

## Fire Statements

1. London Plan Policy D12 requires development proposals to achieve the highest standards of fire safety, embedding these at the earliest possible stage:

“In the interests of fire safety and to ensure the safety of all building users, all development proposals must achieve the highest standards of fire safety....”

2. London Plan Policy D12(B) states:

“all major development proposals should be submitted with a Fire Statement...”

Major development proposals should demonstrate within the Fire Statement how the proposals respond to and contain information on the requirements of both parts A and B of London Plan Policy D12 Fire Safety.

3. This guidance provides additional information on Fire Statements, their contents and the process and role of planning officers in relation to London Plan Policy D12 for major development proposals.
4. A Fire Statement is a standalone document which defines the fire safety objectives and performance requirements of a development, and the methods by which these objectives will be provided/ satisfied. The Fire Statement should evidence the provisions made for the safety of occupants and protection of property as well as the provision of suitable access and equipment for firefighting in light of London Plan fire safety policy requirements and the justification for these measures.
5. It should:
  - Contain a schedule of relevant plan titles and reference numbers which specifically relate to and are linked to elements of its contents
  - Feature excerpts from the plans as required to assist in its usability as a standalone document e.g. the illustration of space identified for the appropriate positioning of fire appliance(s)
  - Mirror/ be reflected in all other planning application documentation
  - Marry up relevant consent references

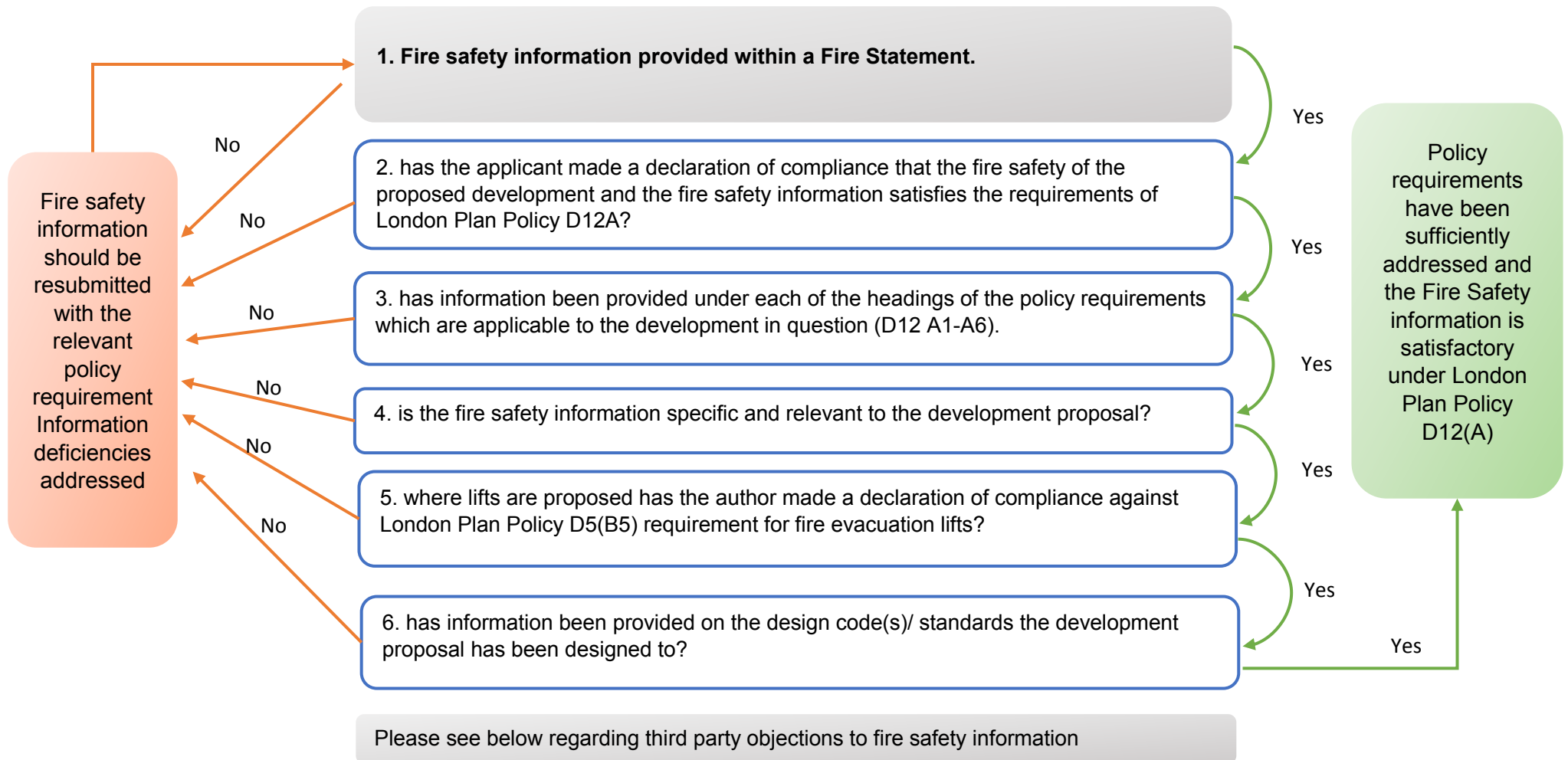
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Policy D12(B)

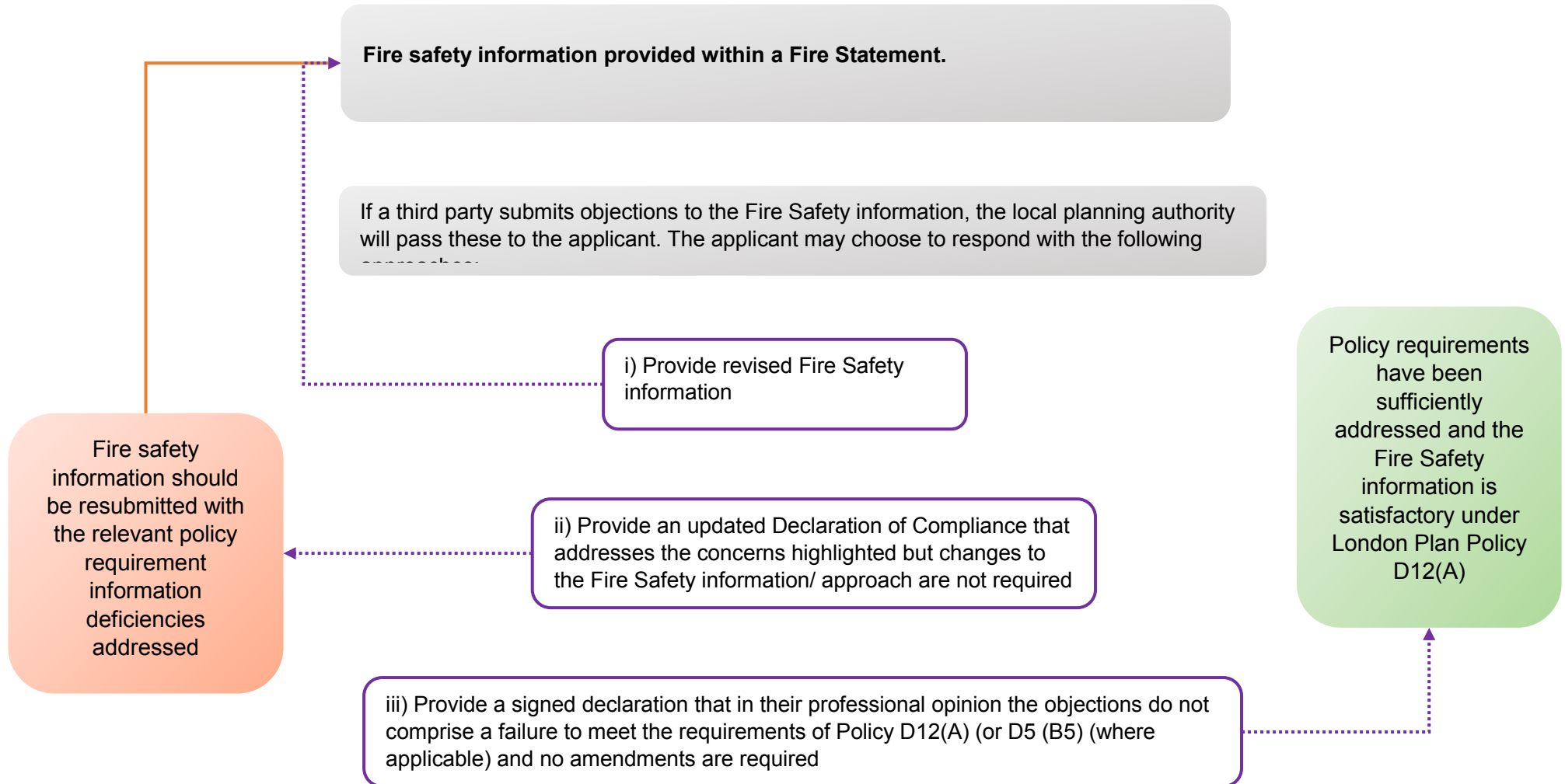
- Be easy to identify as a document and easy to follow, given that it will on the whole be a document members of the public can access<sup>1</sup>.
6. The guidance contained within this document does not generally prescribe the use of specific codes of practice such as British Standards. The applicant should demonstrate through the Fire Statement how the development builds upon the minimum fire safety standards set within the relevant design code(s) or standards, and how they correspond to the requirements of section B of London Plan Policy D12. **The information contained within the Fire Statement should be specific to the development proposal to which it relates.**
  7. Annex A of this guidance contains further information on specific planning application types, and potential conditions which could be used in relation to the requirements of London Plan Policy D12 Fire Safety.
  8. **Figure 1: London Plan Policy D12(B) Fire Statement checklist** below provides a process diagram for planners and applicants defining the role of the planning officer and the criteria against which the planning officer will be checking the Fire Statement at planning application stage.
  9. **NOTE:** Boxes 1-8 should ALL be checked against to ensure policy requirements are sufficiently addressed. Any 'no' responses should trigger the Fire Statement being resubmitted with the relevant deficiencies addressed.

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<sup>1</sup> NOTE: Generally, information submitted with a planning application is public information. Where it is deemed for security reasons that information should not be in the public domain- the information contained in the Fire Statement at planning stage should be treated in the same way as the rest of the planning application information i.e. redacted or restricted as deemed appropriate for the application as a whole.

**Figure 1: London Plan Policy D12(B) Fire Statement checklist**





### Competency requirements for drafting of a Fire Statement

Paragraph 3.12.9 of Policy D12 explains that Fire Statements should be produced by someone who is:

“third-party independent and suitably-qualified”

It goes onto explain:

“This should be a qualified engineer with relevant experience in fire safety, such as a chartered engineer registered with the Engineering Council by the Institution of Fire Engineers, or suitably qualified and competent professional with the demonstrable experience to address the complexity of the design being proposed. This should be evidenced in the fire statement.”

A Fire Statement should only be produced by a competent professional. Typically, such a person will be a fire engineer with the ability to demonstrate knowledge and experience relevant to the complexity of the development proposed. Evidence of competency of the author of the Fire Statement should be detailed in a clearly identified section at the beginning of the Fire Statement, and should demonstrate that the author meets the following criteria:

- a) is a registered fire engineer with the **Engineering Council** with the post-nominals **IEng** (Incorporated Engineer) or **CEng** (Chartered Engineer) after their name, and is registered with the **Institute of Fire Engineers** with the post nominals **MIFireE** after their name
- b) clearly details evidence of suitable training, skills, experience, knowledge and behaviours (relevant to the development in question) indicating the author’s ability to write the Fire Statement.

10. **The Fire Statement should detail how the development proposal will function in terms of, and under the following headings:**
  - i) **The building's construction method and products and materials used**
11. Under this heading, the Fire Statement should specify the construction method of the development and the measures that will be taken to limit any impact on the surrounding area. Construction methods that may impact on the fire safety provisions for neighbouring sites, buildings, occupants etc. must be identified and the risk reduced using suitable control measures. Building methodologies that pose a high risk of fire must also be identified within the Fire Statement with suitable control measures detailed.
12. Where possible, a prescriptive list of the products and materials planned for use during the construction of the asset/ development should be provided. As much information as possible should be provided e.g. planned use of timber for structural framework.
  - ii) **Means of escape for all building users and evacuation strategy**
13. Applicants must demonstrate within the Fire Statement that the means of escape for all building users has been considered and planned into the scheme from the outset. Applicants should identify the code/s that the means of escape has been designed to and detail how they have not only been applied/ adhered to, but also how the proposals have sought to exceed those minimum standards. It is essential that all building users have been considered and planned for within the design of the means of escape and evacuation strategy.
14. There are a number of evacuation strategies/ approaches applicants could incorporate/ design around. Whichever strategy is incorporated, the applicant must ensure that the Fire Statement contains reasonable justification supporting the decision and reference the relevant code/standard that has led to that outcome. 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), and people who do not have a good understanding of English.  
**See Appendix A.**
  - iii) **Passive and active fire safety measures**
15. Passive and active fire safety measures are provisions contained within a building that are in place to reduce the overall risk to life and the risk to building safety in the event of a fire. Examples of passive measures include compartment walls, fire doors and fire-resistant glazing. They are the elementary parts of a built asset that do not require intelligent reaction or

human intervention in a fire situation. An active measure is one that does require human intervention or reacts dynamically to fire. Examples include smoke alarm systems, ventilation systems, and emergency lighting systems.

16. Applicants must demonstrate within the Fire Statement that provisions for passive and active fire safety measures have been considered at the earliest design stage. Again, applicants should identify the code/s that these measures have been designed to and demonstrate how the proposals have sought to exceed those minimum standards.

**iv) Access and facilities for the fire and rescue service**

17. Any and all provisions for active measures that have been designed into the development proposal for use by the fire and rescue service must be clearly identified within the Fire Statement. Requirement B5 of Approved Document B (volumes 1 and 2) provides a means of compliance against the functional requirements of the Building Regulations 2010 for such measures. Development proposals may readily opt to defer to the provisions made within Approved Document B as a minimum standard, however **excerpts taken from Approved Document B without specific context and references to the development proposal do not demonstrate compliance with this policy.**
18. Contained within the Fire Statement should also be an outline management plan for the ongoing maintenance of these provisions.

**v) Site access for the fire and rescue service**

19. Any and all provisions for emergency access to the site by the fire and rescue service must be clearly identified within the Fire Statement. Requirement B5 of [The Building Regulations 2010](#) (detailed in [Approved Document B](#)) provides a means of compliance against the functional requirements of the Building Regulations 2010 for such measures. Development proposals may readily opt to defer to the provisions made within ADB as a minimum standard, however they should be specific and relevant to the development in question.
20. The Fire Statement should clearly demonstrate how the above provisions do not adversely impact on neighbouring sites and access to the surrounding areas.

**vi) Future development of the asset and the 'Golden Thread' of information**

21. To ensure the highest standards of fire safety are considered throughout the lifecycle of the proposed asset, London Plan Policy D12(B) part 6 requires applicants to consider how, if the proposed asset was to be redeveloped in

the future, the fire strategy and the protective measures within the asset would not be compromised. This may be presented in the form of a professional statement from the author identifying the constituent elements of the building that, if modified, may adversely affect the original fire safety strategy.

22. The fire safety information produced within the Fire Statement should be presented and managed in such a way as to consider the evolution of the development and the principles of the golden thread concept<sup>2</sup>.
23. It is anticipated that the information from the Fire Statement will be used to inform the overall 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 build is as per the design. A handover process for the passing of all relevant fire safety information contained within the fire strategy to the building owner should be planned<sup>3</sup> and, where possible, outlined within the Fire Statement.

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<sup>2</sup> Building a safer future: Independent review of building regulations and fire safety

<sup>3</sup> Additional information: see Regulation 38 of the Building Regulations 2010



## Annex A – Application types and conditions

### Information to be submitted with planning applications

- A1. The highest standards of fire safety should be embedded in developments from the earliest possible stage. Therefore, the Fire Statement should be included as one of the suite of documents submitted with a major planning application where the applicant has to demonstrate that the requirements of Policy D12 have been considered as an integral part of their proposals. It should not be left to a later stage in the development process as this undermines the purpose of considering fire safety from the outset and as an integral part of the design.
- A2. If the proposed development is submitted as a **full planning application** there should be sufficient level of detail in the Fire Statement to address the criteria identified in Section B of Policy D12 and informational requirements in Figure 1.
- A3. The local planning authority can then include a condition attached to the grant of planning permission requiring the development to be carried out in accordance with the provisions of the Fire Statement.
- A4. If there are any changes to the scheme which require subsequent Section 96a or Section 73 applications, an amended Fire Statement should also be submitted which incorporates the proposed scheme amendments so that the content of the Fire Statement always remains consistent with the latest scheme proposals.
- A5. If the proposed development is submitted as an **outline planning application** this should be accompanied by an Outline Fire Statement<sup>4</sup> which demonstrates commitment to the highest standards of fire safety. The associated outline planning permission should include a condition which requires the submission of a Fire Statement as part of any subsequent reserved matters application.

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<sup>4</sup> An Outline Fire Statement should be submitted by the applicant with outline planning applications. Given that it will be a higher-level statement and far less detailed than a Fire Statement for a full planning or reserved matters application, the author of an Outline Fire Statement does not necessarily need to meet the competency criteria for the author of Fire Statements as highlighted in this guidance sheet. However, for continuity and maintenance of the 'golden thread' approach (see vi), it is advisable that they are. Subsequent associated reserved matters application should however meet the criteria of and follow the process provided in Figure 1 of this guidance sheet, including the competency criteria for the author of the Fire Statement(s).

## Sample Conditions

### Full planning application/ Reserved matters application

#### **Fire Statement**

**The development must be carried out in accordance with the provisions of the Fire Statement 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.

### Outline planning application

#### **Fire Statement**

**Each application for the approval of reserved matters shall include a Fire Statement which addresses the requirements of Mayor's London Plan Policy D12**

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

## **Annex B – ‘Stay put’ design feature scenario**

### **High-rise residential development proposal with a ‘stay-put’ design strategy**

It is commonplace for high-rise residential developments to be designed in such a manner as to allow for unaffected residents to remain in place during a fire. This is referred to as a stay-put strategy. Where a stay-put strategy has been designed into a proposal, the Fire Statement should include additional measures that have been engineered and designed into the proposal in the event that either; the asset fails to successfully deliver on the stay-put strategy, or, residents decide to evacuate the building. For this purpose, in addition to recommendations made within the chosen design code(s), further passive and active measures may be provided. Where this is the case, the applicant should provide clear details within the Fire Statement.

Where lifts have been proposed in a development, **London Plan Policy D5(B5)** requires a minimum of one lift per core to be an evacuation lift. The provision of evacuation lifts may be utilised to propose alternative evacuation methods to mitigate the risks involved with any failure of the stay-put strategy.

**See also: London Plan Guidance sheet D5 (B5) Evacuation lifts.**