

# **Greater Manchester Remediation Acceleration Plan 2025-2029**

Greater Manchester's approach to Building Safety

Summer 2025

# Foreword

It is now more than eight 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.

Between 2017 -2018 the actions taken in Greater Manchester identified that hundreds of high rise buildings were affected by the cladding and building safety crisis. It quickly became clear that the impact of poor quality construction and the failures in the regulatory system which allowed homes to be built with serious fire safety defects was not restricted to high rise building. An increasing number of residents living in flats of all sizes have been affected and it is not right that many Greater Manchester residents are still living in homes which need significant work 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 been instrumental in supporting residents to lobby for funding, providing evidence of the scale of the problem and developing approaches to improve safety in the short term whilst residents are waiting for remediation work to take place.

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.

We are supportive of the government's ambition to accelerate building remediation and in Greater Manchester we want to ensure these efforts are delivered in a way which puts residents first. This Remediation Acceleration Plan sets out the approach we will take in Greater Manchester with our partners to support an increase in the pace of remediation ensuring that residents are and feel safe in their homes.

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 Remediation Plan sets out how we will work with partners and affected residents to ensure that remediation works are carried out in a way that ensures the safety of homes and supports residents through the process.

In developing this plan, we have listened to the views and experiences of residents who are affected by the building safety crisis to better understand the impact on them. We have worked closely with the Homes England Cladding Safety Scheme to identify how we can work together to ensure that residents views and concerns are addressed and how our joint efforts can support residents through the remediation process.

The Homes England Cladding Safety Scheme database has been a significant step forward in ensuring that relevant information is available about the progress of buildings. We welcome the expansion of this system to provide a National Remediation Register delivering a single version of the truth accessible by all Regulators and we are committed to utilising this and ensuring it is updated with our interactions.

Residents have told us through our engagement with them to develop this plan that in many cases communication about what is happening in relation to their building is poor and this can cause additional anxiety and stress. The Cladding Safety Scheme has a clear focus on engagement and communication with leaseholders and through this plan we will look to extend this to all residents living in the building. We will also set out clearly to those responsible for arranging remediation works our expectations in relation to communication and look to establish a clear 'Greater Manchester' standard for this across all funding schemes in the absence of a national standard.

Many affected buildings are managed by Resident Management Companies and Right to Manage Companies where Residents are the Directors. We are clear that there needs to be significant investment in supporting residents who are directly responsible for the fire safety in their buildings, and we will put measures in place to do this.

We have engaged with the government through regular meetings in order to highlight the barriers to remediation that we cannot tackle in the city region and which require a national response. These include;

- Urgently assessing the current capacity required to accelerate remediation and provide investment to build competency and capacity
- Closing the regulatory gap
- Establishing clear standards and expectations
- Providing clarity on funding
- Embedding and improving Leaseholder Protections

We will support government in attempting to tackle these barriers by providing evidence on the issues as they emerge, ongoing engagement with officials and utilising our experience and expertise to help ‘test’ new policy initiatives.

Greater Manchester Fire and Rescue Service (GMFRS) will lead on the delivery of the Remediation Acceleration Plan utilising the funding provided by government to ensure we have the appropriate resources in place to inspect buildings, enforce where necessary, provide support and guidance to Resident Management and Right to Manage Companies and increase our resident engagement capabilities.

The delivery of the plan will be overseen by the Greater Manchester High Rise & Building Safety Strategic Oversight Group which provides political and strategic oversight of the work and has representation from all key stakeholders including the Manchester Cladators and End Our Cladding Scandal campaign groups. A progress report will be taken to the Greater Manchester Combined Authority on an annual basis following the end of each financial year .

# Our work to date

## Greater Manchester context

Greater Manchester is one of the country's most successful regions, with an estimated population of more than 3 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 to 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 GMFRS 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. In 2023 we worked with other North West fire and rescue services to produce videos for residents living in blocks of flats to help them understand the evacuation strategies in place. We also developed specific leaflets for residents living in flats containing prevention advice and the information required to be provided under the Fire Safety England Regulations - these can be used by housing providers and managing agents and are available free of charge digitally and as a printable download for bulk printing.

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 have been used to highlight buildings of concern to central government and determine what action is required to support acceleration of remediation. Whilst these meetings have provided a mechanism for engagement they have not delivered consistency of approach and not all local authorities have been engaged in this.

## **Inspections and Enforcement**

GMFRS undertook inspections of all high rise buildings in 2017 and in cases where cladding was identified required the type of cladding to be identified and the risk of external fire spread assessed along with assessments of other fire safety features in the buildings.

Where a risk is identified that means that the building can no longer support a 'stay put' strategy then GMFRS has provided support as to how an evacuation strategy can be supported in line with national guidance and carries out regular assurance visits to ensure these arrangements remain in place.

It was agreed through the High Rise Task Force in 2018 that GMFRS would lead on inspections and enforcement as the utilisation of powers under the Fire Safety Order was more efficient and effective than powers under the Housing Act 2004.

GMFRS undertook further inspections as part of the national Building Risk Review exercise which concluded in December 2021 and provided information on the external walls for all occupied buildings as part of that programme.

GMFRS has continued to support housing providers and managing agents to respond to advice notes issued by the Government.

The use of formal enforcement action has been considered as a last resort and where those responsible for buildings have applied for and engaged with one of the Government's funding schemes enforcement has not been considered appropriate. In a small number of cases enforcement action has been taken to address delays in progressing remediation.

# Developing our Remediation Acceleration Plan

Our approach to date in Greater Manchester is built on collaboration and partnership working, and this provided a strong foundation for us to engage with partners to develop our Remediation Acceleration Plan.

This has extended beyond partners within Greater Manchester and included engagement with Homes England and the Building Safety Regulator. Our engagement on the development of this plan has been aligned to the stakeholder mapping below.



## Residents

We engaged directly with residents through two dedicated meetings led by the Deputy Mayors of Greater Manchester and supported by Homes England. These sessions provided invaluable feedback on the experiences of residents and their expectations.

The key concerns raised by residents as part of this engagement are;

- Uncertainty about the works required and timescales
- Delays – particularly for high rise buildings which have moved from the Building Safety Fund to the Developers Pledge
- Communication & Updates on works not being provided regularly and or being unclear
- Funding – unfunded works and buildings under 11m
- Resident experience overall – wider impacts on health and wellbeing
- Inadequate support available to residents

We have also benefitted from the ongoing engagement of the Manchester Cladiators and End Our Cladding Scandal campaigners who work tirelessly to support residents and raise the issues and themes that are impacting on residents.

This feedback was used to shape engagement with other stakeholders.

## **Homes England**

We have worked extensively with Homes England who have heavily shaped this Remediation Acceleration Plan utilising their experiences to date, expertise and commitment to ensure residents are at the heart of all efforts to make buildings safe.

In conjunction with Homes England we hosted workshops which were attended by Local Authority colleagues representing strategic housing services, building control and housing standards functions and colleagues from the Building Safety Regulator.

These workshops were used to build common understanding of the remits of different stakeholders, the processes within the Cladding Safety Scheme, barriers to remediation work and opportunities for interventions and to improve resident experiences.

We have also piloted 'case progression' meetings with the Cladding Safety Scheme and unfortunately worked with them in relation to a potential major decant.

This work has shaped how we will approach delivering remediation acceleration and forms a number of the key deliverables for this year.

## **Local Authorities**

In addition to the workshops which were co-hosted with Homes England we have engaged with the Greater Manchester Private Sector Housing Group to consider how the inspection and enforcement activity which may be required can be delivered across Greater Manchester. This has involved revisiting the principles for enforcing fire safety in high rise flats which were agreed in 2018/19 in light of the national Remediation Enforcement Guidance.

We have agreed that in Greater Manchester the Fire Safety Order remains the most appropriate legislation to effectively enforce fire safety requirements and address the building safety crisis. This is due to the administrative requirements of the Housing Act 2004 and the lack of statutory requirements under that legislation to assess fire risks and manage them in the short and medium term.

The Fire Safety Order is most closely aligned to the remediation process which requires the risks of fire spread to be assessed, where necessary appropriate fire safety arrangements put in place to change the evacuation strategy and undertake remediation works.

There are also a number of competing demands on Private Sector Housing Teams due to new and much welcome legislation to tackle poor quality housing and poor management practices in the private rented sector and to effectively tackle the problem of damp and mould across all rented housing.

In conjunction with the GM Private Sector Housing Group we have identified opportunities for closer working and these have been incorporated into our Remediation Acceleration Plan.

In addition to housing standard enforcement there are various other departments within Local Authorities which may be able to unblock practical barriers to remediation and a Strategic Single Point of Contact has been sought from each Local Authority. This will ensure alignment with the pan Greater Manchester group

led by the Chief Fire Officer co-ordinating actions in response to the Grenfell Tower Phase 2 Inquiry.

## **Housing Providers & Managing Agents**

We work closely with the GM Housing Providers Building Safety Group and with Housing Providers and Managing Agents. We have engaged through the regular Building Safety Group meetings and the monthly drop-ins which GMFRS host for Housing Providers and Managing Agents.

The feedback from this engagement supported the challenges which we raised in the first iteration of our Remediation Acceleration Plan. The concerns about capacity across industry and access to specialist advice was a key concern along with funding for works.

## **Building Safety Regulator (BSR)**

The Building Safety Regulator is a key stakeholder as it has regulatory functions in relation to high rise buildings and is responsible for assessing safety cases and will be the building control body for remediation work in these buildings. In its wider role the BSR has oversight of the building control system and standards and is therefore a key stakeholder in relation to accelerating remediation.

We have engaged with the BSR through the workshops held in conjunction with Homes England to look at processes, escalation points and interventions and have also supported the BSR in workshops it is running to consider the overlapping legislative framework and how the most effective response can be determined and applied.

## **Combined Authorities in other areas**

We have attended and engaged with the Ministry of Housing Communities and Local Government led meetings for Combined Authorities and presented at the initial meeting.

In addition to these meetings we have engaged directly with colleagues in other similar areas to look at their approaches and identify any good practice. We are

committed to sharing our approaches and working with other areas as we implement Remediation Acceleration Plans.



# Our Remediation Acceleration Plan

## Overview

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. We also recognise that this is a complex area with significant overlap between legislation and regulatory powers that can cause confusion and potential duplication.

The key aim of our Remediation Acceleration Plan is to ensure that all blocks of flats with serious fire safety deficiencies are remediated as quickly as possible and that residents are supported through this process. Delivering on this aim will require investment in resources to undertake inspections of buildings, work with partners to identify and address delays to remediation progressing, take enforcement action where necessary and developing materials and mechanisms to better support residents.

A key challenge in our response to date in Greater Manchester is that this work has been largely unfunded and is therefore subject to competing and conflicting demands on partners and stakeholders. We are grateful to the funding which has been provided to enable the development and delivery of a Greater Manchester Remediation Acceleration Plan and we will utilise this funding to create dedicated resource to deliver the plan.

In Greater Manchester we have a unique arrangement where GMFRS is part of the Greater Manchester Combined Authority and responsibility for oversight of the service sits with the Mayor and Deputy Mayor for Safer Stronger Communities.

GMFRS will lead on the delivery of the Remediation Acceleration Plan utilising the funding provided by government to ensure we have the appropriate resources in place to inspect buildings, enforce where necessary, provide support and guidance to Resident Management and Right to Manage Companies and increase our resident engagement capabilities. This will be complemented by the existing work done by GMFRS on preventing fires and will ensure that we can take a holistic approach ensuring that; buildings are made safe, all residents are supported with

those who are vulnerable or at an increased risk of fire receiving additional services and all relevant information is available to operational crews if a fire does occur.

The delivery of the plan will be overseen by the Greater Manchester High Rise & Building Safety Oversight Group which provides political and strategic oversight of the work and has representation from all key stakeholders including the Manchester Cladiators and End Our Cladding Scandal. A progress report will also be taken to the Greater Manchester Combined Authority on an annual basis.

The delivery arrangements have been developed following discussions with other regulators including Local Authorities, the BSR and Homes England. There are a range of legislative options available which can be used in relation to required fire safety works. These include the powers that GMFRS has under the Fire Safety Order and powers of Local Authorities under the Housing Act 2004. The BSR has a range of powers under the Building Safety Act which can be utilised in relation to occupied high rise buildings. The Building Safety Act introduced powers for a range of parties to apply for Remediation Orders and Remediation Contribution Orders. These powers are available to the Secretary of State, leaseholders in affected buildings, Fire and Rescue Authorities, Local Authorities, the BSR and Homes England.

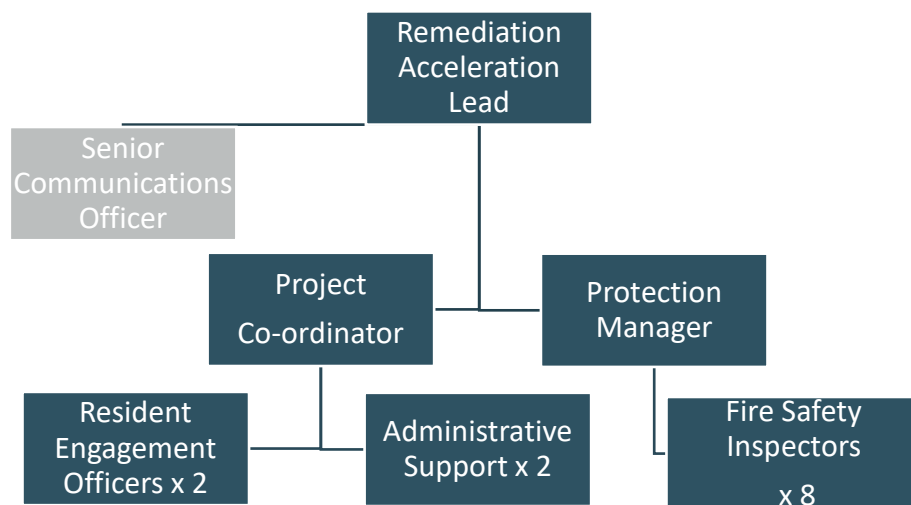
GMFRS is the only regulator which covers all of Greater Manchester but is not a national regulator and therefore can ensure consistency of approach and experience for residents. Whilst recognising that there are new powers available which may be appropriate in specific circumstances as a general approach we consider that the Fire Safety Order is the most appropriate legislative mechanism for the majority of regulatory activity likely to be required.

The Government has published Remediation Enforcement Guidance which suggests that local regulators should agree partnership working agreements at local level to determine which regulator should lead. Under our plan GMFRS will be the lead regulator for inspections and enforcement in the majority of cases but will work with partners where necessary if other legislative interventions are required.

## Resourcing

The funding we have received from the government will provide dedicated resources to support the delivery of this plan. This will require the recruitment of additional Fire Safety Regulators, administrative and project support and new roles to enhance resident engagement.

The structure of the Greater Manchester Remediation Delivery Team is set out below.



The Remediation Acceleration Lead will be the strategic lead and accountable for delivery and oversight of the work, reporting to the Strategic Oversight Group and engagement with senior stakeholders.

The Project Co-ordinator will be responsible for establishing and maintaining mechanisms for regular progress and performance reporting, planning key initiatives and interventions, tracking of actions from stakeholder liaison meetings and overseeing resident engagement initiatives.

The Resident Engagement Officers will lead on improving the support to residents including arranging regular resident forums, preparing and updating advisory information for residents, acting as a point of contact for the team and where necessary providing bespoke advice and signposting to other services. They will

identify cases where communication with residents does not align with expectations and where this cannot be resolved escalate this within the relevant funding scheme.

The Protection Manager will have oversight and accountability for regulatory work including inspections and enforcement activity, support to the Building Safety Regulator and where required being the tactical lead on complex cases involving potential decants and responding to buildings in escheat.

The Fire Safety Inspectors will undertake regulatory activity in buildings including inspections, enforcement and where necessary investigations. They will ensure that progress with remediation is monitored utilising the national remediation system and updates on activity are recorded within that system.

The Senior Communications Officer will be a dedicated resource within our existing Communications & Engagement Team and support the delivery of the plan through development of materials and information including the website and frequently asked questions, supporting resident engagement events and co-ordinating and arranging media requests.

The Administrative Support Officers will provide support to the whole team including monitoring and producing performance information, logging requests for advice and support from residents, supporting the set up and delivery of events and planning and servicing stakeholder meetings.

The Remediation Delivery Team will be integrated with existing Higher Risk Team to ensure that there is a consistent response building on the work done to date and that the support to the Building Safety Regulator required for high rise buildings is bolstered. This will significantly increase the available resources for continuing the case management approach currently being utilised.

We will produce an Annual Delivery Plan on a Page for each year. The plan with key deliverables for this year is set out at the end of this plan.

## **Working with partners**

Although the delivery of our Remediation Acceleration Plan will be led by GMFRS it will build on partnership with working with key stakeholders.

## **Residents & Resident Campaigners**

Residents are at the heart of this plan and we know that by increasing our resources we will be able to enhance and improve the service residents receive from us and those responsible for remediating their buildings.

We will establish a Residents Forum which will be held twice a year to provide updates on progress against this plan and allow residents to feed back. These meetings will alternate between in person and virtual meetings to ensure they are accessible.

We will establish a monthly meeting with the Manchester Cladators as a mechanism for concerns to be raised and improvements suggested.

We will produce and publish guidance in conjunction with Homes England specifically for residents who are Directors of Resident Management Companies and Right to Manage Companies. In addition to this we will design and deliver engagement sessions which provide an overview of these responsibilities and how to access support.

We will create a dedicated website area and ensure this is regularly updated which will act as a conduit to wider information and support and ensure we publish and update Frequently Asked Questions.

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.

## **Homes England**

We have already established effective working relationships with the Homes England through the Cladding Safety Scheme built on a shared commitment to improving residents' experiences.

We will formalise the in-principle agreement on escalation points for interventions and act on these once we have the resources in place and will commit to meeting agreed service level standards.

We will ensure that the national remediation system is effectively utilised to capture inspections and interventions and that where escalation is required for enforcement this is undertaken in a collaborative way. We will agree and formalise a case conferencing procedure for these ensuring decisions are made in a transparent way and that this informs onward communication to residents.

We have already worked in conjunction with Homes England to produce information for those responsible for 11-18 metre buildings as part of the 'Pull In' process for the Cladding Safety Scheme and will build on this to develop further guidance and information as buildings progress through the scheme.

We will explore with Homes England how we can ensure that for buildings under 18 metres building control approval is carried out in a way that minimises risks and ensures that there is early consultation before the works start.

Whilst we await an updated version of the Simultaneous Evacuation Guidance we will explore with Homes England whether we can develop guidance and / or a protocol to support a proportionate response to recommendations to change evacuation strategies for buildings in the Cladding Safety Scheme which reduces or negates the need to utilise Waking Watches. Where the implementation of a Waking Watch is necessary, we will continue to ensure that this provision is replaced with a fire alarm system as quickly as possible using enforcement powers where necessary.

## **Local Authorities**

All Local Authorities across Greater Manchester are key stakeholders and partners in the plan and will be integral to the effective monitoring and delivery of the plan.

We will establish regular review meetings with each Local Authority to track progress on buildings in their area and identify any joint working which is required.

Each Local Authority has been asked to provide a Strategic Single Point of Contact and these Officers will support the oversight of the plan and help unblock barriers to remediation where required.

As part of our wider Housing First programme we will explore whether any of the existing powers of Local Authorities can be delegated to GMFRS to ensure that all residents have working smoke detectors in their homes which may reduce the need for waking watches in some cases.

We will explore opportunities for joint training to increase understanding of technical fire safety matters and hazards under the Housing Health and Safety Rating System and ensure that there are effective referral mechanisms in place.

### **Building Safety Regulator**

The BSR is a key stakeholder in relation to the acceleration of remediation for high rise buildings but has no jurisdiction or powers in relation to buildings under 18 metres or seven storeys. The BSR operates nationally but has committed to prioritising work as part of efforts to accelerate remediation in areas with the most high-rise buildings including Greater Manchester.

GMFRS already provides support to the BSR as part of the multi-disciplinary teams (MDTs) which support the building control process and the assessment of safety cases prior to the issue of a Building Assessment Certificate. The Fire Safety Inspectors within the Remediation Delivery Team once trained will bolster the resources available to support the BSR and ensure that there can be consistency across MDTs operating under different parts of the regime.

The BSR has a five-year programme to direct the principal accountable persons (PAPs) of registered HRBs to apply for a Building Assessment Certificate (BAC). The BAC unit will assess whether those responsible for HRBs are taking all reasonable steps to reduce and manage the risks of fire spread and structural collapse. Where the PAP does not demonstrate that they are taking all reasonable steps to manage the risks of fire spread and structural collapse the BSR must not issue a BAC and will take relevant enforcement action to address identified breaches of the Building Safety Act and associated legislation.

As part of this plan, we will ensure that all relevant information gathered by the Remediation Delivery Team is fed into the assessment process in order to inform the decision making. Where a BAC is not issued, we will ensure that the reasons for this

are clearly communicated to residents within the building and where necessary reassurance activity is delivered to support residents to feel safe in their homes.

The BSR is the Building Control authority for all HRBs, which includes building works to existing HRBs. Remediation of external wall systems is building works that requires a building control application to BSR. No building works can commence without BC approval of the submitted application and works must follow what has been approved. Approval assessments are undertaken by a MDT that includes a registered building inspector, a BSR regulatory lead, and other specialists including a Fire Safety Inspector as required.

BC applications are rejected where applicants have not submitted the required information first time. We will work with the BSR to identify common trends where applications for remediation works are rejected in order to raise awareness and improve the quality of applications for other buildings.

The BSR has committed to ensuring that building control applications relating to remediation of external walls are considered by dedicated (established) MDTs for more efficient assessment and will also allow applicants opportunity to promptly submit missing information before rejecting any incomplete application. These should avoid long delays.

The BSR is working to support industry in making the changes it needs to comply with the way building control will now work for HRBs, competence and attitude towards building safety. As part of this Remediation Acceleration Plan, we will look at what can be delivered at a Greater Manchester level to support these improvements.

The BSR Investigation and intelligence unit (IIU) investigates building safety issues in HRBs raised with BSR via concerns received through the customer services team and mandatory occurrence reports. This includes residents' concerns about interim measures in buildings where remediation work has not started. This unit can investigate current building safety issues and take appropriate enforcement action to ensure resident safety. We will work with the BSR to develop information sharing arrangements to reduce duplication and ensure common concerns are built into the information available to residents via our website.



The BSR is setting up a national Remediation Enforcement Unit to support the national Remediation Acceleration Plan. This team will be the point of contact for the Remediation Delivery Team to share information and coordinate action on specific high-rise buildings to collectively reduce risks. The REU will also be the point for Homes England to escalate action on high rise buildings where inadequate progress is being made. The initial focus of the REU is to proactively assess buildings with combustible ACM and high-pressure laminate cladding with the intent to make immediate assessment of remediation plans and take any relevant enforcement action to drive the pace of remediation. BSR will take enforcement action in line with its enforcement policy and internal guidance where a PAP is in breach of their duties under the Building Safety Act 2022.

The Remediation Delivery Team will work closely with the Remediation Enforcement Unit to share information and we will seek to engage them in formal case conferencing arrangements ensuring decisions are made in a transparent way and that this informs onward communication to residents and minimises the costs that residents may incur.

### **Housing Providers and Managing Agents**

We have worked closely with Housing Providers and Managing Agents over the last eight years and will continue to do so as we deliver this Remediation Acceleration Plan. We have in the past hosted engagement events to share changes in legislation and good practice and will establish a regular programme of events under this plan with a minimum of two sessions a year.

We will also expect Housing Providers and Managing Agents to work with us to improve residents' experiences and hold them to account when communications are poor.

### **Ministry of Housing Communities and Local Government (MHCLG)**

We have engaged extensively with government over the last eight years and officials have attended the previous Task Force meetings and are represented at a Director level at the Strategic Oversight Group.

We welcome buildings in the MHCLG administered schemes moving into the national remediation system and consider this will be a key success factor in accelerating remediation and improving visibility of progress and delays.

We will be looking to replicate the arrangements we are putting in place with Homes England across the other schemes to ensure that residents can expect the same standards irrespective of the funding arrangements.

In cases where there have been extensive delays in remediation will be seeking detailed information from MHCLG officials to inform enforcement decisions and action.

We are committed to ensuring that any further legislative changes deliver improvements for residents and we have offered to host workshops and utilise existing and historic cases to 'stress test' new legislative proposals.

## **Prioritisation of work**

We are clear that residents are at the heart of this Remediation Acceleration Plan and our aim is to ensure that all buildings are made safe as quickly as possible and we are resourcing the delivery of this plan accordingly with funding from the government.

There are thousands of residents in Greater Manchester living in buildings which require significant work and in many cases unsafe cladding was identified as long ago as 2018.

Through our Remediation Delivery Team we will take a twin track approach, working with partners to ensure that buildings with newly identified defects move towards remediation quickly whilst taking action to ensure buildings where there have already been significant delays move towards remediation. In relation to high rise residential buildings we will review buildings starting with those which have been operating with temporary simultaneous evacuation strategies for the longest period.

Our approach will not differ between funding schemes and we will be working to accelerate remediation irrespective of who is responsible for the works.

# Accelerating Remediation: Barriers

In Greater Manchester we have welcomed the government's commitment to accelerate remediation and committed to doing more to support this in line with the national Remediation Acceleration Plan.

In our first Remediation Acceleration Plan we highlighted a range of issues which have delayed the progression of remediation of high rise buildings and many of these were 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 previously highlighted 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. As we have set above this is the approach that we will continue with.

In our first Remediation Acceleration Plan we highlighted a lack of data about buildings affected. This was also identified by the National Audit Office which described the lack of 'clear and consistent data' across the Government's portfolio as a major barrier to measuring progress and determining whether the pace of remediation is reasonable.

The work undertaken by Homes England through the Cladding Safety Scheme has already delivered significant improvements in relation to data on affected buildings

and it is imperative that buildings in all government schemes are incorporated into the Homes England system and this is utilised consistently to track progress.

We remain concerned that 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.

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.

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 is no clear evidence basis for what constitutes a reasonable timescale for remediation from which to build benchmark standards.

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 regulatory capacity for the longer term.

# 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 and ensure that the timescales contained in the National Remediation Acceleration Plan can be met.

### **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.

### **Ask Three: Ensure the completion of a single and sustainable dataset**

**A co-ordinated approach needs to be taken to build on the Homes England Cladding Safety Scheme system to establish a single comprehensive data set of all buildings which may require remediation. This should provide a basis for tracking and monitoring progress over the long term and 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 eight 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.

Homes England have addressed this through their Cladding Safety Scheme system and it is positive that this is being extended to all government schemes. It is vital that this is now used by all stakeholders to record interactions to create a lasting record.

#### **Ask Four: Establish clear standards and expectations**

**Establish clear standards for works to be undertaken and utilise evidence from high rise buildings to clearly set out reasonable timescales which will provide a benchmark for monitoring progress.**

There needs to be action taken to promote and 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 Residential Personal Emergency Evacuation Plans (RPEEPs) to ensure vulnerable residents are supported and protected.

In order, to establish whether enforcement action is necessary to accelerate remediation there need to be some national benchmark standards setting out timescales from identification of fire safety risks to completion of remediation works with key milestones for each stage. MHCLG need to utilise the information gathered from high rise buildings and the administration of the Building Safety Fund to provide these.

### **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.

It is essential that national and local efforts to accelerate remediation result in safe buildings and this needs to include serious fire safety risks related to internal compartmentation.

### **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.

We remain concerned that the funding position for social housing remains unclear and a failure to adequately fund remediation works will have a detrimental impact on residents.

# Annual Delivery Plan 2025/26

## April – June

Engagement on Remediation Acceleration Plan

Finalise Plan for Approval

Commence recruitment of Fire Safety Inspectors & Protection Manager

## July - September

Endorsement of Remediation Acceleration Plan by GMCA (August)

Launch of Plan (September)

Commence recruitment of Remediation Delivery Team (July / August)

Inspectors commence 16 week training & development programme (September)

Establish monthly meetings with Manchester Cladiators

## October - December

Remediation Delivery Team onboarded

Finalise Guidance for RMCs / RTMs

Launch of dedicated web pages

Deliver first engagement session for Resident Directors

Deliver session for Housing Providers and Managing Agents

Agree Case Conferencing Protocol with Homes England & Building Safety Regulator

Agree Guidance on managing changes to evacuation strategies

## January – March

Finalisation of volume of buildings to be inspected

Inspections of 11-18m buildings commence

Case reviews of high rise buildings commence

Local Authority review meetings commence

Development of Annual Delivery Plan for 26/27