

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

Report to: Date:

Investment & Finance Board 29 April 2025 Commissioner's Board 15 May 2025 Fire Board 27 May 2025

London Fire Commissioner

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 Strategic Business Cases for the New Headquarters Project were presented through LFB governance in 2023 (LFC-23-063) and 2024 (LFC-24-095) which provided approval to develop options for delivery of an HQ solution beyond 2027.

The second of these strategic business cases identified the recommended option as the refurbishment of 8 Albert Embankment (8AE), the former LFB headquarters, into a modernised HQ for LFB. This plan also included an upgraded Lambeth Fire Station and dedicated space for the LFB Museum.

This option was selected as it best aligned with LFB's strategic objectives, offering optimal value compared to leasing a separate headquarters, while also integrating with an operational site. This integration directly supports the aspirations set out in LFB's Independent Culture Review 2022.

As a result, a decision was made to proceed with architectural feasibility and planning work to develop this option further. At the same time, alternative options were explored, including securing HQ office space in a rented building and redeveloping Shoreditch Fire Station to incorporate a new headquarters.

The architectural feasibility and planning work has now been progressed at 8AE and it is the recommended option for the new LFB HQ. It is expected that a planning application will be made in Summer 2025.

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 will be required and has been allowed for within the project and business case.

This report seek approval of a further business case (which is attached to part 2 of this report) and seeks approval to process with works at 8AE to create a new LFB HQ alongside an upgraded fire station and space for the LFB Museum (option 2). This project will also include other consequential activities including the delivery of an interim office solution to cover the period between the lease end at Union Street and the completion of the new HQ, and necessary enabling works to accommodate fire crews and appliances from Lambeth Fire Station during construction.

This report seeks approval to commit expenditure to complete this project in its entirety.

For the London Fire Commissioner (LFC)

The LFC has considered the attached report and agrees that:

Option 2 is taken forward (HQ at 8 Albert Embankment - smaller HQ) - including the comprehensive refurbishment, extension and upgrade of 8 Albert Embankment in order to create a new LFB HQ, a fit for purpose Fire Station, an LFB Museum.

As part of Option 2 a suitable interim office solution (agreed through project governance) is put in place to allow continuation of HQ facilities between vacation of 169 Union Street prior to the lease expiry in March 2027 and occupation of the new HQ office accommodation and appropriate decant arrangements are made for Lambeth Fire Station.

Authority is delegated to the Assistant Director of Property and Technical Support Services to commit expenditure set out in part 2, funded through arrangements set out in the financial section of the business case.

The LFC notes that:

- 1. 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 early stages of progression of the project stage could be rendered nugatory.
- 2. That key aspects of the project are as follows:
 - i. that the new HQ arrangements will be significantly smaller than Union Street, designed to be an agile facility that supports hybrid working,
 - ii. that the options being progressed to the next stage include risks and costs etc. as detailed in the Business Case attached to part 2 of this report.

1. Introduction and Background

- 1.1 The lease for the current LFB HQ at US expires in March 2027. Renewing this is not a recommended 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.
- Based on engagement there is a material consideration from LFB corporate management that a new HQ should have a strong brand and presence to support LFB pride and purpose. In addition, the 2022 Independent Culture Review recommended (recommendation 13) 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 recommended 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.
- 1.5 This paper seeks final approval to go ahead with the whole project to refurbish / extend 8AE for HQ, upgraded fire station and space for museum under delegated authority and subject to the cost envelope indicated..
- The next stage of the project involves bringing in a contractor to take forward preconstruction services including development of the design through Royal Institute of British Architects (RIBA) stage 3 and 4. This phase of the project is expected to cost a sum indicated in spend profiles in part two of the report. On this basis it is beneficial to have made a decision to proceed with the whole project before that spend is made in order to avoid nugatory spend.
- 1.7 The decision requested suggests a cost envelope for the project with the intention that if this cost envelope is expected to be exceeded, further governance approvals would be required before proceeding.
- The business case sets out multiple options, with the timeline aligned to the delivery of the new HQ project. If the recommended option is not approved, there will still be an opportunity to explore a leased HQ solution, though this would require additional governance processes. To secure an operational freehold HQ, it will be important to progress without delay to mitigate interim office costs and ensure a smooth transition.

2. Objectives and Expected outcomes

- 2.1 A detailed 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.
- 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 as the project progresses).
- 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 (in advance of the March 2027 lease end at LFB's current HQ), 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

Shorthist of options included within the 2024 Strategic business case			
Option	Title	Description	
0	Benchmark (Do	Do Minimum: Stay at US with no change - renewing	
	minimum) - Stay at US	lease on whole with no sublets. Refurbish fire station	
	(whole)	and provide space for museum at 8 Albert	
		Embankment.	
1	HQ at a Commercial	Take space in commercial premises – assumption mad	
	Rental office	that this would be in a modern building in the London	
		South bank area of c5,000m2 Refurbish fire station and	
		provide space for museum at 8 Albert Embankment.	
2	HQ at 8 Albert	Refurbish LFBs premises at 8 Albert Embankment	
	Embankment (smaller	(Front site) to provide an HQ and a refurbished Fire	
	HQ)	Station with provision for the LFB museum (as already	
	Recommended Option	planned for the site). Provides c4,600m2 of HQ office	
		space.	
3	HQ at 8 Albert	Refurbish LFBs premises at 8 Albert Embankment	
	Embankment (larger HQ)	(Front site) to provide an HQ and a refurbished Fire	
		Station with provision for the LFB museum (as already	
		planned for the site). Provides 5,100m2 of office space.	
4	HQ at Shoreditch	Rear Extension of Shoreditch Fire Station to provide	
		c4,400m2 of HQ office space. Refurbish fire station and	
		provide space for museum at 8 Albert Embankment.	

Recommended Option

- 2.5 The recommended option based on its fit with project objectives and the feedback from senior management, is to carry out a construction/ refurbishment project at 8AE in line with option 2.
- This solution meets 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 this option requires more up-front capital expenditure than the rental option it will provide savings in rental costs over the long term. More information about the options is contained within the Business Case.
- 2.7 The recommended option includes the following main elements and expenditures:
 - Refurbishment and new-build extension works at 8AE to deliver a new HQ, upgraded fire station and space for the LFB Museum
 - Leasing and adapting as necessary accommodation to provide for a temporary
 HQ between lease expiry at Union Street and completion of the new HQ
 - Adapting appropriate LFB fire station premises to provide temporary accommodation for appliances and crews during construction at 8AE

Provision of a fire station and museum at 8 Albert Embankment

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). 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.

Palestra option

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 (who are due to move there in 2026). 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 recommended 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.

Approval sought

2.10 Approval is being sought to commit expenditure and resource in order to deliver the recommended option as detailed above. All work on other options will cease under this project.

Risks and key points

- 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 (which will need to be ready to move into by late 2026). 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. There is however also a risk that the new building will be oversized if staffing numbers (or average time worked in the office) remain similar or decrease significantly between now and 2027. These risks are covered in more detail in the Business Case.

• 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.

Work expected at the next stages of the project

- 2.12 If approval is received, the next stages of the project will include
 - Onboarding a contactor to work through pre-construction phases of the 8AE refurbishment project with a wider consultant team.
 - Leasing the necessary interim accommodation and carrying out necessary works to prepare it for the interim occupation
 - Gaining planning approval and listed Building consent for the works at 8AE
 - Signing a construction contract for the necessary works at 8AE
 - Delivering the works at 8AE whilst providing alternative accommodation for the fire crews and appliances at Lambeth Fire Station
 - Managing two office moves (from the current accommodation to the interim and then to the new HQ at 8AE)
- 2.13 Progression through the next stages of the project will involve the following main areas of expenditure:
 - A. **Professional fees:** To support construction project management, development of the design brief, public engagement, construction legal advice, planning preapplication enquiry, full site surveys, design of building to RIBA Stage 4, planning application/determination and bringing in a building contractor 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. Additional surveying and legal support will be required for leasing the interim accommodation.
 - **B. Building works:** To refurbish and extend 8AE and carry out necessary fit out works for the interim HQ, and enabling works for fire station decant.
 - **C. Rental costs:** To lease the interim HQ from c 2026 until c2029.
 - D. **LFB Project team:** Overall project management, contract management, legal advice, reporting, support for the project board, procuring and managing Project Manager, architect, project consultants, contractor and cost consultant, engaging with HQ based departments and staff, gathering full requirements, engaging with stakeholders including the local council, engaging with LFB 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. Also management of the leasing activities connected with the interim accommodation.

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

3. Values Comments

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

Teamwork will be a fundamental principle in the design of the new HQ office building. The office will be intentionally designed to encourage collaboration by providing both formal and informal spaces for teams to connect, share ideas, and work together effectively. The space will also support inclusivity and equal participation, ensuring an accessible environment that accommodates diverse needs, such as areas for religious reflection and facilities for mothers. By supporting an open and inclusive workspace, the design will empower employees to work together, learn from one another, and serve the community more effectively.

Service – The new HQ, incorporating community assets, an exhibition of the London Fire Brigade's historical collection, and an improved fire station, will enhance service to the local community by creating a more accessible and engaging space. The exhibition will celebrate the Brigade's rich history, educating and inspiring visitors while fostering a deeper connection between LFB and the public. The upgraded fire station will support operational efficiency, ensuring firefighters can respond swiftly and effectively to emergencies. Additionally, the site will feature green spaces, providing a welcoming environment for both staff and the community, promoting well-being and sustainability.

Extensive staff and community engagement has already taken place, with valuable feedback shaping the design and functionality of the site. This input has ensured that the development aligns with the needs of those who work in and interact with the space, making it a true community hub. By integrating public resources and prioritising accessibility, the new HQ will strengthen LFB's role in the local area, enhancing safety, education, and community engagement.

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 oneoff 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 theneeds 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 dueregard, 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 continue to 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 (data from LFB People Services 2023). This may exclude operational colleagues detached to Union Street departments. The total FRS workforce is 1,009 (figures published GLA 2024) however this includes staff based in the Operational Support Centre and offices in stations. A utilisation study undertaken in February 2025 indicated that attendance is circa 200 staff per day during mid-week periods.
- 5.2 The amount of office space needed for the LFB HQ is partly dependent on future levels of office attendance under hybrid working arrangements (in the post covid world uncertainty over future office attendance exists across the public and private sector).
- 5.3 Based on current attendance levels the space provided in the recommended option could be larger than is strictly required, while any major increase in attendance between now and occupation of the building in 2029 would potentially render the space smaller than required. Mitigations for these risks are covered in the business case attached to part two of this report and include ensuring that the new HQ is capable of extension if more space is required or sub-leasing to suitable other government organisations if spare space becomes available.
- 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

- 5.5 The recommended option involved reusing and upgrading a 100-year-old historic listed building allowing it to have a sustainable future as a valuable asset to LFB. While the age and historic nature of the building present a challenge, upgrade work will include interventions to improve thermal insulation in the walls and windows and will aim to provide an all-electric building, allowing use of electricity generated through renewables targeting carbon net zero.
- The design will be considered in line with the Building Research Establishment Environmental Assessment Method (BREEAM) and new build parts will target a BREEAM "Excellent" rating. The project team are working with LFB Sustainable Development team and will carry out necessary sustainability impact assessments during the next stage of the project and as part of the planning application to LB Lambeth.

Procurement

5.7 The current project team are working with the Procurement and Commercial Department (Assets and Estates) on the development and delivery 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 sustainable and value for money solution.

Communications

- The main focus of communications 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.
- 5.9 Continued feedback from the staff engagement process will be used to directly inform the design process which will support new ways of working.

An engagement exercise is underway with the community surrounding 8AE including two drop-in events held at the site supported by leafleting in the local area and the setting up of a web page for the project allowing feedback to be gathered. Another round of public engagement will occur prior to the planning application, allowing updated design information to be provided and regular communications will be maintained with local communities after the planning application has been made.

6. Financial comments

- 6.1 Under part two of this report, commercially sensitive information is disclosed. As part of this the requirement for both revenue and capital funding is set out to deliver the recommended option.
- The capital strategy within the 2025/26 budget report contains the capital borrowing requirements for the recommended option, and therefore short-term revenue implications from financing are contained within the MTFS.
- 6.3 Longer term revenue implications, and associated assumptions are set out in part two and will need to be incorporated into the budget setting process in terms of potential savings and investments required in order to deliver the recommended 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").
- 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 20014 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*
1	EIA	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



When completing this form please use the <u>EIA guidance notes</u> and check our other resources on our dedicated <u>EIA Hotwire pages</u>

Part one

You will only be required to complete a full EIA assessment if:

- a) as a result of completing the initial screening form, potential adverse impacts have been identified in an area of your activity requiring adjustments
- b) you are starting, reviewing or changing any major activity (e.g. a strategy, programme or campaign

The purpose of an EIA is to meet and justify the legal obligation required under the Public Sector Equality Duty (PSED), namely, the 'DUE REGARD' that documents that your activity will:

- a) eliminate discrimination, harassment, and victimisation;
- b) advance equality of opportunity; and,
- c) foster good relations between people who share a relevant protected characteristic and people who do not share it.

In your full EIA, you are only required to complete an assessment of any negative impacts. You must be able to show that your activity meets the three conditions of the due regard by providing relevant information to show how it caters for people with protected characteristics (where applicable), through eliminating potential discrimination and promoting opportunities to build equity between all groups.

A. Title and expected outcomes of the activity

New LFB Headquarters (HQ) Project To provide a new Headquarters for LFB following the end of the lease at Union Street in March 2027.

B. Who is this activity for, who is impacted by it? (all LFB staff, specific department, external communities)

This project is for LFB and will impact all staff and other users of LFB HQ facility. Depending on the option used to deliver an HQ, any new facility may impact local people close to the new building.



C. Reason for Equality Impact Assessment

Review of existing activity due to presentation of an updated Strategic Business Case.

D. Team responsible for the activity

EIA Author(s):

Name: Andy Holdsworth

Job title: Project Lead

Department: Property and TSS

EIA Owner(s) - individual in charge of the overall

activity:

Name: Laura Birnbaum

Job title: Project Sponsor

Department: Property and TSS

E. What other policies/documents are relevant to this EIA? (Please hyperlink each document, policy, and guideline referenced below)

Governance papers

2425305963Inclusive and Accessible Documents for Neurodivergent Individuals - Tips and Resources 2024.pdf

1554305055The-LFB-key-EDI-terminology2024.pdf

Public Sector Equality Duty

Equality Act 2010

Your London Fire Brigade – Our plan for 2023-2029 (CRMP)

LFB Values

F. Equality and diversity considerations

Describe the ways how your activity meets the conditions of the due regard of the PSED and how LFB employees and communities of London may be affected by your activity,



especially those ones with protected characteristics. Explain whether your activity may disproportionately affect any groups with a protected characteristic listed under the Equality Act 2010.

You must make sure to list any sources you have used to complete your analysis.

Risk Assessment

This section reviews risks against protected characteristics that are considered to have a high impact in the new HQ project office/ meeting accommodation, mitigations for these risks are contained in section G3.

Disability

The total percentage of staff across all staffing groups who have self-declared as having a disability is 8% with 4% either preferring not to say or have not provided their information.

- Risk 1: There is a risk of inadequate accessibility for users with physical disabilities
- **Risk 2:** The open-plan office layout, bright lighting, and potential noise levels could create an overwhelming sensory environment for some employees, impacting their ability to work comfortably and productively.
- **Risk 3:** Users with reduced visual acuity may not feel welcome or catered for in the new accommodation
- Risk 4: Users with hearing disabilities may be disadvantaged in meetings and other settings

Gender Reassignment

LFB does not currently collect statistics for gender reassignment.

Risk 5: There is a risk that toilet provision may be un-suitable for users in this category

Pregnancy and Maternity

Risk 6: There is a risk that users in this category will not feel welcome or catered for in the new HQ accommodation.

Religion and Belief

The majority of LFB staff are recorded as no religion at 40% with Christian recorded as the highest percentage at 31%. Other is 3%, Muslim 2% and Jewish, Buddhist, Sikh, Hindu at 1% with 20% either not providing their information or preferring not to say. These are the totals across all staffing groups within the workforce.



Risk 7: There is a risk than users of diverse religions and beliefs will not feel welcome of catered for in the new accommodation

Consideration of Public Users

Risk 8: There is a risk that public users from groups affected by equalities issues will not feel welcome and catered for in the building when visiting

Overall - project delivery

Risk 9: There is a risk that the project will not receive and act on feedback and advice from groups affected by equalities issues

Sources used:

LFB data sources

G. Evidencing Impact: please answer the following four questions:

G1. (a) List all stakeholders and organisations (internal/external) you have consulted or contacted regarding your activity, making sure to seek feedback from groups that may be the most impacted by the activity.

Extensive engagement has been carried out with LFB HQ staff. 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 with specialised requirements including Property, IT, Security, HR policy and Professional Standards Unit. A meeting has also taken place with Representative Groups (Trade Unions). A workplace (desk) occupancy survey was conducted in February 2025 and gate access data has been used to gauge workplace usage since 2023.

(b) Explain the insights gained, how you have/will evaluated and whether you intend to conduct a follow-up or seek post-

The survey provided information on Working style, collaboration and meetings, relaxing and taking a break. The engagement provided information to inform an activity matrix showing priority activities for each team (eg individual working vs. collaboration). Information was also gathered about cultural elements of the workplace including sense of community and social connection.



activity feedback from those stakeholders/organi sations?	Consideration of branding led to a recommendation that the office space tells the LFB story through design and aims to connect HQ staff to firefighters – creating a sense of purpose. Engagement with equalities groups reinforced the intentions of the project to ensure an inclusive workplace design through provision of the type of facilities mentioned in section F above. The workplace occupancy survey will help ensure that an appropriate mix of desks and other work settings is provided in the new office. A Workplace Change lead is being recruited for the project team who will assist in driving forward further rounds of engagement with staff and equalities groups over the coming phases of the project in collaboration with the LFB communications team.
G2. Clearly record any gaps in evidence which has limited this assessment being completed in full. Consider whether you can justify continuing the activity without this information, or if a mitigating action plan is required?	No gaps have been identified so far but as detailed designs for future HQ layout are shared with stakeholders and staff feedback may reveal gaps which can be addressed. A HQ project design advisory panel has been set up to consider designs in detail and report back to the project board on their suitability for LFB. LFB does not currently collect statistics for gender reassignment, neurodivergent needs, marriage and civil partnership, caring responsibilities, or socioeconomic background.
G3. Clearly record the following:a) any adjustments you have considered putting in place for people with	Mitigations against the risks shown in section F are indicated below: Disability Risk 1: There is a risk of inadequate accessibility for users with physical disabilities Mitigation 1: The entire building will be designed with wheelchair accessibility in mind. Spaces will be adapted to accommodate



protected characteristics and,

b) any activity to promote equity of access, opportunity, experience and outcomes? wheelchairs, ensuring that rooms and lifts provide adequate space, and that step-free access is available throughout the building. This includes careful thought about the design of toilet facilities, which will be made accessible for those with physical disabilities. Additionally, workstations will be designed with flexibility in mind, allowing for the height of tables to be adjusted to accommodate wheelchair users as well as those who may prefer to work standing up.

Risk 2: The open-plan office layout, bright lighting, and potential noise levels could create an overwhelming sensory environment for some employees, impacting their ability to work comfortably and productively.

Mitigation 2: Neurodivergent needs will be considered when developing decoration, branding, and signage. The office will provide a variety of work settings including individual booths, quiet areas and a wellbeing room.

Risk 3: Users with reduced visual acuity may not feel welcome or catered for in the new accommodation

Mitigation 3: Visual elements such as signage and carpeting for primary circulation areas will be created with the understanding that people may have different levels of visual acuity, and efforts will be made to ensure that the environment is comfortable and accessible for all.

Risk 4: Users with hearing disabilities may be disadvantaged in meetings and other settings

Mitigation 4: Principal meeting rooms and reception areas will be designed with individuals who have hearing difficulties in mind. Appropriate technology will be used to enhance their experience in these spaces.

Gender Reassignment

Risk 5: There is a risk that toilet provision may be un-suitable for users in this category

Mitigation 5: The New HQ will make provisions for self-contained individual gender-neutral toilet facilities wherever possible. This is



part of the wider effort to ensure that the building is inclusive and accessible for all users, regardless of gender identity.

Pregnancy and Maternity

Risk 6: There is a risk that users in this category will not feel welcome or catered for in the new HQ accommodation.

Mitigation 6: The design will incorporate a private area that can be used for mothering or other related needs, ensuring that individuals have the facilities they require. This area will be communicated through staff comms, building orientation materials and signage.

Religion and belief

Risk 7: There is a risk than users of diverse religions and beliefs will not feel welcome of catered for in the new accommodation

Mitigation 7: The New HQ project will accommodate individuals with specific religious practices by providing a dedicated reflection space. This area will allow for quiet time, enabling staff or visitors to pray or engage in other forms of spiritual observance. This area will be communicated through staff comms, building orientation materials and signage.

Consideration of Public Users

Risk 8: There is a risk that public users from groups affected by equalities issues will not feel welcome and catered for in the building when visiting

Mitigation 8: All mitigations above apply to all building users including members of the public.

The accessibility of meeting rooms that may be used by the public will be a key focus, ensuring that everyone can use the facilities comfortably in line with mitigations shown above for all users.

Overall Project Delivery



Risk 9: There is a risk that the project will not receive feedback and advice from groups affected by equalities issues.

Mitigation 9: Draft architectural designs will be shared with Equalities Groups and communicated to all staff with feedback acted upon to ensure that the design meets requirements. The workplace change lead for the project will be charged with ensuring that communications and change plan is put in place to assist during transition to new accommodation taking account of the diverse needs of staff.

Public engagement is taking place as part of a planning application allowing feedback on equalities issues.

G4. Clearly record how you will communicate the activity to those involved, especially if their protected characteristic may be a factor. You may need to consider diverse formats such as audio, large print, easy read, and other accessibility options in various materials?

Communications to staff is being carried out through the LFB internal communications team.

External communications (eg to members of the local community where building projects are proposed) is being assisted by specialist consultants in collaboration with the LFB communications and community engagement teams.

During communications, protected characteristics will be considered in order to ensure that the communication is delivered effectively.

Where engagement with local people in advance of a planning application is necessary, communications will be carefully tailored to meet the needs of people with protected characteristics, ensuring inclusive and effective engagement.

The below documentation will be referenced to ensure communications are accessible and inclusive:

2425305963Inclusive and Accessible Documents for Neurodivergent Individuals - Tips and Resources 2024.pdf

1554305055The-LFB-key-EDI-terminology2024.pdf



H. Mitigating action plan (where an adverse impact has been identified, please record the steps that are being taken to mitigate or justify it?)				
Protected characteristic	Action being taken to mitigate or justify			
I Mitigation Dlaw Over				
I. Mitigation Plan Ow	/ner			
Name: Laura				
Birnbaum	To be completed by the inclusion Team			
Job title: Project	To be completed by the Inclusion Team			
Sponsor	Review date: September 23, 2025			
Department:	•			
Property and TSS				



Part two: Inclusion team to complete - feedback and recommendations

J. EIA Outcomes

⊠ Recommendation 2:

Adverse impact(s) identified - activity continues with agreed justification or mitigation in place

K. Feedback

Please specify the actions required to implement the findings of this EIA and how the programme/ activity's equality impact will be monitored in the future. It may be helpful to complete the table.

Name: EIA team Sign-off Date: 24/03/2025 Recommendation 2: Continue and correct the activity accordingly following our feedback – this involves taking steps to remove any barriers to better advance equality and/or to foster good relations.

For the New LFB Headquarters (HQ), the EIA led to Recommendation 2. This activity can continue due to the robust equality considerations mentioned, we note that adjustments have been outlined by the submitter to ensure the equitable engagement of those with protected characteristics. These actions will be reviewed in six months to ensure alignment with the legal requirements of the PSED.

For future EIA submission:

Utilise HotWire resources library for Equality, Diversity, and Inclusion updates. This repository provides valuable information on data and supporting charities.



Link: Equality, Diversity and Inclusion Resources