GREATER**LONDON**AUTHORITY

REQUEST FOR DEPUTY MAYOR FOR FIRE DECISION – DMFD277

Electric vehicle charging infrastructure

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 2 of this decision, to fund the first two phases, and the first seventh of the third phase, referred to as phase 3a, of a programme to upgrade and expand London Fire Brigade's (LFB) electric vehicle (EV) charging infrastructure. Fulfilment of the remaining phase 3 works, presently referred to as phase 3b is expected to take a further 6 years, but it is not yet possible to confirm if this will be funded as individual annual or multi-year sub phases.

LFB reports that the roll-out of suitable EV charging infrastructure is critical to support its current and future operational capability, given its fleet replacement cycle. LFB has started to replace its fleet with EVs: electric cars are already in use; electric vans will be used from 2026-27; and heavy vehicles will be replaced with electric versions at the end of their operational life. However, LFB describes its current low-powered EV charging infrastructure as 'aged and unreliable'.

This report seeks approval to procure and install both low- and high-powered EV charging equipment across the LFB estate, to the value set out in part two. In 2026-27, LFB plans to replace aged low-powered charging equipment (phase one); install additional low-powered chargers to support new electric fleet vehicles (phase two); and install the first tranche of high-powered EV charging equipment required for new heavy vehicles (phase 3a), including Zero Emission Pumping Appliance (ZEPA) prototypes.

The Mayor of London chose the Accelerated Green pathway as his preferred option to meet his target for London to be net zero-carbon by 2030. Decarbonisation of LFB's fleet operations will follow this pathway, as detailed in the LFB Fleet Strategy 2024-35 and the LFB Carbon Net Zero Strategy. LFB reports that investment in EV infrastructure will enable its transition to a 'zero tailpipe emissions' fleet, and support partner organisations' transitions, by sharing access to high-powered EV charging equipment at LFB premises.

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 the Part Two report for the purposes of providing EV charging equipment.

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:
JoesPR	12 December 2025

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

Decision required - supporting report

1. Introduction and background

- 1.1. Report LFC-25-070z to the London Fire Commissioner (LFC) provides a detailed overview of the proposal. It explains that London Fire Brigade (LFB) is in the process of replacing its fleet with electric vehicles (EVs), as part of its commitment to the Mayor of London's Accelerated Green plan for London to reach net zero-carbon emissions by 2030.
- 1.2. LFB's commitments to a 'zero tailpipe emissions' fleet are set out in detail in LFC-24-019 (LFB Fleet Strategy 2024-35) and LFC-23-072y (LFB Carbon Net Zero Strategy), with the latter a supporting paper for DMFD211 (Provision of Increased Electrical Power at 55 Fire Stations).
- 1.3. LFB finds that the current EV infrastructure on its estate is not sufficient to support its current and expanding use of EVs, because:
 - LFB's current 'aged and unreliable' low-powered EV chargers are limited to one or two per site
 - some locations that will receive new EVs under LFB's plans have no EV chargers
 - while LFB plans to introduce electric heavy vehicles once current vehicles reach the end of their
 operational life, future Zero Emission Pumping Appliance (ZEPA) prototypes and other LFB fleet
 large electric vehicles cannot be deployed before high-powered charging infrastructure is in place
 and staff are trained to use it.
- 1.4. LFB reports that failure to replace low-powered EV charging infrastructure would result in operational difficulties, increased costs and lower productivity; while failure to provide high-powered charging infrastructure would delay its transition to electric vehicles and extend exhaust emissions from its fleet for many years.

2. Objectives and expected outcomes

- 2.1. This report seeks approval to procure and install both low-powered and high-powered EV charging equipment throughout the LFB estate in three phases:
 - phase one will replace existing, aged low-powered charging equipment
 - phase two will install additional low-powered chargers, at sites earmarked to receive new electric fleet vehicles
 - phase 3a (2026-27) will begin the installation of high-powered charging equipment and associated infrastructure following works to increase incoming power supplies at premises, (see DMFD211).
- 2.2. LFB plans to fund this initial investment in charging infrastructure from existing budgets by reprioritising its capital programme, as set out in part two. LFB will monitor LFB fleet fuel costs reduction and accrue cost recovery from staff and third-party charger use to provide evidence of LFB's ability to afford repayments for future borrowing.
- 2.3. Subject to a separate decision, LFB proposes to apply to The Mayor's Green Finance Fund for loans to finance phase 3b of this programme between 2027-28 and 2032-33. During phase 3b, LFB plans to continue to install high-powered charging equipment and associated infrastructure at an average of 14-15 sites per year. LFB finds that this approach meets the future LFB fleet EV charging requirements.

- 2.4. LFB reports that it has secured revenue funding outside of this decision to provide the Charge Point Management System (CPMS) and infrastructure maintenance service required to operate all its EV charging infrastructure for three years. LFB does not have any budget allocated to continue the CPMS provision following the initial three-year funded period.
- 2.5. LFB expects that, over time, the income from third-party and (to a lesser extent) staff use of its EV charging infrastructure will provide cost recovery to meet both future Green Finance Fund repayments and CPMS running costs.

3. Equality comments

- 3.1. 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.
- 3.2. 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.
- 3.3. 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.
- 3.4. 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 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.
- 3.5. The steps involved in meeting the needs of disabled persons that are different from the needs of persons who are not disabled include steps to take account of disabled persons' disabilities.
- 3.6. 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 to the need to:
 - tackle prejudice
 - promote understanding.
- 3.7. Installation of new EV charging equipment provides the opportunity to use PAS1899 Electric Vehicles Accessible Charging Specification guidelines to provide improved accessibility for charger users.

3.8. An Equality Impact Assessment has been approved, with no negative impacts identified.

4. Other considerations

- 4.1. LFB has completed and approved a full sustainable development impact assessment (SDIA). This identified positive impacts including reductions in fleet operating costs, carbon use, exhaust fumes, and noise pollution; and the ability to consider accessible charge point guidance for new installations. LFB plans to use a scoring mechanism during procurement to minimise the consumption of fuel and materials during the manufacture, delivery and installation of charging equipment.
- 4.2. LFB reports that the requirements for phases one, two and 3a will be tendered in accordance with the respective procurement regulations and the LFBs Scheme of Governance. The procurement team will develop a full procurement strategy with the Property and Technical Services team, with the exact duration of the contract(s) and the structure of the extension options established to support the LFBs Fleet electrification strategy and to provide LFB with future flexibility.
- 4.3. Should cost recovery exceed annual expenditure in the future, LFB reports that it may reduce the rates charged to others, following any adjustment required for previously incurred deficit. It plans to initially consider how the reduction in cost of purchasing fuel versus electricity could be set against repayment costs. However, once third-party charging cost recovery is established, it may allocate any saving against future vehicle costs, if appropriate.

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. This report recommends that capital expenditure is agreed, to the amount set out in the part two report, for the purposes of providing EV charging equipment. The cost implications of this proposal are set out in part two.
- 5.2. The report also notes that revenue funding is already available to source a new CPMS and maintenance service for three years. The ongoing cost after that point is expected to be funded through cost recovery.
- 5.3. Additional finance comments are set out in the part 2 report.

6. Legal comments

The LFC's General Counsel's Department have confirmed the following:

- 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 for Planning, Regeneration and the Fire Service (the Deputy Mayor).
- 6.3. Paragraph (b) of Part 2 of the said 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) of the 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. Section 5A of the FRSA 2004 allows the LFC to procure personnel, services and equipment they consider appropriate for purposes incidental, or indirectly incidental, to their functional purposes.
- 6.5. There are risks associated with this approach. The infrastructure provider might withdraw from the market, as per BP Pulse; or the equipment installed may become obsolete over time. This could require another replacement of the EV charger estate, and new installations or software to support them.
- 6.6. The chargers will be installed across much of the LFC estate. Risks will need to be balanced with other third-party user rights on sites such as telecoms and cabling, to ensure that the new EVs do not compromise existing land rights and connections. The installation will be further complicated by landlord requirements on PFI and leasehold stations and sites, and where buildings are listed by Historic England. These consents will add complexity, cost and timescales to the installation process.

Appendices and supporting papers:

LFC-25-070z: Electric Vehicle Charging Infrastructure Part 1 and its appendices

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 <u>or</u> 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	
<u>Daisy McLachlan</u> has drafted this report with input from the LFC and in accordance with GLA procedures and confirms the following:	(✓)
Assistant Director/Head of Service	
<u>Chandru Dissanayeke</u> 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 20 October 2025.	

CHIEF FINANCE OFFICER:

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

Signature Date
12 Dec

12 December 2025