

LONDON FIRE BRIGADE

London Fire Brigade (LFB) - New Headquarters (HQ) Project

Report to:
Investment & Finance Board
Commissioner's Board
Fire Board

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Report by:
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Report classification:

For decision

For publication

Values Met
Service
Integrity
Teamwork
Equity
Courage
Learning

PART ONE

Non-confidential facts and advice to the decision-maker

Executive Summary

The lease at London Fire Brigade (LFB) Headquarters (HQ) in Union Street (US) comes to an end in March 2027. To address this a Strategic Business Case was presented through LFB governance in August 2023 (LFC-23-063) which provided approval to develop options for delivery of an HQ solution beyond 2027.

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

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 and this work has been put on hold pending the results of the feasibility and planning work at 8AE. The work at Shoreditch will be of assistance in consideration of the future of that site even if it is not chosen as the location for the new LFB HQ.

In order to prove the feasibility of the refurbishment of the main building at 8AE as a modern HQ office building for LFB it is necessary to carry out further detailed architectural feasibility and planning work 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 the potential to take HQ office space in a rented building and the Shoreditch option mentioned above.

Because the expected completion date of a new HQ delivered through a capital build/refurbishment is later than the lease end at US, interim accommodation for about two years will be required and has been allowed for within the project and business case.

It is now necessary to commit further expenditure to develop all the options further so that planning permission can be sought on 8AE, and an informed decision made on the way forward.

This report's main purpose is to seek agreement to the continuation of the project to take this work forward and to delegate authority to make the necessary expenditure up to the next decision point in Summer 2025.

For the Deputy Mayor

That the Deputy Mayor for Planning, Regeneration and the Fire Service authorises the London Fire Commissioner (LFC) to commit capital expenditure of up to the amount set out in the Part Two report for the purposes of developing options for a new LFB HQ after the end of the lease at US in 2027.

For the London Fire Commissioner (LFC)

The LFC has considered the attached report and agrees that:

1. The project is continued, and a project team fully established to carry out the next phase of feasibility and planning work on 8 Albert Embankment in order to create a new LFB HQ, a fit for purpose fire station, an LFB museum and to consider other options as detailed in the business case.
2. Authority is delegated to the Assistant Director of Property and Technical Support Services that expenditure can be committed in accordance with part two of this report.

In doing this it is recognised:

- A. That there is a risk (should planning permission not be forthcoming or a change of direction is necessary for other reasons) that significant portions of the work carried out during the next stage could be rendered nugatory.
- B. That key aspects of the project are as follows:
 - i. that it is necessary to consider transitional arrangements between occupation of the current HQ and the new facility (e.g. use of temporary office space),
 - ii. that the new HQ arrangements will be significantly smaller than Union Street, designed to be an agile facility that supports hybrid working,
 - iii. that the options being progressed to the next stage include risks and costs etc. as detailed in the Strategic Business Case.

1. Introduction and Background

- 1.1 The lease for the current LFB HQ at US expires in March 2027. Renewing this is not a preferred option as the building is much too large for LFB 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 and is difficult to sub-let to multiple non-government bodies without significant work due to its lack of secure divisions between floors.
- 1.2 Based on engagement 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. Since then, the 2022 Independent Culture Review 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, while the Greater London Authority (GLA) accommodation strategy indicates a moratorium on new leased space external to GLA family (subject to operational need). On this basis solutions have been sought which refurbish/ extend an existing fire station to create a new HQ that supports LFB values.

- 1.3 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 representative from all LFB departments and discussions with the Equalities Support Group and teams requiring specialised facilities.
- 1.4 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 with a preference for this to be achieved through a refurbishment of the former LFB HQ at 8AE. Further work is necessary to prove feasibility of this option and, 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.

2. Objectives and Expected outcomes

- 2.1 A detailed Strategic Business Case for the project is attached to part two to this report and includes information on objectives, selection of options, costs, risks and plans for delivery.
- 2.2 The overall objective is to provide continuity of suitable LFB HQ accommodation beyond the end of the lease at US. This will entail having suitable accommodation ready by the end of 2026 which will mean (in the case of the options to build / refurbish at 8AE or Shoreditch) that a temporary solution will be necessary between the end of the US lease in March 2027 and the completion of the chosen solution – likely to be late 2028 or 2029 (although this timing is subject to confirmation based on further feasibility and planning work).
- 2.3 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 and targeting carbon net zero.
 - **HQ specific Objectives:** allowing LFB branding to support LFB pride and purpose, attracting and retaining staff and facilitating collaborations (staff and partners)
 - **Independent Culture Review** Integrating HQ with operations (recommendation 13).
 - **GLA accommodation strategy** Delivering a Freehold or existing GLA leasehold option if operationally possible.
 - **Delivery objectives:** being deliverable by end 2026, being affordable for LFB, providing acceptable value for money overall.

- 2.4 The shortlist of options for provision of an HQ facility beyond the end of the lease at US in 2027 are set out in the business case as follows:

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 in the London South bank area of c5,000m2
2	HQ at 8 Albert Embankment (smaller HQ)	Refurbish LFBs premises at 8 Albert Embankment (Front site) to provide an HQ and a refurbished Fire Station with provision for the LFB museum (as already planned for the site). Provides 4,475m2 of HQ office space.
3	HQ at 8 Albert Embankment (larger HQ)	Refurbish LFBs premises at 8 Albert Embankment (Front site) to provide an HQ and a refurbished Fire Station with provision for the LFB museum (as already planned for the site). Provides 5,211m2 of office space.
4	HQ at Shoreditch	Rear Extension of Shoreditch Fire Station to provide c4,400m2 of HQ office space.

Preferred option

- 2.5 The preferred option based on its fit with project objectives and the feedback from senior management, is to carry out a construction/ refurbishment project at 8AE with the option of provision of an HQ at Shoreditch providing a strong back-up option for this.
- 2.6 These are the only solutions which meet the recommendation of the 2022 Independent Culture Review to integrate HQ with operations, as well as the objective of providing an LFB branded facility to support LFB pride and purpose. While these options require more up-front 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.
- 2.7 Further work is necessary in order to prove feasibility and cost of the 8AE and Shoreditch options and, 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

- 2.8 One option considered during development of the business case was a move to TfL's Palestra building. However, in May 2023 LFB were informed that TfL do not have sufficient space in Palestra to accommodate LFB alongside 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 retained for consideration alongside the preferred option, the potential location of this accommodation has not yet been determined and will be considered 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 8 Albert Embankment

- 2.9 The 8AE site currently houses the fully operational Lambeth Fire Station and 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 utilise 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.

Approval sought and risks

- 2.10 Approval is being sought to commit expenditure and resource in order to continue to investigate the feasibility of the preferred option (locating the HQ at 8AE) as well as the all the other options detailed in the business case except option 0 (remain in Union Street). This will involve continuing to establish a project team to develop the feasibility of options, prior to making a final decision by Summer 2025 (at the point where a planning application is expected to have been submitted on the 8AE site).
- 2.11 Risks for the project going forward are detailed in the business case but at this stage it is important to note the following key points:
- **Transitional accommodation will be necessary:** As mentioned above, a project at either 8AE or Shoreditch will not deliver new HQ accommodation until late 2028 at the earliest therefore there is a need to make provision for temporary accommodation from March 2027 onwards. Work on this has already started through detailed discussions with GLA partners with a view to finding accommodation in the GLA estate and working with property consultants to identify options in the wider government estate or through an arrangement with a private sector landlord.
 - **The new HQ footprint will be smaller:** The expectation is that the new HQ facility will be significantly smaller than the current HQ to take account of hybrid working and reflecting a move to a smaller more agile HQ design. The size requirement has been reviewed in detail based on Union Street occupancy data and through the staff and operational engagement mentioned above, but there remains a risk that the building could be under sized, particularly if staffing numbers (or average time worked in the office) increase significantly between now and 2027.
 - **Potential for some of the work at the next stage to be rendered nugatory:** As the work being carried out at the next stage involves uncertainties in respect of gaining planning permission there is a possibility that a proportion of the outputs will be rendered nugatory. This could happen if planning permission proves unachievable within the timescale, or a change of direction is necessary due to other factors. Much of the work (including the staff engagement and development of design concepts for the smaller more agile future HQ solution) will however be unaffected by issues concerning a specific site and will remain useful whichever option is pursued.

Next Stage

2.12 The work necessary for the next stage between now and summer 2025 is:

- Review and update the results of the staff and operational engagement exercise that took place in 2022/23 in order to inform an inclusive building design.
- Complete necessary site surveys and develop the building design and planning application materials for 8AE to a sufficient detail for submission of 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.

2.13 Progression through the next stage of the project will involve two main areas of expenditure:

- A. **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. In order to progress this a single multi-disciplinary service provider has been procured to provide project management and manage project consultants.
- B. **LFB Project team:** Overall project management, reporting, support for the project board, procuring and managing PM, 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 the establishment of support for the project across the Brigade.

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

3. Values Comments

3.1 The LFC notes the Fire Standards Board requirements around adopting and embedding the Core Code of Ethics at an individual and corporate level. Following extensive engagement, the LFC has introduced Brigade values which build on and do not detract from the Code of Ethics.

3.2 The Brigade values are:

- **Service:** we put the public first
- **Integrity:** we act with honesty
- **Teamwork:** we work together and include everyone

- **Equity:** we treat everyone fairly according to their needs
- **Courage:** we step up to the challenge
- **Learning:** we listen so that we can improve

3.3 The project team will ensure that these values are built into the delivery of the project at all stages. The values will also be reflected in the design of the HQ office building. In particular the design will aim to foster collaboration in the workplace to facilitate teamwork and ensure equality e.g. through the provision of an accessible workplace.

4. Equality comments

- 4.1 The LFC and the Deputy Mayor for Planning, Regeneration and the Fire Service 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.
- 4.2 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.
- 4.3 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.
- 4.4 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.
- 4.5 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.
- 4.6 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.

- 4.7 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.
- 4.8 An Equalities Impact Assessment 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 the project which will put staff consultation and equalities at the centre of the design process to ensure alignment with the provisions of the Equality Act 2010.

5. Other considerations

Workforce

- 5.1 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 which support service delivery across all occupational groups is based on a thorough understanding of the needs and requirements of the workforce of LFB and other required uses of new HQ accommodation.

Sustainability

- 5.2 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 LFB Sustainable Development team and will carry out the necessary Sustainability Impact Assessment during the next stage of the project.

Procurement

- 5.3 The current project team are working with the Procurement and Commercial Department (Assets and Estates) on the development of a procurement strategy which is fully compliant with 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.

Communications

- 5.4 The next phase of the project will involve the production of a developed design (RIBA Stage 2/3) and planning application for 8 Albert Embankment.
- 5.5 The main focus of communications for this stage of the project will be a continuation of engagement with the future users and checking and updating LFB corporate and individual department requirements of a new HQ. Equalities Support Groups will continue to be engaged with.
- 5.6 Continued feedback from the staff engagement process will be used to directly

inform the design process which will support new ways of working.

- 5.7 In the run-up to a planning application the correct levels of engagement with the local community will be considered very carefully based on advice from architects and planning consultants and engagement with the local planning authority.

6. Financial comments

- 6.1 Under part two of this report, 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.
- 6.2 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.
- 6.3 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 and this will be developed throughout the budget setting process.
- 6.4 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.

7. Legal comments

- 7.1 Under section 9 of the Policing and Crime Act 2017, the London Fire Commissioner (the "Commissioner") 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 Commissioner specific or general directions as to the manner in which the holder of that office is to exercise his or her functions.
- 7.2 By direction dated 1 April 2018, the Mayor set out those matters, for which the Commissioner would require the prior approval of either the Mayor or the Deputy Mayor for Planning, Regeneration and the Fire Service (the "Deputy Mayor").
- 7.3 Paragraph (b) of Part 2 of the said direction requires the Commissioner 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...".
- 7.4 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"). Section 7 (2)(a) FRSA 2004 the Commissioner 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 Commissioner to procure personnel, services and equipment they consider appropriate for purposes incidental or indirectly incidental to their functional purposes. Provision of a suitable headquarters building falls within this remit.
- 7.5 General Counsel notes that the proposed tenders will be carried out in accordance with the Public Contracts Regulations 2015 ("the Regulations") and the London Fire Commissioner's Scheme of Governance (Part 3 Standing Orders Relating to Procurement).

List of appendices

Appendix	Title	Open or confidential*
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1	EIA	Open
2	Sustainable Development Impact Assessment	Open

Part two confidentiality

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

Is there a Part Two form: YES