

Remediation Acceleration Plan

Greater Manchester's approach to Building Safety

November 2024

Foreword

It is now more than seven years since the horrific fire at Grenfell Tower in which 72 innocent people lost their lives and a whole community was impacted for the remainder of their lives – the Grenfell Community remain in our thoughts and in our hearts.

Since 2017 the actions taken in Greater Manchester identified that hundreds of buildings were affected by it is not right that many Greater Manchester residents are still living in high rise that need remediating before they can be deemed safe and potentially thousands more do not know if their homes are safe. The impact on residents is widespread and has had a significant and detrimental impact on health, finances and ability to move on with their lives.

Immediately after the Grenfell fire, Mayor Andy Burnham established the city region's High Rise and Building Safety Task Force. Chaired by Salford City Mayor Paul Dennett, the task force has brought together Greater Manchester Fire & Rescue Service, local authorities, landlords, residents and government officials to help make all our buildings safe. The Task Force has achieved an enormous amount in this time and its work is considered later in this Plan.

The barriers to fixing our unsafe buildings are multiple and complex. They include the failure of the previous Government to deliver a timely and effective funding regime resulting in confusion and delay; disputes over Grant Funding Agreements; critical fire safety works being deemed ineligible funding; Developers stalling on progressing with required works despite pledging to fix buildings; problems with duplicated and conflicting specialist reports; large freeholders prioritising work across a national portfolio; and problems finding suitable alternative building materials.

The new government has pledged to accelerate building remediation and is asking combined / mayoral authorities to help deliver this. This Plan provides an overview of the work we have already undertaken in Greater Manchester, identifies the barriers that need addressing and sets out how we will move forward to support an increase in the pace of remediation.

We will work with national government to help accelerate remediation programmes and will continue to work in an integrated way with local partners. As Deputy Mayors of Greater Manchester, we remain absolutely committed to supporting our residents and ensuring their safety.

Kate Green, Deputy Mayor, Safer and Stronger Communities,

Paul Dennett, Deputy Mayor, Housing First, and Salford City Mayor

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Executive Summary

In Greater Manchester we share the concerns about the pace of remediation and the need for this to be accelerated. Our plan highlights a range of issues which delay the progress of remediation. In addition to investing in resources to deliver this important work, our asks of the Government are to:

1. Urgently assess the current capacity required to accelerate remediation and provide investment to build competency and capacity
2. Close the regulatory gap
3. Develop a single dataset
4. Establish clear standards and expectations
5. Provide clarity on funding
6. Embed Leaseholder protections

Introduction & work to date

Greater Manchester context

Greater Manchester is one of the country's most successful regions, with a population of more than 2.8 million and an economy larger than those of Wales and Northern Ireland. It is our vision to make Greater Manchester one of the best places in the world to grow up, get on and grow old. We are delivering this through a combination of economic growth, and the reform of public services. We have significant growth plans for the region including an increase in housing. This is set out in 'Places for Everyone', our long term plan for the region and a collaboration between nine local authorities and the GMCA.

Places for Everyone sets out ambitious proposals to deliver the homes Greater Manchester needs, including high rise developments utilising brownfield sites. We have signalled our intent to help deliver the Government's manifesto commitment to Get Britain Building again and we aim to build 75,000 new homes in the region over

the course of this parliament. This includes a significant increase in delivery of affordable and net zero homes which are key to ending the homelessness and housing crisis.

The security of a good home is a fundamental foundation for us all to achieve our ambitions in life – our safe space for growing up, getting on and growing old, in line with the city region’s “**Live Well**” ambitions. The housing crisis means that too many of us don’t benefit from the security of a safe and secure home which is the bedrock of enabling people to fulfil their potential. The building safety crisis means that many of our residents feel trapped in unsafe homes, unable to move and in fear of unmanageable bills. Our bold aspirations for the future won’t happen unless we fix that, so in Greater Manchester, we are putting Housing First.

Our ambition is for everyone in Greater Manchester to live in a home they can afford that is safe, secure, healthy and environmentally sustainable – a healthy home for all by 2038.

The Grenfell Tower Inquiry has exposed the failures of the regulatory system to ensure that buildings are safe for those who live in them. Reversing this will require significant investment and effort across a range of stakeholders.

Ensuring that buildings are designed, constructed and managed to high standards is key to preventing future tragedies and ensuring that residents in flats of all heights are safe. Our ambition extends beyond our commitment to delivering new homes. It is vital we ensure residents are safe and feel safe in their existing homes. We know this requires significant work across our existing building stock to remedy fire safety defects and we welcome the Government’s clear intention to speed up the pace of remediation.

The GM High Rise & Building Safety Task Force

The Greater Manchester High Rise Task Force was established immediately after the fire at Grenfell Tower by Andy Burnham, the Mayor of Greater Manchester. Salford City Mayor Paul Dennett has chaired the Task Force since its inception, supported by Greater Manchester Fire and Rescue Service (GMFRS).

The Task Force has led on a collaborative approach to tackling building safety, drawing together local authorities, the GM Housing Providers Group, universities, and other agencies who can offer support to ensure action is taken to ensure high rise buildings are made safe and residents receive the right fire safety advice.

When established, the key objectives of the Task Force were;

- Ensuring all services in Greater Manchester can respond in the event of a large scale incident at a high rise building.
- Providing assurance to all residents that their homes are safe as quickly as possible.

The Task Force has overseen the response within Greater Manchester to ensure preparedness in the event of a similar incident to the fire at Grenfell Tower. It has taken action to ensure the safety of premises and provided reassurance to residents.

From the outset in Greater Manchester, we recognised that a comprehensive and holistic approach to the safety of buildings was required, acknowledging the risks of a range of cladding types and other fire safety defects. As long ago as 2018 we were raising concerns with government about the risk of a range of cladding types, and warning that the risks were not restricted to buildings over 18 metres. In 2019 the scale of the risks was demonstrated by a fire at The Cube in Bolton – student accommodation with high pressure laminate cladding and measuring under 18 metres. The work undertaken across Greater Manchester following the publication of the Grenfell Tower Phase 1 Report meant that Greater Manchester Fire and Rescue Service took swift action to instigate an immediate building evacuation and undertake a small number of rescues so consequently no residents suffered serious injuries. Key stakeholders worked together in the hours and days after the fire to ensure affected residents were provided with emergency accommodation and ongoing support.

The work of the Task Force has evolved. In 2023, the meeting structures were changed and a Strategic Oversight Group established. The purpose of the Strategic Oversight Group is to oversee work undertaken across Greater Manchester to ensure the safety of residents living in blocks of flats, including the implementation of legislative changes brought in under the Building Safety Act. Its other key function is

to clearly articulate the voice of Greater Manchester and our residents to inform legislative and policy change, ensuring safety is prioritised.

The Strategic Oversight Group will monitor our work to accelerate remediation, ensuring we build on the effective approaches taken so far.

Collaboration & Engagement

The Building Safety Crisis has created unprecedented challenges for those who own, manage, regulate and live in blocks of flats. The scale of the problem emerged over a number of years, and between 2017 and 2020 the Government issued over 20 Advice Notes relating to building safety risks. There have subsequently been significant changes in legislation with new duties and requirements imposed on those responsible for fire safety in buildings and a new approach to the design, construction and management of the safety of high rise buildings introduced under the Building Safety Act.

In Greater Manchester we have sought to work together to understand these challenges and respond to them. Much of this work has been delivered under the oversight of the GM High Rise and Building Safety Task Force with many elements building on the existing partnerships within Greater Manchester.

GMFRS has worked pro-actively with Housing Providers and Managing Agents to share information and advice through regular engagement sessions both in person and online covering Government advice notes, legislative changes, and emerging risks. These events are well attended and support the consistent approach being taken across Greater Manchester. (See Case Study 1 – Fire Safety England Regulations)

Residents have been at the heart of our approach in Greater Manchester and our work has been shaped by their feedback and concerns. Since the establishment of the Manchester Cladiators in 2019 there has been close liaison and support for their work including the national lobby of Parliament in 2020, regular attendance at meetings and the co-production of a safety video for residents in December 2021.

Local authorities and GMFRS have engaged with central government officials to provide data and consider interventions at an individual building level. The central government approach has evolved over time and currently this monitoring is undertaken through 'Account Management Meetings' with key local authorities. These meetings are used to highlight buildings of concern and determine what action is required to support acceleration of remediation. Whilst these meetings provide a mechanism for engagement, we consider that the effectiveness of these meetings would be improved through broadening the stakeholders involved and ensuring there is a better system for monitoring progress towards remediation.

Current position

The extent of the impact of the building safety crisis in Greater Manchester is not yet fully known and this is reflective of the national picture. It is absolutely vital that an understanding of the number of buildings and residents affected, the nature of the defects and potential costs of remediation is assessed and understood in order to ensure a clear plan of action can be developed with realistic timescales.

The work undertaken since 2017 to inspect high rise buildings has resulted in significant numbers of buildings identifying serious fire safety defects which require remediation works. The extent of fire safety defects is not restricted to 'unsafe cladding' and in many cases poor quality construction means there are missing cavity barriers and internal compartmentation issues.

Recent changes to the way the Ministry of Housing, Communities and Local Government (MHCLG) collates and shares information about buildings requiring remediation means it is not possible to establish the status of buildings by height. However, according to the latest statistical information provided about buildings within a Government portfolio, there are 77 buildings with known cladding defects where work is yet to start on site. The majority of these are buildings over 18 metres.

A high number of buildings where remediation work is yet to commence are those which have moved from a Government funded scheme to the 'Developers Pledge'. There are currently 112 buildings across Greater Manchester which are covered by

the Developers Pledge, with only sixteen of these having completed remediation, and 20 with remediation works underway.

Analysis of the latest data shared by MHCLG in relation to remediation works suggests there are 116 buildings which require remediation of some form but where works have not yet started.

High Rise buildings

There has been extensive action to inspect high rise buildings since 2017. Following the fire at Grenfell Tower, GMFRS inspected all occupied high rise buildings. Where cladding was identified, Housing Providers and Managing Agents were asked to identify the materials used in the external wall system and assess the risk of external fire spread. This work continued under the Building Risk Review programme which was funded between 2020 and 2021 and involved GMFRS assessing, inspecting and providing information about 712 buildings, of which 551 were occupied high rise buildings.

As a result of these inspections, over a third of high rise residential buildings have identified such serious fire safety defects that the evacuation strategy has needed to change. Currently there are 147 high rise buildings across the city region operating with a 'temporary' simultaneous evacuation strategy – in some cases these temporary arrangements have now been in place for five years.

Since 2017 the number of high rise buildings in Greater Manchester has increased considerably, and 737 high rise buildings have been registered with the Building Safety Regulator.

The remediation of high rise buildings with unsafe cladding is ongoing across Greater Manchester, however only 60% of buildings within Government remediation programmes have completed all works required. All high rise buildings identified as having Aluminium Composite Material have completed remediation works and there are 59 buildings where remediation works are currently underway and 112 where all works have been completed.

In Greater Manchester our view is that those buildings which are awaiting remediation should be prioritised by the new Building Safety Regulator to ensure a robust approach is taken to making the buildings safe leveraging all of the power of the new enhanced regime.

The changes in Government advice since 2017, and the introduction of the PAS9980 standard for assessing external walls, means there are many buildings where multiple safety reports have been undertaken, often with differing conclusions. This creates a further degree of complexity in determining the extent of remediation work required and can cause significant distress and disruption to residents. (See Case Study 2 – High Rise Building with Multiple Reports)

11-18m Buildings

The position in Greater Manchester in relation to 11-18m buildings is unknown at this stage and this reflects the national picture.

“Remediation of buildings over 11 metres is not currently on course to complete by 2035 and there are significant challenges to overcome.” *National Audit Office report – ‘Dangerous cladding: the government’s remediation portfolio’*

Identifying the number of buildings across Greater Manchester is a challenge and there is no comprehensive list of blocks of flats. In 2020, the Home Office utilised Ordnance Survey data to determine allocation of Protection Uplift funding to FRS. This estimated there to be 1,500 blocks of flats 11-18m in Greater Manchester.

Homes England are working to identify 11-18m buildings which may require remediation works and have shared the initial findings. Early indications are that the number of 11-18m buildings is likely to be significantly higher than the estimates used by the Home Office in 2020. An initial data set of 6,000 unique property reference numbers (UPRNs) in Manchester alone has identified 990 buildings 11-18m in height, of which 584 have so far been confirmed as having some form of cladding.

Manchester is just one of 10 local authorities in Greater Manchester. Whilst it is the most densely populated area, it also has the highest concentration of high-rise buildings (18m+). **It is possible, therefore, that there could be between 7,000 and 10,000 buildings across the city region that are between 11 and 18 metres in height.**

Whilst significant resource has been committed to inspecting high rise buildings, primarily by GMFRS, there is not currently capacity within Greater Manchester to proactively inspect smaller blocks of flats. This means that we are in a reactive position and responding to issues as they are identified by Housing Providers and Managing Agents.

There are currently 49 buildings under 18 metres which are operating temporary simultaneous evacuation strategies and 39 of these have a known risk of external fire spread. According to the latest statistical information provided by MHCLG, there are 24 buildings which are in the Cladding Safety Scheme and none of these buildings have remediation works underway.

The Fire Safety Act 2021 clarified the extent of the Fire Safety Order in relation to external walls of blocks of flats. Information explaining the implications of this have been shared with Housing Providers and Managing Agents across Greater Manchester. However, undertaking assessments of external walls in buildings under 18 metres will be ongoing. Based on capacity and capability within the wider industry, this could take a number of years.

The Risk Prioritisation Guidance issued by the Government to support the implementation of the Fire Safety Act means that a single staircase six-storey building without balconies, but where the materials in the external wall system are unknown, could be categorised as a 'low priority' for prioritising an assessment of the external walls. This coupled with the capacity issues within the sector to undertake PAS9980 assessments poses a significant challenge to identifying 11-18m buildings which may require remediation works.

This current costs of a PAS9980 assessment vary significantly with costs of between £12,000 – £25,000 routinely being reported. In order to have the assessment

undertaken leaseholders must meet these costs often in advance and in addition to the costs of obtaining an EWS1 form the price of which can range from £6,000 - £50,000.

Accelerating Remediation: Barriers

In Greater Manchester we share Ministers' concerns about the pace of remediation and the need for this to be accelerated. We have highlighted a range of issues which have delayed the progression of remediation of high rise buildings and many of these are reflected in the **National Audit Office report**. The way these have impacted Greater Manchester is complex and varied but their effect means that we have been unable to target our resources where they are needed most.

Whilst the Government focus has been on the remediation of unsafe cladding, a more holistic approach is required to remediation to remove fire safety risks. There is a wealth of evidence that poor quality construction is not restricted to cladding and many buildings have also identified significant risks from internal fire spread. The replacement of cladding alone cannot be considered as remediation of buildings where there are other defects.

We have repeatedly highlighted to national Government that the regulatory interventions available to local authorities and FRS were not designed to address the failure of the wider regulatory system – there is no simple enforcement route to address failings in the design and construction stage. In Greater Manchester we took the position early on that the most efficient regulatory mechanism for addressing fire safety defects was the Fire Safety Order and therefore GMFRS has led on inspections and enforcement interventions. However, this work has been done without significant additional resourcing with only the time-limited Building Risk Review programme being funded.

There has been considerable investment in data collection exercises, but this has failed to produce a single data set of buildings accessible by all key stakeholders. Local Authorities, GMFRS, National Fire Chiefs Council and the Building Safety Regulator have all collated information on high rise buildings. Despite these various exercises there is still no single comprehensive data set of high rise occupied

buildings which can be utilised by stakeholders, and no means of validating the information provided to different regulators. **To date, there has been no data collection undertaken in relation to 11-18m buildings.**

The National Audit Office has identified the lack of 'clear and consistent data' across the Government's portfolio as a major barrier to measuring progress of works across comparable buildings to determine whether the pace of remediation is reasonable. This reflects our experiences in Greater Manchester and exacerbates the challenges of determining what, if any, regulatory intervention would support acceleration of works.

There is no clear mechanism for establishing fire safety defects which require remediation, and the national position has shifted from a requirement to replace unsafe cladding, to the promotion of more proportionate approaches to remediation. However, there is a lack of clarity and consistency in relation to 'proportionality' and no established mechanisms for determining what works are proportionate. This is exacerbated by a lack of up to date centralised guidance on managing fire safety in blocks of flats, leaving regulators and those responsible for buildings without effective benchmarks for determining appropriate safety standards.

The lack of a centralised system for logging the extent of remediation work required, and monitoring progress of remediation works, impedes our ability in Greater Manchester to identify and respond to the barriers to remediation at a building level. The content of the data shared from central Government has changed frequently often with no explanation and lacks key information to support effective regulation. Recent data sets have not included Unique Property Reference Numbers, have buildings allocated to incorrect Local Authorities and lack detail about the remediation status and plans. There is no transparency in relation to the progression of buildings which are covered by the Developers Pledge and how this is being monitored.

Whilst we welcomed the introduction of Government funding as a means of protecting leaseholders from the costs of fixing their buildings the approach taken to funding was piecemeal and created a complicated system which many found difficult to navigate and apply for. Administration of the fund has been slow with many

buildings stuck in the system for years awaiting approvals, in some cases these delays meant the works had to be re-tendered and costs increased significantly. The disputes between Freeholders and the Government in relation to Grant Funding Agreements delayed progression with remediation and required national resolution.

There is a lack of clarity about what can reasonably be expected as a timeframe for progressing remediation works, and the progress of many buildings through the Building Safety Fund has been slow. There was no agreement in place with national Government on how information about the progress of buildings in the Building Safety Fund would be shared with local partners. This has created a lack of clarity around expected and reasonable timescales.

The introduction of Leaseholder Protections was welcomed in Greater Manchester, but the interaction between the protections and remediation work is not well understood, and there is a lack of clarity as to how the protections can be enforced. The nature of the protections means that non-qualifying leaseholders may still be liable for considerable costs, and this has the potential to delay the progression of remediation work.

The widespread issues of competency and capacity across a number of sectors has contributed to delays in remediation. We remain concerned that the capacity of industry to support the identification and remediation of fire safety defects will continue to pose a barrier, with the potential to drive up costs. There are significant defects beyond cladding that are unfunded but need to be included in a programme of works.

There has been inadequate funding to support an increase in public sector regulatory capacity at a national and regional level and this poses a key risk to accelerating remediation and ensuring that any works to make buildings safe are undertaken to a high standard. The Government's commitment to increase the number of Planning Officers by 300 in the next two years is a positive step but there has been no such commitment to date to increase Building Control Officers, Housing Officers and Fire Safety Regulators.

The impact of the previous deregulation agenda which preceded a decade of cuts to local authority budgets has created a significant shortfall in capacity. Nationally there are approximately 1400 Housing Officers working within Local Authorities to assess and respond to a range of housing standards issues and many of these are not fully qualified environmental health professionals. In 2021 the Chartered Institute of Environmental Health raised concerns about the impact of budget cuts and called on Government to increase financial support to local authorities in order to maintain resources within LAs for regulatory and public health work.

There are currently 4094 Building Control professionals registered with the Building Safety Regulator of which 1900 are Trainees and only 464 are Class 3 Registered restricting the capacity to oversee remediation work on high rise residential buildings through the Building Safety Regulator. It is unclear how many of the 1600 Class 2 Building Control Inspectors have registered to undertake work in relation to buildings over 11m and this must be urgently assessed.

There are currently in the region of 1200 qualified Fire Safety Regulators nationally with less than 75% of these qualified at Level 4 Diploma and only 27 Fire Engineers working across 43 Fire and Rescue Services. There has been limited investment to increase capacity to support the introduction of the Building Safety Regulator but this is aligned to the requirements of the new regime and for Greater Manchester was based on 550 high rise residential buildings not the 700+ which are now occupied. There is an urgent need for sustained investment to increase

Accelerating Remediation: Our Ask

We are committed to supporting the acceleration of remediation and recognise the complexity of the challenge posed by the building safety crisis and the efforts of national government to respond.

Our plan to accelerate remediation will only be effective as part of a wider national effort to develop a long-term roadmap to ensure that existing buildings are made safe and the quality of the construction of future buildings is improved. This poses a

significant challenge in relation to buildings under 18 metres, which are outside the enhanced safety regime introduced by the Building Safety Act.

Ask One: Urgently assess the current capacity required to accelerate remediation and provide investment to build competency and capacity

The extent and complexity of the building safety crisis has identified significant gaps in competency across the whole system, from building design, to building management and regulatory awareness and expertise. There needs to be urgent and sustained investment in increasing regulatory capacity. More needs to be done to address this to ensure the work undertaken by the Competence Steering Group is embedded and delivering meaningful change.

In order to effectively support the acceleration of remediation there needs to be clarity about the current capacity to support the work. There are common issues across a range of sectors relating to the lack of resources, workforce, and relevant skills which will be a key barrier to success across all partners

There must be an urgent national review of the capacity to support the following work;

- Regulatory capacity across a range of disciplines
- Capacity and expertise to undertake relevant assessments of buildings
- Capacity to prepare scope of works and oversee programmes of works
- Capacity within the construction sector and associated supply chains

There needs to be significant investment in providing support to residents who are Directors of Resident Management Companies to understand and exercise their duties effectively.

This needs to be considered centrally to inform the key milestones of a national roadmap.

Ask Two: Close the regulatory gap

There have been significant changes in legislation primarily through the introduction of the Building Safety Act and the Fire Safety England Regulations. These changes significantly enhance the regulatory requirements for high rise buildings throughout the life cycle of a building. Whilst these changes have been welcomed, there is now a two tier system of regulation for blocks of flats.

For buildings under 18 metres, the only major changes in relation to regulatory requirements concern clarity on the requirement for fire risk assessments to consider the materials in the external walls and providing information to residents.

This creates a significant regulatory gap and a two-tier system of regulation which poses a risk to the safety of our residents. There must be increased oversight and control of remediation works as without this there is a risk that the same actors who have profited from substandard construction will continue to select their own regulator and the building control process will not exercise sufficient scrutiny of works.

Consideration should be given as to whether some of the requirements imposed on high rise buildings should be extended to other blocks of flats, and whether the registration of buildings and mandating fault and safety occurrence reporting should be introduced.

Ask Three: Develop a single dataset

A co-ordinated approach needs to be taken to establish a single data set of all buildings which may require remediation and will provide a basis for tracking and monitoring progress over the long term. This will ensure the duplication of work undertaken in relation to high rise buildings is not repeated.

A lack of grip on data and effective data sharing over the last seven years has resulted in duplication of effort, wasted resources and impeded the ability to focus effort on s a minimum, this data set needs to include unique property reference numbers (UPRNs), the details of responsible entities, and key building information.

The creation of a single data set would be expedited by a requirement for registration of buildings as set out above. This would reduce the level of resourcing required to identify buildings which require remediation.

Consideration should be given to building on the work undertaken by Homes England to develop a case management system accessible by local regulators.

Ask Four: Establish clear standards and expectations

Develop a clear understanding of expectations in relation to the progression of work in high rise buildings. National government must clearly set out reasonable timescales for undertaking remediation works which reflect the complexities of funding arrangements and regulatory approvals and can be used as a benchmark for monitoring progress.

This needs to be supported by a single data set accessible by the Building Safety Regulator, local authorities, and GMFRS to support the tracking of progress at a building level and a consistent and proportionate approach to enforcement.

Ensure consistency in assessments undertaken under the PAS9980 methodology and consequent recommendations for remediation. The assessment of risks must extend beyond 'life safety risks' to ensure that residents are and feel safe in their homes and address the financial burden faced by many due to increased insurance costs. Without addressing the inconsistencies and quality issues related to PAS9980 assessments and subsequent fire risk assessments there will inevitably be a repeat of the surge in the use of unreliable and costly Waking Watches.

The Simultaneous Evacuation Guidance must be reviewed to ensure that a pragmatic and proportionate approach is taken when managing a change to the evacuation strategy in 11-18m buildings.

Standards must be enshrined in national guidance to support those responsible for fire safety in flats to understand and comply with their obligations. The publication of updated guidance on Fire Safety in Purpose Built Blocks of Flats must be prioritised. This must include guidance on the legal position in relation to Personal Emergency

Evacuation Plans (PEEPs) to ensure vulnerable residents are supported and protected.

Ask Five: Provide clarity on funding

A key factor in the pace of remediation has been the evolution of funding regimes and the eligibility of works for funding. The Cladding Safety Scheme offers a more holistic approach to funding works, but this is reliant on the effectiveness of the PAS9980 assessments. There are concerns regarding internal compartmentation works which can be costly and are not effectively funded.

The work undertaken by national Government in relation to the Developers Pledge and the Responsible Actors Scheme is not widely understood. We consider that improving communication on this work will build understanding and awareness of what works may be funded through these schemes.

Ask Six: Embed leaseholder protections & ensure adequate funding

The introduction of leaseholder protections was welcomed across Greater Manchester as a positive step in protecting residents from the costs of remedying defects caused by developers. However, there has not been sufficient resource committed to supporting leaseholders to understand and utilise these protections and ensure they deliver on the policy intent.

Residents have told us these protections do not go far enough and more work is required to ensure there is not an adverse impact on the pace of remediation. At present the guidance available is long, detailed and complex making it difficult for residents and others to navigate. This leaves leaseholders vulnerable to inaction by Freeholders with no obvious and easy mechanisms to ensure they are protected. The protections are inadequate to protect leaseholders from what may be unreasonable costs of a Waking Watch as they do not prohibit these costs from being passed on. A thorough review of the current protections should be carried out to ensure that they are delivering on the policy intent.

The single biggest delay in progressing remediation of high rise buildings was the delays in funding of the works. It took 3 years for the previous government to move from a mantra of 'Freeholders should do the right thing' to establishing the Building Safety Fund which was subsequently expanded.

It is absolutely imperative that the funding position is clear in relation to 11-18m buildings. A particular concern is the lack of funding for social housing given the estimated costs of remediation given in the National Audit Office report and the potential impact this will have on funding other essential works and progressing with plans to increase the scale of delivery of affordable housing.

Accelerating Remediation: Our Approach

Our approach to date in Greater Manchester is built on collaboration and partnership working, and this provides a strong foundation for us to support the acceleration of remediation.

A key challenge in our response in Greater Manchester is that this work has not been funded and is therefore subject to competing and conflicting demands on partners and stakeholders.

We welcome the ask to support the acceleration of remediation to review and refresh our approach in light of new challenges. However, we are clear that the extent and effectiveness of what can be achieved will be determined by the resources we can commit to this work. There is a need for significant investment if we are to deliver for our residents and make them safe in their homes.

This plan sets out our approach and we will engage with partners and stakeholders to clarify the scope of work and develop an effective delivery plan which will identify the resources required.

Greater Manchester partners

The GM High Rise & Building Safety Task Force has co-ordinated much of the activity across Greater Manchester and has evolved over the last seven years. A

consequence of this is that those local authorities with the majority of privately owned high rise buildings have been more actively engaged in recent years.

We will review and revisit the key stakeholders and undertake further consultation to establish the mechanisms for accelerating remediation at a tactical level, identifying the current barriers and escalating them to national Government.

Residents

We will continue to work with the Manchester Cladators and affected residents to ensure their experiences continue to shape our approach. We will also look to re-establish our GM Residents Forum.

Homes England

We have commenced engagement with Homes England to explore how we can work effectively together to support the progress of buildings through the cladding safety scheme. Although this work is at an early stage, progress has been made on effective sharing of information and a pilot agreed to give GMFRS fire safety officers direct access to Homes England's case management system.

An in principle agreement has been reached on the circumstances in which Homes England may require support from GMFRS in relation to applications which are not effectively progressing. Homes England have been identified as a key stakeholder to join the GM Strategic Oversight Group and provide high level data on progress of buildings in Greater Manchester.

Building Safety Regulator (BSR)

Although the BSR is a national regulator it is considered key to supporting the acceleration of remediation in Greater Manchester and ensuring our resources are utilised effectively to maximise impact.

We are supportive of the BSR's ambition in its Strategic Plan that by April 26, '*any work on remediating dangerous cladding will be completed or underway*'.

GMFRS and local authority Building Control departments are already invested in supporting the new regime through participation in multi-disciplinary teams assessing

and overseeing proposals for work and assessing safety case reviews. There has been some investment to increase capacity for building control and fire safety to support the new regime, but there is a risk that the initial demand for support may be greater than the available resource.

It is imperative that high rise buildings which require remediation are prioritised as part of the new regime. This will ensure we maximise the available resource, agree a clear plan of action, and can effectively monitor and track the works required.

Accelerating Remediation Over 18m buildings

We consider that we can make significant progress with our existing resources for buildings over 18 metres.

This can be done through improving the information sharing between stakeholders and utilising the case conferencing approach developed by GMFRS and key local authorities with MHCLG officials in November 2022. This will ensure a detailed review of information is undertaken on a building by building basis, determining the most appropriate enforcement mechanisms to accelerate remediation and the appropriate lead for this.

Developing a Plan for 11-18m buildings

There is significant work required in order to understand the scale of the challenge affecting 11-18 metre buildings.

Based on work undertaken in conjunction with the National Fire Chiefs Council, if GMFRS allocated all of its current competent Fire Safety Regulators, it could take up to 10 years to identify and inspect all our 11-18m buildings, and one year if only 1000 buildings required inspection.

Our approach to 11-18 metre buildings needs to start with a process of identification. There needs to be a clear plan identifying how to ensure relevant assessments have been undertaken, and how this can be enforced.

We will work with Homes England, MHCLG and local stakeholders to establish how this single data set can best be created and avoid duplication of effort and work.

Next Steps

In light of the information contained in the National Audit Office report of the extent of the work required, and potential timescales for completion of remediation, we are clear that any work to accelerate remediation must be planned on a long term basis.

Whilst this plan sets out our high level approach and ask from Government, significant further work is required to develop a detailed plan which recognises the interdependencies of work undertaken by other stakeholders.

Consulting on our Remediation Acceleration Plan

A Greater Manchester Remediation Acceleration Plan needs to be built on collaboration. We therefore need to undertake consultation on our approach and use this to inform the development of a delivery plan. It is our intention to share this Plan and consult with stakeholders over the coming months to shape our delivery arrangements.

This consultation will support us in identifying in further detail the existing barriers to remediation and help inform expectations moving forwards. It will also assist in identifying capacity issues across stakeholders to inform our asks for the required delivery resources.

Determining resourcing

We are not in a position to establish the level of resourcing required to deliver a remediation acceleration plan over a ten year period without further work to establish the extent and scale of work required. However, additional resourcing will be needed to support this work and create the capacity within the GMCA to effectively support the Task Force and development of a delivery plan.

We have set out an indicative delivery structure for progressing this work which reflects the complexity of the challenge of both identification and inspections of buildings, co-ordination of work with stakeholders and increasing engagement with residents. It is imperative to recognise that there is not capacity within the existing regulatory system across Greater Manchester to pro-actively undertake inspections of 11-18 metre buildings and this will require significant investment with a minimum

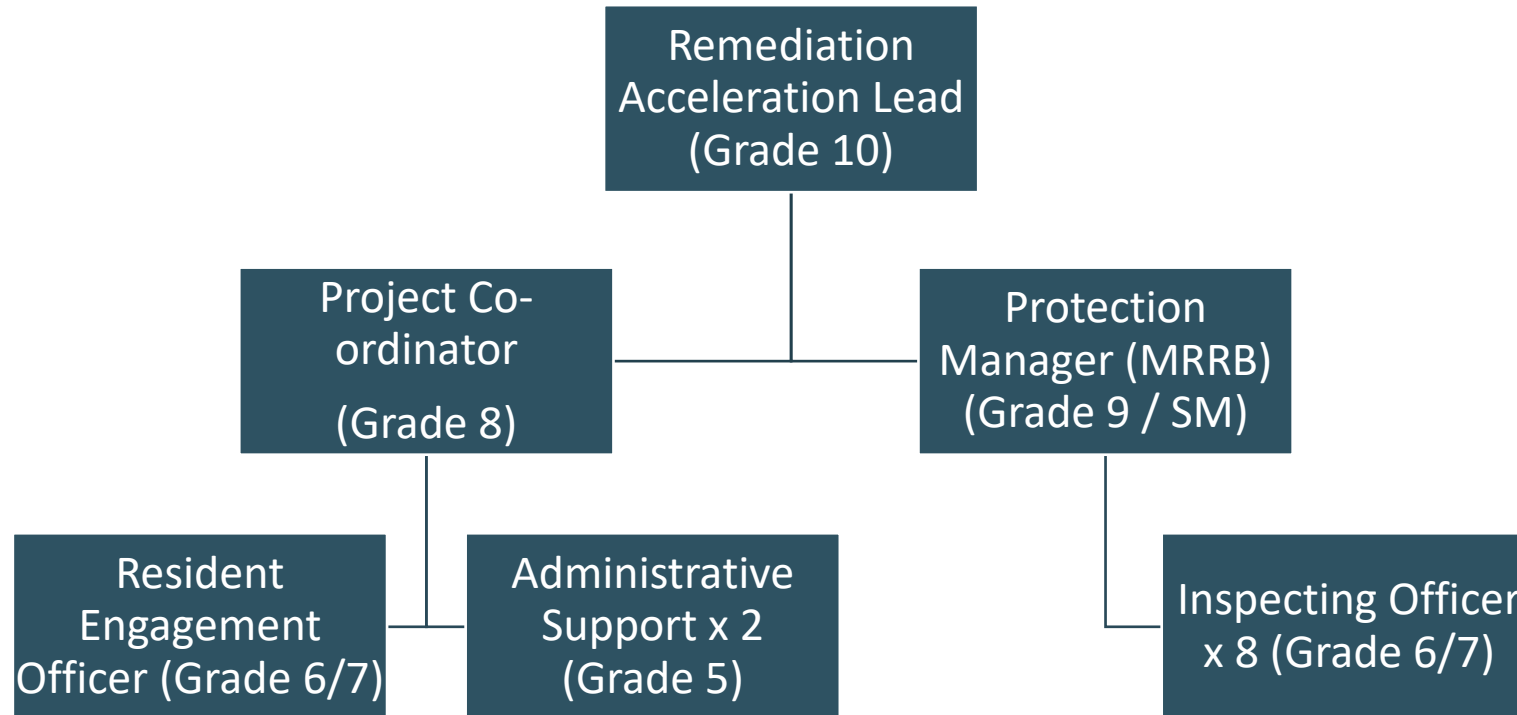
of a nine month lead in time for recruitment and training. The estimated costs of this delivery are c.£850,000 per year in salary costs.

This would provide the capacity to inspect and take follow up action in approximately 1000 buildings over a three year period and the capacity to inspect and take action in 3500 buildings in a 10 year period. If inspections of all buildings are required, then the number of Inspecting Officers would need to increase to 18 to create the capacity to inspect 10,000 buildings over a 10 year period.

We consider as a minimum in the short term there should be immediate investment in resourcing to support the work required to develop this Remediation Acceleration Plan and ongoing work in relation to high rise buildings. There should be immediate funding of c.£250,000 for the creation of the following posts:

- Remediation Acceleration Lead
- Project Co-ordinator
- Resident Engagement Officer
- Administrative Support

GM Remediation Delivery Team



Case Study 1: Fire Safety England Regulations

Our approach to collaboration has ensured we have a collective understanding of the challenges posed by adapting to new legislation and are able to address them. An example of this is the Greater Manchester approach to the introduction of the Fire Safety England Regulations and the provision of advice and information for residents.

Our residents survey in 2019 identified that many residents were unaware of the evacuation strategy for their building and highlighted that GMFRS was trusted by residents.

The Fire Safety England Regulations imposed new legal requirements to provide information to residents including fire safety instructions and the importance of fire doors. This information is required to be provided to residents when they first move in and on an annual basis.

In Greater Manchester we welcomed these legislative changes but recognised that this could have significant cost implications for housing providers and managing agents so working together we developed materials that can be used across the city region.

GMFRS developed leaflets which are available free of charge and meet the requirements of the Fire Safety England Regulations. They contain key prevention messages to help reduce the risk of a fire and can be utilised by Housing Providers and Managing Agents.

This approach was expanded by working with fire and rescue services (FRS) across the North West to produce evacuation strategy videos which support this key messaging.

To reinforce prevention messaging and help residents feel safe in their homes, GMFRS is working with Housing Providers and Managing Agents to deliver High Rise Days of Action in all buildings operating a temporary simultaneous evacuation strategy.

Case Study 2: High Rise Building with Multiple Reports

The complexities of the differing funding regimes and multiple reports are made evident in the case of a 17 storey high rise residential building in Manchester. The building has a number of different wall types, but predominantly render over mineral wool insulation with some aluminium spandrel panels incorporated into windows and upper three floors.

The building was inspected in 2017 and 2021 as part of the Building Risk Review Programme. An assessment of the external walls was undertaken in accordance with the Consolidated Advice Note and identified that the spandrel panels posed a risk of external fire spread, but that a change to the evacuation strategy was not required. A further assessment was undertaken by Fire Engineers under PAS9980. This identified the spandrel panels as a moderate risk requiring remediation but not necessitating a change to the evacuation strategy.

An application was made to the Building Safety Fund but the building has subsequently transferred into the Developers Pledge.

The Building Safety Regulator (BSR) has requested the Safety Case and established a Multi-Disciplinary Team to review it. A Fire Risk Assessment undertaken in 2024, provided as part of the Safety Case Report, utilises information from the original assessment of the external walls, but concludes that the risk was 'intolerable'. It failed to reference the assessment undertaken in accordance with PAS9980.

Some 18 months after the building was transferred from the Building Safety Fund to the Developers Pledge, a full programme of works is yet to be finalised.