

provide adequate protection, do not compromise good design, do not shift vulnerabilities elsewhere, and are cost-effective. Development proposals should incorporate measures that are proportionate to the threat of the risk of an attack and the likely consequences of one.

- 3.11.4 By drawing upon current Counter Terrorism principles, new development, including streetscapes and public spaces, should incorporate elements that deter terrorists, maximise the probability of their detection, and delay/disrupt their activity until an appropriate response can be deployed. Consideration should be given to **physical, personnel and electronic security** (including detailed questions of design and choice of materials, vehicular stand off and access, air intakes and telecommunications infrastructure). The Metropolitan Police (Designing Out Crime Officers and Counter Terrorism Security Advisors) should be consulted to ensure major developments contain appropriate design solutions, which mitigate the potential level of risk whilst ensuring the quality of places is maximised.

## Policy D12 Fire safety

- A 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 and ensure that they:
- 1) identify suitably positioned unobstructed outside space:
    - a) for fire appliances to be positioned on
    - b) appropriate for use as an evacuation assembly point
  - 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
  - 3) are constructed in an appropriate way to minimise the risk of fire spread
  - 4) provide suitable and convenient means of escape, and associated evacuation strategy for all building users
  - 5) develop a robust strategy for evacuation which can be periodically updated and published, and which all building users can have confidence in

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

**B** All major development proposals should be submitted with a Fire Statement, which is an independent fire strategy, produced by a third party, suitably qualified assessor.

The statement should detail how the development proposal will function in terms of:

- 1) the building's construction: methods, products and materials used, including manufacturers' details
- 2) the means of escape for all building users: suitably designed stair cores, escape for building users who are disabled or require level access, and associated evacuation strategy approach
- 3) features which reduce the risk to life: fire alarm systems, passive and active fire safety measures and associated management and maintenance plans
- 4) access for fire service personnel and equipment: how this will be achieved in an evacuation situation, water supplies, provision and positioning of equipment, firefighting lifts, stairs and lobbies, any fire suppression and smoke ventilation systems proposed, and the ongoing maintenance and monitoring of these
- 5) how provision will be made within the curtilage of the site to enable fire appliances to gain access to the building
- 6) ensuring that any potential future modifications to the building will take into account and not compromise the base build fire safety/protection measures.

- 3.12.1 The **fire safety of developments** should be considered from the outset. Development agreements, development briefs and procurement processes should be explicit about incorporating and requiring the highest standards of fire safety. How a building will function in terms of fire, emergency evacuation, and the safety of all users should be considered at the earliest possible stage to ensure the most successful outcomes are achieved, creating developments that are safe and that Londoners can have confidence living in and using.
- 3.12.2 The matter of fire safety compliance is covered by Part B of the Building Regulations. However, to ensure that development proposals achieve the

**highest standards of fire safety**, reducing risk to life, minimising the risk of fire spread, and providing suitable and convenient means of escape which all building users can have confidence in, applicants should consider issues of fire safety before building control application stage, taking into account the diversity of and likely behaviour of the population as a whole.

- 3.12.3 Applicants should demonstrate on a site plan that space has been identified for the **appropriate positioning of fire appliances**. These spaces should be kept clear of obstructions and conflicting uses which could result in the space not being available for its intended use in the future.
- 3.12.4 Applicants should also show on a site plan **appropriate evacuation assembly points**. These spaces should be positioned to ensure the safety of people using them in an evacuation situation.
- 3.12.5 Developments, their floor layouts and cores need to be **planned around issues of fire safety and a robust strategy for evacuation from the outset**, embedding and integrating a suitable strategy and relevant design features at the earliest possible stage, rather than features or products being applied to pre-determined developments which could result in less successful schemes which fail to achieve the highest standards of fire safety. This is of particular importance in blocks of flats, as building users and residents may be less familiar with evacuation procedures.
- 3.12.6 Suitable **suppression systems** (such as sprinklers) installed in buildings can reduce the risk to life and significantly reduce the degree of damage caused by fire, and should be explored at an early stage of building design.
- 3.12.7 The provision of **stair cores** which are suitably sized, provided in sufficient numbers and designed with appropriate features to allow simultaneous evacuation should also be explored at an early stage and provided wherever possible.
- 3.12.8 Policy D5 Inclusive design requires development to incorporate **safe and dignified emergency evacuation** for all building users, by as independent means as possible. In all developments where lifts are installed, Policy D5 Inclusive design requires as a minimum at least one lift per core (or more, subject to capacity assessments) to be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the building. Fire evacuation lifts and associated provisions should be appropriately designed and constructed, and should include the necessary controls suitable for the purposes intended.
- 3.12.9 **Fire statements** should be submitted with all major development proposals. These should be produced by a third-party independent, suitably-qualified

assessor. 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. Planning departments could 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.

- 3.12.10 **Fire safety and security measures** should be considered in conjunction with one another, in particular to avoid potential conflicts between security measures and means of escape or access of the fire and rescue service. Early consultation between the London Fire Brigade and the Metropolitan Police Service can successfully resolve any such issues.
- 3.12.11 **Refurbishment** that requires planning permission will be subject to London Plan policy. Some refurbishment may not require planning permission; nevertheless, the Mayor expects steps to be taken to ensure all existing buildings are safe, taking account of the considerations set out in this policy, as a matter of priority.

## Policy D13 Agent of Change

- A The Agent of Change principle places the responsibility for mitigating impacts from existing noise and other nuisance-generating activities or uses on the proposed new noise-sensitive development. Boroughs should ensure that Development Plans and planning decisions reflect the Agent of Change principle and take account of existing noise and other nuisance-generating uses in a sensitive manner when new development is proposed nearby.
- B Development should be designed to ensure that established noise and other nuisance-generating uses remain viable and can continue or grow without unreasonable restrictions being placed on them.
- C New noise and other nuisance-generating development proposed close to residential and other noise-sensitive uses should put in place measures to mitigate and manage any noise impacts for neighbouring residents and businesses.