Planning authorities, fire engineers, fire safety professionals, designers and applicants to understand how planning applications can demonstrate they have achieved the highest standard of fire safety.

Specialists consultants, enforcement and regulatory bodies and members of the public may review the Planning Fire Safety Strategy (PFSS) to assess compliance with policy.

What does this document cover?

Fire Safety Information

How should fire safety information be presented?

What should a Planning Fire Safety Strategy (PFSS) include?

What level of competence is required to write the Planning Fire Safety Strategy (PFSS)?

Guidance on policy criteria for London Plan policy D12(A)

Implementation flow diagrams

Details on the information required for specific application types.

¹ See Appendix 1 for further details on the information required for specific application types

1 About this document

1.1 Fire safety information

- 1.1.1 The fire safety of developments should be considered from the outset to ensure the most successful outcomes are achieved for occupants and users. At this early design stage, developers should take a holistic approach which considers location, land use, occupancy, operation of the building, construction methods, materials, the Building Regulations, passive and active fire safety measures and management to inform the most appropriate fire safety strategy for the development. The fire safety measures required during the construction and management stages of a development also need to be fully considered at the early design stage.
- 1.1.2 Early consideration of fire safety can prevent the need to redesign a scheme at Building Regulations stage, where any changes to the design or construction methods and materials can lead to inappropriate fire safety solutions and delay the development as well as add costs. It can also prevent the construction of unsafe buildings and enforcement action from authorities where breaches of regulations and codes occur along with the required remedial costs.

1.2 Life of the development and the ‘Golden Thread’ of information

- 1.2.1 The ‘**Golden Thread**’ refers to a concept where the fire safety information of a building is to be updated and maintained through the whole life cycle of the building. The fire safety information should be maintained and updated as the development evolves in line with the principles of the golden thread². The fire safety information provided at planning application stage should be developed to inform the overall fire strategy for the development. When passing fire safety information to subsequent development stages, consideration should be given to the accessibility, accuracy and relevance of the information to ensure the development is constructed as it has been designed and originally specified. A handover process for the fire strategy to the building owner should also be identified³.

² [Building a safer future: Independent review of building regulations and fire safety](#)

³ Additional information: see [Regulation 38 of the Building Regulations 2010](#)

2 Planning Fire Safety Strategy

2.1 Demonstrating compliance with Policy D12(A)

- 2.1.1 To demonstrate development proposals have achieved the highest standards of fire safety, applicants should submit a Planning Fire Safety Strategy (PFSS).
- 2.1.2 Major development should incorporate the PFSS into the Fire Statement as set out in London Planning Guidance Fire Statements (Policy D12(B)).
- 2.1.3 Compliance with the PFSS should be secured by condition or s106 agreement. An example condition is provided in Appendix B.

2.2 How should the Planning Fire Safety Statement be presented?

- 2.2.1 The Planning Fire Safety Strategy should be presented as:
- A standalone document so that it is easy to find and share with stakeholders
 - In a digital format which will support the golden thread⁴ of fire safety information
 - With a clear structure that addresses the criteria set out in London Plan Policy D12(A).

2.3 What should a Planning Fire Safety Statement include?

- 2.3.1 The Planning Fire Safety Strategy should include:
- A clear statement that sets out who has written and approved the fire safety information for submission with the planning application and their competence (relevant qualifications and experience), commensurate with the size, scope and complexity of the development (see section 2.4 below)
 - Information under each criteria of London Plan Policy D12(A)
 - The relevant fire safety design code/s and standards, and how these ensure the proposed development achieve the highest standards of fire safety, proportionate to the size and nature of the development.
- 2.3.2 The information contained within the PFSS should be specific to the development proposal to which it relates.

⁴ Fire Safety information of a building that is to be updated and maintained through the whole life cycle of the building, i.e. design, construction, occupation, alterations, decommissioning.

2.3.3 Figure 1: The **London Plan Policy D12(A) Planning Fire Safety Strategy checklist** below provides a process diagram defining the role of the planning officer and the criteria against which the PFSS will be checked at planning application stage.

Note: Boxes 1-6 should all be checked against to ensure policy requirements are sufficiently addressed. Any 'no' responses should trigger the submission of a **Reasonable Exception Statement** justifying why that policy requirement is not relevant to the development or the relevant deficiencies addressed. An updated PFSS should then be submitted.

2.3.4 Figure 2 provides a process diagram defining the role of the planning officer when a third party objection is received.

Figure 1: London Plan Policy D12(A) Planning Fire Safety Strategy flow diagram

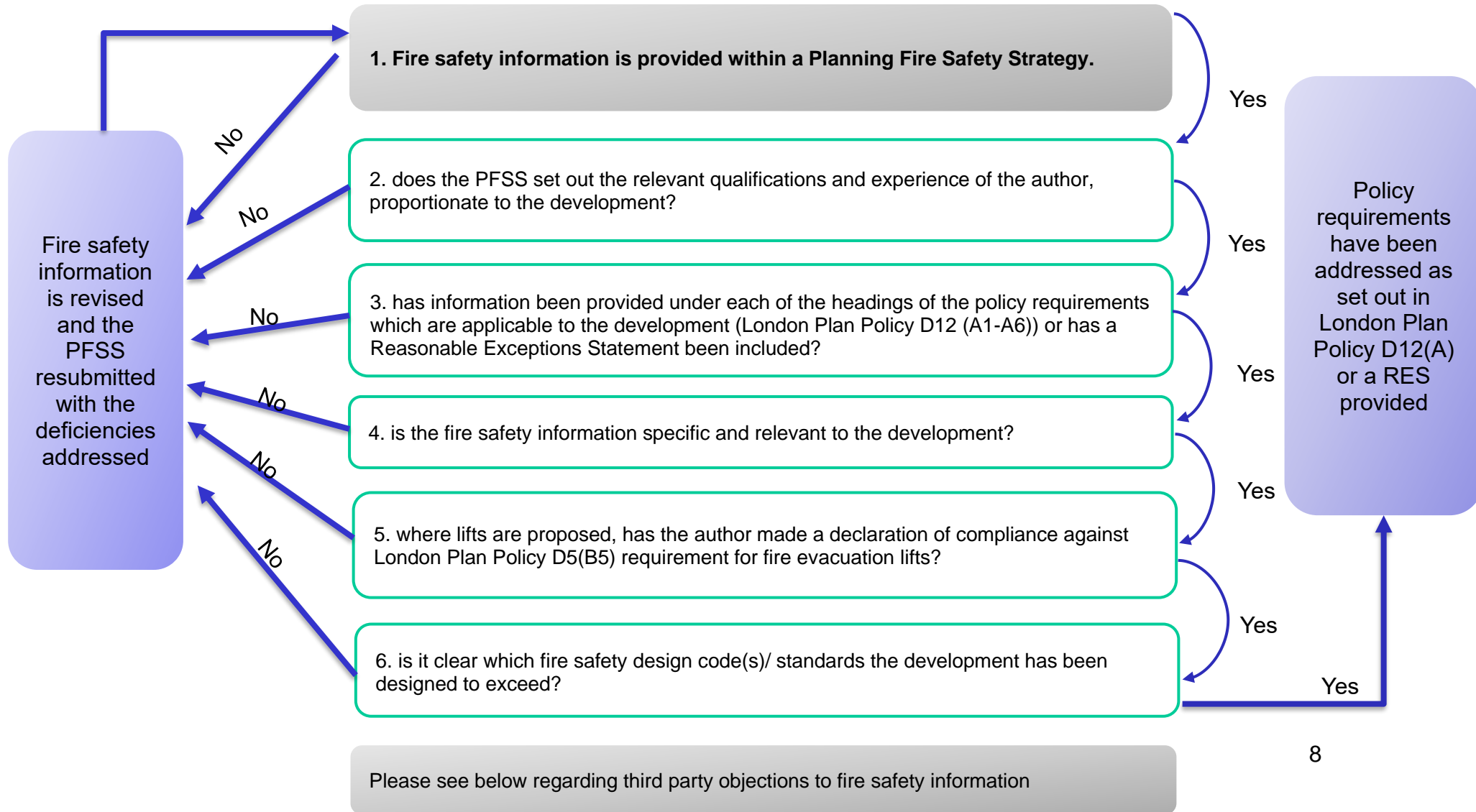
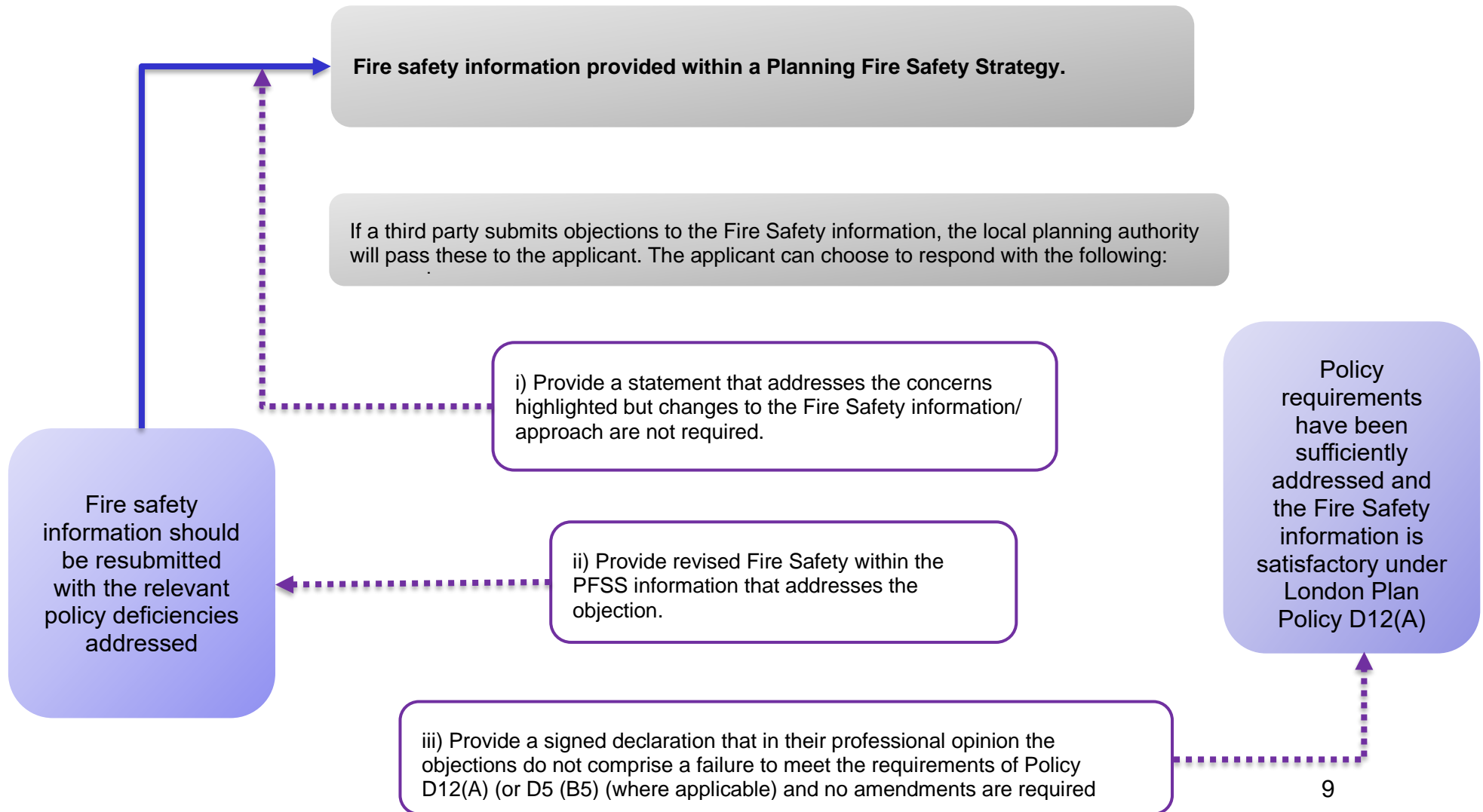


Figure 2: Process for when a third party objection is received



2.4 What level of competence is required to write the PFSS?

- 2.4.1 Due to the variety of size, land uses and settings of developments, there are no minimum qualification requirements for the author of a PFSS. The author should have a suitable fire safety background with the appropriate knowledge, understanding and qualifications commensurate with the size, scope and complexity of the proposed development.
- 2.4.2 For major developments a registered fire engineer is required to author the PFSS and Fire Statement as set out in London Planning Guidance Fire Statements (Policy D12(B)).
- 2.4.3 For larger and more complex schemes it is also advised that the author of the PFSS is a registered fire engineer and has the competency to progress the PFSS to a full fire strategy (where required) and maintain oversight of the fire safety considerations throughout the development.
- 2.4.4 For smaller schemes the author should justify their competency to write the PFSS.

3 Guidance on Policy Criteria for London Plan policy D12(A)

- 3.1.1 To demonstrate developments have met the highest standards of fire safety, proportionate to the development, the following information should be addressed:

1) Identify suitably positioned unobstructed outside space for:

a. fire appliances to be positioned on

The PFSS should identify areas where fire and rescue service pumping appliances can be sited. Ideally areas should be identified on the development site so that they remain in the control of the development. Where this is not possible, the PFSS should set out the implications of not having control of this area and any proposed mitigation measures such as obtaining the agreement of the landowner to keep the area clear for emergencies. The PFSS should also identify suitable access routes into and out of the development, both during construction phase and occupation. See criteria 6 below.

b. appropriate for use as an evacuation assembly point

The PFSS should identify a suitably sized evacuation assembly point for both the construction and occupation phases of the development. Ideally areas should be identified on the development site so that they remain in the control

of the development. Where this is not possible, the PFSS should set out the implications of not having control of this area and any proposed mitigation measures such as obtaining the agreement of the landowner to keep the area clear for an assembly point during an evacuation.

2) Are designed to incorporate appropriate features which reduce the risk to life and the risk of serious injury in the event of a fire; including appropriate fire alarm systems and passive and active fire safety measures

The PFSS should set out what passive and active fire safety measures have been incorporated into the development, what fire safety code/s have been used and which standards these measures have been designed to meet, as well as any additional measures that have been included in the development in order for the development to achieve the highest standards of fire safety, proportionate to the size and nature of the development.

Passive and active fire safety measures within a building increase levels of personal safety and property protection in the event of a fire. Passive measures are the elementary parts of a building or structure that do not require a reaction or human intervention during a fire. Examples include compartment walls, fire doors and fire-resistant glazing. Passive fire protection is achieved through compartmentalisation, effectively sub-dividing a building into compartments to prevent the spread of fire such as with the use of fire-resistance rated walls, floors and fire doors. Dampers are used to prevent the spread of smoke throughout any ductwork.

Active fire protection systems require a reaction or action to mitigate the effects of a fire. Systems are mostly automatic, such as fire alarms, smoke detectors, sprinkler systems and ventilation systems. Others require manual intervention such as fire extinguishers.

3) Are constructed in an appropriate way to minimise the risk of fire spread

The PFSS should detail the construction methods of the development and the measures that will be taken to limit fire safety risks posed to the surrounding area. Construction methods that could impact the fire safety of neighbouring sites, buildings, occupants etc. must be identified and the risk reduced using suitable fire control measures.

Where possible, construction materials' fire safety information should be provided within the PFSS. It is recognised that owing to individual procurement strategies, such information may not be readily available at the planning stage. The provision of a materials information register displaying the fire safety properties of construction materials will assist in enabling a 'golden thread' (see *paragraph 1.2.1 above*) of building safety information and ensure that the design criteria, including the proposed construction method and materials is followed through the construction phase.

The Fire Statement for major developments must include a commitment that the development will not incorporate combustibile materials in its external walls⁵.

4) Provide suitable and convenient means of escape, and associated evacuation strategy for all building users

The PFSS must clearly state how the means of escape for all building users has been considered and planned from the initial design of the development (also see London Plan Policy D5(B5) and its London Plan Guidance). The PFSS should evidence, including through the use of plans, which code/s and standards the means of escape have been designed to meet and any additional measures that have been included in order for the development to achieve the highest standards of fire safety, proportionate to the size and nature of the development.

The proposed means of escape will inform the evacuation strategy. The PFSS should justify the proposed evacuation strategy, including by identifying the code / standard that has informed the strategy. The evacuation strategy must be inclusive and appropriate for people with disabilities including mobility, sensory and cognitive disabilities and those who may not speak or understand English as their primary language.

5) Develop a robust strategy for evacuation which can be periodically updated and published, and which all building users can have confidence in

The Evacuation Strategy should set out how the users of a development will move to a safe location in the event of an emergency. It should be relevant to the type, use, size and associated risk to the building and its occupants with contingency measures, where necessary. The PFSS should include a timeframe for the periodic review and update of the evacuation strategy over the lifecycle of the development.

6) Provide suitable access and equipment for firefighting which is appropriate for the size and use of the development

The PFSS should identify how emergency access is to be provided and what fire safety equipment for the fire and rescue services has been included into the scheme; temporarily for the construction phase of the development; and permanently for the occupation phase. The author should ensure and confirm in the PFSS that there is an adequate firefighting water supply.

⁵ That is, only materials that are Class A2-s1 rated and above under the European classification system, as set out in the standard BS EN 13501-1 and as reflected in UK Building Regulations will be used except for the exempt elements as set out under Regulation 7(3) of Approved Document B.

Section B5 of Approved Document B (ADB) Parts 1 and 2 provide a way to comply with Part B of Schedule 1 to the Building Regulations 2010 requirement B5 'access and facilities for the fire service'. The proposed access for the fire and rescue service may be provided in line with ADB as a minimum standard, however proposed measures must be specific and relevant to the proposed development. The PFSS should clearly demonstrate how the proposed access does not adversely impact neighbouring sites and access to the surrounding areas.

Firefighting facilities, where required can be provided in line with ADB as a minimum standard, however they must be specific and relevant to the proposed development. The PFSS should include an outline management plan for the ongoing maintenance of both the access and firefighting equipment provisions.

Simply submitting excerpts taken from Approved Document B without specific context and reference to the proposed development do not demonstrate compliance with this policy.

Appendix 1 Planning Applications and Information Requirements for D12 (A)

Table A1.1 Planning Applications and Information Requirements for D12 (A)

Where the applicant considers parts of or the whole policy do not apply, this should be justified in a **Reasonable Exception Statement (RES)**.

Application Type	Policy D12 (A)	Policy D12 (B)	Expected Policy Information Requirements	Recommended Authoring Competency Requirements
Full planning permission (Major development)	Yes	Yes	Also see London Plan Guidance Fire Statements D12(B)	See London Plan Guidance Fire Statements D12(B)
Full planning permission (other)	Yes	n/a	Information on space provisions for fire appliances and assembly points (criteria 1) . Information on passive and active safety measures (criteria 2) . Information and data on construction products and materials (criteria 3) . Information on means of escape and evacuation strategy (criteria 4) . Information on access and equipment for firefighting (criteria 6) .	Applicant justification
Outline planning permission	Yes	Yes	See London Plan Guidance Fire Statements D12(B) ⁶	See London Plan Guidance Fire

⁶ Outline planning applications should submit an Outline Fire Statement which commits the development to achieving the highest standards of fire safety.

Application Type	Policy D12 (A)	Policy D12 (B)	Expected Policy Information Requirements	Recommended Authoring Competency Requirements
(major development)				Statements D12(B) ⁷
Reserved Matters (where it relates the Fire Statement or any matters that relate to fire safety eg layout, access, materials)	Yes	Yes	See London Plan Guidance Fire Statements D12(B) In line with the Golden Thread principle Fire Statement should be updated.	See London Plan Guidance Fire Statements D12(B)
Householder planning permission	Yes	n/a	Information on space provisions for fire appliances and assembly points (criteria 1) . Information on passive and active safety measures (criteria 2) . Information and data on construction products and materials (criteria 3) . Information on means of escape and evacuation strategy (criteria 4) . Information on access and equipment for firefighting (criteria 6) .	Applicant justification
Listed building consent			Information on space provisions for fire appliances and assembly points (criteria 1) .	Applicant justification

⁷ Given that an Outline Fire Statement will be less detailed than a Fire Statement for a full planning or reserved matters application, the author of an Outline Fire Statement does not need to meet the competency criteria set out in London Plan Guidance Fire Statements D12(B). However, for continuity and maintenance of the 'golden thread' approach, it is advisable that a competent person is involved from the first stages in the design of the development.

Application Type	Policy D12 (A)	Policy D12 (B)	Expected Policy Information Requirements	Recommended Authoring Competency Requirements
	Yes	n/a	<p>Information on passive and active safety measures (criteria 2).</p> <p>Information and data on construction products and materials (criteria 3).</p> <p>Information on means of escape and evacuation strategy (criteria 4).</p> <p>Information on access and equipment for firefighting (criteria 6).</p> <p>Particular focus should be placed on the fire safety of occupants and persons in and around these buildings, as well as adjoining properties.</p> <p>Given that historic listed buildings are generally constructed from a higher proportion of flammable materials, applicants should consider submitting a draft risk assessment and method statements (RAMS) that details the anticipated fire safety hazards on site during the construction phase and potential control measures.</p>	

Application Type	Expected Policy Information Requirements	Recommended Authoring Competency Requirements
Advertisement Consent	Cannot request fire safety information.	N/A
Permitted Development Lawful Development Certificate (LDC)	<p>Developers should check the latest requirements⁸</p> <p>Most permitted developments are not required to submit fire safety information to local authorities. However, developers are encouraged to follow this guidance and communicate relevant fire safety information on the development / building to any existing occupants (if present) and relevant persons who may be impacted upon by the development.</p>	N/A
Permitted Development Prior approvals (general)	<p>Developers should check the latest requirements⁹</p> <p>As permitted development above.</p>	Applicant justification
Permitted Development Prior approvals Class A new dwelling houses on detached blocks of flats ¹⁰	Prior approval to an existing building which is 18 metres or more in height, is to be accompanied by a report confirming that the external wall construction of the existing building shall adequately resist	A chartered engineer or other

⁸ <https://www.gov.uk/guidance/when-is-permission-required#What-are-permitted-development-rights>

⁹ <https://www.gov.uk/guidance/when-is-permission-required#What-are-permitted-development-rights>

¹⁰ <https://www.legislation.gov.uk/uksi/2020/1459/made>

Application Type	Expected Policy Information Requirements	Recommended Authoring Competency Requirements
Class AA new dwelling houses on detached buildings in commercial or mixed use development ¹¹	the spread of fire over the walls and from one building to another, having regard to the height, use and position of the building in compliance with paragraph B4(1) of Schedule 1 to the Building Regulations 2010 (S.I. 2010/2214) ¹² .	competent professional ¹³ See London Plan Guidance Fire Statements D12(B) for useful information

Application Type	Policy D12 (A)	Policy D12 (B)	Expected Policy Information Requirements	Recommended Authoring Competency Requirements
Application for non-material amendments (s96A) (where it relates the Fire Statement, PFSS or any matters that relate to fire safety eg layout, access, materials)	Yes	Yes ¹⁴	Subject to the element being amended. In line with the Golden Thread principle Fire Statement or PFSS should be updated.	See London Plan Guidance Fire Statements D12(B) for major developments or Applicant justification for other development.

¹¹ Ibid

¹²

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/948336/PDR_Guidance_for_publication.pdf

¹³

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/948336/PDR_Guidance_for_publication.pdf

¹⁴ If related to a major development

Application Type	Policy D12 (A)	Policy D12 (B)	Expected Policy Information Requirements	Recommended Authoring Competency Requirements
<p>Removal / variation of conditions (s73) (where it relates the Fire Statement, PFSS or any matters that relate to fire safety eg layout, access, materials)</p>	Yes	Yes ¹⁵	<p>Subject to the element being amended.</p> <p>In line with the Golden Thread principle Fire Statement or PFSS should be updated.</p>	See London Plan Guidance Fire Statements D12(B) for major developments or Applicant justification for other development.
<p>Approval (Discharge) of conditions (where it relates the Fire Statement or any matters that relate to fire safety eg layout, access, materials)</p>	Yes	Yes ¹⁶	<p>Subject to the element being amended.</p> <p>In line with the Golden Thread principle Fire Statement or PFSS should be updated.</p>	See London Plan Guidance Fire Statements D12(B) for major developments or Applicant justification for other development.
<p>Consent under Tree Preservation Orders</p>	n/a	n/a	Not Applicable	N/A
<p>Notification of proposed works to trees in conservation areas</p>	n/a	n/a	Not Applicable	N/A

¹⁵ If related to a major development

¹⁶ If related to a major development

Appendix 2 Example condition

Full planning applications

Planning Fire Safety Strategy

The development must be carried out in accordance with the provisions of the Planning Fire Safety Strategy prepared by xxx dated xxx unless otherwise approved in writing by the Local Planning Authority.

Reason: To ensure that the development incorporates the necessary fire safety measures in accordance with the Mayor's London Plan Policy D12.

