

MAYOR OF LONDON

London Plan Guidance

Fire Safety

February 2022

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Greater London Authority

February 2022

Published by:

Greater London Authority

City Hall

Kamal Chunchie Way

London E16 1ZE

www.london.gov.uk

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London Plan Policy

Policy D12 Fire Safety and Policy D5 Inclusive design (Part B5 Evacuation lifts)

Local Plan making

Boroughs are not required to include a local approach.

Planning Application type and how the LPG will be applied

See Appendix 1 for full information.

Policy D12A

Planning applications for development which include:

- a new residential or commercial unit, or
- a new lift, or
- alterations to the materials on the external walls, or
- alterations to the internal or external communal areas that support the evacuation strategy for the property

should submit a Planning Fire Safety Strategy (PFSS).

Where the applicant considers parts of or the whole policy are not relevant to a development, this should be justified in a **Reasonable Exception Statement (RES)**. See section 4.2 below. This includes all **householder applications**.

Policy D12B

Major developments should submit a Fire Statement.

Section 96a or Section 73 applications to major developments where elements addressed in the Fire Statement or secured by condition such as the access to the site or building, evacuation strategy or materials are amended applicants should submit an (updated) Fire Statement that considers the amended development as a whole.

Outline planning applications should submit an Outline Fire Statement. See section 5.4 below.

Policy D5(B5)

For all planning applications where a lift or lift core will be installed the applicant should submit a Fire Statement or a Planning Fire Safety Strategy.

Who is this guidance for?

Planning authorities to understand the role of planning officers in receiving fire safety information and when an evacuation lift is required.

Applicants to understand the need to use fire safety professionals and designers to determine when an evacuation lift is to be provided and to ensure fire safety has been appropriately considered and addressed from the initial design stage and that this is demonstrated as part of the planning application.

1 Introduction

- 1.1.1 The fire safety of developments needs be considered from the outset to ensure the most successful outcomes are achieved for building occupants and users. The evolution of a fire safety strategy and associated evacuation strategy is iterative, progressing alongside the detailed design of the development and understanding of how it will be used and occupied.
- 1.1.2 This Fire Safety London Plan Guidance (LPG) sets out how applicants should demonstrate compliance with London Plan Policies D12 and D5(B5), where applicable. Planning officers are not experts in fire safety. Therefore, the onus is on the applicant to ensure that they use the necessary fire safety expertise to demonstrate compliance with these policies. This guidance provides template forms for the applicant to provide the required fire safety information and for planning officers to check that information has been provided against each relevant policy criteria.

2 How this LPG relates to the ‘golden thread’ of information and the government’s fire safety gateways

- 2.1.1 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 of the building. The fire safety information should be maintained and updated as the detailed design evolves as well as throughout the construction and occupation phases. When a development is completed, the fire safety strategy is to be passed to the regulator and the building owner¹ and kept under review.
- 2.1.2 This Fire Safety LPG supports the ‘golden thread’ by setting out how applicants should demonstrate that fire safety has been considered at the earliest design stage of a development and addressed in the planning application, in line with London Plan Policies D12 and D5(B5).
- 2.1.3 The Government’s system of fire safety gateways requires fire safety information for relevant buildings to be submitted to the regulator (see Appendix 2 for more information). In comparison to Gateway One, London Plan Policy D12:
- applies to all land uses
 - applies to a lower size threshold

¹ Additional information: see [Regulation 38 of the Building Regulations 2010](#)

- requires more fire safety elements to be demonstrated as part of a planning application.

2.1.4 Given the London Plan requires more information than that set out in Gateway One, as well as the intrinsic link between fire safety, design and the evacuation strategy, it is essential that applicants submit fire safety information in line with the requirements in this LPG, as well as complying with the government’s fire safety gateways.

3 How should fire safety information be submitted

3.1 Standard template forms

3.1.1 London Plan Policy D12 sets out fire safety criteria for development to address. To support the submission of the correct information, template forms are provided in Appendix 3. Applicants should submit fire safety information as follows:

Table 3.1 In what form is fire safety information to be provided

Development type	Major development	Non-major development	Householder and some Non-major development ²
Approach	Fire Statement	Planning Fire Safety Strategy	Reasonable Exception Statement
Relevant section of London Plan Policy D12	Policy D12 part B	Policy D12 part A	Policy D12 part A
Form	Form 1 (see Appendix 3)	Form 2 (see Appendix 3)	Form 4 (see Appendix 3)

3.1.2 Where a **lift** will be provided as part of the development, **Form 3** should also be submitted to demonstrate compliance with London Plan Policy D5(B5).

²² See paragraph 4.2.3

4 London Plan Policy D12A – The highest standard of fire safety

- 4.1.1 To demonstrate development proposals can achieve the highest standards of fire safety non-major applications should be accompanied by a Planning Fire Safety Strategy (PFSS). A PFSS template form is provided in Appendix 3.

4.2 When is a PFSS template form not required?

Reasonable Exception Statement

- 4.2.1 Where the applicant considers parts of or all of policy D12A are not relevant, this should be justified in a **Reasonable Exception Statement (RES)**. The RES should clearly set out which policy criteria is not relevant to the development and why.
- 4.2.2 Where an applicant considers the proposed development will not alter the fire safety of the building, this should be clearly stated as part of the application with a short justification.
- 4.2.3 The RES route will generally be appropriate for householder applications and planning applications where no additional dwellings or commercial units are created, no lifts are provided, the external materials are not altered and there are no alterations to the internal or external communal areas that support the evacuation strategy for the property. In these applications, the applicant should confirm that current fire safety measures are appropriate and will not be negatively affected by the development. Where existing fire safety measures will be altered, the applicant should identify any mitigation measures.
- 4.2.4 See Appendix 3 for a RES template form.

4.3 Who should write a PFSS?

- 4.3.1 Due to the variety of size, land uses and settings of developments the author of the PFSS should demonstrate they have suitable fire safety knowledge, understanding and qualifications, commensurate with the size, scope and complexity of the proposed development.
- 4.3.2 For example, for schemes containing flats and a lift, the experience and qualifications of the author of the PFSS should be similar to that required to write a Fire Statement (see section 5.2 below).

4.4 Guidance on Policy Criteria for London Plan Policy D12(A)

- 4.4.1 To comply with London Plan Policy D12A, development proposals should demonstrate, including in a PFSS and on plans that they meet the following criteria, proportionate to their size and complexity:

Identify suitably positioned unobstructed outside space for fire appliances to be positioned on

- 4.4.2 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.

Identify suitably positioned unobstructed outside space appropriate for use as an evacuation assembly point

- 4.4.3 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.

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

- 4.4.4 The PFSS should set out what passive and active fire safety measures have been incorporated into the development and what fire safety codes, standards and regulations these measures have been designed to meet. The PFSS should identify any additional measures that have been included to achieve the highest standards of fire safety, proportionate to the size and nature of the development. Identifying the role these measures play in the design and fire safety of the development supports the golden thread approach. If the fire safety measures are altered, the impact on fire safety should be assessed and mitigation measures included, where required.
- 4.4.5 Passive and active fire safety measures within a building increase levels of personal safety and the protection of property 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. 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.

- 4.4.6 **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. Some measures require manual intervention such as fire extinguishers.

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

- 4.4.7 The PFSS should detail the construction methods of the development. The method of construction such as block and brick, timber frame or modular construction will influence how a fire could spread. The potential fire spread risks associated with the proposed method of construction should be identified along with any potential impact on the fire safety of neighbouring units, sites, buildings and occupants. The PFSS should set out the measures that will be implemented to limit fire safety risks such as suitable fire control systems.
- 4.4.8 The intended fire safety performance of construction materials should be provided within the PFSS. The identification of the construction methods and fire resistance performance of materials as part of the initial design phase supports the golden thread principle and if altered should be assessed for any adverse impacts and mitigation measures included.

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

- 4.4.9 The PFSS should clearly state how the means of escape for all building users has been considered and planned for from the initial design of the development (also see guidance for the provision of evacuation lifts below). The PFSS should evidence, including through plans, the codes 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.
- 4.4.10 The proposed means of escape will inform the evacuation strategy. The PFSS should justify the proposed evacuation strategy, including by identifying the codes and standards that have informed the strategy. The evacuation strategy must be inclusive and appropriate for people with disabilities and those who may not speak or understand English (see London Plan Policy D5 and guidance on evacuation strategies, including the provision of evacuation lifts below).

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

- 4.4.11 The evacuation strategy should set out how the users of a development will exit a building to a safe location in the event of an emergency. It should be relevant to the use, size, anticipated occupancy 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 lifetime of the development.

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

- 4.4.12 The PFSS should identify how emergency access is to be provided to and within the development site and what fire safety equipment for the fire and rescue services has been included in 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.
- 4.4.13 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 '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 the PFSS should set out how the proposed measures are specific and relevant to the proposed development. The PFSS should identify any potential obstacles and delays that would impede access to the site and potential alternative access routes.
- 4.4.14 Firefighting facilities (where required) can be provided in line with ADB as a minimum standard, however the PFSS should set out how the proposed facilities are specific and relevant to the proposed development. The PFSS should include an outline management plan for the ongoing maintenance of both the on-site access and firefighting equipment provisions.

5 London Plan Policy D12B – Fire Statements

- 5.1.1 London Plan Policy D12B states that major development proposals should be submitted with a Fire Statement.

5.2 Who should write a Fire Statement?

- 5.2.1 A Fire Statement should be written by a suitably qualified assessor that is:
- 1) registered with the Engineering Council as an Incorporated Engineer (IEng) or Chartered Engineer (CEng), and
 - 2) registered with the Institution of Fire Engineers as a Member (MIFireE), Fellow (FIFireE) or Life Fellow (FIFireE(Life)) of the Institution.

5.2.2 Further details can be found on the Institution of Fire Engineers website (<https://www.ife.org.uk/>).

5.2.3 To write a Fire Statement, other professionals must have suitable qualifications and demonstrable experience, commensurate with those set out above.

5.3 What should a Fire Statement address?

5.3.1 The Fire Statement should set out:

- how the proposed fire safety measures meet the requirements of London Plan Policy D12B (parts 1-6)
- how evacuation lifts have been incorporated into the development (where required in line with London Plan Policy D5(B5) (see section 6 below)
- how the development meets the minimum fire safety regulations and standards
- what additional fire safety measures are to be included beyond the minimum requirements of the Building Regulations
- whether a Planning Gateway One Fire Statement has also been submitted.

1) The building's construction: methods, products and materials used

5.3.2 The Fire Statement should:

- specify the proposed construction method of the development
- identify the construction methods that could impact on the fire safety of adjoining units, neighbouring sites, buildings, and occupants
- identify suitable fire control measures, where the proposed construction methods pose a high risk of fire (cross referenced with criteria 3 below on active and passive fire safety measures)
- identify suitable fire control measures to reduce the risk of and limit any impact of a fire within the proposed development on the surrounding area (cross referenced with criteria 3 below on active and passive fire safety measures).

5.3.3 The applicant should set out the class of fire resistance the various elements of the development are to achieve and how this has informed the overall design and fire safety strategy. This information will support the 'golden thread' of building safety information and ensure that the design criteria, including the proposed construction method and performance of materials, is followed in the construction phase. This would also ensure that changes to materials can be identified by all parties and any required mitigation measures implemented to ensure the highest standard in fire safety.

5.3.4 The Fire Statement must include a commitment that the development will not incorporate combustible materials in its external walls³.

5.3.5 Also see the guidance set out in paragraphs 4.4.7 and 4.4.8 above.

2) Means of escape for all building users and the evacuation strategy

5.3.6 The Fire Statement should set out:

- the proposed evacuation strategy and means of escape for all building users
- the fire safety regulations, standards and codes that the means of escape has been designed to meet
- the justification for the chosen strategy and fire safety regulations, standards and codes, including:
 - whether simultaneous evacuation has been considered and whether the proposed stair cores would allow for this
 - if a stay-put strategy is proposed, what mitigations measures are included should occupants decide to spontaneously self-evacuate
- how the number of common stair cores has been rigorously assessed based on the evacuation strategy, mitigation measures should occupants spontaneously self-evacuate, the fire safety measures included in the development, height of the building, likely number of occupants, any characteristics of the occupants that make it more difficult for them to evacuate via the stairs and the requirement for fire fighters to access each floor in the event of a fire
- any specific characteristics of the occupants that may find it more difficult to evacuate such as a concentration of older people, younger people, families, people with physical or cognitive disabilities, people that may not speak English and specific mitigations measures proposed
- how occupants will be made aware of the evacuation strategy and any updates to it
- a timeframe for the periodic review and update of the evacuation strategy over the lifetime of the development.

5.3.7 The evacuation strategy must make provision for everyone, including people who may be slow using the stairs, who require level access, people with all range of disabilities which may include those who are bed bound or who require level access or use braile or a hearing loop and people who do not have a good understanding of English.

³ 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.

5.3.8 Where a lift is provided, the evacuation strategy should also be developed in line with the guidance in Section 6 of this guidance, which provides more details on evacuation strategies, including the provision of an evacuation lift.

5.3.9 The evolution of the design of the development and the evacuation strategy should be iterative.

3) Passive and active fire safety measures

5.3.10 The Fire Statement should set out what passive and active fire safety measures, including suppression systems, have been considered at the earliest design stage. The Fire Statement should set out what fire safety regulations, standards and codes these measures have been designed to and how they achieve the highest standards of fire safety.

5.3.11 The Fire Statement should also address the guidance set out in paragraphs 4.4.4 to 4.4.6 above.

4) Access and facilities for the fire and rescue service

5.3.12 The Fire Statement must clearly identify the emergency access routes to the site, including contingency routes and access in the event the primary route is blocked.

5.3.13 The Fire Statement must identify all active measures included for use by the fire and rescue service.

5.3.14 The Fire Statement should also address the matters set out in paragraphs 4.4.12 to 4.4.14 above.

5) Access within the site for the fire and rescue service

5.3.15 The Fire Statement must clearly identify the emergency access routes within the site and to individual buildings for the fire and rescue service. The Fire Statement should also address the matters relevant to internal site access set out in paragraphs 4.4.12 to 4.4.14 above.

6) Modifications to the proposed development and the 'golden thread' of information

5.3.16 The Fire Statement should set out how fire safety has been considered in the evolution of the development and how the principles of the golden thread principle will be implemented. To ensure the highest standards of fire safety are maintained throughout the lifetime of the development, applicants should consider how the fire strategy and the protective measures would be retained and not be compromised. As a minimum, the Fire Statement should identify the elements of the building that, if modified, may adversely affect the original fire safety strategy. The Fire Statement should include an outline management plan for the ongoing maintenance of these provisions.

5.3.17 The Fire Statement should be used to inform the ongoing fire strategy for the development. When adopting information from the Fire Statement into the fire strategy, consideration should be given to the accuracy and relevance of the information to ensure the building will function as per the design. In line with the principles of the golden thread, the fire strategy is to be passed to the building owner⁴.

5.4 Outline planning applications

5.4.1 Outline planning applications should be accompanied by an Outline Fire Statement which, as a minimum should commit to meeting the highest standards of fire safety in the proposed development. The level of detail included within the Outline Fire Statement will vary depending on which (if any) reserved matters are submitted with the application. Guidance on the information to be submitted with an outline application (or subsequent reserved matters applications) is set out in the table below.

Reserved Matter submitted	Fire safety measures to be included
Access	Access for fire service personnel, vehicles and equipment
Appearance	Details of construction methods and materials to be used (and products where known)
Landscaping	Details of how the provision of suitable access for fire service personnel, appliances and equipment including the stationing of appliances and evacuation points can be accommodated
Layout	Details of how the provision of suitable access for fire service personnel, appliances and equipment including the stationing of appliances and evacuation points can be accommodated
Scale	Details of evacuation lifts and provision of means of escape from buildings to be included where internal layouts of buildings have been submitted

⁴ Additional information: see [Regulation 38 of the Building Regulations 2010](#)

All matters reserved	Commitment to principles and details of how the requirements of Policy D12 will be included in subsequent reserved matters submissions
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5.4.2 NOTE: Where parameter plans have been submitted with an outline planning application there should be sufficient information included to demonstrate that any fire safety measure can be accommodated in the minimum parameter scenario, where relevant

6 London Plan Policy D5(B5) – Evacuation lifts

6.1 What is an evacuation lift?

6.1.1 An evacuation lift is a passenger or goods lift that has been specifically designed to be used as a means of escape for people that require level access and exit or assistance during an emergency. These lifts operate as passenger or goods lifts but have additional structural, electrical and fire protection features so that when they are switched to emergency mode they can operate as an evacuation lift. During an emergency, evacuation lifts operate under the control of one of the following:

- trained building management
- a trained operator
- the fire and rescue service.

6.2 When should an evacuation lift be provided?

6.2.1 London Plan Policy D5(B5) states that where a lift is installed in a development, at least one lift per core (or more) should be a suitably sized evacuation lift. This planning requirement for evacuation lifts is in addition to the requirements for firefighters' lifts, where required by Building Regulations Approved Document B. It is the duty of the applicant through the use of expert fire safety assessors to demonstrate how the provision of an evacuation lift will be achieved, including the provision of supporting lobbies and signage.

6.2.2 Appendix 4 provides information on the features of and standards for evacuation lifts.

6.3 What information on evacuation lifts should be included in the PFSS or Fire Statement?

6.3.1 The information set out below should be included in the PFSS for non-major developments and in the Fire Statement for major developments. Applicants should include or cross reference to this information in the Inclusive Design Statement for the development (see London Plan policy D5 – Inclusive design).

6.3.2 To demonstrate the suitable provision of evacuation lifts has been incorporated into the development, the Fire Statement or the PFSS should include:

- A capacity assessment
- An evacuation strategy
- An evacuation lift management plan
- A declaration of compliance – see Section 7 below.

i) Capacity assessment

6.3.3 A capacity assessment should be carried out to establish the number and size of evacuation lifts that the development will need to provide. This assessment should set out:

- the likely number of occupants and visitors
- the nature of the occupants (for example the likelihood that occupants may require evacuation in a wheelchair or bed) and any other assumptions the capacity is based on
- the calculation of the evacuation lift capacity required
- the evacuation lift capacity that would be provided
- any potential risks during evacuation due to the anticipated capacity.

ii) Evacuation strategy

6.3.4 The provision of evacuation lifts and associated facilities such as protected lifts shafts, lobbies, communication infrastructure and signage should be designed to support the development's evacuation strategy. The strategy must make provision for everyone, including people who require level access, disabled people with a range of impairments (including mobility, sensory and cognitive impairments), people who are bed bound and people who do not have a good understanding of English.

6.3.5 The evacuation strategy and the number and size of the evacuation lifts will be informed by the capacity assessment, potential speed of the lifts, mobility of the occupants and number of floors to be evacuated. The Evacuation Strategy should be reflected in the Building Management Plan (see below).

6.3.6 The evacuation strategy should:

- identify and justify the proposed measures that support the evacuation of the development
- set out how the measures meet the requirements of London Plan Policy D5(B5)
- identify any risks to the safe use of the evacuation lift during an evacuation
- include an assessment and rating of the risks
- include measures to mitigate the identified risk and a justification for each measure
- detail the contingency arrangements for people who require level access and exit, in the event of the evacuation lift not being available, including during times of maintenance.

iii) Evacuation lift management plan

- 6.3.7 The building management plan should include an evacuation lift management plan which sets out how the evacuation lift will be operated in an emergency. The switch to evacuation mode and subsequent operation of the evacuation lifts is normally carried out by a suitably trained person. It is recognised that some developments may not have a trained person on-site to operate the evacuation lift. In some circumstances it may be possible to train those most likely to use the evacuation lift to operate the lift to support their evacuation in an emergency.
- 6.3.8 Where the applicant identifies there will not be a competent person on-site to support the immediate use of the evacuation lifts, alternative measures should be incorporated into the development to ensure the safe and dignified evacuation of occupants in the knowledge that in the interim the evacuation lift can be operated by the fire service when it arrives. Where necessary, it is the duty of the applicant to explore suitable alternatives to meet the requirements of London Plan Policies D5(B5) and D12 and clearly set them out in the evacuation strategy and building management plan.
- 6.3.9 The evacuation lift management plan should also set out how the features of the evacuation lift and supporting facilities and infrastructure will be maintained and kept up to date by the building management team.

7 A declaration of compliance

- 7.1.1 For major developments and those including an evacuation lift, a declaration of compliance should be signed by a suitably qualified fire safety professional (see section 5.2) confirming that the technical content produced for the planning application complies with all the relevant legislation and requirements of London Plan Policy D12 and D5(B5), where applicable.

- 7.1.2 Where an evacuation lift has been provided, the declaration of compliance should confirm that the design, number, size and operation of the evacuation lift complies with the relevant regulations and standards.

8 Receiving the fire safety information

8.1 Policy compliance and the PFSS, Fire Statement and RES

- 8.1.1 This guidance does not prescribe the use of specific standards, design codes or best practice. It is for the author of the fire safety information to set out and justify which standards the development will be designed to meet and how they address London Plan Policy D12 and D5(B5). Planning officers are not experts in fire safety and therefore the onus is on the applicant for the development through the use of fire safety professionals to demonstrate compliance with these policies. The role of the planning officer is to ensure information has been provided and considered as part of the application against the relevant London Plan fire safety policy and not review it for compliance against building regulations and standards.

8.2 Checking the provision of information for a PFSS or a Fire Statement

- 8.2.1 Planning officers should check the PFSS or Fire Statement against the following criteria:
- 1) Does the author have appropriate qualifications and expertise?
 - 2) Has the applicant included a declaration of compliance that the fire safety of the proposed development and the fire safety information satisfies the requirements of London Plan Policy D12 and D5(B5), where applicable?
 - 3) Has information been provided under each criteria of the policy relevant to the development (London Plan Policy D12 (A1-A6 for non-major development and for major development B1-B6))?
 - 4) Is the fire safety information specific and relevant to the development, including through the use of site and floor plans?
 - 5) Where lifts are proposed:
 - have details of the evacuation lifts, and supporting infrastructure such as lobbies been provided?
 - has an outline evacuation strategy been provided?
 - has an outline management plan been provided, including how the evacuation lift will be operated?
 - 6) Is it clear which fire safety regulations, standards, design codes and best practice the development has been designed to?

- 7) Has a Planning Gateway One Fire Statement has also been submitted (where required) See Appendix 2.

8.3 Reviewing a Reasonable Exception Statement

8.3.1 Planning officers should check the RES against the following criteria:

- 1) Has the author identified themselves and their role in the development?
- 2) Has the author set out the category of development?
- 3) Has the author:
 - confirmed that the current fire safety measures are appropriate and will not be adversely affected by the development and provided a justification, or
 - confirmed that fire safety measures will be altered and outlined any required mitigation measures, or
 - confirmed which criteria are not relevant to the development and provided a justification?
- 4) Is the fire safety information specific and relevant to the development, including through the use of site and floor plans?

9 Securing the fire safety measures

- 9.1.1 Not all the details of the development such as building materials and products that will affect the fire safety of the development may be known at the time of the planning application. Therefore, the planning authority may seek further details with regards to the fire safety measures prior to the commencement of the development which should be conditioned, where appropriate. This approach supports the golden thread principle by ensuring fire safety information at the planning stage remains consistent.
- 9.1.2 Compliance with the PFSS and the Fire Statement should also be secured by condition or s106 agreement. Example conditions are provided at Appendix 5.

Appendix 1 Planning application types and the fire safety information requirements

Table A 1.1 shows the various application types and the application of Policy D12.

Where the applicant considers parts of or the whole policy are not relevant to the development, this should be justified in a **Reasonable Exception Statement (RES)**. See section 4.2 for more detail.

Table A1.1 Planning application types and the fire safety information requirements

Application Type	Policy D12 application	Expected Policy Information Requirements	Recommended Authoring Competency Requirements
Full planning permission (Major development)	D12B	See section 5 on Fire Statements D12(B)	See section 5.2
Full planning permission (Non-major development which includes a new residential or commercial unit, or alterations to the materials on the external walls, or alterations to the internal or external communal areas that support the evacuation strategy for the property, or a lift is provided)	D12A	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 See section 4.3
Full planning permission (Non-major development,	NA	Submit a RES – See section 4.2	Applicant justification See sections 4.2 and 4.3

Application Type	Policy D12 application	Expected Policy Information Requirements	Recommended Authoring Competency Requirements
other than those captured above)			
Householder full planning permission	NA	Submit a RES – See section 4.2	Applicant justification See sections 4.2 and 4.3
Outline planning permission (major development)	D12B	See section 5.4 on Fire Statements D12(B) and Outline planning applications	See section 5.2 on Fire Statements D12(B) ⁵
Listed building consent	Yes	Given that historic listed buildings are generally constructed from a higher proportion of flammable materials, applicants should consider the fire safety hazards on-site during the construction phase and potential control measures in construction management plans	Applicant justification
Advertisement Consent	NA	Cannot request fire safety information	N/A
Permitted Development Prior approval (general) (excluding Classes A, AA and MA)	No	Developers should check the latest requirements ⁶	N/A

⁵ 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.

⁶ <https://www.gov.uk/guidance/when-is-permission-required#What-are-permitted-development-rights>

Application Type	Policy D12 application	Expected Policy Information Requirements	Recommended Authoring Competency Requirements
<p>Permitted Development Prior approval</p> <p>Class A new dwelling houses on detached blocks of flats⁷</p> <p>Class AA new dwelling houses on detached buildings in commercial or mixed use development⁸</p>	<p>NA</p>	<p>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 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)⁹</p>	<p>A chartered engineer or other competent professional¹⁰</p> <p>See section 5 on Fire Statements D12(B) for useful information</p>
<p>Permitted Development Prior approval</p> <p>Class MA</p> <p>Change of use from Class E (Commercial, business and service) to Class C3 (dwellinghouses)</p>	<p>Yes</p>	<p>Prior approval to confirm the development is acceptable in terms of fire risk and the fire safety impacts on the intended occupants of the building</p>	<p>See sections 4.2 and 5.2</p>

⁷ <https://www.legislation.gov.uk/uksi/2020/1459/made>

⁸ Ibid

⁹

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

¹⁰

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

Application Type	Policy D12 application	Expected Policy Information Requirements	Recommended Authoring Competency Requirements
<p>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)</p>	Yes	<p>Subject to the element being amended</p> <p>In line with the Golden Thread principle Fire Statement or PFSS should be updated</p>	<p>For major developments - see section 5.2</p> <p>For other development - Applicant justification – see section 4.2</p>
<p>Approval (discharge), removal or variation of conditions (s73) (where it relates the Fire Statement or any matters that relate to fire safety eg layout, access, materials)</p>	Yes	<p>Subject to the element being amended, noting that this application results in a new implementable planning permission.</p> <p>In line with the Golden Thread principle Fire Statement or PFSS should be updated</p>	<p>For major developments - see section 5.2</p> <p>For other development - Applicant justification – see section 4.2</p>
<p>Consent under Tree Preservation Orders</p>	N/A	Not Applicable	N/A
<p>Notification of proposed works to trees in conservation areas</p>	N/A	Not Applicable	N/A

Appendix 2 The National Approach to Fire Safety

A2.1 Fire safety Gateways

A2.1.1 The Government's fire safety gateway stages, which require fire safety information for relevant buildings (see paragraph A2.2.2 below) to be submitted to the regulator, support the principle of the 'golden thread'.

Gateway 1 – the planning application stage.

Gateway 2 – the initial building control stage. Construction cannot begin until the regulator is satisfied that the detailed design meets fire safety requirements.

Gateway 3 – completion / final certificate. All the required fire safety documents and information regarding the completed building must be provided to the accountable person (such as the building owner) and submitted to the regulator.

A2.2 The Government's Planning Gateway One

A2.2.1 Planning Gateway One was introduced on 1 August 2021. Planning applications that include relevant buildings are referred to the Health and Safety Executive (a statutory consultee) to consider fire safety.

A2.2.2 Relevant buildings are those that:

- contain two or more dwellings or educational accommodation¹¹, and
- are 18m or more in height, or 7 or more storeys, whichever is reached first.

A2.2.3 A planning Gateway One Fire Statement¹² is required when a planning application (not outline planning applications) involves:

- the provision of one or more relevant buildings, or
- development of an existing relevant building¹³, or

¹¹ Residential accommodation for the use of students at boarding school or in later stages of education (see the definition in article 9A(8) of the proposed Statutory Instrument - https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/984537/Draft_SI_Planning_Gateway_1.pdf)

¹² The template can be found here <https://www.gov.uk/guidance/building-safety-planning-gateway-one#annex-c-draft-fire-statement-form>

¹³ Except where this involves a change of use so that the building is no longer a relevant building

- development within the curtilage of a relevant building¹⁴.

A2.2.4 The local planning authority will refer the planning application to the Health and Safety Executive.

A2.2.5 Information on the Government's Planning Gateway One can be found on its website¹⁵ and in the Planning Practice Guidance.

¹⁴ Except where this involves a material change of use of buildings or land within the curtilage of a relevant building

¹⁵ <https://www.gov.uk/guidance/building-safety-planning-gateway-one>

Appendix 3 Template Forms

A3.1 Form 1 – Fire Statement template (London Plan Policy D12B) for major development

Form 1 – Fire Statement template (London Plan Policy D12B) for major development	
Site address	
Description of development	
Name, qualifications, professional memberships and experience of author	
Has a Gateway One Statement been submitted?	
Policy considerations (D12B)	Potential Gateway One cross reference
The building’s construction: methods, products and materials used	Gateway One Q6f&g
Means of escape for all building users and the evacuation strategy	Gateway One Q6h
Passive and active fire safety measures	Gateway One Q6i
Access and facilities for the fire and rescue service	Gateway One Q10, 11, 13 & 14
Site access for the fire and rescue service	Gateway One Q10 & 11
Modifications to the development and the ‘golden thread’ of information	

Where a lift core is provided, at least one lift is an evacuation lift See Form 3	London Plan Policy D5B5
Declaration of Compliance by a competent person¹⁶	

A3.2 Form 2 – Planning Fire Safety Strategy template (London Plan Policy D12A) for non-major development as set out in Appendix 1

Form 2 – Planning Fire Safety Strategy template (London Plan Policy D12A) for non-major development	
Site address	
Description of development	
Name, qualifications, professional memberships and experience of author	
Has a Gateway One Statement been submitted?	
Policy considerations	Potential Gateway One cross reference
Identifies suitably positioned unobstructed outside space for fire appliances to be positioned on	Gateway One Q12
Identifies suitably positioned unobstructed outside space appropriate for use as an evacuation assembly point	Gateway One Q6h
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	Gateway One Q6i (part)
Constructed in an appropriate way to minimise the risk of fire spread	Gateway One Q6g

¹⁶ See Sections 5.2 and 7 for further details

Provides suitable and convenient means of escape, and associated evacuation strategy for all building users	Gateway One Q6h
A robust strategy for evacuation which can be periodically updated and published, and which all building users can have confidence in	Gateway One Q6h
Suitable access and equipment for firefighting which is appropriate for the size and use of the development	Gateway One Q10 &11
Where a lift core is provided, at least one lift is an evacuation lift See Form 3	London Plan Policy D5(B5)

A3.3 Form 3 - Provision of evacuation lift (Policy D5(B5))

(to supplement Forms 1 or 2, where a lift is provided)

Form 3 - Provision of evacuation lift (Policy D5(B5))	
Site address	
Description of development	
Name, qualifications and / or experience of author	
Policy considerations Policy D5(B5) Potential cross reference London Plan Policy D12A(4&5) and Policy D12B(2)	
Details of the evacuation lift and shaft	
Capacity Assessment	
Evacuation Strategy	

Evacuation Lift Management Plan
Declaration of Compliance by a competent person¹⁷

A3.4 Form 4 – Reasonable Exception Statement

Form 4 – Reasonable Exception Statement		
Site address		
Description of development		
Name of Author and role in the development		
Category of development	Expected policy information requirements	
Householder	The current fire safety measures are appropriate and will not be adversely affected by the development	Yes Justification
	The fire safety measures will be altered	Outline any required mitigation measures
Non- major development that does not create additional units or alter the materials on the external walls or alter the internal or external communal areas that support the evacuation strategy for the	The current fire safety measures are appropriate and will not be negatively affected by the development	Yes Justification
	The fire safety measures will be altered	Outline any required mitigation measures

¹⁷ See Section 7 for further details

property and does not include a lift		
Non major development (other than those captured above)	Information on space provisions for fire appliances and assembly points (D12A criteria 1)	Relevant Y/N Justification
	Information on passive and active safety measures (D12A criteria 2)	Relevant Y/N Justification
	Information and data on construction products and materials (D12A criteria 3)	Relevant Y/N Justification
	Information on means of escape and evacuation strategy (D12A criteria 4)	Relevant Y/N Justification
	Information on access and equipment for firefighting (D12A criteria 6)	Relevant Y/N Justification

Appendix 4 Standards for evacuation lifts and firefighters' lifts

- A4.1.1 London Plan policy D5(B5) requires that where lifts are installed in a development, at least one lift per core is to be a suitable sized evacuation lift. This is a planning requirement which is in addition to any requirement by the Building Regulations to provide firefighters' lifts.
- A4.1.2 Some of the features of evacuation and firefighters' lifts differ. Requirements and standards for firefighters' lifts are set out in the Building Regulations and British Standards. There are currently no published standards for evacuation lifts, however BS 9991 and BS 9999 set out a holistic approach to fire safety within developments. Standards (EN81-76) specifically for the inclusion of evacuation lifts were consulted on in 2019 but are not finalised. A draft revised BS 9991 which included guidance on providing evacuation lifts was consulted on in 2021 and is due to be published in 2022. Below are some of the potential features and differences between evacuation and firefighters' lifts.

Table A4.1 Features of Evacuation lifts and firefighters' lifts

	Evacuation lifts	Firefighters' lifts
Description	<p>A lift system specifically designed to be used as a means of escape by people who require level access in an emergency.</p> <p>A trained person supports the use of the lift by persons that require an assisted evacuation following the evacuation strategy.</p> <p>These lifts are generally used as passenger or goods lifts until required for evacuation.</p>	<p>A lift system designed to facilitate the safe movement of firefighters and their equipment in the event of an emergency.</p> <p>The fire and rescue service has exclusive use of the lift for transporting firefighters and their equipment.</p> <p>These lifts are generally used as passenger or goods lifts until required by the fire and rescue service.</p>
Key Features (Building design)	<p>Fire protected lift shaft</p> <p>Protected safe areas (lobbies) in front of lift entrances</p> <p>Smoke control measures, including safe areas (lobbies)</p> <p>Separate power supply to the lift to enable the lift to remain in use</p>	<p>Fire protected lift shaft</p> <p>Protected safe areas (lobbies) in front of lift entrances</p> <p>Smoke control measures</p> <p>Separate power supply to the lift to enable the lift to remain in</p>

	Evacuation lifts	Firefighters' lifts
	<p>throughout the evacuation process</p> <p>Water protection measures for electrical components in the shaft and the lift car</p> <p>Clear signage, lighting and pictograms of the evacuation route to the safe area / evacuation lift</p> <p>Provision of a management plan that sets out operational procedures for trained staff designated to manage and use the lift in an emergency</p>	<p>service for the fire and rescue service</p> <p>Water protection measures for electrical components in the shaft and the lift car</p>
Key Features (Lift requirements)	<p>Emergency lift operation via lift control system, fire detection and alarm system to support the evacuation strategy.</p> <p>Emergency intercom / communication system and lift operation.</p> <p>Emergency trap doors in lift car</p> <p>Trained person control of operation</p> <p>No specified lift size, but likely to be larger to accommodate beds or stretchers</p> <p>Visual and audible indications in the lift car</p>	<p>Emergency lift operation via interface between the lift control, fire detection and alarm system.</p> <p>Emergency intercom system.</p> <p>Provision for trap doors and ladders for rescue operations.</p> <p>Firefighter control of operation</p> <p>Minimum lift car size specified (typically 8 or 13 person passenger or goods lift)</p>
Relevant British Standard	<p>BS EN 81-76 when / if published as a designated standard</p> <p>BS 9991, BS 9999</p>	<p>BS EN 81-72</p> <p>BS 9991, BS 9999</p>

A4.1.3 Given the lifetime of new buildings, it is important to incorporate evacuation lifts at the time of construction to ensure suitable evacuation for all building users from initial occupation. Standards and technology will

improve over time and therefore until formal standards are adopted for the inclusion of evacuation lifts developers should implement innovative solutions for the installation and operation of evacuation lifts in the knowledge that for non-managed buildings they can be operated when the fire service or other responsible person arrive.

Appendix 5 Example conditions

Where additional information is required

Further details on the (*insert aspect of fire safety*) must be submitted and approved by the Local Planning Authority prior to the commencement of the development.

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

Planning Fire Safety Strategy

The development must be implemented in accordance with the provisions of the Planning Fire Safety Strategy prepared by xxx dated xxx

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

Fire Statement

Full planning application

The development must be implemented in accordance with the provisions of the Fire Statement prepared by xxx dated xxx

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

Outline planning application (and subsequent Reserved Matters applications)

The development must be carried out in accordance with the provisions of the Outline Fire Statement prepared by xxx dated xxx

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

