Written Statement

11 January 2019

Examination in Public – Draft London Plan

Introduction

London Fire Brigade (LFB) is London’s fire and rescue service - one of the largest firefighting and rescue organisations in the world and we are here to make London a safer city. Decisions are made either by the London Fire Commissioner (the statutory fire and rescue authority for Greater London), the Mayor of London or the Deputy Mayor for Fire and Resilience. A Fire, Resilience and Emergency Planning Committee of the London Assembly holds the Commissioner, Mayor and Deputy Mayor to account.

Matter 43

M43. Would policies D10 and D11, in addressing matters including fire safety, refer to strategic planning matters? In particular, would policies D10 and D11 provide an effective and justified strategic framework for the preparation of local plans and neighbourhood plans in relation to this matter?

Response

1. The Grenfell Tower fire has put an unprecedented spotlight on fire safety and it’s now vital that Government, local authorities, builders, architects and developers seize this once in a generation opportunity to raise fire safety standards to the highest possible level across all future building developments in the capital, whether they are residential or commercial.

2. The changes made to ‘Policy D11 Fire safety’ in the updated Plan, put a keener emphasis on fire safety, including from the strategic planning stages. It instils a principle of fire safety by design through seeking to ensure that development proposals achieve the highest standards of fire safety.

3. Only by making fire safety a priority during every part of a building’s life – from the earliest stages of the planning process, throughout its construction, after its completion and during occupation; and through any maintenance and refurbishment work – will we see a significant improvement to safety standards in the capital’s buildings that will reassure those who live in, work in and visit them that they are as safe as possible.

Access for fire appliances and to firefighting facilities

4. We welcome the inclusion of a requirement to identify suitably positioned unobstructed outside space for fire appliances to be positioned and appropriate for use as an evacuation assembly point. To achieve the highest standards of fire safety, all aspects of building development must be taken into consideration, and at the earliest, strategic planning stage. If space for emergency vehicles and evacuation is not taken into account at the very outset, it can be almost impossible to rectify at later stages of planning.

5. While fire appliance access has been addressed, we do feel there needs to be further clarification on access to firefighting facilities within the building(s). We would expect the Fire Statement to consider water supplies for firefighting, which will likely require supporting information from the water undertaker such as hydrant locations and projections for water flow and pressure. We would expect this to meet the
standards set out in Water UK’s national guidance document on the provision of water for firefighting\(^1\), which was produced jointly by the water industry and the fire and rescue services.

**Fire Statements and information to be provided to the London Fire Commissioner**

6. The London Fire Commissioner welcomes the introduction of Fire Statements for all major development proposals. The London Fire Commissioner has in the past voiced concerns that the current process for planning and building control consultations can lead to the fire and rescue service being consulted very late in the day, in some cases after the building has been completed and occupied. This can lead to inappropriate fire safety solutions being put in place which may remain in a building throughout its life. These issues could often have been resolved very easily earlier in the process. The introduction of Fire Statements in London should go some way to rectifying this issue and making sure that fire safety of any new development is considered at an early stage.

7. The London Fire Commissioner is pleased to note the amendments made to the draft London Plan, but would still like to see more specific information included where Automatic Fire Suppression Systems (AFSS – incorporates sprinklers) should be fitted in the capital. Specifically, the London Fire Commissioner would like to see stipulation that:

   - All new residential developments over 18m in height to be fitted with AFSS.
   - Existing residential blocks over 18m in height should be retrofitted with AFSS.
   - AFSS to be mandatory in all new school builds and major refurbishments.
   - All other residential properties including hotels, hostels and student accommodation, over 18m in height to be fitted with AFSS.
   - All new residential care homes and sheltered accommodation to be fitted with AFSS.
   - All existing residential care homes and sheltered accommodation to be retrofitted with AFSS.
   - All homes occupied by the most vulnerable\(^2\) in our communities to be fitted with AFSS.

8. The categories of information to be included in Fire Statements, as described in Policy D11 Fire Safety, B 1-4, are supported by the London Fire Commissioner as the appropriate ones to be covered in order to help ensure that the fire safety of these new developments is of a good standard. These are given in broad categories however, The London Fire Commissioner would like to see them specifically include the following:

   - Information about access for firefighting and emergency vehicles in accordance with building regulations (currently part B5).
   - Information about water supplies for firefighting in accordance with Water UK’s national guidance document (see paragraph 9).
   - A statement on how the proposed development would meet the expectations within the LFB position statement on AFSS. The current version of which is provided in appendix 1 of this submission.
   - A demonstration on how they are going to meet the functional requirements of the building regulations (either using prescriptive guidance such as Approved Document B or BS9999/BS9991 or a fire engineered solution).

9. Policy D11 Fire Safety states that “Planning departments should work with and be assisted by suitably qualified and experienced officers within borough building control departments and/or the London Fire Brigade, in the evaluation of these statements”. This opportunity for consultation with the LFB is welcomed by the London Fire Commissioner. However, it must be noted that LFB has limited resources, especially of the specialist kind required for this work, and so would not be able to consider all of the 1000+ fire statements expected to be made in London in a year. The London Fire Commissioner supports the policy that “suitably qualified and experienced officers within borough building control departments” would be appropriate for the evaluation of the majority of Fire Statements but would like to have the opportunity to provide a specific guidance note for London on when LFB officers should also be consulted. The London Fire Commissioner would also look to take forward targeted communications work

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\(^2\) A person who is at a higher than average risk from fire due to their: propensity to contribute to the starting of or development of a fire and/or capacity to respond appropriately to signs of a fire or other cues and/or ability to escape

\(^3\) Number of major development proposals by financial year in London: 2012, 834; 2013, 1241; 2014, 1420; 2015, 1180; 2016, 1287.
for this group on the introduction of Fire Statements to help support their smooth introduction which we see would have a very positive impact on the future built environment in London. The nature and the number of fire statements that the LFB would be able to consider, is dependent on the resources available. The guidance note and the communications work would help ensure specialist officers are focused on those developments where there is the strongest risk-based case for them to do so.

10. LFB currently provide guidance notes on many different issues for the public and other interested bodies. They cover a wide range of fire safety topics. LFB would provide similar guidance on Fire Statements. This guidance would specify the circumstances when consultation with the LFB is necessary as well as what the process would be. The London Fire Commissioner would like to see a reference to LFB guidance in the London Plan.

Information to be provided to the public and public bodies

11. The London Fire Commissioner would like to see an expectation on those undertaking major developments to demonstrate that building regulations are being met at different stages in construction, particularly in cases where, once construction is complete, only very expensive invasive testing can provide evidence of what is in place. Examples of this would be cavity barriers and other forms of passive fire protection.

12. An online system where evidence is provided and stored at different stages of construction, similar to how planning documents are provided to the public, might be one solution. A similar approach is already used by some developers particularly in the commercial sector, for large shopping malls. Southwark Council already requires this information when signing off fire stopping works. The London Fire Commissioner would suggest that planning departments and building control bodies should only sign off Fire Statements which include this commitment as evidence that the development would achieve the highest standards of fire safety.

Competency

13. The London Fire Commissioner would advocate wider use of competent and third party accredited fire safety professionals to assure the competency of construction work being carried out. Examples would be UK Engineering Council registration for the fire engineers designing a scheme or a third party accredited contractor undertaking fire stopping works or fire risk assessment. The London Fire Commissioner welcomes the reference to competence within the London Plan but would suggest that building control bodies should be encouraged only to sign off schemes where everyone has demonstrated competence and accreditation. This could be specified as an undertaking from the developer included in the Fire Statement.

For further information, please contact: Deputy Assistant Commissioner Lee Drawbridge at lee.drawbridge@london-fire.gov.uk
Appendix 1

Automatic Fire Suppression System (AFSS)
Position Statement

Introduction

London Fire Brigade (LFB) believes that Automatic Fire Suppression Systems (AFSS) play a significant role, as part of an appropriate package of fire safety measures, in reducing the impact of fire on people, property and the environment. They also assist firefighters in carrying out search and rescue operations by limiting fire development, which significantly reduces the risks to firefighters.

There is clear evidence that AFSS (also referred to as Automatic Water Fire Suppression Systems - AWFSS), such as sprinklers and watermist systems are effective in the rapid suppression of fires. We therefore recommend AFSS in the following building types to protect those living in, working in and visiting London:

Residential premises

While current Building Regulations recognise that all new residential buildings in excess of 30m height should be provided with AFSS, LFB are of the opinion that this should be extended to existing buildings and that is that the appropriate height is 18m in both cases. We therefore recommend AFSS in:

• All new residential developments over 18m in height.
• Existing residential blocks over 18m in height (retrofitting), subject to a risk based approach that should include consideration of the vulnerability of the residents.

Schools

Building Bulletin 100 (BB100): Design for fire safety in schools, published in 2007, introduced the ‘expectation’ that all new schools would have AFSS installed. We recommend that:

• AFSS is mandatory in all new school builds and as part of major refurbishments.

Care homes and sheltered (specialised) accommodation

We recommend the inclusion of AFSS in:

• All new residential care homes and sheltered (specialised) accommodation.
• Existing residential care homes and sheltered (specialised) accommodation (retrofitting), subject to a risk based approach that should include consideration of the vulnerability of the residents.

Other priorities

We also strongly advocate the use of AFSS in the following premises:

• All homes occupied by the most vulnerable in our communities.
• All other residential properties which include hotels, hostels and student accommodation, over 18m in height.
• All new London Fire Brigade buildings.

Other premises

We will also continue to promote the installation of AFSS within the following types of properties throughout London:

• Heritage buildings.
• Complex and deep sub surface structures such as basements.
• Large warehouses.

Additional information supporting this statement is available on the London Fire Brigade website: http://www.london-fire.gov.uk/sprinklers.asp