

REQUEST FOR DEPUTY MAYOR FOR FIRE DECISION – DMFD252

London Fire Brigade – New headquarters project

Executive summary:

This report requests the approval of the Deputy Mayor for Planning, Regeneration and the Fire Service to authorise the London Fire Commissioner (LFC) to commit capital expenditure, up to the amount set out in Part Two of this decision, to develop options for a new London Fire Brigade (LFB) headquarters (HQ) after March 2027, when the lease at its current HQ in Union Street ends.

In 2023, LFB considered a strategic business case regarding potential locations for a new HQ. One of these was a proposed new office building to the rear of 8 Albert Embankment (8AE). This was subject to a development agreement with a private-sector partner for a residential-led, mixed-use development with a fire station and LFB museum. That development agreement has now been terminated. This presents an opportunity for LFB to refurbish the main 8AE building (a former LFB HQ) into a new, modern HQ for LFB.

To prove the feasibility of refurbishing the main building at 8AE, further detailed architectural feasibility and planning work must be carried out on the building. This would be conducted alongside work to develop other options – including taking HQ office space in a rented building, and locating the new HQ at Shoreditch fire station. The LFC wishes to commit further expenditure to develop all the options, so that planning permission can be sought on 8AE, and an informed decision made on the way forward.

The London Fire Commissioner Governance Direction 2018 sets out a requirement for the LFC to seek the prior approval of the Deputy Mayor before “[a] commitment to expenditure (capital or revenue) of £150,000 or above as identified in accordance with normal accounting practices”.

Decision:

That the Deputy Mayor for Planning, Regeneration and the Fire Service authorises the London Fire Commissioner to commit capital expenditure of up to the amount set out in Part Two of this decision for the purposes of developing options for a new London Fire Brigade headquarters after the end of the lease at its current headquarters in Union Street in 2027.

Deputy Mayor for Planning, Regeneration and the Fire Service

I confirm that I do not have any disclosable pecuniary interests in the proposed decision.

The above request has my approval.

Signature:



Date:

06/01/2025

PART I – NON-CONFIDENTIAL FACTS AND ADVICE TO THE DEPUTY MAYOR

Decision required – supporting report

1. Introduction and background

- 1.1 Report LFC-24-095x to the London Fire Commissioner (LFC) explains that the lease at London Fire Brigade (LFB) Headquarters (HQ) in Union Street (US) will end in March 2027. To address this, a decision was taken on a strategic business case (Deputy Mayor for Fire Decision 206, [available here](#), and report LFC-23-063 to the LFC). This provided approval to commit expenditure to develop options for delivery of an HQ solution beyond 2027.
- 1.2 Renewing the lease at US is not a preferred option, as the building is much too large for LFB's needs and the present sub-tenants are not committed to staying beyond the lease end. In addition, the building is not ideal to act as LFB HQ beyond 2027, as it does not support effective energy performance or accessibility requirements. It is also difficult to sub-let to multiple non-government bodies without significant work, due to its lack of secure divisions between floors.
- 1.3 Based on engagement with staff, there is an overriding requirement from LFB corporate management that a new HQ should have a strong brand and presence to support LFB pride and purpose. The 2022 Independent Culture Review of LFB recommended that the expiry of the HQ lease in 2027 should be used as an opportunity to improve integration of LFB senior leaders and HQ staff with operations. The Greater London Authority (GLA) accommodation strategy, meanwhile, indicates a moratorium on new leased space external to the GLA family (subject to operational need). Co-location aims to foster cultural integration between office-based and front-line staff. This approach aims to foster cultural integration between office-based and front-line staff. On this basis, solutions have been sought that refurbish/extend an existing fire station to create a new HQ that supports LFB values. The operational requirements of the current and future HQ demand significant parking and bespoke facilities, which are not satisfactorily addressed in the existing leased accommodation. For these reasons, colocation was identified as the preferred option during the initial work. LFB staff are well accustomed to working in environments adjacent to operational stations, with many working from local stations, particularly during the pandemic. In contrast, external office users, hotel guests, and residential occupants may find this type of environment more challenging.
- 1.4 Extensive engagement has also been carried out with LFB HQ staff to inform office design. This included a workplace experience survey across all HQ staff; meetings with representatives from all LFB departments; and discussions with the equalities support groups and teams requiring specialised facilities.
- 1.5 The preferred option for a new HQ (based on its fit with project objectives, and the feedback from senior management) is to carry out a construction/refurbishment project at an existing fire station, to provide a central HQ. The preference is for a refurbishment of the former LFB HQ at 8 Albert Embankment (8AE). Further work is necessary to prove feasibility of this option. Until that is completed, other options (including a project to build a new HQ to the rear of Shoreditch Fire Station, and an option to use rented accommodation) as presented in the business case must be pursued concurrently.
- 1.6 One location considered for a new HQ in the 2023 business case was a proposed new office building to the rear of 8AE. This was subject to a development agreement with a private-sector partner for a residential-led, mixed-use development with a fire station and LFB museum. That development agreement has now been terminated. This presents an opportunity for LFB to refurbish the main 8AE building (a former LFB HQ) into a new, modern HQ for LFB.
- 1.7 Extensive progress has been made to develop a design, and prepare for a planning application, for the option to locate the new LFB HQ at Shoreditch Fire Station. This work has been put on hold pending the results of the feasibility and planning work at 8AE. The work at Shoreditch will assist in considering the future of that site, even if it is not chosen as the location for the new LFB HQ.

- 1.8 To prove the feasibility of the 8AE refurbishment as a modern HQ office building for LFB, further detailed architectural feasibility and planning work is needed on the building – with a view to submitting an application for planning and listed building consent in early 2025. This would be conducted alongside work to develop other options, including taking HQ office space in a rented building and the Shoreditch option mentioned above.
- 1.9 As a new HQ delivered through a capital build/refurbishment is expected to be ready after the US lease ends, interim accommodation will be required for about two years. This has been allowed for within the project and business case.
- 1.10 Hence, the LFC now wishes to commit further expenditure to develop all the options, so that planning permission can be sought on 8AE, and an informed decision can be made on the way forward.

2. Objectives and expected outcomes.

- 2.1 A detailed Strategic Business Case for the project is attached to the Part Two of report LFC-24-095x. This is appended to the Part Two of this decision and includes information on objectives; selection of options; costs; risks; and plans for delivery.
- 2.2 The objectives set out for the project in the business case are as follows:
 - Estate objectives:
 - supporting the delivery of LFB services
 - used efficiently, available to community and partners
 - promoting LFB's identity in the landscape of London
 - safe and compliant
 - secure for users
 - adapted to be inclusive for users
 - targeting carbon net zero.
 - HQ-specific objectives:
 - allowing LFB branding to support LFB pride and purpose
 - attracting and retaining staff
 - facilitating collaborations (staff and partners).
 - Independent Culture Review objectives: integrating HQ with operations (recommendation 13).
 - GLA accommodation strategy objectives: delivering a Freehold or existing GLA leasehold option if operationally possible.
 - Delivery objectives:
 - being deliverable by the end of 2026
 - being affordable for LFB
 - providing acceptable value for money overall.

- 2.3 The shortlist of options for providing an HQ facility after the US lease ends in 2027 are set out in the table below:

Table 1 – Shortlist of options included within the 2024 Strategic Business case

Option	Title	Description
0	Benchmark (do minimum) – stay at US (whole)	Do nothing: Stay at US with no change – renewing lease on whole with no sublets
1	HQ at a commercial rental office	Take space in commercial premises – assumption made that this would be in a modern building, of around 5,000m ² , in the South Bank area
2	HQ at 8AE (smaller HQ)	Refurbish LFB’s premises at 8AE (front site) to provide an HQ and a refurbished fire station with provision for an LFB museum (as already planned for the site) to provide 4,475 m ² of HQ office space
3	HQ at 8AE (larger HQ)	Refurbish LFB’s premises at 8AE (font site) to provide an HQ and a refurbished fire station with provision for LFB museum (as already planned for the site) to provide 5,211 m ² of office space
4	HQ at Shoreditch Fire Station	Rear extension of Shoreditch Fire Station to provide around 4,400 m ² of HQ office space

Preferred option

- 2.4 The preferred option, based on its fit with project objectives and the feedback from LFB senior management, is to carry out a construction/refurbishment project at 8AE. The option of an HQ at Shoreditch Fire Station is a strong back-up option for this.
- 2.5 These are the only solutions that meet the recommendation of the 2022 Independent Culture Review to integrate HQ with operations; and the objective to provide an LFB-branded facility to support LFB’s pride and purpose. While these options require more upfront capital expenditure, they will provide savings in rental costs over the long term. More information about the options is contained within the Strategic Business Case.
- 2.6 Further work is necessary to prove feasibility and cost of the 8AE and Shoreditch options. Until that is completed, other options as presented in the business case must be pursued concurrently – with the option to deliver an HQ in a rented office providing a back-up solution, should the other options not be achievable.

Palestra option

- 2.7 One option considered in developing the business case was a move to Transport for London’s (TfL’s) Palestra building. However, in May 2023 LFB was informed that TfL does not have enough space in Palestra to accommodate LFB, since it will already be accommodating the current GLA occupants of 169 Union Street. This remains the situation; and, on this basis, while the option for LFB to move into rented office accommodation is being considered alongside the preferred option, the potential location of this accommodation has not yet been determined. This will occur during the next stage as necessary. LFB is working closely with TfL over the potential for an interim HQ to be sited on the TfL estate.

Provision of a fire station and museum at 8AE

- 2.8 The 8AE site currently houses the fully operational Lambeth Fire Station. Previous plans (under the development partnership for a residential-led, mixed-use development) included a refurbished/renewed fire station on the site as well as provision for an LFB museum (based on a decision to house it there made by the London Fire and Emergency Planning Authority in 2015). The museum is able to use unused appliance bays and the historical memorial hall which forms part of the

8AE listed building. All options therefore include provision of a new/refurbished fire station and museum.

Next stage

2.9 The work necessary for the next stage, between now and summer 2025, is as follows:

- review and update the results of the staff and operational engagement exercise that took place in 2022-23, to inform an inclusive building design
- complete necessary site surveys; and develop the building design and planning application materials for 8AE to a sufficient level of detail to submit a planning application (Royal Institute of British Architects (RIBA) stage 2/3)
- work with the local authority, with a view towards making a planning application as early as possible in 2025
- continue to work on all other options, pending confirmation of the feasibility of the capital build/refurbishment options
- establish arrangements for interim accommodation from March 2027
- put in place arrangements to allow continuity of fire and emergency cover during works at either Shoreditch or 8AE.

2.10 Progressing to the next stage of the project will involve two main areas of expenditure on professional fees and the LFB Project team:

- Professional fees: To support construction project management; development of the design brief; public engagement; planning pre-application enquiry; full site surveys; design of building to (RIBA) Stage 2/3; planning application; and determination, with potential for a building contractor to be brought in early, to assist with detailed design under a two-stage design and build arrangement. To progress this, a single multi-disciplinary service provider has been procured to provide project management and manage project consultants.
- LFB Project team: Overall project management; reporting; support for the project board; procuring and managing project management; architect and cost consultant; engaging with HQ-based departments and staff; gathering full requirements; engaging with stakeholders including the local council; engaging with teams and team leadership; engaging with people services regarding smart working strategy and supporting policies; ensuring full communication with staff; and establishing support for the project across LFB.

2.11 A breakdown of the estimated cost for this work is provided in the Part 2 report.

3. Equality comments

- 3.1 The LFC and the Deputy Mayor for Planning, Regeneration and the Fire Service (the Deputy Mayor) are required to have due regard to the Public Sector Equality Duty (section 149 of the Equality Act 2010) when taking decisions. This, in broad terms, involves understanding the potential impact of policy and decisions on different people; taking this into account; and then evidencing how decisions were reached.
- 3.2 It is important to note that consideration of the Public Sector Equality Duty is not a one-off task. The duty must be fulfilled before taking a decision, at the time of taking a decision, and after the decision has been taken.

- 3.3 The protected characteristics are: age, disability, gender reassignment, pregnancy and maternity, marriage and civil partnership (but only in respect of the requirements to have due regard to the need to eliminate discrimination), race (ethnic or national origins, colour or nationality), religion or belief (including lack of belief), sex, and sexual orientation.
- 3.4 The Public Sector Equality Duty requires decision-takers in the exercise of all their functions, to have due regard to the need to:
- eliminate discrimination, harassment and victimisation and other prohibited conduct
 - advance equality of opportunity between people who share a relevant protected characteristic and persons who do not share it
 - foster good relations between people who share a relevant protected characteristic and persons who do not share it.
- 3.5 Having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to:
- remove or minimise disadvantages suffered by persons who share a relevant protected characteristic where those disadvantages are connected to that characteristic
 - take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it
 - encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.
- 3.6 The steps involved in meeting the needs of disabled persons that are different from the needs of persons who are not disabled include, in particular, steps to take account of disabled persons' disabilities.
- 3.7 Having due regard to the need to foster good relations between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to:
- tackle prejudice
 - promote understanding.
- 3.8 An Equalities Impact Assessment (EIA) has been undertaken, indicating that there are no adverse impacts predicted at this stage. The EIA will continue to be developed during the next phase of the project. It will put staff consultation and equalities at the centre of the design process, to ensure alignment with the provisions of the Equality Act 2010.

4. Other considerations

Workforce comments

- 4.1 The US building currently has approximately 800 staff assigned to it. The next phases of the project will ensure that continued engagement takes place with staff, trade unions and equality support groups/users of HQ facilities. This will also require formal negotiation with the trade unions collectively (in particular this is because staff locations are a contractual term and condition for FRS staff). The team will work with LFB People services to ensure that new ways of working are taken into account; and that the design of the office and additional facilities that support service delivery across

all occupational groups is based on a thorough understanding of the needs and requirements of the LFB workforce and other required uses of new HQ accommodation.

Sustainability

- 4.2 One of the project's objectives is to deliver environmental sustainability. Capital build options will be aiming for at least a Building Research Establishment Environmental Assessment Method (BREEAM) Excellent rating for new buildings and sustainability will be built into consideration during the process of design and/or selection of buildings. The project team are working with the LFB Sustainable Development team, and will carry out the necessary Sustainability Impact Assessment during the next stage of the project.

Procurement

- 4.3 The current LFB project team is working with the Procurement and Commercial Department (Assets and Estates) on the development of a procurement strategy that is fully compliant with the LFB Scheme of Governance and Standing Orders relating to procurement to ensure timely procurement of necessary services whilst providing a sustainable and value for money solution.

Conflicts of interest

- 4.4 There are no conflicts of interest to declare from those involved in the drafting or clearance of this decision.

5. Financial comments

- 5.1 Under Part Two of this decision, commercially sensitive information is disclosed. As part of this, the requirement for both feasibility funding and potential capital funding is set out across the range of options.
- 5.2 The feasibility expenditure will be contained by drawing down funding from the approved capital plan, within the existing funding profile set out for the HQ project.
- 5.3 In terms of longer-term capital costs, these will need to be incorporated into the future capital plan, along with the associated financing of any such project. This will be developed throughout the budget setting process.
- 5.4 This will also have a significant impact on the revenue budget. Again, this will need to be incorporated into the budget-setting process, in terms of potential savings and investments required in order to deliver the preferred option.

6. Legal comments

- 6.1 Under section 9 of the Policing and Crime Act 2017, the LFC is established as a corporation sole with the Mayor appointing the occupant of that office. Under section 327D of the GLA Act 1999, as amended by the Policing and Crime Act 2017, the Mayor may issue to the LFC specific or general directions as to the manner in which the holder of that office is to exercise his or her functions.
- 6.2 By direction dated 1 April 2018, the Mayor set out those matters, for which the LFC would require the prior approval of either the Mayor or the Deputy Mayor.
- 6.3 Paragraph (b) of Part 2 of that direction requires the LFC to seek the prior approval of the Deputy Mayor before "[a] commitment to expenditure (capital or revenue) of £150,000 or above as identified in accordance with normal accounting practices".

- 6.4 The statutory basis for the actions proposed in this report is provided by sections 7 and 5A of the Fire and Rescue Services Act 2004 (FRSA 2004). Under section 7 (2)(a) FRSA 2004, the LFC has the power to secure the provision of personnel, services and equipment necessary to efficiently meet all normal requirements for firefighting and section 5A allows the LFC to procure personnel, services and equipment they consider appropriate for purposes incidental or indirectly incidental to their functional purposes. Provision of a suitable HQ building falls within this remit.
- 6.5 General Counsel notes that the proposed tenders will be carried out in accordance with the Public Contracts Regulations 2015 and the LFC's Scheme of Governance (Part 3 Standing Orders Relating to Procurement).
- 6.6 These comments have been adopted from those provided by the LFC's General Counsel Department in report LFC-24-095x to the LFC.

Appendices and supporting papers:

Appendix 1 – Report LFC-24-095x – London Fire Brigade – New Headquarters Project to the LFC.

Public access to information

Information in this form (Part 1) is subject to the Freedom of Information Act 2000 (FOI Act) and will be made available on the GLA website within one working day of approval.

If immediate publication risks compromising the implementation of the decision (for example, to complete a procurement process), it can be deferred until a specific date. Deferral periods should be kept to the shortest length strictly necessary. **Note:** This form (Part 1) will be published either within one working day after approval or on the defer date.

Part 1 Deferral:

Is the publication of Part 1 of this approval to be deferred? NO

Part 2 Confidentiality: Only the facts or advice considered to be exempt from disclosure under the FOI Act should be in the separate Part 2 form, together with the legal rationale for non-publication.

Is there a part 2 form? YES

ORIGINATING OFFICER DECLARATION:

Drafting officer to
confirm the
following (✓)

Drafting officer

Soeli Dayus has drafted this report with input from the LFC and in accordance with GLA procedures and confirms the following:

✓

Assistant Director/Head of Service

Niran Mothada has reviewed the documentation and is satisfied for it to be referred to the Deputy Mayor for Planning, Regeneration and the Fire Service for approval.

✓

Advice

The Finance and Legal teams have commented on this proposal.

✓

Mayoral Delivery Board

A summary of this decision was reviewed by the Mayoral Delivery Board on 6 January 2025.

✓

CHIEF FINANCE OFFICER:

I confirm that financial and legal implications have been appropriately considered in the preparation of this report.

Signature:



Date:

06/01/2025