

REQUEST FOR DEPUTY MAYOR FOR FIRE AND RESILIENCE DECISION – DMFD154

Title: Purchase of Replacement Cooking Equipment and Appliance Bay Heaters – Decarbonisation of LFC Estate

Executive summary:

This report seeks the approval of the Deputy Mayor for Fire and Resilience for the London Fire Commissioner (LFC) to commit capital expenditure for the amount set out in part 2 of the report, to replace gas-cooking equipment and gas appliance bay heaters with electric models across 40 sites. The implementation of these key actions will enable the LFC to achieve 28 per cent reduction of the current property emissions net-zero target by 2030. The sites have been selected where no electrical capacity upgrade works are required.

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 Fire and Resilience authorises the LFC to commit expenditure for the amount set out in part 2 of the report for the purposes of carbon reduction across the LFC estate.

Deputy Mayor for Fire and Resilience

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

The above request has my approval.

Signature:



Date:

8/3/22

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

Decision required – supporting report

1. Introduction and background

- 1.1 Report LFC-0641 to the London Fire Commissioner (LFC) sets out the background for the request to approve expenditure for London Fire Brigade (LFB) to implement several key actions that enable LFC to achieve 28 per cent of the property emissions carbon net-zero target by 2030. The London Environment Strategy (LES) was published in May 2018 with the support of the London Fire and Emergency Planning Authority (Report FEP 2797). This reinforced the existing group-wide 60 per cent reduction target; and set the further carbon-zero target. Following this, the Deputy Mayor for the Environment tasked each of the functional bodies to develop a strategy setting out how the 60 per cent CO₂ reduction target for 2025 would be met, along with the five-year carbon budgets introduced through the LES.
- 1.2 The LFC carbon reduction report (LFC0256) confirms the plan to achieve a 70-tonne carbon reduction across the LFC estate by 2023. This project is on target and budget to deliver the recommendations.
- 1.3 In July 2021 the Mayor of London committed to London being a net zero-carbon city by 2030, highlighting the urgency and the importance of the Greater London Authority (GLA) Group leading by example. The LFC proposes to adopt the UK Green Building Council's definition of zero-carbon, which defines net-zero operational carbon as "when the amount of carbon dioxide emissions associated with a building's operational energy on an annual basis is zero or negative". The World Green Building Council's definition, meanwhile, states that a net-zero operational carbon building "is highly energy efficient and fully powered from on-site and/or off-site renewable energy sources and offsets".
- 1.4 The LFC corporate performance indicators already include the CO₂ reduction target, which is reported annually. More detailed performance-monitoring information, including progress against carbon budgets, is captured through the sustainable development annual report, which is reported to the Deputy Mayor's Fire and Resilience Board.

2. Objectives and expected outcomes

Carbon net-zero stations

- 2.1 A feasibility study detailing the requirements to create a carbon net-zero fire station has been carried out. The study identifies the removal of gas-burning equipment and water-saving measures; and cites the retrofitting of LFC stations as the least expensive option for achieving carbon net-zero when compared to new-build. The data extrapolated to provide indicative costs and a high-level strategy for all fire stations has been submitted to the GLA.
- 2.2 Achieving carbon net-zero by 2030 will require the LFC to remove gas dependency from the estate. It is anticipated that this will require significant electrical capacity upgrade works and this

will be covered in the commissioned net-zero strategy. The LFB estate is currently fitted predominately with gas cookers that require replacement as they are beyond their economic life.

- 2.3 Forty premises have been identified as having adequate electrical capacity to replace the existing gas cookers with electric cookers. Additionally, 16 of these premises have adequate electrical capacity to replace the gas appliance bay heaters with electric space heaters. Electric cookers and heaters are already in use in the private finance initiative (PFI) estates. The PFI estates comprise nine stations that were designed, built and maintained by Blue 3 using funding under the government PFI. The Blue 3 contract runs for 28 years and forms a public/private partnership. Engagement has been undertaken with stations to confirm there is no operational impact to these proposals.
- 2.4 The premises have been selected based on the size of the electrical supply and available electrical capacity. Fire stations are required to retain 20 per cent spare electrical capacity and 80 per cent diversity, based on the approved standard station design brief. Gas cooking will need to remain in the remainder of the estate until the net-zero strategy is developed, as the present station's electrical capacity is insufficient.
- 2.5 The additional benefit is that removing gas cookers and appliance bay heaters improves air quality and reduces maintenance, due to the lack of flue gases requiring ventilation.
- 2.6 To support behavioural change, LFB has undertaken a technology upgrade as this is recognised as having the potential to deliver savings of 5 per cent or more. The new building management system will enable the central optimisation of energy usage in combination with the LFC's green champions programme, which seeks to promote behavioural change.

Collaboration

- 2.7 The outline principles in this report have been shared with the chair of the Environment Implementation Group. The chair noted her approval of the LFC's decision to separate the decarbonisation report into different papers, to concentrate on the immediate opportunities while continuing to explore a longer-term plan.

3. Equality comments

- 3.1 The LFC and the Deputy Mayor for Fire and Resilience 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.

4. Other considerations

Workforce comments

- 4.1 Given the significance of the targets and that the GLA has declared a climate emergency, it is intended that the net-zero strategy will receive a formal launch. A foreword to accompany the strategy will be drafted for the LFC; and discussions will take place with the GLA with regards to appropriate launch activity and press.

Sustainability implications

- 4.2 This report outlines LFC's carbon-reduction plans, in accordance with the 2030 net-zero targets set by the GLA.

Procurement implications

- 4.3 A collaborative framework agreement will be used to procure the replacement electric cookers and appliance bay heaters. The successful contractor will be expected to provide a dedicated project manager to deliver the programme of work and report to the LFB Capital Delivery team.
- 4.4 The new net-zero strategy will be undertaken by the current energy management consultant through its contract with the LFC to provide energy management and consultancy services. TEAM Energy provides regular reporting on consumption, cost, carbon emissions and renewable energy, and is familiar with all the buildings through site visits.

Conflicts of interest

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

5. Financial comments

- 5.1 The majority of the gas cookers and heaters in the estate are past their expected economic life. In many cases they have faults including the pilot lights running continuously. The replacement of the assets and the pilot projects will be funded through the LFB Property Capital Programme.
- 5.2 Property already has approval within the capital programme to fund the £384,000 requested in this report. The profiling of spend will be adjusted across the years 2022-23 to 2024-25; and any changes in this report will be shown in the capital monitoring report as part of the quarterly financial position.
- 5.3 The revenue impact of this programme has been considered. The whole-life cost of the new assets will be lower than the gas equivalent. The cost associated with buying gas is expected to increase by more than 25 per cent by 2030; and the carbon tax is expected to more than double to over £100 per tonne. This is aimed at moving gas from a low-cost fuel to a higher-cost fuel, comparable to electricity.

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 for Fire and Resilience (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...” hence that prior approval is sought by this report

- 6.4 Under section 351A of the GLA Act 1999, the Mayor is required to prepare and publish an LES. Under section 373 of the GLA Act 1999, the LFC must have regard to the LES while exercising any function.
- 6.5 One of the core principles of the LES is that the Mayor and the GLA Group, including the LFC, should lead by example in tackling environmental challenges. This report detailing the move towards net-zero is one such challenge to be met.
- 6.6 These comments have been adopted from those provided by the LFC's General Counsel Department in report LFC-0641 to the LFC.

Appendices and supporting papers:

Part 2 – DMFD154 – Carbon Net Zero Across the London Fire Commissioner Estate

Part 1 of report LFC-0641 – Carbon Net Zero Across the London Fire Commissioner Estate

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 either be published 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 Fire and Resilience for approval.

✓

Advice

The Finance and Legal teams have commented on this proposal.

✓

Corporate Investment Board

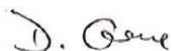
This decision was agreed by the Corporate Investment Board on 7 March 2022.

✓

EXECUTIVE DIRECTOR, RESOURCES:

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

Signature



Date

7/3/22