



LONDON FIRE BRIGADE

LFC-24-019

London Fire Brigade Fleet Strategy 2024 - 2035

Report to:

Service Delivery Board
Commissioner's Board
Deputy Mayor's Fire and Resilience Board

Date:

24 January 2024
15 February 2024
5 March 2024

Report by:

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Report classification: For decision

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PART ONE

Non-confidential facts and advice to the decision-maker

Executive Summary

This report seeks agreement to a proposed Fleet Strategy document which is an enabling strategy for the Community Risk Management Plan. It is based on the fleet principles, vision, and objectives. These have been derived from engagement with Babcock International, the Carbon Net Zero project and operational colleagues.

At the core of the delivery model is management and maintenance of the fleet and associated equipment in order that it continues to support the objectives set out in this strategy (in particular the effective and resilient themes). While projects and change initiatives are required, focus on core services first being at the center of fleet delivery is in accordance with the feedback received from fleet and equipment users.

The Fleet Strategy does not request approval for expenditure. Approval for spending on individual projects will be sought through the regular LFB Governance process on a case-by-case basis.

Recommended decisions

For the London Fire Commissioner

That the London Fire Commissioner approves the London Fire Brigade Fleet Strategy which is attached at Appendix 1.

1 Introduction and background

- 1.1 The Community Risk Management Plan (CRMP) sets out the services that LFB will provide over the period 2024 to 2029 to keep London safe. The LFB fleet and associated equipment is vital platform for delivery of these services through the provision of appliances and specialist infrastructure which support a wide range of activities including fire and rescue response, prevention and protection and training for LFB staff. The fleet is also a source of innovation and possible collaboration with internal and external partners.
- 1.2 The LFB's Fleet is made up of both vehicles (over 350 including nearly 250 heavy goods vehicles) and operational equipment (approximately 100,000 items of which around 50% are maintained by Babcock and 50% by LFB OSG) utilised on the front line. Fleet and the associated equipment are managed through the Vehicle and Equipment contract with Babcock International Group and Operation Support Group (OSG). This strategy encompasses the decarbonisation and modernisation of LFB's fleet of vehicles and associated equipment.
- 1.3 Requirements of the Fleet are constantly evolving in response to service delivery needs as well as expectations for provision of the latest technologies. These factors, together with the cost and fixed asset replacement life of specialist assets within the current asset replacement program (ARP) mean there is a greater need for LFB to move to a planned rather than a reactive short notice ad hoc model of fleet and equipment commissioning for additional requirements.
- 1.4 A paper setting out the Fleet Strategy Principles Vision, Strategic Themes and Objectives is attached for approval at Appendix 1.
- 1.5 The Strategy delineates the fleets characteristics, assesses the fleet implications stemming from LFB corporate strategies, plans, and reviews (including the CRMP). It takes into account the perspectives of stakeholders, gathered through informal engagement, and input from market experts in these technologies. The document presents a versatile delivery plan steering investment towards technologies to collate data and decarbonise the fleet.

2 Principles and expected outcomes

- 2.1 The Strategic principles for the fleet strategy are reproduced below.

Principles and Objectives for the Fleet Strategy

Strategic Principles for the Fleet	Strategic Objectives for the fleet
1) Effective Provide the fleet resources in a flexible manner that suits the need of the London communities. Utilise technology and data to make decisions.	1) Improve data and information. 2) Deliver maintenance with optimal scheduling. 3) Operational approach review.
2) Innovative Investigate new technologies and innovations to improve sustainability, inclusivity and act as a market stimulant across the fleet.	4) Engagement with vehicle industry to keep abreast of market technology. 5) Investigate vehicle innovations and prototype/trial in advance of fleet replacement where necessary.
3) Resilient Provide a fleet that all LFB can trust, ensuring that it is reliable and available when required and efficiently used.	5) Ensure the asset replacement programme provides all equipment required to fulfil LFBs present and future obligations. 6) Ensure that charging infrastructure, associated fleet support equipment

	and maintenance practices provide seamless availability of equipment for operational staff.
<p>4) Collaborative</p> <p>Ensure that the fleet includes a collaborative approach to use and design, fostering shared insights and learning from across the sector.</p>	<p>7) Collaborate nationally with other Brigades and emergency service partners to expedite design and management of future fleet.</p> <p>8) Work with GLA partners and other public sector bodies within London to share knowledge and resilience.</p>

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.

- 3.8 Equalities Impact assessments will be carried out as necessary for projects coming under the strategy.
- 3.9 An EIA has been approved by the EIA Inclusion Team as meeting Recommendation 1, no further action required.

4 Other considerations

Workforce comments

- 4.1 The strategy requires continued adequate resourcing of the LFB Property and TSS department through normal arrangements.

Sustainability comments

- 4.2 A sustainable development impact assessment (SDIA) has been completed and approved.

Procurement comments

- 4.3 There is no direct procurement impact, but any future procurement activity, will be undertaken in line with the Scheme of Governance and Standing Orders for Procurement as necessary.

Communications comments

- 4.4 The final report will be subject to a lay-out and design process to ensure consistency with other CRMP Enabling Strategies and the Fleet team will continue to work with the communications team over appropriate communications actions at the time of publication.

5. Financial comments

- 5.1 This report recommends that the LFB Fleet Strategy is agreed. This report does not request approval for expenditure. Any recommendations to incur expenditure based on this strategy will be considered in line with LFB Governance requirements.
- 5.2 The 2024/25 November Budget Submission to the Mayor included a Capital Strategy for the LFB covering a 20-year period. Any proposals to incur expenditure will be considered against the figures in that Capital Strategy. The Fleet Strategy notes that the existing fleet budget will not cover the investment required to replace the entirety of the entirety of LFB's fleet with carbon zero emission alternatives. This will continue to be considered as part of the budget process for future years.

6. Legal comments

- 6.1 This report seeks approval of the Fleet Strategy 2024- 2029 ('the Strategy') which is attached at Appendix 1.
- 6.2 The report confirms the Strategy supports and is consistent with the Community Risk Management Plan.
- 6.3 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.
- 6.4 Section 327A(5) of the Greater London Authority Act 1999 ('GLA Act') requires the Commissioner to secure that the London Fire Brigade is efficient and effective. The Mayor must hold the Commissioner to account for the exercise of its functions in accordance with Section 327A(8) of the GLA Act. Consideration of this report and attached Strategy at Appendix 1 will fulfil this obligation.
- 6.5 The core duties of the London Fire Brigade are primarily set out in the Fire and Rescue Services Act 2004, and the decision to roll out the Strategy is within the Commissioner's general powers under that Act.

List of appendices

Appendix	Title	Open or confidential*
1	LFB Fleet Strategy	Open
2	Equalities Impact Assessment	Open
3	SDIA	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: NO



LONDON FIRE BRIGADE

London Fire Brigade Fleet Strategy 2024 - 2035

Title:	LFB Fleet Strategy 2024/2035	Revision:	DRAFT v5	Date Created:	12/01/2024
Owner:	Tim Claringbull Head of Contract Management and Performance	Author:	Ross MacLennan (Babcock) Alternative Fuels Project Engineer Charlotte Smith Fleet Technical Officer Mark Smith Fleet Strategy and Carbon Net Zero Manager	Review Date:	01/04/2025

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1) Executive Summary

London Fire Brigade’s Fleet is made up of both vehicles (over 350 including nearly 250 HGVs) and operational equipment (approximately 100,000 items) utilised on the front line. Fleet and the associated equipment are managed through the Vehicle and Equipment contract with Babcock International Group and Operational Support Group (OSG).

This strategy encompasses the decarbonisation and modernisation of LFB’s fleet of vehicles and associated equipment. The strategy has been co-authored with Babcock International. They have provided technical and market content.

This strategy is derived from the LFB Carbon Net Zero Strategy and the Community Risk Management Plan that both have several principles and programmes that relate to the work being completed within this strategy. The purpose of this strategy is to provide a guiding direction and principles to follow for the duration of the Babcock V&E contract, when replacing the vehicles and equipment at their planned replacement dates and meeting the Mayoral aspiration of Carbon Net Zero by 2030. In addition, the Estate Strategy is being composed at the same time and these two strategies will need to work together in order to accomplish LFB’s goals.

This strategy has drawn on lessons and engagement from key stakeholders, encompassing existing working groups and boards across LFB. The strategy was shared for input with enabling services such as strategy and risk, and property, and to be presented to the next Carbon Net Zero Project Board. These collaborative efforts shaped the guiding principles embedded in the strategy, reflecting drivers in Change Programmes 3, 6 and 8.

Considerations for the fleet strategy:

- The current fleet approach is for replacement of similar vehicles and equipment on fleet at defined end of life dates subject to modification to suit operational requirements but does not account for alternative methods of propulsion.
- The fleet consists of a wide variety of vehicles, with the highest volume being 188 Dual Pump Ladders (DPL) which may be considered as a ‘typical fire engine’ (143 of these are operationally available at any one time). These are the exact same type of vehicle with two different equipment stowage arrangements, of which the majority of what is carried is the same, to meet the first response needs of Londoners.
- Fire and Rescue Services across the country deal with different conditions in comparison to London. London has a unique risk profile as it includes the majority of high-rise premises in the UK, yet also encompasses river rescue and rural settings.

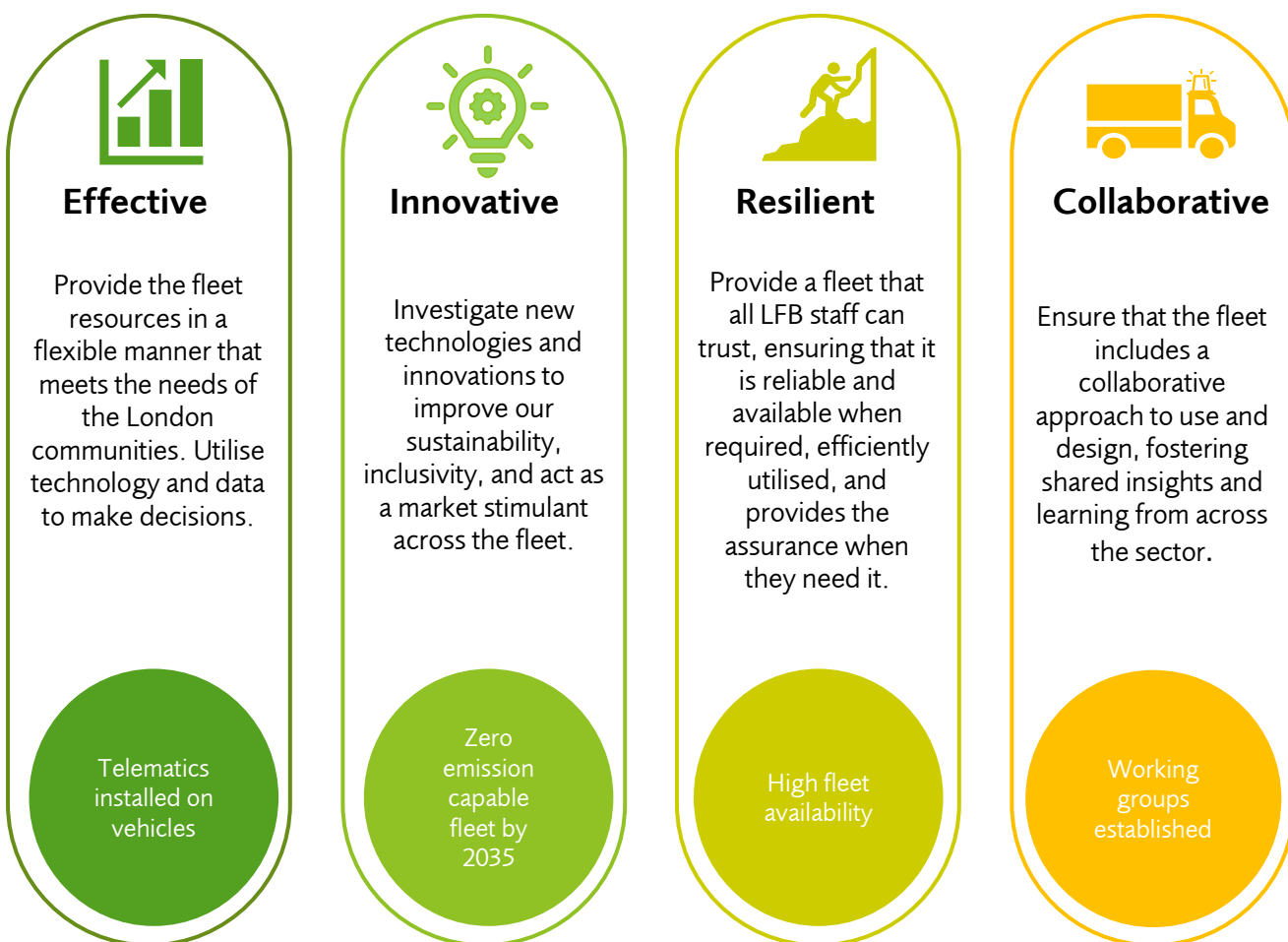
This strategy will ensure that LFB deploy the latest technological innovations to have a fleet that is fit for purpose, effective and resilient, encompassing the sustainable goals of the organisation.

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The outputs of this strategy will be:

- Data led fleet analysis – Historic incident information, maintenance, and fuel records along with telematics data will be utilised alongside future brigade requirements to determine future fleet requirements.
- Modernisation of fleet vehicles - New fleet vehicles will utilise appropriate technology and improvement in design to optimise capability and accessibility.
- Optimisation of Fleet Management- There will be a review into the operational assets and decisions regarding any future vehicles and equipment lifecycles will be data led. This will include assessment of de-coupling and fleet maintenance practices.
- Emissions reductions- By 2030 LFBs Fleet carbon emissions will have been reduced to approximately 50% of its 2022 consumption, with full fleet decarbonisation forecast for 2035.
- Fleet Infrastructure and Resilience– Development of vehicle charging and associated equipment/planning to effectively support LFB operations.
- Improved Collaboration- Working more closely with other brigades and emergency services nationally to share new fleet technology experience and knowledge, working with GLA partners and other public sector organisations within London to support resilience and modernisation.

The four principles of the fleet strategy and the supporting workstreams are:



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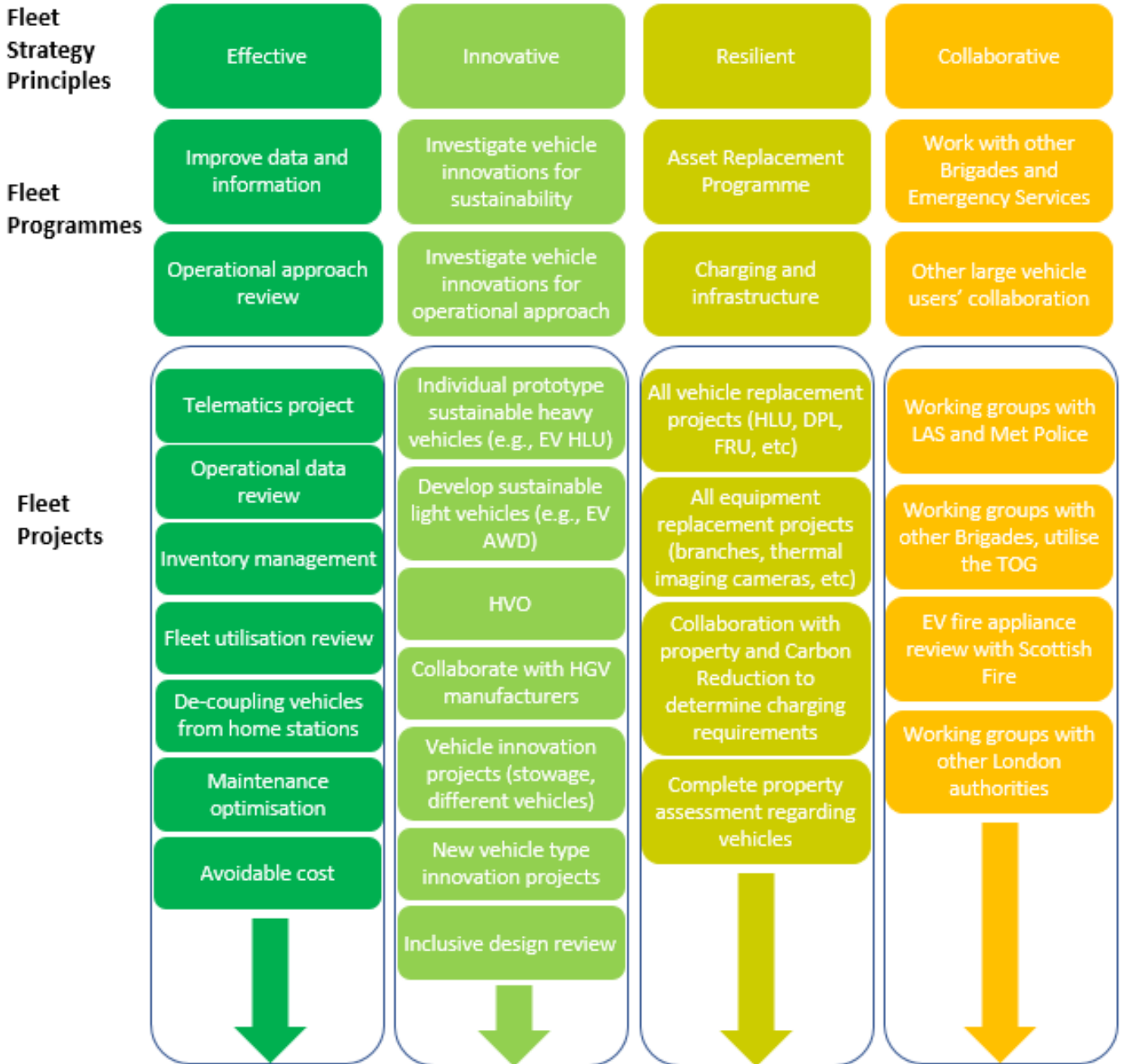
Date Created: 12/01/2024

Owner: Tim Claringbull
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Fleet Technical Officer
Mark Smith
Fleet Strategy and Carbon Net Zero Manager

Review Date: 01/04/2025

LFB Fleet Strategy



- Data led fleet analysis – historic incident and maintenance information alongside vehicle telematics
- Modernisation of fleet vehicles – utilise appropriate technology and optimise capability through design
- Emissions reduction – 50% reduction by 2030 and full fleet decarbonisation by 2035
- Fleet infrastructure and resilience – development of charging and planning to support operations
- Improved collaboration – working closer with FRS, emergency services and public sector organisations

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2. Purpose and Strategic Drivers

a. Purpose

This purpose of this document is to provide a fit for purpose and flexible vehicle and equipment fleet with high capability and reliability, encompassing the sustainability goals of the organisation. This fleet strategy will encourage collaborative working and the utilisation of data driven strategic decisions to supply the necessary assets to operational colleagues, maintaining operational responsibilities to ensure the community's safety.

LFB Fleet Strategy will be paired with annual Fleet Strategy Action Plans: these will provide a high-level plan with detailed individual projects as summarised within the table on previous page for LFB FLEET to support the needs of LFB's Community Risk Management Plan, ensuring LFB has a fleet of vehicles and equipment, including the iconic frontline fire appliances, which allow the organisation to satisfy its duty of protecting Londoners.

b. Strategic Drivers

In 2022 the Mayor of London published 'Analysis of a Net Zero 2030 Target for Greater London' which identifies the Accelerated Green scenario as the preferred pathway to net zero. This provides major decarbonisation but supports the principles of interim offsetting measures and the need to consider the remaining life of existing public assets.

Following extensive public consultation LFB shared LFB Community Risk Management Plan (CRMP) in 2022 which confirms LFB commitment to reducing impact on the environment and stated the target of aiming to reach net zero carbon by 2030. This strategy defines net zero to include Scope 1 and Scope 2 emissions in accordance with methodologies laid out in the Greenhouse Gas Protocol¹. In 2020/2021, this equated to 10,991 tonnes of CO₂e.

This strategy also delivers CRMP commitments to work closely with strategic partners, modernising enabling services technology, adapting to changing demand and Net Zero.

Principles 4, 5 and 6 from the Carbon Net Zero Strategy (Offsetting and alternative fuels, fleet decarbonisation and smart energy use respectively)

Principles of collaborative procurement established by the GLA Collaborative Procurement Board².

Mayor of London - London Environment strategy (May 2018) Leading by example – *the Mayor and wider GLA group should lead by example. Organisations like Transport for London (TfL), as well as organisations the Mayor has oversight of, such as the Metropolitan Police and London fire brigade, can set examples and use new technologies.*

¹ [Greenhouse Gas Protocol | \(ghgprotocol.org\)](https://www.ghgprotocol.org) **Scope 3** emissions from sources not owned or controlled by LFC are not within scope of this strategy, however under the requirements of the GLA group Responsible Procurement Implementation Plan (RPIP) LFC are working with suppliers to reduce supply-chain carbon emissions.

² [Collaborative Procurement Board | London City Hall](https://www.london.gov.uk/working-with-us/collaborative-procurement)

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The wider need for LFB to improve air quality in London in accordance with the ULEZ³ standards. Diesel obsolescence – November 2021 the UK Government announced the sale of new petrol and diesel vehicles would be phased out from 2030 to only allow Battery Electric Vehicles (BEVs) and hydrogen Fuel Cell Electric Vehicles (FCEVs) to be sold in mainstream road-going markets in the UK with both having zero tailpipe emissions. The Prime Minister has since announced that the ban would be pushed back to 2035.

i. Health and Safety

The LFB Health and Safety policy (597) sets out clear requirements for all brigade activities with reference - *4.16 Providing safe plant, equipment, working conditions and safe systems of work.* - providing a clear standard that all vehicles and equipment provided by the fleet strategy must meet. Replacement of assets provides the opportunity to review any incidents involving previous versions of fleet equipment, changes in legislation/guidance and developments in technology to ensure that new vehicle and equipment designs provide further enhancement of safe working conditions. The change to zero tailpipe emission vehicles and equipment provides clear health and safety benefits in improving air quality and reducing noise in work environments in the immediate vicinity of operational equipment whilst also reducing the need for colleagues to handle conventional refuelling equipment, but potentially also presents some elements of risk with the introduction of vehicle traction batteries and associated charging equipment. Electrical safety will be a key consideration in all vehicle prototyping and subsequent fleet procurement. All technical developments and legislation will be taken into account including but not limited to:

- BSI pas-7060,7061 & 7062 - Electric Vehicle Standards
- BS ISO 6469 – Electrically propelled road vehicles. Safety specifications Rechargeable ESS.
- ECE Regulation 100 Rev.3 – Harmonized Technical Standard for Wheeled Vehicles
- ISO/SAE 21434:2021 – Road Vehicles Cyber Security Engineering

ii. Reduction of Road Risk

Whilst operational road risk can be affected by various elements, such as driver behaviour and traffic conditions- replacement and modernisation of the fleet presents the opportunity to improve vehicle safety by applying advancements in design and technology. The London Vision Zero action plan sets out bold and ambitious plans to eliminate deaths and serious injuries from London's transport network. Associated with this plan, TfL's Direct Vision Standard sets requirements for improved driver vision whilst operating HGVs over 12-ton GVW within London. All LFB HGV support vehicles will meet the criteria of the Direct Vision Standard and whilst fire appliances are exempt from the standard, improvements in vehicle design as a result of the Direct Vision Standard which are able to will be integrated into new appliance specifications.

iii. Equality, Diversity, and Inclusion

This fleet strategy covers the decarbonisation and replacement of LFB fleet assets utilised by members of LFB staff. Whilst vehicles and equipment utilised by the brigade are subject to several legal and other safety requirements which determine much of the vehicles design, for example -

³ [Ultra-Low Emission Zone - Transport for London \(tfl.gov.uk\)](https://www.tfl.gov.uk)

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BSEN1846 Safety and Performance Standard for Fire Fighting and Rescue Service Vehicles, there is the opportunity for the brigade to consider and where possible improve the inclusiveness and accessibility of the fleet by utilising an inclusive design review process. This process is applied as a “business as usual” practice for every fleet replacement project, consulting with users and reviewing outgoing assets for areas of improvement to be included by the LFB FLEET team in the next assets specification. An example of physical changes between generations of vehicles to improve inclusiveness via accessibility as a result of FLEET team work is the change of Command Support Units from the previous truck body type to the new low floor “bus” body type, this change allows much easier access due to the removal of steps to enter and exit the vehicles.

Further considerations for fleet replacements will include how information is presented to the user – partly as a neurodiversity consideration but also for practicality - some manufacturers information is presented in intensive and highly technical formats, generally using extensive black text on white backgrounds. Reducing un-necessary text at the point of use and considering the format of text and colours used for backgrounds where possible should prove to be particularly beneficial for neurodivergent colleagues, any changes of this type will be subject to consultation with the Neurodiversity ESG to ensure the quality of the solutions provided. All asset specifications and/or modifications are designed and approved by the LFB FLEET team, with all modifications completed or managed by Babcock as part of the vehicle and equipment maintenance contract. All procurement is completed in line with LFB Policy 696 - The GLA group responsible procurement policy, of which Sections 5 & 6 detail requirements relating to EDI from LFBs supply chain.

c. Assumptions

The Mayor of London’s Objective	<p>An objective of this Fleet Strategy is to achieve carbon net zero tailpipe emissions for London Fire Brigade’s fleet of vehicles. It is assumed the Mayor of London does not change the targets that underpin this strategy.</p> <p>For example, the exclusion of emissions created during the manufacture and transport of the vehicles from the carbon targets before they join London Fire Brigade’s fleet.</p>
The Mayor of London’s Target Date	The aspirational date specified by the Mayor of London for London Fire Brigade to achieve this objective will remain as 1 st January 2030, as opposed to the central government target date for the UK to achieve this objective by 2050.

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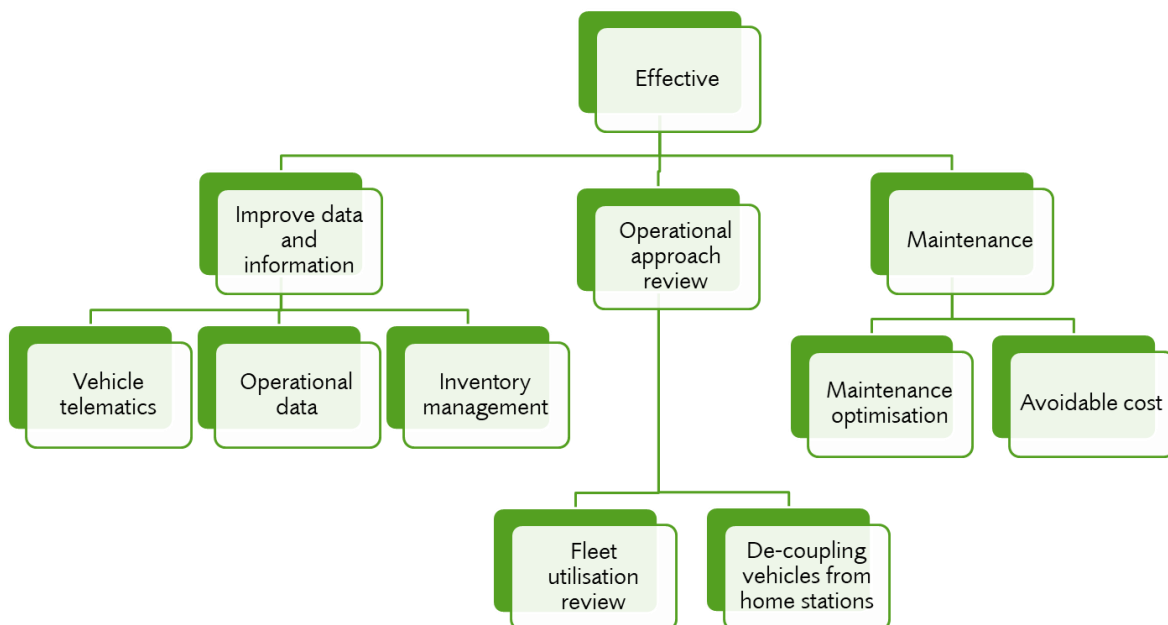
Technology Market	<p>The technology market, both vehicle and fuel, will mature over the coming decade, improving capability, reliability, and affordability of new and converted solutions.</p> <p>Original Equipment Manufacturers (OEMs) are expected to be incentivised to develop capable, reliable, and affordable solutions as national and international demand for alternatively fuelled vehicles increases.</p>
Operational Approach	London Fire Brigade’s current operational approach can be evolved and adapted and the ‘like for like’ asset replacement strategy can be innovated to include zero tailpipe emission technology.
Fleet Resilience	<p>London Fire Brigade’s fleet requires the same/improved level of resilience achieved through business continuity planning. Alternatively fuelled vehicle solutions will be available that do not negatively impact the resilience of London Fire Brigade’s fleet.</p> <p>This includes the fuelling and any new part requirements resulting from the transition to alternatively fuelled vehicles.</p>
Infrastructure	London Fire Brigade’s infrastructure, specifically fire stations, can be developed in a timely manner to accommodate the needs of the fleet as the vehicles and equipment are transitioned over to alternative solutions. This will also require revision of station management policies regarding the use of infrastructure.
Electricity Supply	Sufficient carbon net zero electricity will continue to be available and economically viable. This is expected to be a combination of zero carbon electricity purchased from suppliers and that generated locally at LFB premises utilising solar panels.
Fleet Funding	Increased funding is available to allow the Fleet Strategy objectives to be achieved by the specified target date.
Resource Training	London Fire Brigade and Babcock staff will be adequately upskilled via a long-term plan providing comprehensive training, whether that be for the operation, management, or maintenance of alternatively fuelled vehicles.
Stakeholder Engagement	There is organisation-wide buy in and alignment to this Fleet Strategy from London Fire Brigade stakeholders throughout the duration of this transition to the modernised vehicle and equipment fleet which will be achieved with ongoing communication and internal stakeholder management.

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Workforce	Any assets will be as inclusive as possible, whilst maintaining practicality, for all members as London Fire Brigade’s workforce continues to diversify over the coming decade.
London’s Risk Profile	Any developments to London’s risk profile are disseminated throughout London Fire Brigade and encompassed, where relevant, into the application of this Fleet Strategy.

3. Principles

a. Principle 1 – Effective programme



i. Vehicle Telematics and Operational Data

Real time, accurate data is necessary to understand exactly how LFB use the current fleet and therefore which solutions will be a success. A limited level is presently in operation across the fleet with a review currently underway to investigate more widespread use. Investment in technology and data will be the subject of discrete business cases aligned to the LFB governance process.

There is a wide range of possible opportunities to gather data and generate information on fleet utilisation and impact. These include, but are not limited to:

- Telematics
 - Location

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- Vehicle use (drive)
- Equipment use (auxiliary power requirement – fire pump/turntable ladder)
- Fuel usage/battery state of charge
- Operational data
 - Fuel dispensed/Vehicle charger information
 - False alarms attended.
 - Vehicles required vs personnel required vs equipment required.

The decision to invest in and develop any solution will be based on data provided by telematics and operational records. The two programmes within this principle and the projects within them are shown in the graphic below and on the plan on a page.

ii. Inventory management

The fleet includes over 100,000 pieces of equipment, the aim of this project is to implement a software solution to track each item of equipment, maintain maintenance records, life cycle costings and service details. The software will also enable firefighters to raise equipment maintenance jobs, transfer equipment between appliances and report any issues. Additionally, the system will be used to collate all requests for new equipment or service requests to intelligently route the day van service eliminating the need to visit stations unnecessarily.

Equipment will be provided with a unique identity using tags, scanning hardware will also be procured to read the tags intelligently and efficiently. This solution would also align the Brigade to other blue light partners such as the LAS and other Fire and Rescue Services.

A further benefit of employing this solution is the potential for cost saving in relation to a reduction of the amount of equipment held within the Brigade due to the removal of stockpiling of equipment, lower fuel consumption due to a reduction of day van service miles, and the ability of the Brigade to procure with accurate historical data in the future.

iii. Fleet utilisation review

Utilising the data collected through telematics and the operational data available, it is the intention of this strategy to complete a review of the fleet. The purpose of this review is to determine whether LFB’s fleet is suitable for the ever present and changing risks of London. Considerations for this review are as follows: are LFB are making the most of the various appliances and equipment across the fleet, in what situations are the vehicles and equipment used in and what exactly they are used for in these scenarios, how often the assets are used, do they need to be more readily available or in more specialist situations, amongst others.

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The outcomes of this review will be a good understanding of the fleet and how it is utilised in various scenarios, what vehicles and equipment may be required in the future to meet the needs of London communities, what work may need to be done to the current fleet to bring it up to the required level and peak efficiency.

Some data analysis was completed as an initial part of the strategy development to gain understanding of the operational data available and what additional data may be required. Please see the tables below:

Asset Types	Incidents Attended
Bulk Foam Unit	11
CBRN Unit	356
Command Unit	2,027
Deputy Assistant Commissioner	6
Equipment Lorry	19
Fire Boat	108
Fire Investigation Unit	1,466
Fire Rescue Unit	8,620
High Volume Pump Base	18
High Volume Pump Hose Pod	1
Hose Laying Lorry	40
Incident Support Personnel	142
Ops Support Unit	461
Prime Mover (Resilience)	32
Pump	39,479
Pump Ladder	82,008
Pump Ladder - Single Pump	50,100
Pump Ladder @ FRU/ALP Stn	20,977
Station Commander	898
Turntable Ladder	5,393
Turntable Ladder 64m	500
USAR Pod (Resilience)	6
Grand Total	212,668

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Incident Type	No of Incidents	Average Incident Duration Seconds	Average Pump Count	Average Pump Hours	Average No. FRU	Average No. Aerials
AFA	46,566	809.12	1.82	1.83	0.07	0.11
Chimney Fire	15	2,503.47	1.73	2.33	0.00	0.27
False alarm - Good intent	11,840	1,046.71	1.77	1.80	0.07	0.12
False alarm - Malicious	1,009	995.02	1.81	1.83	0.07	0.11
Flood call attended - Batch mobilised	234	11,801.02	1.01	2.44	0.00	0.00
Late Call	7		1.14	1.14	0.00	0.00
NULL	2,279	644.00	1.20	1.19	0.00	0.00
Primary Fire	9,118	2,303.93	2.75	5.22	0.11	0.19
Secondary Fire	10,157	1,180.56	1.18	1.32	0.00	0.01
Special Service	46,445	1,663.93	1.11	1.29	0.08	0.01
Standby	7		1.14	1.14	0.14	0.00
Use of Special Operations Room	37	757.50	1.00	1.00	0.00	0.00
Grand Total	127,714	1,298.59	1.56	1.82	0.07	0.07

iv. De-coupling Vehicles

Currently LFB's fleet of vehicles have a specific home station for each vehicle and vehicle type. This is based on the most appropriate strategic location for the type of appliance and the ability to fit the appliance in the station. This is most notable for the 64m Turntable Ladders (TLs) that are on a 32-ton chassis vehicle, 12m long and nearly 4m tall, which are the biggest vehicle on the fleet and are only able to fit in a small number of stations because of this. The intention of de-coupling is to increase the flexibility of the fleet and balancing the operational usage across vehicles that have previously been at busier stations with vehicles that have previously been at quieter stations. This will have benefits seen by both operational colleagues and the FLEET team, through reduced equipment restows with longer gaps between them saving LFB time, money and will have a positive impact on the reduction of CO2 emissions of the fleet. In addition, wear will be more evenly distributed across the fleet ensuring that there will be a reduced risk to some vehicles needing significantly more repair work, increased downtime in workshops and becoming unviable towards the end of their operational life.

v. Maintenance optimisation

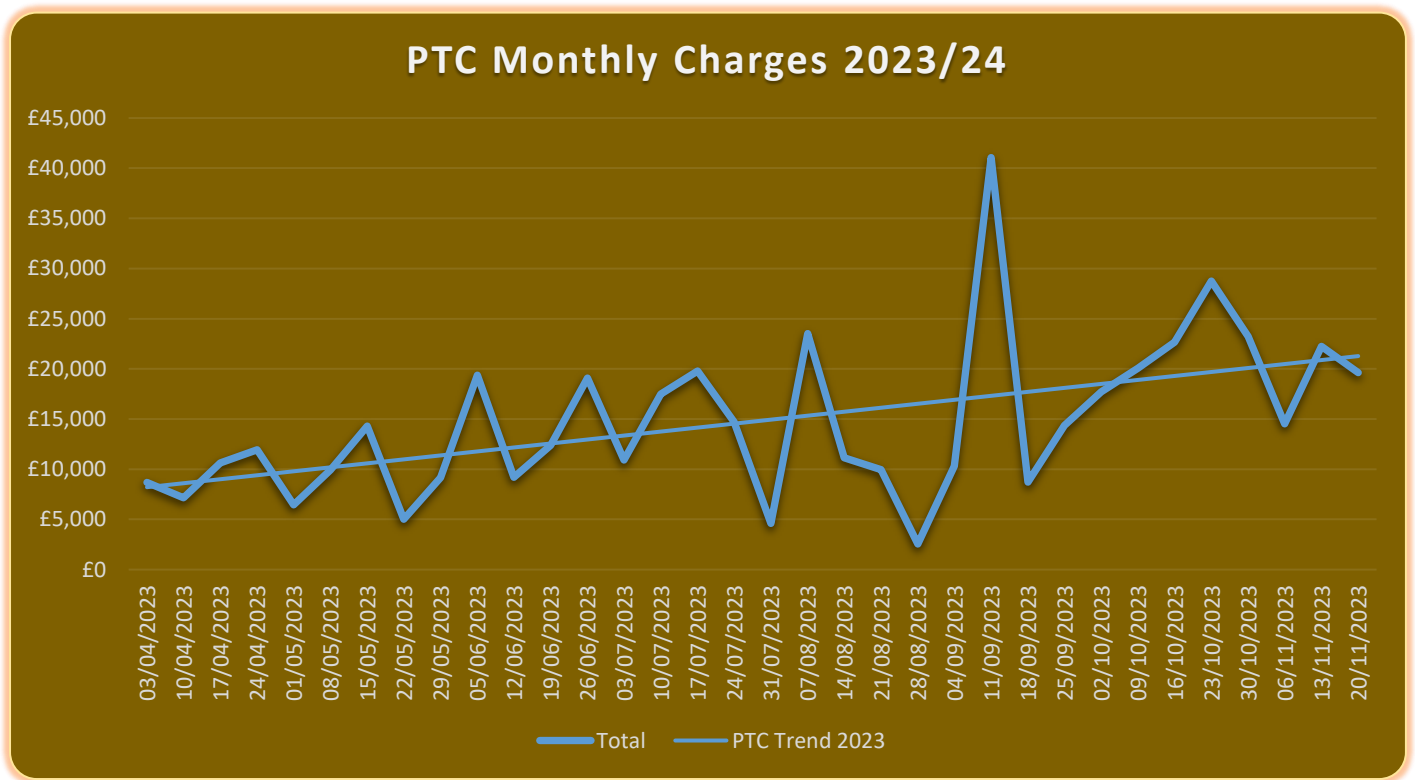
Maintenance is an integral part of fleet management ensuring efficiency and reliability throughout the operational life of vehicles and equipment. Ensuring this is completed in a timely and professional manner is vital. LFB outsource the maintenance of vehicles and equipment to Babcock International Group as mentioned throughout this strategy. LFB comprehensively monitor vehicle off road time along with analysis of repair information to ensure maximum availability of assets.

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Quality assurance is provided by Applus who complete independent inspection of vehicles completed by Babcock and provide detailed assessment and reporting to LFB FLEET.

Pass Through Costs (PTC) are all repair and maintenance costs (non-fair wear and tear) which are not covered by the terms of the contract with Babcock.

Summary information for these is provided by Babcock at predetermined dates, including an overview of all the maintenance completed as part of a service or coded defect that they do not consider to be included within the contract. This is reviewed internally by the engineers within FLEET and accepted or rejected. Through the current process monetary savings have been made, but the future project around this process is to ensure that the items that come up on a regular basis are either absorbed into the normal maintenance cost, or training and engineering solutions are provided to reduce the instances of reoccurrence.

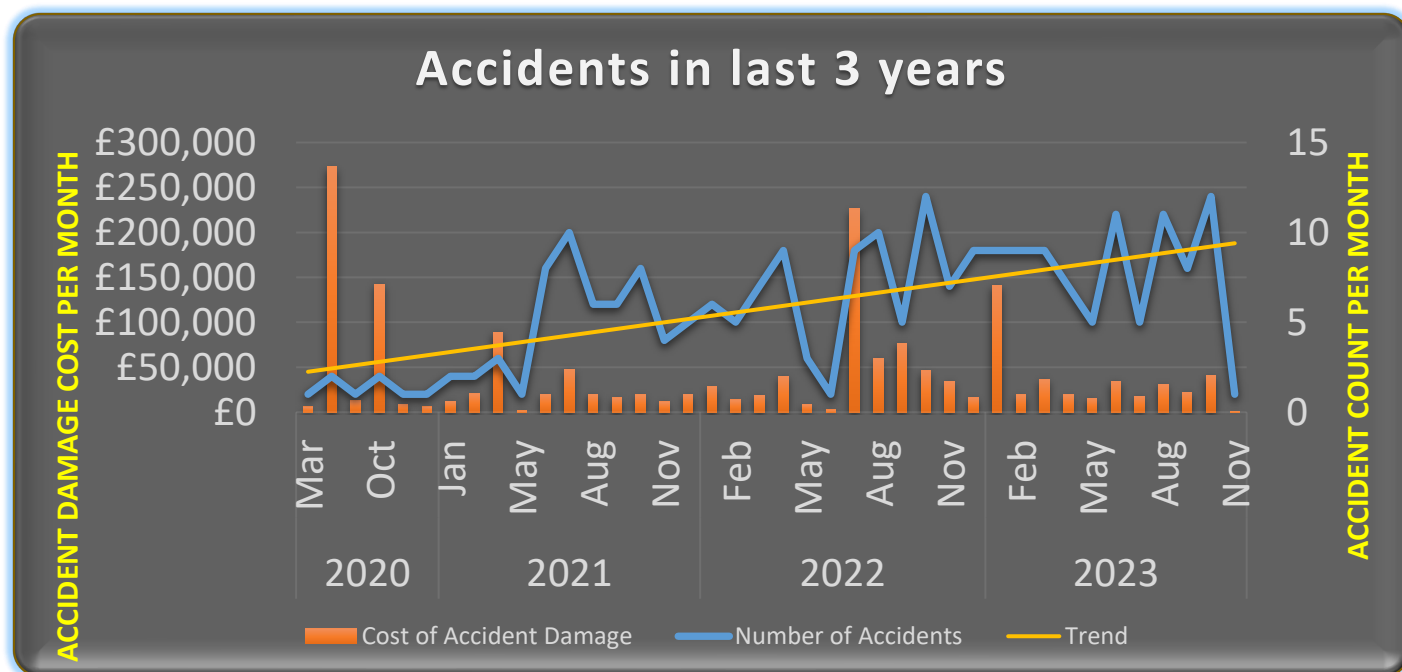


As can be seen in the graph above the PTC monthly costs for 2023 show an upward trend. This could be due to several factors, such as increased accident damage, inflationary cost increases of parts and number or type of vehicles in the workshop at any one time. However, this project will investigate the reasons behind this and aim to reduce the monthly costs going forward.

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vi. Variable Costs

The graph below demonstrates the increase in accidents over the last three years and the costs associated with these.



This accident data is regularly collected, updated, and analysed to:

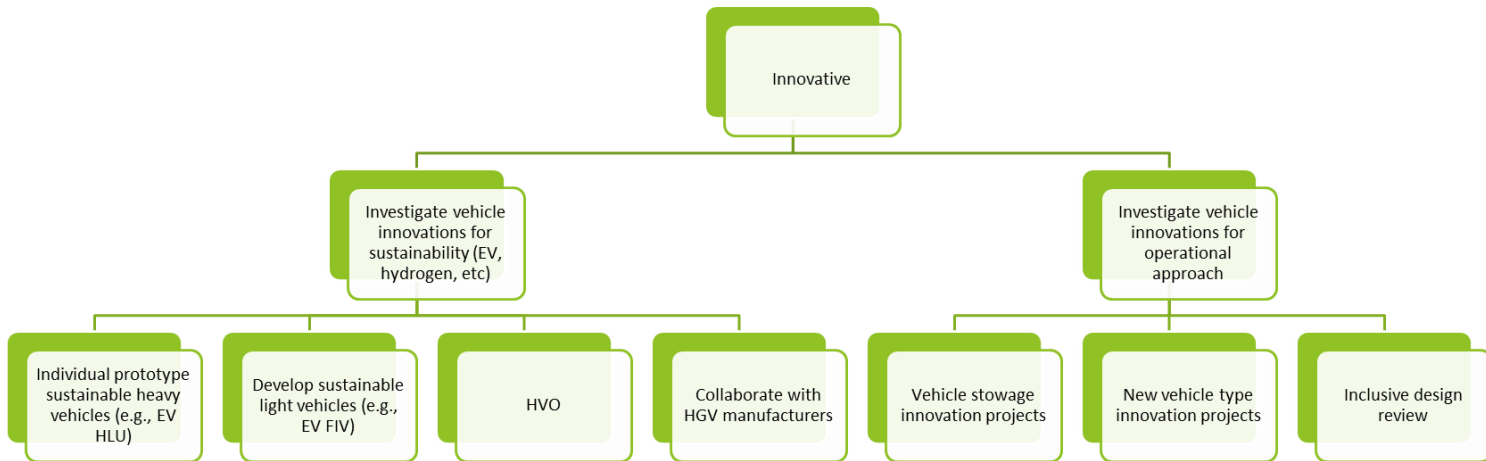
- Monitor costs and associated vehicle downtime.
- Determine repeat issues.
- Identify risks.
- Identify training requirements.
- Educate operational users about the causes of accidents and costs to the organisation.

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b. Principle 2 – Innovation programme

LFB has committed to moving to a state of Carbon Net Zero. The ongoing evolution of the technology market, and previous stimulation of the market by LFB through their ZEPA (Zero Emission Pumping Appliance) project, indicate that there is a need for LFB to remain focussed on emerging trends and technologies globally.

The below chart shows the programmes and summary of the projects for the second principle of the strategy:



Indicative projects and information:

- Inclusive Design Review
- Ensure the completion of equality impact assessments per vehicle, equipment, and stowage solution changes.
- Ensure inclusion is in mind when designing and procuring vehicles.
- Vehicle Stowage Projects
- Equipment and vehicle stowage review, determine types of equipment used at commonly attended incidents and where they are stowed on vehicles.
- Ensure that a stowage review is undertaken when a new piece of equipment is required to be carried on a vehicle and make decisions on whether any equipment can be moved or removed to make space.
- Utilising data to make decisions on whether equipment should be non-mobile specials for certain times of year, incidents, or activities.

New Vehicle and Equipment Projects

- Determine whether there are any known or emerging risks that would benefit from new types of vehicles and equipment.
- Proof of concept vehicles.
- Innovative Carbon Reduction technology
- Continually assess vehicle technology market for innovative new solutions.

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Individual prototype vehicles

- Where needed prototype vehicles will be developed with the aim of adding them to the operational fleet for assessment and training in advance of the scheduled replacement of that vehicle type. This will most likely be limited to specialist heavy vehicles.

HVO project implementation

- Following the successful conclusion of the present limited two station HVO trial, it is intended to deploy HVO to all stations with compatible vehicles and bunkered fuel facilities and then optimise the use of these facilities where practical whilst retaining access to conventional fuel cards.

These innovations will lead to an improvement of our operational capability, adhere to LFB carbon reduction commitments, and ensure inclusion is at the forefront.

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Assessment of Alternatives to Diesel Fuelled Fleet Vehicles

Solution A – Battery Electric Vehicle (BEV) – Decision: Viable - Pursue

- BEV is a zero-tailpipe emissions option.
- Electric infrastructure will be viable in Greater London.
- BEV alternatives to most Fleet Types are already commercially available.

Solution B – Hydrogen – Decision: Unviable – Do not pursue for the next 12 months

- **B(1) – Hydrogen Fuel Cell Electric Vehicle (FCEV)**
- **B(2) – Hydrogen Internal Combustion Engine (H₂ ICE)**
- Carbon zero tailpipe emission option which is carbon net zero subject to the usage of green hydrogen, however, when used in Internal Combustion Engine hydrogen is not zero tailpipe emissions due to the nitrogen oxide emissions.
- No reliable supply of green hydrogen is available and there is very limited refuelling infrastructure in Greater London.
- Hydrogen alternatives to most Fleet Types are not commercially available.

Solution C – Biofuel – Decision: Viable – Pursue HVO as interim measure

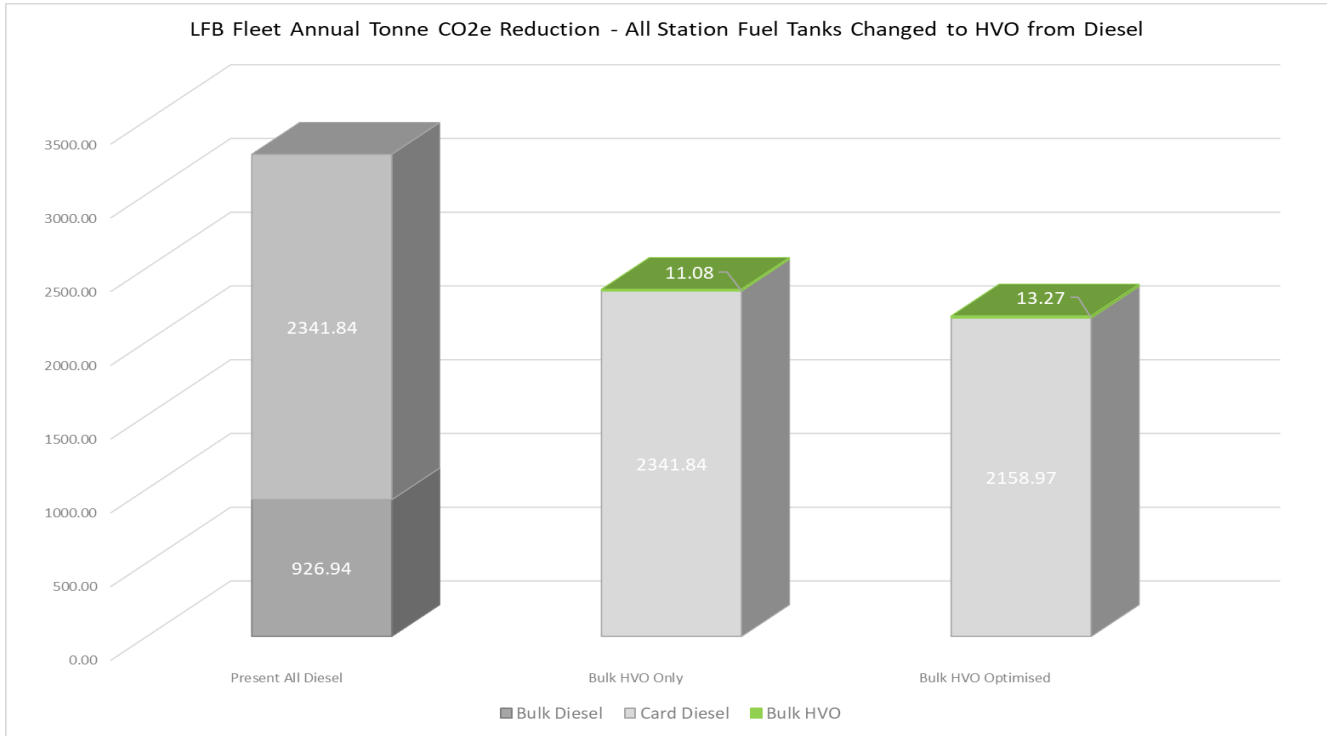
- HVO (Hydrotreated Vegetable Oil) provides a reduction in carbon emissions due to the lack of fossil fuel usage when compared to diesel and may offer a partial reduction in tailpipe emissions.
- HVO not widely available at public fuelling stations – bulk fuel tanks (strategic diesel tanks) would need to be utilised.
- Most diesel vehicles on fleet are HVO compatible.

Solution D – Synthetic Fuel – Decision: Unviable – Do not pursue for the next 12 months

- Synthetic fuels are produced by capturing carbon from the atmosphere and using renewable electricity to convert this into a combustible liquid, and hence are carbon net zero, however not carbon zero tailpipe emissions.
- Synthetic fuels are inefficient and are currently prohibitively expensive – the amount of energy used to produce them does not equate to the energy they release.
- The diesel vehicles on fleet are synthetic fuel compatible.

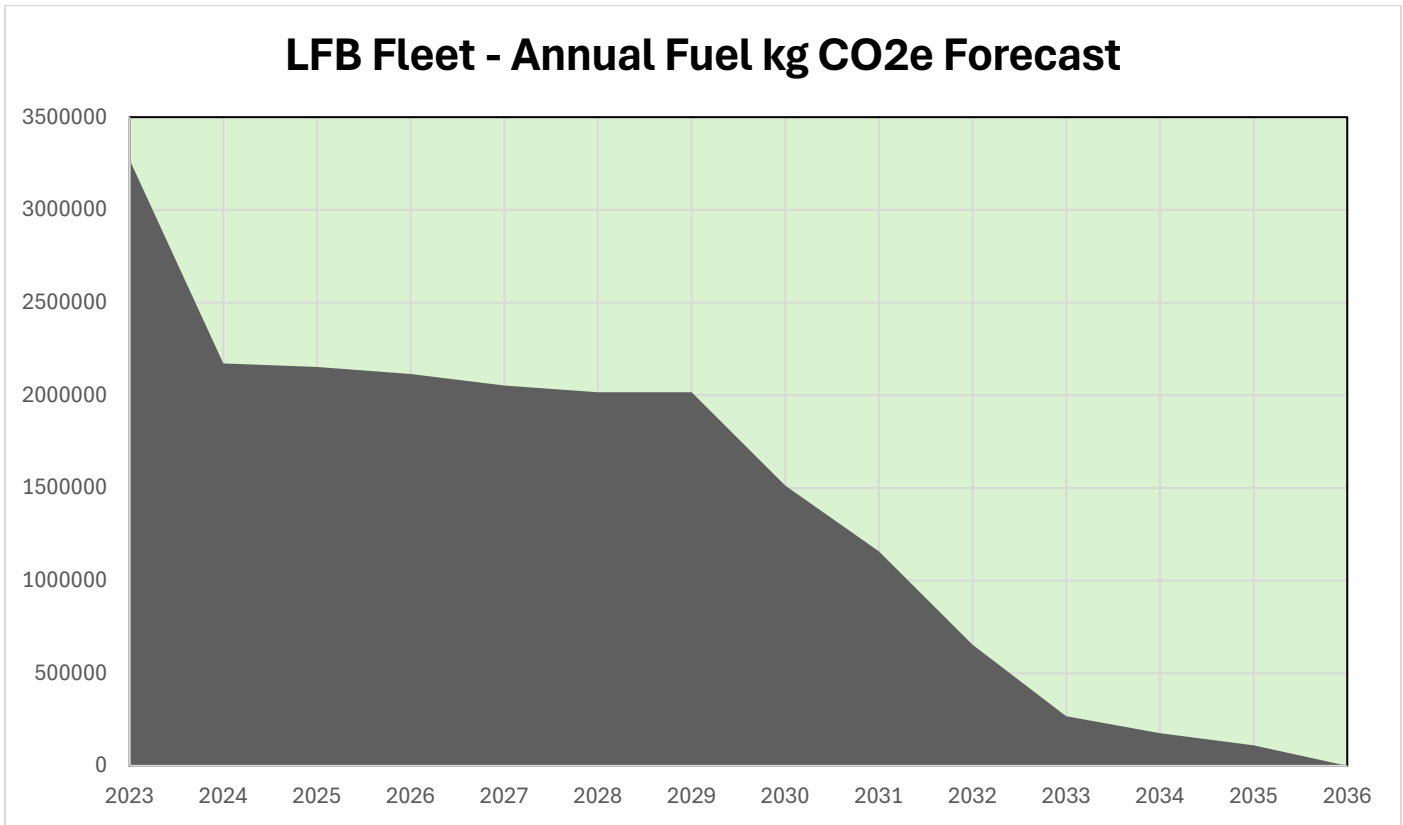
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A number of innovations are required, not just in terms of the vehicle propulsion, but with regards to the stowage on vehicles, equipment carried and potentially different types of vehicles. These projects will be led by the data collected and analysed with the help of the work completed through the first principle. In addition, HVO is an interim measure that will be utilised in some of the fleet until a fully zero tailpipe emissions option. The graph below shows the carbon emission reduction when the bulk fuel tanks at stations are changed to hold HVO instead of diesel.



Following the ARP replacements that are currently planned the below graph demonstrates how the carbon emissions will decrease with the use of HVO across the vehicles at the bulk fuel tank stations in 2024 and then the replacements of each of the vehicles with zero tailpipe emission alternatives.

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There is not presently an existing comprehensive solution ready which is able to fully decarbonise the LFB fleet. As such possible solutions have been analysed for suitability of progression, as tabled above and further detailed in Appendix 2.

Decarbonisation has been started successfully prior to the commencement of this strategy by replacing cars and light 4x4 vehicles with BEV and PHEV models.

The next step of decarbonisation is expected to be achieved by the expanded use of HVO fuel in our existing vehicle fleet, based at stations with bunkered fuel facilities.

Following this, further decarbonisation and removal of exhaust emissions is planned to be achieved by electrification of the fleet as assets become due for renewal as per the asset replacement programme. Existing diesel vehicles will not be removed from service early but will be replaced with zero tail pipe emission vehicles at their next scheduled replacement.

LFB vehicles have varying degrees of complexity, in some cases this will require development and prototyping of vehicles prior to replacement commitment.

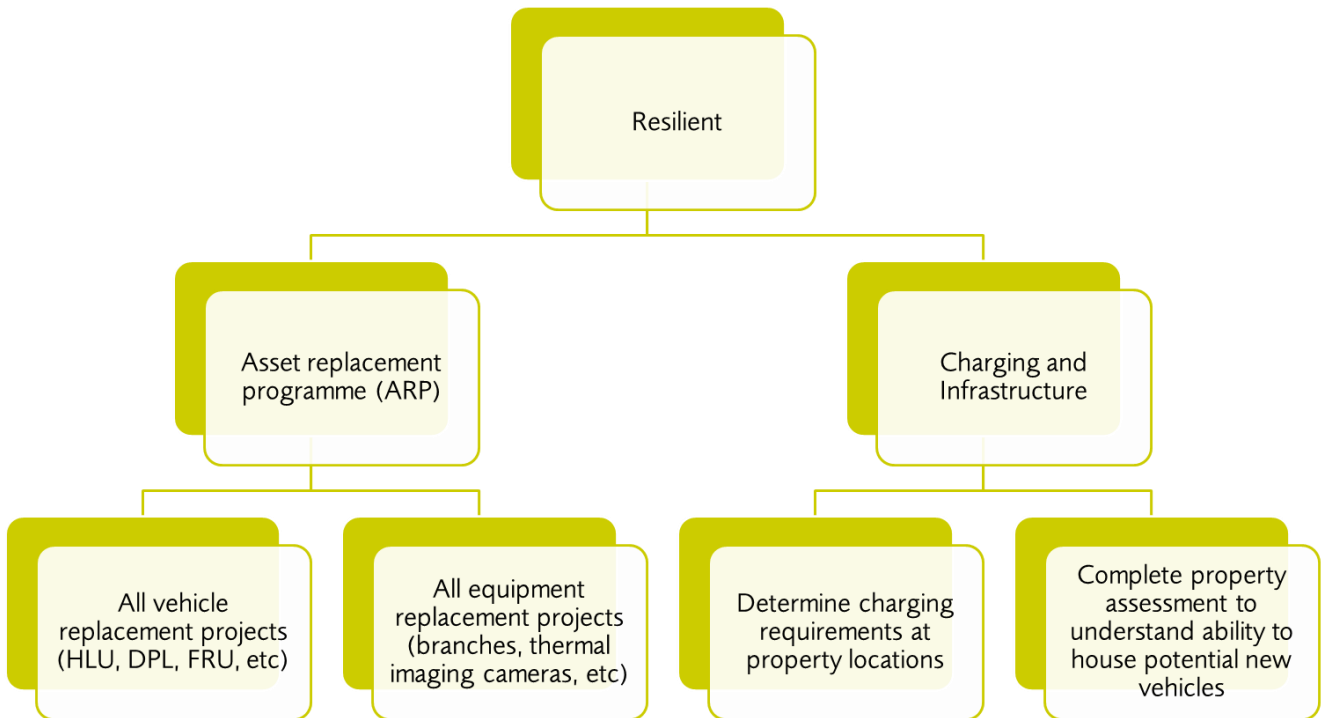
Deployment of electric vehicles requires appropriate charging and support infrastructure to provide operational resilience, this will be forecast and planned in line with fleet replacement.

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Whilst Hydrogen and E-Fuels options have been assessed as not viable presently or in the foreseeable future they will be reviewed annually for progress within their sectors. Any other potential new technologies will also be reviewed as part of this process.

c. Principle 3 – Resilience programme

The Asset Replacement Programme (ARP) is the current fleet replacement programme and that encompasses all vehicle and equipment replacement projects. This will be accompanied by the required charging infrastructure.



All vehicle and equipment replacement projects

All current and replacement vehicle and equipment projects are included in FLEET capital projects and replacement programme and the department financial forecasts. Any new vehicles and equipment would need to have a business case and be approved before becoming a live project. These display a level of resilience because these will be programmed in at each replacement cycle unless it is otherwise agreed, and therefore, it is expected that they will be available in the future. As Babcock are the holder of LFB’s vehicle and equipment contract, they are the suppliers for the procurement of the assets within that and therefore, the procurement exercises are completed through their tender process.

During the final stages of the procurement process, the assets are attributed an operational life, this is achieved through the life policy given to the piece of equipment before and recommendations from OEMs.

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Once the life of the asset has been determined, there is an expected maintenance cost to the vehicle or equipment, this is called the slot price and is a charge paid at specified increments. When the asset has reached the end of its operational life, it's replaced, currently like for like with a review of the requirements. However, it is suggested to complete a more thorough review of whether the equipment is still required or not based on the data, rather than assume that it still is.

LFB Asset Replacement Programme 2024-35

	Fleet	Code	Qty	Life	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035
Specialist Heavy Vehicles	Hose Layer Units	HLU	5	12			5									
	Cold Cutter	CC	1	7			1									
	Pumping Appliances	DPL	188	12						53	41	52	42			
	All Wheel Drive	AWD	1	10									1			
	Detection Investigation Monitoring	DIM	1	10									1			
	Fire Rescue Units	FRU	18	12										18		
	Heavy Distribution Unit	HDU	5	12											5	
	Command Units	CSU	9	12											9	
	Operational Support Units	OSU/LRL	9	12											9	
	Aerials - 32m	TL	12	15												
Aerials - 64m	TLE	3	15													3
Light Vehicles	SOG & Commissioner 4X4	CH	9	5	3	6										
	Vans (Various/All)	MV/MVT/UV/UVL/FID/FIV	26	7	5	8	27	14	5							
	Pool Cars	CEV	52	5					50							
	ERD Cars	CEV	2	5					2							

Prototype Development	
Procurement	
Replacement	

Charging and Infrastructure

Vehicle charging and associated equipment will be required at all LFB stations and other premises where fleet vehicles are based. Requirements for increased power supply have presently been estimated at 500kVa capacity per site but this is subject to confirmation which will be determined from the type and number of fleet vehicles based at each location and operational data.

Charging equipment will need to be installed in accordance with, and in advance of the fleet asset replacement programme.

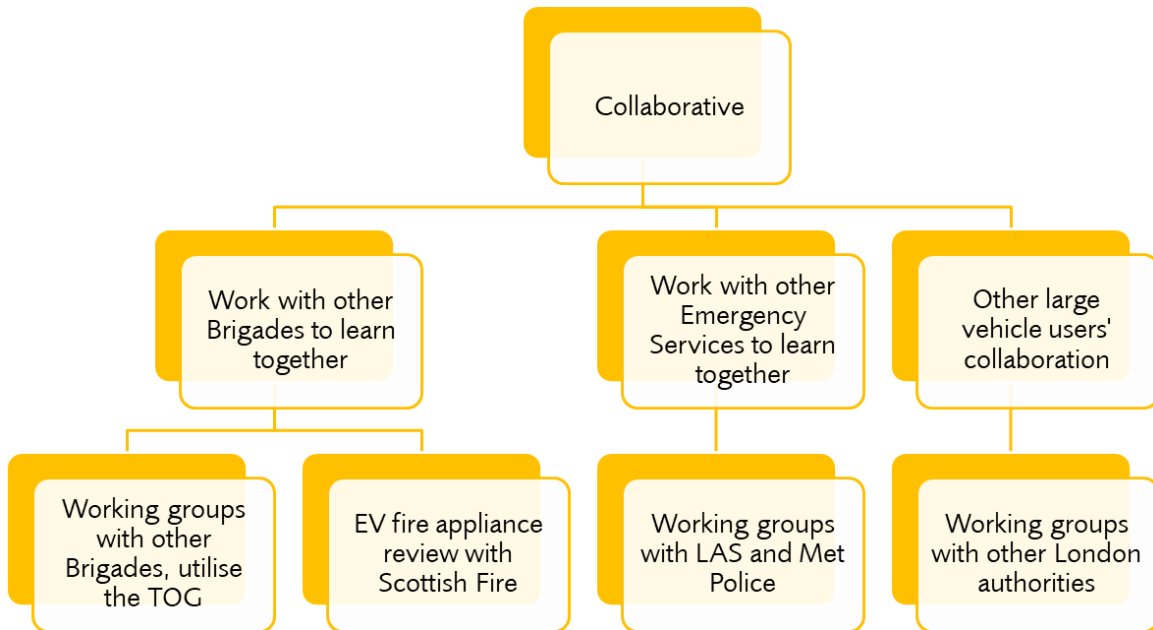
Power supply resilience will be included in the fleet projects to ensure that all operational requirements can be met, this will include premises and/or mobile ESS (energy storage systems) such as batteries or in the short term possibly generators. Vehicle-to-Vehicle power management will also be assessed for viability.

Premises Resilience

Subject to the outcome of new vehicle development and resultant potential changes in the weight or size of fleet vehicles there may be premises related issues which effect the viability of operating certain types of vehicles at some locations, this will be a consideration of the asset projects with the intention of avoiding complication where possible.

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d. Principle 4 – Collaborative programme



LFB are undertaking decarbonisation and modernisation of our fleet at the same time as many other organisations. This presents the opportunity to collaborate to share progress, knowledge, and experience with similar emergency service organisations nationally via the TOG (Technical Officers Group) of the NFCC and possibly even internationally with other fire and rescue services.

There may also potentially be opportunities to work with a variety of GLA or other public sector related bodies within London to secure mutual resilience for vehicle charging and/or possibly reduce infrastructure costs by aligning grid connection upgrade projects.

We will maintain membership and participation with organisations such as ZEMO Partnership and OZEV Specialist Vehicle Group to ensure that we are ahead of legislative changes.

Working with vehicle manufacturers and organisations such as Innovate UK may help promote the requirements of emergency service customers whilst stimulating the market. We will also remain open where appropriate to working with academia and other Babcock clients such as military vehicle users.

Work on the inventory management system engages with contractors that work with other fire and rescue services, allowing utilisation of their knowledge within this area.

LFB have visited Rosenbauer in Austria to evaluate their zero emission capable appliances, whilst the manufacturer stressed that these vehicles are still in the process of development there are pros and

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cons with their designs which will continue to be evaluated for use by LFB alongside other alternatives.

4. The Initial Direction – Our Recommended Next Steps

Given the outlined potential solutions, the following business case details the recommended next steps to bridge the gap between now and a carbon zero tailpipe emission fleet.

This direction is to be reviewed annually to:

Evaluate the progress made against the annual Fleet Strategy Action Plan.

Evaluate the vehicle solutions, both old and new, taking into account any new developments.

a. 2024 -2026

Complete the ongoing HVO drop-in biofuel trial by March 24. Assuming successful conclusion then transition diesel fleet based at sites with bunkered fuel to HVO by September 2024.

Pilot telematics across all vehicles and operational data to be recorded across all incidents.

Engage with peer group organisations to share learnings and align needs.

Conduct an infrastructure review across LFB’s estate, considering the number of vehicles based at each site, their utilisation and electrical consumption, to provide the groundwork for the fleet transition. Work with the LFB Carbon Net Zero project on the specification and number of required electrical charging posts.

Replace current ICE light vehicles (cars and vans up to 3.5t) with new OEM BEV alternatives.

Replace current ICE heavy vehicles (HGVs) with no significant auxiliary power requirement (i.e. not Pumping Appliances and Turntable Ladders) with BEV alternatives.

New from OEM

Evaluating Repower Options (conversion from diesel to electric)

Maintain focus on the technology market as new solutions emerge and reach suitable levels of maturity – investigate, prototype, evaluate, and trial alternatively fuelled options to replace current diesel HGVs with significant auxiliary power requirements (i.e. Pumping Appliances and Turntable Ladders).

New from OEM

Evaluating Repower Options (conversion from diesel to electric)

In advance of the next scheduled DPL replacement, carry out concurrent prototype and evaluation workstreams comprising multiple specifications of ZEPA from a variety of suppliers, with and without range extenders, due to finite timescale available.

Consider expansion of HVO use in the longer term for the Fire Boat fleet, due to the complexity, cost, and limited availability of alternatively fuelled solutions of these types of assets. Evaluate carbon offsetting the emissions they produce as an interim solution until they are replaced with zero tailpipe emission alternatives.

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Pilot transferring remaining ICE-powered Operational Equipment to electric alternatives as and when suitable solutions come to market before the 2030 Mayoral target date.

Each stage of this progress which facilitates a change of equipment for operational staff will include fully costed training in advance of implementation and additional support whilst initially utilised to ensure smooth transitions to new equipment types.

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b. Transition

The Mayor of London has specified 2030 as the target for London to achieve carbon net zero, however LFB's fleet contains specialist vehicles which are unlikely to be available to purchase before 2030. Additionally, many of these assets are presently relatively new, having been purchased as Euro VI vehicles to meet the ULEZ standards.

LFB internal fleet analysis has shown that, whilst challenging from a technical perspective, carbon net zero can be achieved by 2035 by replacing vehicles with zero tailpipe emission alternatives at their next scheduled replacement. An independent review was completed by Egnida which came to a similar conclusion.

Quantified pressures of the 2030 Mayoral target date:

Light vehicles: 2 specialist light vehicles would need to be replaced before their disposal dates to meet the 2030 Mayoral target. These include the All-Wheel Drive appliance which is not yet available in any zero tail pipe emission variants, and the Detection Investigation Monitoring van.

Heavy vehicles (with no significant auxiliary power requirement): 35 HGVs would need to be replaced up to 5 years before their scheduled replacement dates to meet the 2030 Mayoral target. These include all Fire Rescue Units, Command Support Units, Operational Support Units, and Heavy Distribution Units.

Heavy vehicles (with significant auxiliary power requirements): 150 HGVs (pumping appliances and turntable ladders) would need to be replaced between 2 and 5 years before their scheduled replacement dates to meet the 2030 Mayoral target.

Therefore, LFB will continue to use existing vehicles until their defined replacement dates, where they must then be replaced with alternatively fuelled vehicles.

Fixed replacement cycles (defined asset life policies) are a constraint which could be evolved. Replacement cycles could be extended into regular, evenly spread replacements, which would be associated with benefits to financial reporting (lower, more consistent spend rather than low spend followed by high spend). LFB's contract with Babcock would need to be reviewed to understand how spare appliances would operate i.e. a diesel only fire station being provided with a BEV spare.

c. Appropriate Funding:

The existing fleet budget will not cover the investment required to replace the entirety of LFB's fleet with carbon zero tailpipe emission alternatives. Both the procurement of new assets and meeting their corresponding infrastructure requirements will necessitate increased funding, and hence there is a gap between the current fleet budget which is already provided for the current 'like for like' asset replacement strategy and the required alternatively fuelled fleet budget (of both capital expenditure and operational expenditure).

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The cost of any alternative power solution is high – alternatively fuelled vehicles are currently more expensive than fossil fuel powered vehicles, although this increase will reduce as international demand grows. LFB currently does not have the available funds for an immediate changeover, therefore a slow, iterative process is much more viable. The assets procured will have corresponding infrastructure requirements; fire stations will need to be developed, both physically and in the way they are managed, to accommodate the needs of the fleet as it is transitioned over to alternatively fuelled solutions.

The ZEPA (Zero Emission Pumping Appliance) project initially planned for Stage 1 to provide the first vehicle with Stage 2 consisting of 10 more vehicles of similar specification. Due to delays in operational testing of the first vehicle and limited time available for testing this funding will now be used to develop individual alternative DPL prototypes along with other specialist vehicle types as opposed to multiple ZEPA Stage 1 equivalent vehicles.

In addition to fleet asset costs, significant investment will be required in vehicle charging equipment and associated electrical infrastructure. However, this equipment should last much longer than the vehicle fleet which it serves, and future fuelling costs of the fleet will be significantly reduced by the change to electric from diesel vehicles.

There may also be some requirement for investment in reinforcement of station floors or other similar work dependant on the outcome of our fleet modernisation projects. This will not be able to be quantified until vehicle specific project work has been matured.

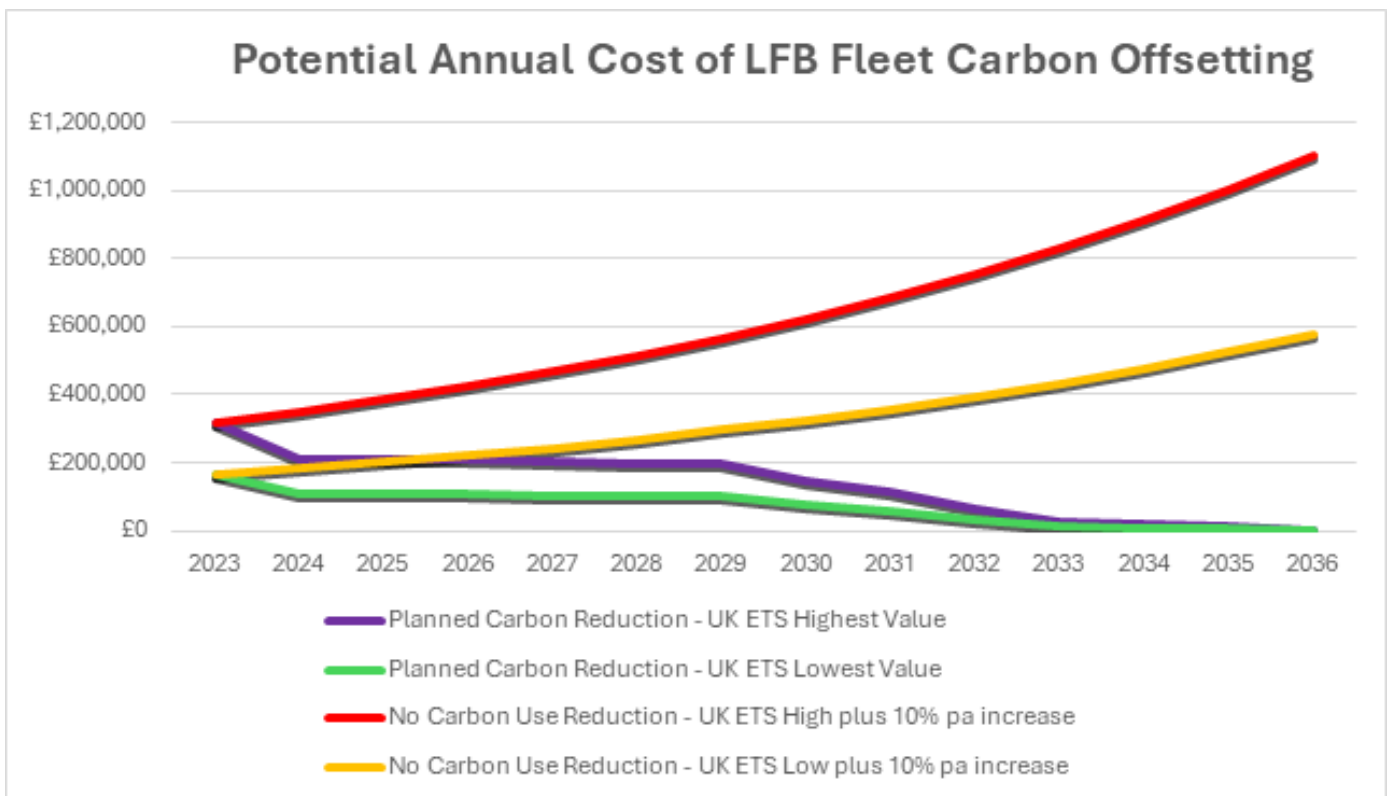
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d. Potential Cost of Offsetting:

To achieve Carbon Net Zero from LFB fleet operations it may be necessary for LFB to purchase carbon offsets against the equivalent remaining carbon (fossil fuel) use. Whilst there isn't presently any clear guidance available on the future cost or availability of these offsets and there isn't a specified scheme which LFB would be required to use, the UK governments Emissions Trading Scheme gives an indication of potential future carbon offsetting cost.

The UK ETS (Emissions Trading Scheme) replaced the UKs participation in the EU ETS. Under the scheme a reducing number of allowances are available for purchase each year by annual auction by organisations which continue to consume carbon. As the number of available allowances reduces it is expected that they will increase in price. As the allowances are subject to market forces the value of carbon aligned to them can increase or decrease, although the latter is unlikely over the longer term.

Using the present UK ETS scheme highest and lowest values as a guide with 10% annual increases applied, the annual potential costs of carbon offsetting per year for LFB fleet planned decarbonisation and also no carbon use reduction (theoretical continued full diesel fleet use) are estimated in the graph below.



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e. Babcock Repair and Maintenance Support Considerations:

There are aspects of achieving this objective, most notably the transition to electric vehicles which directly affect Babcock’s ability to provide repair and maintenance support safely and competently for the LFB fleet.

The Ruislip Workshop operation will as a minimum require the following preparation:

Training of engineering, management, and support staff.

Assessment of Site infrastructure in relation to use for new vehicle types (size/weight etc)

Electrical capacity to support vehicle charging requirements.

Provision of vehicle charging equipment, potentially including moveable chargers within the vehicle workshop bays and provision for charging completed vehicles before return to station.

Specialist tooling, including MRTs (Mobile Repair Technicians)

Safety and PPE (Personal Protective Equipment)

The risk profile will need to be reevaluated because of the transition from carrying out maintenance activities on traditional Internal Combustion Engine (ICE) vehicles to carrying out maintenance activities on alternatively fuelled vehicles, resulting in the introduction of appropriate risk mitigating factors.

A similar approach will need to be adopted for LFB’s vehicle training provider, Babcock Training, who’s sites will also require preparation such as electric charging infrastructure, including site capacity, alongside fuel storage and refuelling facilities.

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5. Supporting information

a. London Fire Brigade

The London Fire Brigade (LFB) is the firefighting, rescue, and emergency planning service for Greater London. LFB is the busiest Brigade in the United Kingdom and one of the largest firefighting and rescue organisations in the world covering 1587 square kilometres and having attended over 125,000 incidents in 2022 alone. Its mission is to serve and protect London.

LFB is led by the London Fire Commissioner (LFC), the fire and rescue authority for London and employs over 5,000 people, operating from 109 locations including 102 fire stations, the river station and support premises such as headquarters in central London. LFB's vehicles and equipment are required to be reliable and readily available, where unavailability of vehicles and equipment has a significant impact on the Brigade's ability to perform its statutory requirements.

b. Vehicle and Equipment Contract

In May 2014, LFB entered a 21-year responsibility for Babcock International Group to manage and maintain LFB's fleet of operational vehicles and equipment, with the aim to improve availability of both vehicles and specialist equipment across Greater London. Babcock support LFB's delivery of vital services to make London a safer city and sustain its status as a world-class fire and rescue service. All assets included within the contract are LFB capital purchases exclusively supplied by Babcock for the duration of the contract.

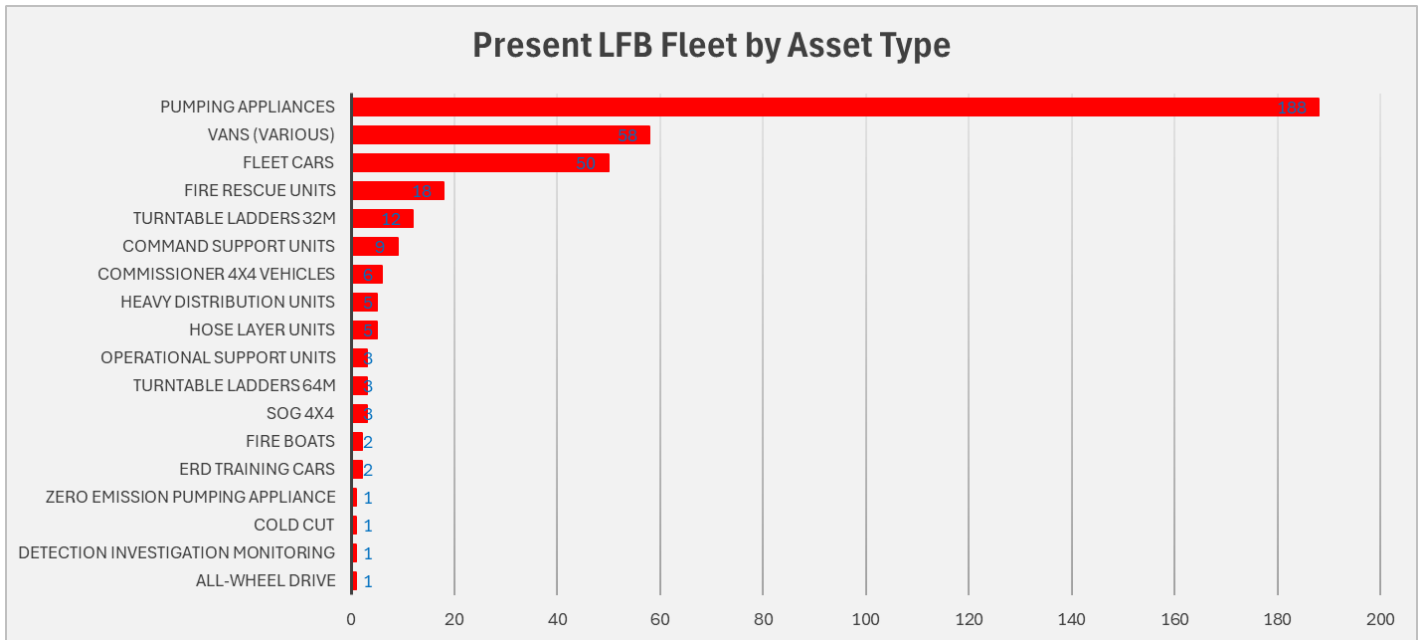
Babcock International Group is a leading provider of critical, complex engineering services which support national defence, save lives, and protect communities. Babcock focuses on three highly regulated markets – defence, emergency services and civil nuclear – delivering vital services and managing complex assets in the UK and internationally. Babcock is a trusted partner who understands the key roles that technology, expertise, infrastructure, and assets play in ensuring its customers can deliver.

LFB's Vehicle and Equipment (V&E) repair and maintenance contract with Babcock (Critical Services Ltd.) incorporates the Asset Replacement Programme (ARP), for the exclusive replacement of all vehicles and operational equipment covered by the contract. Only non-branded leased cars and equipment managed by the Operational Support Group are outside the scope of the contract with Babcock.

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i. LFB’s Current Fleet

LFB’s current fleet of vehicles is comprised of the following vehicle assets:

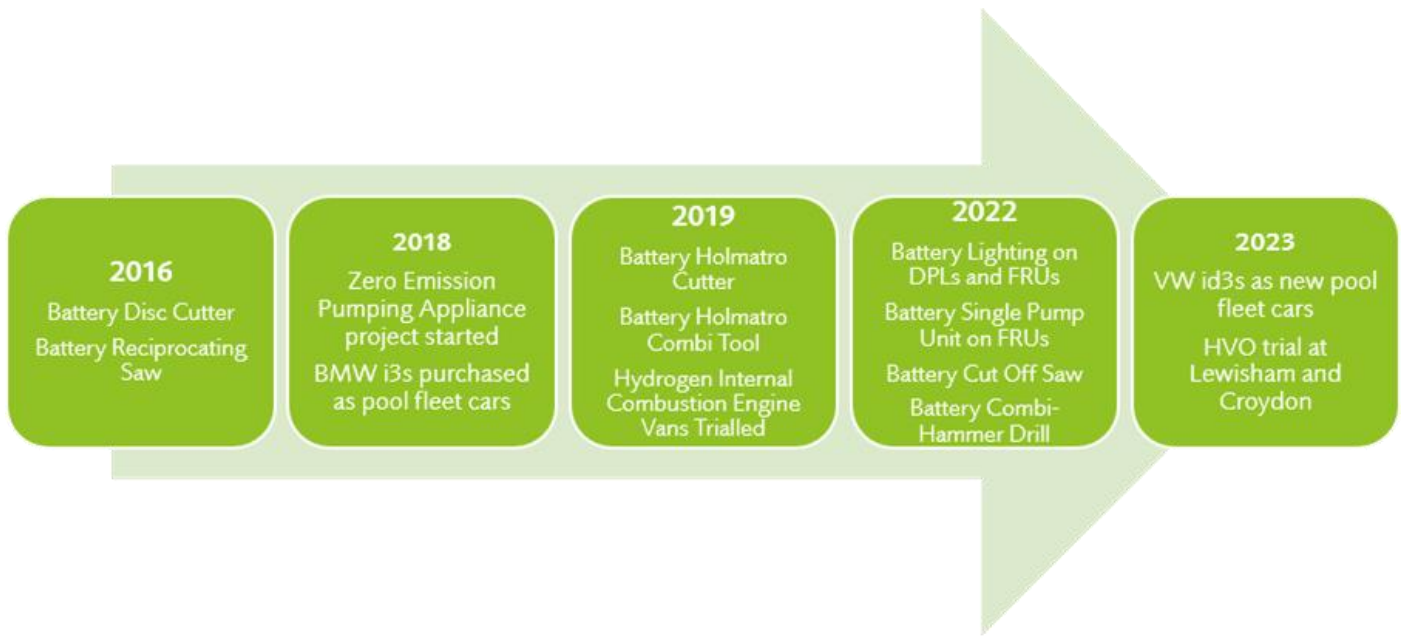


In addition to approximately 100,000 items of Operational Equipment, including Thermal Imaging Cameras, Firefighting Branches and Ground Attack Monitors.

ii. Asset Replacement Programme

The Asset Replacement Programme (ARP) is a core deliverable within the 21-year V&E Contract for the replacement of vehicles and operational equipment operated by LFB. The current fleet, which is maintained and managed by Babcock. Assets are replaced within their fixed replacement cycles as defined and revised by LFB FLEET with specification variation driven by LFB’s policies, operational requirements, and industry product improvements. The constraints of ensuring value, compatibility with existing infrastructure and training costs all need to be embedded into the programme.

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The above graphic shows the work already completed as part of the Asset Replacement Programme to phase out polluting equipment and replace with battery operated alternatives to achieve carbon reduction goals across the fleet.

iii. Infrastructure

LFB’s Carbon Net Zero Programme is ongoing, with LFB’s Estate Strategy currently under development, where one of the most notable goals is the electrification of all 102 fire stations consisting of appliance bays ranging from 2 to 7 in number, all housing at least one appliance. There is a significant age range across the estate, with some old fire stations, and some very new, such as Walthamstow (2012) and West Norwood (2016), where Plumstead is due to be completely refurbished by 2024.

Some of the older fire stations do not possess the ability to house larger vehicles due to the size of vehicle ingress and egress points. An example of this is Bromley Fire Station, where LFB have needed to modify an appliance’s ladder gantry to allow the vehicle to pass through the station’s restrictive archway. In addition, several fire stations have basements which could be limiting for new technologies due to appliances potentially increasing in weight. The load capacity of fire station appliance bays will need to be assessed to determine whether they can withstand the extra weight that may accompany alternatively fuelled vehicles.

Consideration will need to be given to the electrical capacity available across LFB’s estate to allow for the accommodation of future appliances. Currently, except for Hammersmith, none of LFB’s fire stations have the required electrical capacity to power the volume of 150 kW (230 A) charge points necessary to meet the changing needs of the number of fleet vehicles based there. The anticipated electrical load capacity is expected to require Distribution Network Operators (DNOs) to install sub-

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stations solely for the use of each fire station, and hence the present limitations of the estate will need to be considered as part of any future fleet trials and replacements.

In line with the introduction of the plug-in electric BMW i3 Fleet Cars in 2018, 22 kW AC charge points were installed throughout LFB's estate. The intention presently is for 150 kW charge points to be installed in the leadup to 2030 at fire stations in advance of the deployment of electric HGVs, this will be reviewed as more information around vehicle manufacturers charging requirements and LFBs operational usage can be confirmed.

iv. Technology Market

Over the last two years the range of electric light vehicles (cars and vans) available has developed with a much higher volume of vehicles now being in line with LFB's specifications. Significant progress has been made by the heavy vehicle industry with the major seven manufacturers now all offering ranges of electric HGVs. There are also several businesses providing conversion from diesel to electric alongside chassis preparation for specialised electric vehicles. The existing market for alternatively fuelled fire appliances (specialist HGVs with auxiliary power requirements such as Pumping Appliances and Turntable Ladders) is extremely limited, with no perfect alternatively fuelled solution is available now, where currently only Emergency One (E1) and Rosenbauer have produced completed fire appliance vehicles.

v. Operational Approach

LFB's operational approach to firefighting and rescue operations is determined by LFB's Operational Policy and Assurance (OP&A) department. Current response targets are 6 minutes on average for the first appliance, and 8 minutes on average for the second appliance, where an appliance must arrive at an incident anywhere in London within 10 minutes for 90% of incidents and within 12 minutes for 95% of incidents. There are a predetermined number of the appliances located strategically in areas of London where they may be required to mitigate the risk associated to that specific area. One key technical requirement of the Pumping Appliances is that they are specified to be able to pump for 4 hours continuously without refuelling.

Currently, all appliance replacements have been procured on a 'like for like' basis to maintain crew familiarity with the previous generation of vehicles. To date there has been little appetite for changing, innovating, or adapting LFB's operational approach – the historic 'like for like' asset replacement strategy has limited opportunities for operational change. There have been several new appliances introduced to LFB's fleet to mitigate operational risk in specific circumstances, such as the three 64m Turntable Ladders, however, there has not been a full review of the current 188 Pumping Appliances, considering how they could best be configured to meet any new and emerging risks facing Londoners.

6. There are frequent requests to introduce new items of equipment to the frontline Pumping Appliances, allowing one vehicle type to attend the vast majority of incident categories. These crews then have the ability to call on more specialist assets when the relevant criteria are met. However, the current Pumping Appliances have limited stowage space available for

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equipment and as a result these vehicles are already at capacity, hence it is becoming increasingly challenging to meet these additional equipment requirements without removing the presently stowed integral items of equipment. **Methodology**

a. Developing a Vision, Principles and Projects for the Fleet

LFB’s Fleet Strategy has been developed in stages:



b. The Strategic Context for Development of the Strategy

The LFB is undergoing a transformation programme to improve its culture, governance, and performance in the aftermath of the Grenfell Tower fire in 2017, which was the deadliest fire in the UK since World War II.

The LFB is facing new and emerging risks and challenges that require it to adapt and innovate its services and capabilities including climate change, population growth and security and resilience threats such as terrorism and the fleet will continue to play a vital enabling role in this.

c. Preparation for the Strategy

We've incorporated insights and input from our meetings and discussions with crucial stakeholders, sourced from existing working groups and boards across LFB covering Carbon Zero, accident damage, health and safety and equipment design. Additionally, the strategy has been circulated for feedback among enabling services such as strategy and risk, and property. It will be shared with the next Carbon Net Zero Project Board. This engagement process laid the foundation for the principles outlined in the strategy and the drivers in Change Programmes 3, 6 and 8.

This strategy was created in partnership between LFB and Babcock, with research and engagement throughout the emergency services and heavy vehicle supply industries.

i. The LFB Community Risk Management plan

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The Community Risk Management Plan (CRMP) is summarised in the diagram below.



LFB Community risk management plan

The programmes within this strategy relate more closely to CRMP pillar “Representing You” as it sets out a drive towards achieving Net Zero across the fleet.

ii. Views from Stakeholders

Stakeholder engagement took place early in the development of the problem statements, vision, and principles. This strategy has had a more accelerated timeline than other strategies and therefore, the stakeholder engagement has not been in depth as required. The stakeholder groups engaged with consisted of uniformed and non-uniformed staff at a high level within the Brigade, due to the timeline it is expected that more stakeholder engagement will have to take place as the projects progress.

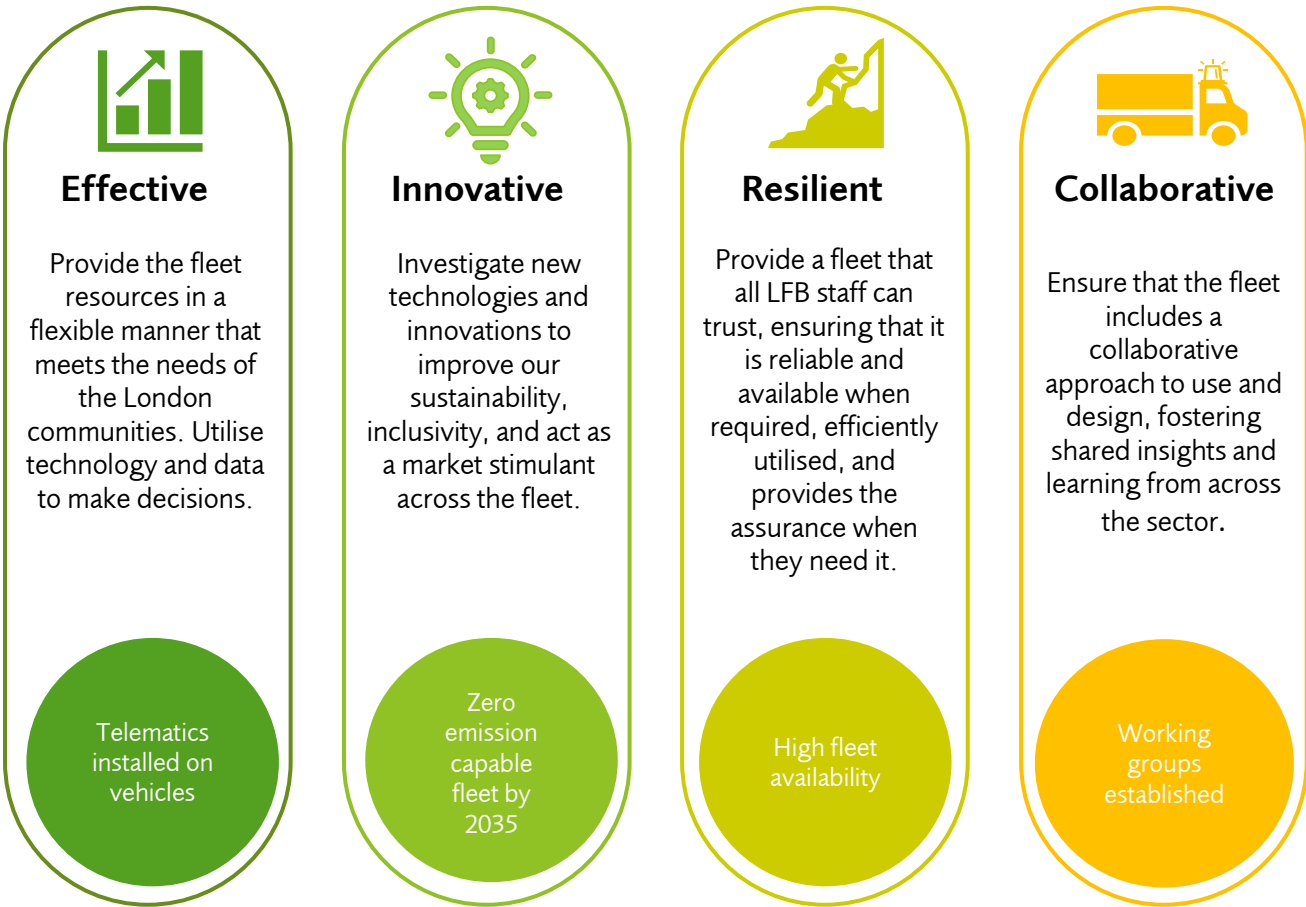
The engagement consisted of sharing the problem statements, vision, and principles with the selected groups. Any feedback was taken on board and incorporated into the final versions of each. These are displayed in the section below.

Many opportunities were identified during the stakeholder engagement including the potential to better understand in detail the utilisation of the fleet to drive improvements within it. As departmental strategies emerge, the FLEET will continue to consult with stakeholders to introduce and implement more specific requirements across the fleet.

d. Fleet Strategy Principles, Vision, and Objectives

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Principles



ii. Fleet Vision

The agreed vision for the LFB Fleet is:

Create a strategy that provides a fit for purpose and flexible London Fire Brigade fleet with high capability and reliability, encompassing the sustainable goals of the organisation, encouraging collaborative working and utilising data driven strategic decisions in order to supply all the necessary assets to all of our operational colleagues, maintaining operational responsibilities to ensure their and our community's safety in various situations.

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iii. Problem Statements

The below problem statements were developed through collaboration within the FLEET team and stakeholders. These have been able to provide direction for the areas that need improvement and help to determine the principles and therefore the projects within this strategy.

Currently, our maintenance contract consists of an asset replacement program that focusses on like for like replacements and a Property Departmental Carbon Net Zero Strategy that includes a Mayoral target of CNZ by 2030. We do not have a dedicated fleet strategy in its entirety.

Across the Brigade's 102 fire stations there are 188 DPLs with 143 available for use at any time. These are all the exact same vehicle, utilised in two stowage variations to carry the majority of the same equipment to incidents. In a dynamic city such as London, LFB fleet needs to meet operational needs efficiently and effectively in an agile and flexible manner.

In addition, there are a number of other FRS across the country that have differing fleet make ups, and while they may have varying conditions in comparison to London, there are learning opportunities for LFB to engage with.

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Appendix 1

Telematics Briefing Note published March 2023

Summary:

This briefing note outlines a phased plan of introducing telemetry onto the London Fire Brigades fleet of vehicles, and the benefits and opportunities it presents.

Background Information:

A number of London Fire Brigades vehicles already have telemetry capabilities that are built in by the manufacture which can be activated for a monthly subscription fee. There are several telemetry solutions available on the market, however for ease, this report will look at the existing capabilities, E1 Fleet Telemetry and Scania Telemetry to provide examples of costs.

Recommendations:

It is recommended that authorisation is given to carry out a phased implementation of telemetry onto London Fire Brigades fleet of vehicles over the three stages outlined in this briefing note. Phase one is a pilot of 31 vehicles, phase two is installing and activating telemetry on all front-line response vehicles, and phase three is to install and activate telemetry across the whole fleet, including vans and cars. It must be noted that the costs within this report are estimates only and will change depending on the provider we chose.

Phase one: Pilot of 10 Training Vehicles, 15 TLs, ZEPA 1, and five EFCC vehicles. This will help to determine the vehicles usage, what it will influence (maintenance regimes, real life data, real time data etc), at incident pumping data and to see how our vehicles are used at incidents to advise future vehicle strategies and usage.

Phase One pricing table redacted.

Phase Two: Role out of telemetry to all front-line response vehicles as detailed in the below table. This will provide LFB with valuable insight on how often front-line vehicles are used, what and how long they are used for, and assist with future vehicle strategies, based on real life data.

15 DPLs have already been captured in Phase One, leaving 174 requiring telemetry and 189 requiring annual subscriptions.

All 15 Aerials have already been captured in Phase One, and so will only require annual subscription fees.

ZEPA 1 has already been captured in Phase One, and so will only require annual subscription fees.

Phase Two pricing table redacted.

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Phase Three: Role out of telemetry across the remainder of the fleet cars and vans. This stage will involve continuing annual subscriptions for all previously shown fleet, with the addition of cars and vans telemetry installation and annual subscription costs.

Phase Three pricing table redacted.

Benefits:

Telemetry data can be tailored to provide information specific to LFBs requirements. For example, information can be extracted on geofencing, speed travelled, braking pressure, instant vehicle defect warnings, blue light activation mode, PTO (power take off), 'arrive at scene' data, and pumping data. This information can be collated within an application and exported for review and inform vehicle output specifications for new and replacement assets, as well as feeding into future fleet strategies.

Furthermore, telemetry can support accident investigations in a timelier manner, and provide a clarified understanding of events. Accident investigations will become more efficient, and support our staff involved in incidents by offering clarity around the events. Not only can telemetry support investigations around accidents, it can also assist with security related incidents. LFB have experienced a high number of equipment thefts from the fleet which has resulted in high replacement costs. Telemetry can provide enhanced vehicle security and additionally provide greater assistance with investigations by supporting internal and Police investigations.

Other more generic telemetry benefits include:

Real-time vehicle monitoring,
Maintenance optimisation,
Enhanced vehicle security,
Fuel/energy usage and efficiency,
Eco-driving training and carbon footprint monitoring - This feedback encourages eco-driving techniques, such as smooth acceleration and deceleration, maintaining steady speeds, and avoiding unnecessary idling (when not responding to emergencies). This type of data can be used to reduce LFBs carbon footprint, inform fleet strategies and even be more far-reaching by educating drivers in their personal vehicles to drive in an eco-friendlier way.

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Considerations:

It is worth noting that only the vehicles manufacturer can provide accurate speedometer data, and that aftermarket telemetry will only provide GPS speed data, which is not as accurate and based on a time / distance calculation.

If LFB were to go with multiple telemetry systems, based on the vehicle manufacturer, there would be numerous different systems to subscribe to and manage.

There is an associated amount of administration that comes with managing telemetry data that LFB FLEET do not have capacity to manage. This will come at an increased revenue, if LFB were to adopt this role.

Babcock Critical Services would also benefit from LFB having telemetry on the FLEET, as they manage the maintenance on LFB's behalf. This fact has been acknowledged by Babcock, however to date discussions around whether they would contribute to the costs have not been had.

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Appendix 2

Assessment of future fuel/vehicle technology for LFB fleet.

Summary Table:

Solution	A	B(1)	B(2)	C	D
Description	Battery Electric Vehicle	Hydrogen Fuel Cell Electric Vehicle	Hydrogen Internal Combustion Engine	Biofuel	Synthetic Fuel
Abbreviation	BEV	FCEV	H ₂ ICE	HVO	E-Fuel
Alignment to Target (Carbon Reduction)	High	Medium	Medium	Medium	Medium
Efficiency	High	Low	Low	Medium	Low
Maturity	Medium	Low	Low	High	Low
Future Proof	High	Low	Low	High	Medium
Operational Fit and Resilience	Medium	Low	Low	High	High
Transition Requirements	Medium	High	High	Low	Low
Capital Cost	Medium	High	High	Low	Low
Running Costs	Low	High	High	Medium	High
Pursue?	YES	NO	NO	YES	NO

Analysis of each Solution:

Solution A- Battery Electric Vehicles

Recommendation

It is recommended that Battery Electric Vehicle options are progressed and prioritised by the LFB Fleet Strategy due to the reasons detailed below. However, the fleet market will be reviewed annually in case of any significant changes or new developments within its sector.

Electric Vehicle Types

There are fundamentally two types of Electric powered vehicles:

Battery Electric Vehicle (BEV) – these vehicles are powered by electricity only. All BEVs store power in their batteries, supplied by chargers, which is used to drive electric motors only. BEVs emit zero tail pipe emissions which make them the best option, meeting all our environmental commitments.

Hybrid Vehicle (HEV, PHEV, mHEV, REEV) – there are various types of hybrid vehicles, all of which operate partly as electric zero tailpipe emissions and partly with engines running. Some (PHEV and REEV types) can plug into chargers to operate partially as BEVs as well as being engine powered, others (HEV and mHEV) aren't able to accept power from chargers so are powered by their engines running causing tail pipe emissions.

All hybrid vehicles have some degree of tailpipe emissions, so whilst acceptable for “Zero Emission Capable” short term requirements these vehicles do not meet the medium/long term “Fossil Fuel Free” or “Zero Emission” requirements, as such they are not recommended to be purchased.

Electricity Generation

Electricity has the potential to provide zero carbon emissions when used as a vehicle fuel, but only when produced from clean energy sources such as solar or wind. This clean electricity is available to purchase by means of a “Green Tariff” whereby our electricity supplier purchases the equivalent amount of electricity that we use from green sources on our behalf.

We can also generate our own clean electricity locally using solar panels at our premises, or other designated sites, and could potentially also utilise wind generation although this is presently

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impractical due to the size of equipment and consistent wind speed required compared to the geographical area which we operate in.

Presently LFB have a solar capacity split between around 70% of our sites totalling 1.1MWp which will generate around 1250MWh per year. There is scope to increase this significantly which could surpass the volume of electricity required to run some of our premises and then contribute to power used to operate our vehicles. Onsite energy storage could maximise the utilisation of solar energy for vehicle charging.

Access to Electricity

All LFB sites have access to electricity, and almost all presently have a limited number of vehicle chargers installed, however these are all lower speed AC chargers which will not be suitable for charging large vehicles.

Almost all sites will require significant increases in the capacity of their grid connections to enable charging of the full range of electric vehicles at appropriate speeds.

Investment will also be needed in vehicle charging equipment matching the requirements of the fleet. This will need to be planned and rolled out carefully together with the fleet replacement programme and increases in grid connection capacity.

Resilience

Electric vehicles require planning around resilience in operation, but there are several ways to provide this against local power supply disruption and/or long duration incidents which need to be investigated/evaluated:

Static energy storage – Battery or mechanical at LFB sites (charge vehicles during power cuts)

Portable energy storage – Battery mounted on dedicated vehicle or palletised for HDU delivery.

V2V – Vehicle to vehicle power, use of spare battery capacity in support vehicles to power others

Third party charging – Public EV charging within London is unlikely to be able to accommodate large vehicles, but TFL bus depots and Council refuse collection vehicle premises may be viable emergency resilience vehicle charging facilities, in addition to any suitable London Ambulance, Metropolitan Police or other TFL sites such as Highways or Tube depots.

Portable generation – Generator mounted on dedicated vehicle or palletised for HDU delivery (this is not a zero-emission option but could be utilised in the short/medium term).

Cost - Infrastructure

The cost of each Fire Station electrical upgrade and vehicle charging installation will vary dependant on premises requirements and expected fleet utilisation. Total, average, and peak power requirements will need to be assessed for electrical upgrades for each location, this information can be extracted from present and historic vehicle fuel/charging and premises gas & electric records. This combined with the expected number of vehicles, battery capacity and charge rates of the vehicles likely to be based at each site will provide an accurate guide for what is required.

The use of energy storage systems has the potential to reduce grid infrastructure costs whilst providing access to high-speed charging for some sites.

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Cost – Electricity

The cost of electricity is subject to market variation but is generally somewhere around 50% of the cost of conventional vehicle fuel when purchased from a utility provider (electricity purchased from high-speed public EV charging networks has cost parity with conventional fuel). Maximising premises solar capacity combined with managed energy storage provides the opportunity to reduce operational electricity costs significantly in addition to its resilience benefits.

Availability of Electric Vehicles

At the time of writing the electric vehicle market is still relatively immature. There are now over 1 million electric vehicles in the UK, the vast majority being cars with around 90 different models now available. The electric van market is much smaller with only around 50,000 vehicles registered from 25 models presently available, but more types of vans and options with improved battery capacity and charging capability are entering the market.

Electric HGV registration figures are misleading as they are classified by DVSA as vehicles above 3.5t (so include larger vans, along with legacy EVs such as milk floats), the DVSA figure is around 2000 vehicles registered, however the actual number of electric HGVs over 7.5t in the UK appears to only be around 500, of this figure at least half are refuse collection vehicles. However, within the last year all the main seven European truck manufacturers have started supplying or accepting orders for electric HGVs with models covering most of their ranges, registration figures are increasing steadily. There aren't presently any electric HGVs available ready made in Fire Service specifications, but the market has progressed significantly since the start of the ZEPA project, and a growing range of electric trucks are available. In addition to new electric HGVs there are also some options for repowering diesel vehicles to electric or purchasing new glider chassis (supplied without engine or gearbox) from manufacturers and having electric drivelines installed which can be investigated.

Additionally, there are also over 2500 electric buses in the UK with over 1000 in use within London on TFL contracts.

Efficiency

BEV are more energy efficient than any other type of vehicle. Very little power is wasted into producing heat or noise compared to internal combustion engine vehicles and EVs benefit from regenerative braking where the vehicles motors are used in reverse to slow the vehicle returning some energy to the vehicle's batteries.

The supply of electricity to vehicles is also more efficient than any other fuelling process as power is transmitted from production to the point of distribution by the electricity grid with only minimal transmission losses. All other fuel types rely on additional use of energy to change their state, compress/pump and transport them to their point of use, often including the use of additional diesel-powered road tanker vehicles.

Battery Safety

Whilst incidences of electric vehicle battery fires are very low per number of vehicles registered when compared to conventional vehicles fires, the nature of an EV fire can be substantially more severe, prolonged, and difficult to deal with.

However, improving battery chemistry and design, and development of electric vehicle technology continue to reduce the risks of incident.

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Whole vehicle safety, including electrical design will remain a paramount specification and procurement criteria.

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Solution B (1&2) – Hydrogen Vehicles Recommendation

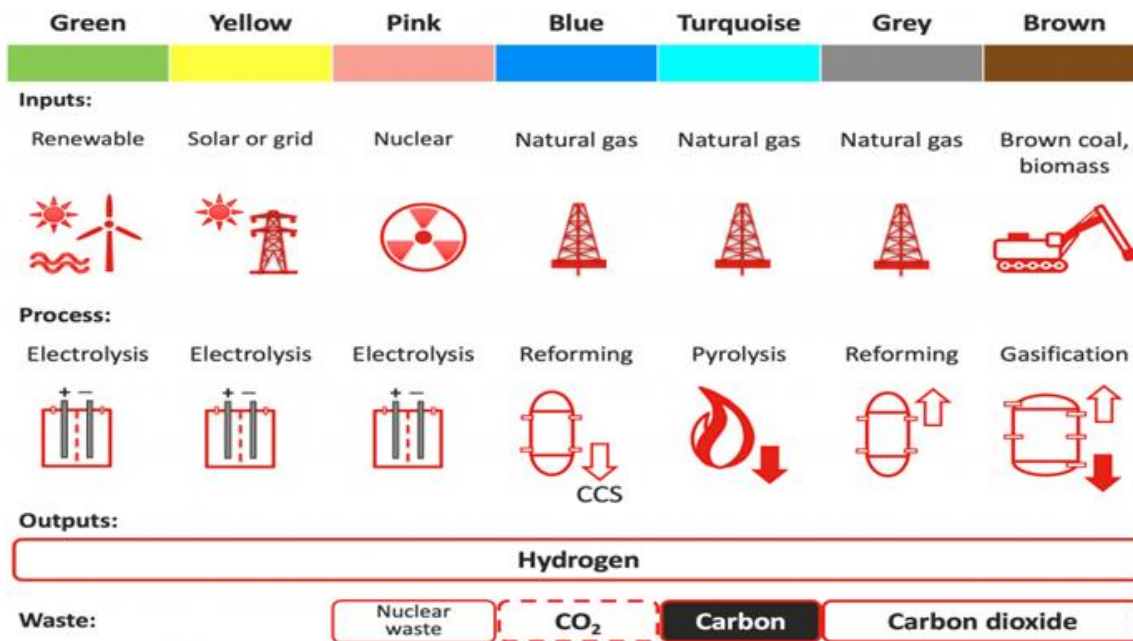
It is recommended that Hydrogen options are presently suspended from LFB Fleet Strategy due to the information detailed below. However, Hydrogen as a vehicle fuel will be reviewed annually in case of any significant changes or progress within its sector.

Information

Hydrogen Generation

Hydrogen has the potential to provide zero carbon emissions when used as a vehicle fuel, but only when provided as “Green Hydrogen” – being that manufactured from clean (solar or wind generated) electricity using electrolysis to split water into hydrogen and oxygen. There is however not presently any suitable supply of Green Hydrogen readily available in South-East England.

Most other types or “Colours” of Hydrogen presently available are sourced from fossil fuels, although some reduce their carbon emissions by means of physical carbon capture and storage (CCS). As such these cannot be considered as zero carbon emissions fuels.



Source: <https://broadleaf.com.au/resource-material/the-colour-of-hydrogen/>

Hydrogen Vehicles

There are fundamentally two types of Hydrogen powered vehicles:

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Hydrogen Internal Combustion Engine (H2ICE) – these vehicles are broadly similar mechanically to conventional diesel or petrol vehicles but burn Hydrogen instead of conventional fuel. Whilst they can be classed as zero carbon emissions (subject to the use of Green Hydrogen only) the vehicles do still emit limited NOx exhaust emissions, so are not zero tail pipe emissions.

Hydrogen Fuel Cell Electric Vehicle (FCEV) – these vehicles process hydrogen using an onboard fuel cell into electricity. This electricity is supplied to the vehicles batteries where it is stored until required by the vehicles electric drive motor, in the same way as a Battery Electric Vehicle (BEV). The only emission from the fuel cells process is water, so these vehicles are classed as zero tail pipe emissions.

Availability of Hydrogen Vehicles

There are presently no new hydrogen vehicles available for sale in the UK from mainstream vehicle manufacturers. Toyota and Hyundai have both previously supplied hydrogen cars, with 106 supplied by Toyota and 29 by Hyundai presently licenced according to DVSA statistics. There are 62 hydrogen buses licenced and 15 other vehicles which all appear to be one-offs, so project or development vehicles. Several light vehicle manufacturers such as Toyota, BMW and Stelantis Group have stated interest in development of hydrogen vehicles and provided some press information, but none presently have firm dates for vehicle availability.

Several heavy manufacturers including Mercedes, Volvo and DAF have all stated that they are working on development of hydrogen HGVs. Volvo and Mercedes have working prototype vehicles and Iveco have recently purchased a hydrogen vehicle manufacturer. There are presently no confirmed availability dates for any hydrogen HGVs.

Access to Hydrogen

At the time of writing there are understood to only be two active Hydrogen refuelling stations in London, Air Products at Hatton Cross for cars and Ryzee at Metroline Bus Depot Perivale, which can accommodate large vehicles, but has an unknown availability to provide fuel for third party customers.

There do not appear to presently be any developed plans for implementation of Hydrogen filling stations within or practically near to London, so any use of Hydrogen vehicles would be subject to LFB investing in LFB’s own hydrogen refuelling infrastructure.

Cost – Infrastructure

The cost of each fire station hydrogen refuelling installation would vary dependant on site requirements but should be expected to average between £500,000 to £1,000,000 per site. If on-site electrolysis (producing Hydrogen from electricity) were utilised this cost would likely be increased by a further approx. £300,000 to £500,000.

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Each refueler installation will require a minimum 3-phase 415v 63amp electrical supply to power the compressors required to bring the stored hydrogen from the low delivered pressure up to a high enough pressure to be dispensed efficiently.

In the case of FCEV heavy vehicles being operated a significant level of electric vehicle charging equipment investment will also be required for the vehicle batteries in addition to the hydrogen refuelling equipment, although this would be significantly lower power than the capacity required for full BEV assets.

Cost – Hydrogen

The cost of delivered Grey Hydrogen varies significantly but is presently understood to be around £35 per kg, Green Hydrogen is not yet readily available but is more expensive to produce. Whilst it is difficult to draw accurate comparisons this can be interpreted as being a cost of roughly £600-£800 to fill a vehicle such as a pumping appliance with Grey Hydrogen, this would compare with around £200 for diesel, or potentially significantly less for electric (all subject to fuel and electricity price fluctuations and tank/battery size).

Practicality

In accordance with British Compressed Gas Association (BCGA) Code of Practice 33 - set horizontal minimum spacings are required for separation distances between Hydrogen equipment installations and various other fixed installations such as buildings or boundaries at our premises. These distances vary according to the type of fixed installation, but for the purpose of this BN can be simplified to an eight-metre clear radius surrounding the combination of equipment required to receive, store, and dispense Hydrogen into vehicles.

This equipment would most likely comprise of low-pressure storage, compressor, high-pressure storage and a refueler dispenser which would have a likely combined footprint in the region of 2.5x10 metres. Dependant on lay out and site-specific variation (size of storage required due to no of vehicles) this would lead to a total area being required of approx. 26x18.5 metres or 400-450 square metres. For visualisation this is roughly the size of the entire yard area at Chelsea or around a quarter of the yard at Croydon Fire Stations.

Hydrogen is delivered by heavy goods vehicles (diesel/Hydrotreated Vegetable Oil powered as required by [Agreement Concerning the International Carriage of Dangerous Goods by Road](#) regulations), there are limited supplies of Hydrogen available so road tanker delivery distances are likely to be significantly greater than for conventional fuel, also due to the low volumetric efficiency of Hydrogen more deliveries would be required than for conventional fuel to provide the same amount of energy.

Dependant on the quantity required delivery is generally either by 44t artic, using 40-foot multitube trailers which are then left on site as low-pressure storage and swapped for full trailers when emptied, or in smaller quantities in Manifolded Cylinder Pallets (MCPs) which are generally delivered using 26-32t rigid trucks utilising the vehicles on board equipment to lift the MCPs in and out of the

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storage enclosure as required. Areas for safe station access and operation of these vehicles would also need to be assessed at each location.

Efficiency

The use of Green Hydrogen for transport is much less efficient than the direct use of electricity. This is because Green Hydrogen starts as clean electricity, is then converted to Hydrogen, physically transported and then either converted back to electricity via a fuel cell or burnt in an internal combustion engine.

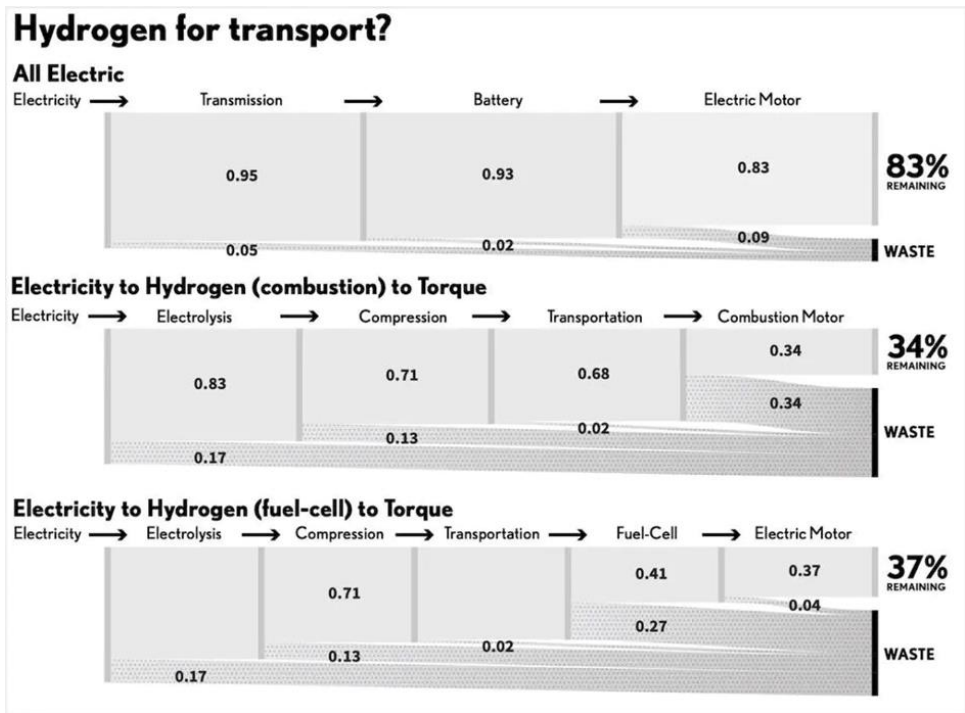


Diagram source – “The Big Switch” by Saul Griffith

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Solution C – Biofuel Recommendation

It is recommended that HVO options are included in LFB’s Fleet Strategy due to the information summarised below. However, the use of HVO by LFB fleet is recommended as a temporary measure only, to reduce carbon emissions from existing conventional diesel fleet vehicles based at sites with bulk fuel tank facilities prior to their replacement with zero emission vehicles.

Why do we need an Interim Solution?

Whilst the future of the LFB fleet will be zero tail pipe emissions we presently operate predominantly diesel vehicles. For the remaining lifespan of these vehicles prior to replacement the use of HVO will achieve a partial but significant reduction in Carbon and exhaust emissions.

If the replacement of any specific types of fleet vehicles are delayed further than planned due to lack of viable zero tailpipe emissions options, the use of HVO provides the lowest possible emissions from their continued use.

What is HVO?

HVO is a “drop-in” synthetic replacement for conventional diesel fuel. As such HVO can be used with most of the conventional Internal Combustion Engine (ICE) diesel vehicles and refuelling equipment, so does not require LFB investment in fleet related infrastructure.

HVO is a paraffinic synthetic fuel which has lower hydrocarbon content than diesel and no sulphur, this eliminates up to 90% of net CO₂ and reduces Nitrogen Oxide (NO_x), Particulate Matter (PM) and Carbon Monoxide (CO) exhaust emissions.

HVO Production

The majority of plant and animal oils can be used as feedstocks for the production of HVO. HVO production firstly introduces hydrogen into the raw fat or oil molecules of the feedstock, then converts them to hydrocarbons by removing their oxygen content as water and/or carbon dioxide.

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Access to HVO

Whilst not presently readily available from retail fuel filling stations there are several bulk fuel suppliers that are able to provide deliveries of HVO to LFB stations with fuel tank facilities. As such our fleet which presently refuel from our own tanks can switch to HVO easily.

Full fleet use of HVO would be subject to review of present refuelling procedures. It may be that a small number of additional temporary fuel tanks at specific stations could be used to increase access to HVO where suitable.

Cost of HVO

HVO is more expensive than diesel per litre, the exact additional cost varies dependant on fuel price fluctuation but can be assumed to be an increase of between 15-30%. Some reports suggest a slight efficiency improvement from HVO over conventional diesel, but this cannot be confirmed at the time of writing.

The cost of HVO may increase in line with demand as we get closer to 2030. There is also the potential for future multi-tiered pricing of HVO dependant on its CO2 reduction. I.e. the lowest carbon reduction HVO produced from plentiful cheap feedstock such as imported palm oil would be the cheapest to purchase, and then require substantial carbon offsetting to achieve net zero. Whereas the highest carbon reduction HVO produced locally with used cooking oil products as its feedstock would be more expensive but then require minimal carbon offsetting to achieve net zero.

Emissions

HVO is not a zero-emission fuel. However, its suppliers state that in comparison to diesel it achieves:

Reduction in greenhouse gas/CO2 emissions by up to 90%

Reduction in NOx emissions by up to 27%

Reduction in particulate matter emissions by up to 30%

Reduction in carbon monoxide emissions by up to 24%

Sustainability

The reduction in greenhouse gas emissions of HVO are “well-to-wheel” and as such are dependent on the source of the feedstock used to produce the fuel, the production process, and its transportation. The lowest emissions are only achieved when feedstock such as use cooking oil is used.

The supply of HVO from used cooking oil products will never be able to scale to meet all potential offtake, as nationally and globally we use far less cooking oil products than vehicle fuel. The production of new crops specifically for use in HVO production can have a negative effect on carbon reductions, particularly if rain forest or other “Carbon Soaks” are cleared to produce palm oil for this purpose.

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As such any business supplying LFB with HVO should be required to be International Sustainability & Carbon Certification (ISCC) certified and should be able to demonstrate a fully validated and auditable supply chain, including presentation of Proof of Sustainability certification.

LFB Fleet Compatibility

Compatibility and vehicle manufacturer approvals for the use of HVO have been audited on behalf of LFB by Babcock. Whilst almost all fleet vehicles can use HVO, the New Dimension MAN prime movers and around 30 MAN vans do not have the required approval, these vehicles will need to continue to use conventional diesel. HVO and diesel can safely be mixed in any ratio, so should HVO not be available at any site diesel can be used temporarily.

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Solution D – Synthetic Fuel Recommendation

It is recommended that Synthetic also known as E Fuel options are presently suspended from LFB Fleet Strategy due to the information detailed below. However, E Fuel as a vehicle fuel will be reviewed annually in case of any significant changes or progress within its sector.

Information

What are E Fuels?

E Fuels are “drop-in” synthetic, and sometimes described by their manufacturers as “Carbon Neutral”, replacements for conventional fossil based liquid fuels such as petrol and diesel. As such E Fuels can be used with conventional Internal Combustion Engine (ICE) vehicles and refuelling equipment, so do not require investment in fleet related infrastructure.

Whilst E Fuels and HVO are similar from the vehicle user's perspective they are manufactured using different processes from different source materials. E Fuels use carbon captured from the atmosphere as their base material, whereas HVO utilises vegetable or animal oils or fats.

E Fuel Production

E Fuel is manufactured using a process called Fischer-Tropsch Synthesis which combines Carbon captured from the atmosphere with Hydrogen, with the use of high temperature and pressure via a catalyst (usually containing Cobalt) which binds the Carbon and Hydrogen together to form a liquid. The liquid is then upgraded to a suitable form for use as a vehicle fuel.

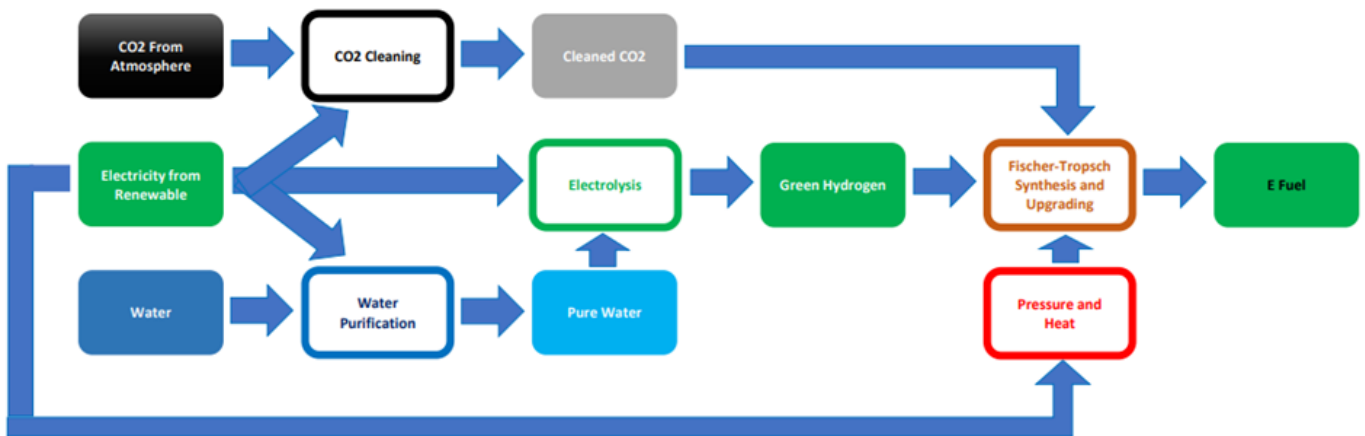


Table 1: Fischer-Tropsch Synthesis Process:

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Access to E Fuels

E Fuels are, at the time of writing, still in an immature phase of development with no regular supply available and very high development period pricing understood to be more than £1000 per litre. There have been several motor trade press articles quoting “industry insiders” who expect the eventual actual market price to be around the £35 per gallon/ £7.70 per litre figure, however this is purely speculation at this stage.

E Fuels are not yet commercially available. LFB presently purchase liquid fuel via the CCS framework, this only allows for specific named types of fuels not including E Fuels, but the present framework expires in January 2025 so further issues of the framework may include E Fuels. The alternative YPO and ESPO frameworks are both worded to allow for “other liquid fuels” in addition to petrol and diesel which may allow for E Fuels once they are available.

Emissions

E Fuels are not zero exhaust emissions fuels. The E Fuels are combusted inside the engine in the same ways that petrol and diesel are burned. However, as the carbon which is burnt within the E Fuel has been removed from the atmosphere during production of the fuel, as opposed to having been newly released via extraction from fossilised sources, and then returned to the atmosphere when used the E Fuels are described as being “Carbon Neutral”.

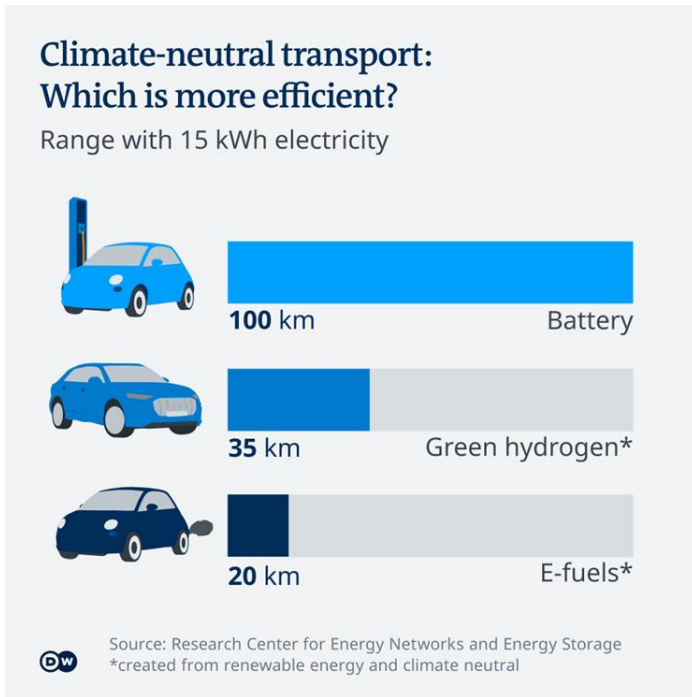
Exhaust emissions are made up of several different types of gases and particulate matter, tests have been completed comparing vehicles running on E Fuels against conventional fuels. Testing of E Fuels using a petrol Mercedes A180 was completed by IFP Energies Nouvelles in France and published by Transport and Environment on 06/12/21, a summary of the tests emissions findings is tabled below:

Exhaust Emission	Comparison
NOx	Equivalent to petrol
Carbon Monoxide	Increased vs Petrol
Hydrocarbon	Reduced vs Petrol
Regulated Particle (larger than 23nm)	Reduced vs Petrol
Unregulated Particle (larger than 10nm)	Reduced vs Petrol
Ammonia	Increased vs Petrol

Efficiency

Whilst the miles per gallon consumption of vehicles using E Fuel is expected to be similar to that of vehicles using petrol or diesel, the amount of energy (clean electricity) required to produce E Fuels make them one of the least efficient ways of powering vehicles.

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Graphic – www.dw.com – Gero Rueter 25/05/22

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Appendix 3

The key contacts engaged in the definition of LFB’s Fleet Strategy are identified in the below table:

Business	Title	Person	Engagement	Duration
LFB	Assistant Director Property and TSS	Laura Birnbaum	Governance	Governance
LFB	Deputy Assistant Commissioner	Mark Davidson	Governance	Governance
LFB	Head of Contract Management and Performance	Tim Claringbull	Owner	Full
LFB	Fleet Strategy and Carbon Net Zero Manager	Mark Smith	Technical Contributor	Full
LFB	Head of FLEET, Engineering Manager	Vic Macias	Technical Contributor	Full
LFB	Technical Officer	Charlotte Smith	Technical Contributor	Full
Babcock	Fleets Contract Director	Sandy Donald	Governance	Governance
Babcock	LFB Fleet Contract Manager	Dave Elliott	Governance	Governance
Babcock	Engineering and Technical Manager	Neil Corcoran	Technical Contributor	Full
Babcock	Asset Replacement Programme Manager	Fiona Macdonald	Contributor	Full
Babcock	Alternative Fuels Project Engineer	Ross Maclennan	Author	Full

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Part 1: Equality Impact Assessment – submitter to complete

Before carrying out an Equality Impact Assessment (EIA), you should familiarise yourself with the guidance notes (see Appendix) and our other resources located within the [EIA section on Hotwire](#)

An EIA should be carried out whenever you are starting (or reviewing) any major new activity/programme/policy/project/strategy/campaign *, or where you propose changes or a review of the previous one.

*In this document, any kind of activity/programme/policy/project will be called an ACTIVITY for an easy read, while you specify the type of your event from your end.

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/programme/policy will:

- 1. eliminate discrimination, harassment, and victimisation
- 2. advance equality of opportunity
- 3. foster good relations between people who share a relevant protected characteristic and people who do not share it.

In the EIA, you need to show that your activity meets the 3 conditions of the due regard, as listed above, and provide any relevant information showing that your activity caters for people with protected characteristics (where applicable), but also that it promotes equality and eliminates potential discrimination and offers additional opportunities to advance equality.

Where you identified any possible negative impacts on individuals and groups with protected characteristics, you need to complete a mitigating action plan (Section F below). After your mitigating action plan has been implemented, you need to inform the EAI Team by sending the same form again with the notification of the date when the mitigation action plan was completed.



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A. Name, goal and the expected outcomes of the programme/ activity

Fleet Strategy 2024-2035
This strategy provides the means to continue cyclical replacement of the LFB fleet whilst decarbonising and reducing/eventually eliminating fleet vehicle exhaust emissions.

B. Reason for Equality Impact Assessment

- Proposed changes to the existing activity.

C. Names of the team responsible for the programme/ activity

Responsibility for the EIA:

Name: Mark Smith
Job title: Fleet Strategy and Carbon Net Zero Manager
Department: Property & TSS

Responsibility for the whole activity:

Name: Laura Birnbaum
Job title: Assistant Director
Department: Property & TSS

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

All LFB staff that use vehicles will be directly affected by the strategy, the general public will benefit from reduced vehicle exhaust emissions and reduced global warming impact.

E. What other policies/documents are relevant to this EIA?

Carbon Net Zero Strategy
Estates Strategy (for vehicle/premises interfaces such as vehicle charging)



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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 programme/activity may disproportionately affect any group named below?

Protected characteristics Equality Act 2010:

- Age
- Disability/Barrier
- Gender and gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race including ethnicity and nationality
- Religion or belief
- Sexual orientation
- Socio-economic backgrounds
- Caring responsibilities

Do not provide databases, graphs, or tables in this Section, just key findings and the outcomes of your learning about these different groups. For detailed evidence and lists of data used, use Section E 1.

Age – Positive – Improved air quality from zero emission vehicles will particularly benefit younger and older colleagues and members of the public, both groups being potentially more susceptible to the negative effects of air pollution.

Disability/Barrier- Positive – There are presently around 500 colleagues (LFB Equalities data) that have identified having a disability, whilst the number of these which operate or are affected by fleet vehicles and equipment isn't recorded, each replacement of fleet assets allows for improvement of design via the inclusive design review approach taken at commencement of each replacement with equipment users. Whilst vehicles must comply with various legislation which largely determines the design of the assets, FLEET will undertake reasonable adjustments as needed in specific cases to accommodate colleagues' requirements.

Gender and gender reassignment – Neutral

Marriage and civil partnership- Neutral

Pregnancy and maternity – Positive – Improved air quality will benefit colleagues, also the change to electric vehicles charged at LFB premises will eliminate the need for staff detour journeys to filling stations – manual handling fuel nozzles, exposure to fumes/liquid fuel, queueing waiting to pay etc

Race including ethnicity and nationality – Neutral

Religion or belief – Neutral

Sexual orientation – Neutral



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Socio-Economic backgrounds – Positive – London’s air quality is understood to be worst in areas of deprivation, changing to a zero-tail pipe emissions fleet will help to improve air quality within those areas.

Caring responsibilities - Neutral

G. Evidencing Impact

Please answer the following six questions:

1. How have you gathered and utilised information from various sources, including consultations with individuals, wider research, and resources from the EIA website, to comprehensively understand the people involved in or impacted by the activity, particularly those with protected characteristics?

It is expected to provide benefits by helping to improve air quality, particularly within London and reducing LFBs carbon emissions so helping to reduce environmental damage. We have referenced material from the LFB Hotwire Equalities pages including but not limited to:

[Culture - 2425305963Inclusive and Accessible Documents for Neurodivergent Individuals - Tips and Resources 2024.pdf - All Documents \(sharepoint.com\)](#)
[making-information-accessible-for-neurodivergent-people-final-v2-20.04.21.pdf \(wypartnership.co.uk\)](#)
[How to design visual learning resources for neurodiverse students | Full Fabric neurodiversity workplace toolkit.pdf \(base-uk.org\)](#)

2. Are there any gaps in evidence for assessing your activity's impact, and if so, can you justify proceeding with the EIA without addressing them or are you considering a mitigation action plan?

This strategy covers the whole of the fleet replacement and decarbonisation, as such there may presently be some gaps in specific areas which are unable to be assessed presently as some vehicle types are not being worked on presently, and what is available from the market and specific brigade operational requirements may change before these workstreams start. As such any impacts which are specific to replacement of individual types of vehicle and resultant reasonable adjustment specifications will be addressed as the Asset replacement programme progresses. EIA will be completed as part of each procurement exercise.



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3. What adjustments have you considered for people with protected characteristics? How does your activity promote equality of opportunity and caters for equity?

The most significant change that the Fleet Strategy will lead to is the use of vehicle charging equipment in place of present fire station bulk fuel tanks or the use of public fuel filling stations. To ensure that this change does not have any negative affects we will use PAS 1899:2022, Electric vehicles – Accessible charging – Specification, in the design of our vehicle charging equipment installations.

Vehicle chargers can be difficult to use for those with mobility restrictions due to the way in which some have been designed and/or installed (ie posts designed to protect chargers from accidental vehicle damage getting in the way, chargers installed on high kerbs or cables/controls being out of reach) using the accessible charging standard will ensure that the fleet don't have a negative effect for anyone.

Each asset replacement throughout the duration of this strategy will be subject to inclusive design review with the users of the vehicles at the outset of each procurement exercise, this will provide the opportunity to improve the inclusiveness of our fleet vehicles, albeit within the confines of the standards which they must conform with.

Our vehicles are only used by brigade staff, so other than their emissions there isn't that much effect for the public - things like sirens, lighting and vehicle graphic design are subject to standards. Each batch of vehicles which we replace goes through thorough inclusive design review but there may be changes which we don't know about, yet which presents the gap in evidence for us.

4. How does your activity foster positive relations promoting equality between different groups, and what specific examples facilitates this interaction, highlighting the benefits for individuals with protected characteristics?

Bringing the new modern fleet is intended to bring colleagues into what we are doing and involving them, then supporting all users together through the changes which we bring whilst identifying.

The change to zero tail pipe emission fleet promotes equality by improving air quality for all, with the most benefit being for the youngest and oldest, those who are pregnant/maternity and those living in areas which present suffer from the worst air quality which are generally lower income areas.



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5. How do you communicate the activity to those involved, especially with protected characteristics, and have you considered diverse formats such as audio, large print, easy read, and other accessibility options in various materials?

We will seek input from groups potentially effected at the output of each part of implementation of the fleet replacement and installation of charging infrastructure. This is expected to primarily be the LFB Disability Working Group, but FLEET are open to consulting with any group as appropriate for each part of the fleet replacement. Group feedback will be considered in vehicle specification and applied as far as practicable, keeping vehicles within all their operational requirements.

Familiarisation, support and if required training will be made available to ensure that all users of equipment are comfortable with their understanding and use of it and that any reasonable adjustments required have been completed.

As the Fleet Strategy, and resultant changes as the fleet is decarbonised, will affect the majority of the organisation we intend to communicate with the whole organisation to explain why and what we are doing in stages as we progress. This will predominantly be via internal communications such as LiveWire and Yammer, however we will also share our progress externally as LFB will be leading this change within our sector. Any print and/or web articles and training content will be prepared in line with LFB accessible communication and neurodiversity guidance.

6. List all the internal/external stakeholders contacted in relation to this activity. What information did you get from these?

Internal Stakeholders:

Carbon Reduction- Fleet Fuel (Carbon) usage, CNZ Strategy

Estates- Property Strategy

FLEET- Asset replacement Programme



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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 and potential adverse impact	Action being taken to mitigate or justify	Lead person/department responsible for the mitigating action
1.		
2.		
3.		
4.		

I. Signed by the Submitter

Name: Mark Smith

Rank/Grade: Manager

Date: 17/01/2024



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Part 2: Inclusion team to complete - feedback and recommendations

J. EIA Outcomes

Select one of the four options below to indicate next steps:

Recommendation 1: No change required – the assessment showed that the activity is/will be robust.

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.

Recommendation 3: You must complete the mitigation action plan and continue the activity despite the potential for adverse impact with mitigation in place.

Recommendation 4: Stop the activity as there are adverse effects which cannot be prevented/mitigated.

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.

Recommendation 1: 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.

Fleet Strategy 2024-2025 – the EIA led to Recommendation 1, indicating that no changes are necessary due to the anticipated robustness of the activity. The policy stands out for its extensive list of considerations to protected characteristics, reflecting a commitment to operational effectiveness.

Future recommendation:

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](#)

L. Sign off by EIA Inclusion team

Date: 29/01/2024



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Full SDIA Template Name or Title of Policy/Project and Reference Number (if available):		
LFB Fleet Strategy 2024-2035		
Purpose of Policy/Project:		
Provision of LFB fleet from 2024 to 2035 including decarbonisation of the fleet and revision of each asset type to provide the most suitable solutions.		
What are the potentially negative impacts or benefits against the 6 areas of LFB's sustainability framework?		Have any opportunities for improvement or reducing negative impacts been identified?
Equalities and Social Inclusion	Benefit- Contribution to improved air quality by reducing exhaust emissions	
Climate Change	Benefit – Reduction of fossil fuel usage	
Environment & Its Resources	Benefit – Reduction of fossil fuel use and opportunity to electricity produced from renewable sources	Negative Impact – production of new battery electric vehicles consumes resources– exact vehicle and battery specifications will take into account materials used in production to reduce environmental impact
Community Safety	Reduction of liquid fuel use will help reduce the number of fuel tanker deliveries within London slightly decreasing HGV traffic	
Health, Safety & Wellbeing	The move to zero tailpipe emission vehicles will reduce public and staff exposure to exhaust fumes, noise and vibration from vehicles	
Economic Sustainability	Moving to renewably sourced electricity from liquid fossil fuels will remove susceptibility to oil price variation	Investment required in infrastructure to support electric vehicles will be spread over several years
What evidence or information has helped to indicate what the potential impacts will be? Did you seek any further advice or guidance from any internal or external sources, and if so how have they contributed?		
The effects of pollution from vehicles within London are well known and documented by amongst others the Mayor of Londons office, TfL and academia such as Imperial College London.		
How will any changes be implemented?		
Initially fleet vehicles drawing fuel from bunkered supplies at LFB fire stations will be switched to HVO to make an initial carbon usage reduction. Then fleet vehicles will be replaced in line with the Asset replacement programme, with zero tailpipe emission vehicles replacing aged diesels. Vehicle charging equipment will be installed over several years, ahead of the replacement of the fleet vehicles.		
Is a Procurement to take place as part of the policy/project?		
Yes Vehicles will be procured along with vehicle charging equipment.		
Contact		

To be completed by the Sustainable Development Team

Date Approved*	<i>For policies only</i>
Sustainable Development Team Comments	
Legal Compliance	
EMS Aspects	
General Comments	<i>Approved for Fleet Strategy by Jennifer Porter 18/01/2024</i>

Review
Is a review of this SDIA required? Yes/No
If yes, detail: <i>e.g. policy review date or start of project delivery phase to confirm environmental legal compliance requirements</i>

Board Sign off date	<i>For projects only</i>
Review date	<i>For projects only</i>

