

READING BOROUGH COUNCIL

REPORT BY THE DIRECTOR OF ENVIRONMENT AND NEIGHBOURHOOD SERVICES

TO:	HOUSING, NEIGHBOURHOODS AND LEISURE COMMITTEE		
DATE:	15 NOVEMBER 2017	AGENDA ITEM:	9
TITLE:	AN UPDATE ON FIRE SAFETY CONSIDERATIONS POST GRENFELL TOWER		
LEAD COUNCILLOR:	CLLR ENNIS, CLLR LOVELOCK, CLLR JONES	PORTFOLIO:	HOUSING/PROPERTY/ EDUCATION
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1. PURPOSE AND SUMMARY OF REPORT

1.1 This report sets out the Council's response following the Grenfell Tower fire in Kensington on 14th June. This includes action taken in relation to the Authority's own housing stock, other corporate buildings and schools, as well as wider work in partnership with the Royal Berkshire Fire and Rescue Service in respect of privately owned high rise residential blocks within the Borough boundaries.

1.2 In summary the local authority has taken the following action post the Grenfell Tower incident:

- Published information on the Council's website in respect of our own housing stock and advice to residents more widely.
- Internally reviewed the fire safety measures and systems in place in relation to the Council's own housing - with a focus on high rise flatted blocks.
- Despite the Council's 7 high rise housing blocks differing in design to Grenfell Tower, the Council has appointed an external qualified Fire Engineer (FireSkills) to carry out a review of our fire safety practices.
- The structure and fire safety practices of other corporate buildings and schools have been reviewed.
- Fire Risk Assessment re-inspections of other Council buildings have been commissioned for Priority 1 and 2 buildings and these are currently being undertaken; school re-

inspections will be actioned later this year following completion of the current programme of site works.

- An internal Council Officer group has been set up to manage subsequent phases of work given the medium to longer term implications of the Grenfell Tower fire incident.
- Across tenures, a total of 88 residential buildings over 18 meters in height have been identified in Reading and the Royal Berkshire Fire and Rescue Service (RBFRS) have visited all of these to review fire safety including an assessment of the external materials used on each block. Where there is a concern over the cladding used, the owner has been asked to send material for testing by the Building Research Establishment (BRE).
- Officers have been in close liaison with RBFRS since the Grenfell Tower incident and a County-wide Steering group has been convened by RBFRS with representatives of the 6 Unitary Authorities to agree a programme of joint work cross tenure to ensure that residential high rise (and other) buildings cross tenure are safe.
- Provided a full briefing session to Members on the actions taken to date and proposed further actions. The member briefing session was attended by the RBFRS.

2. RECOMMENDED ACTIONS

- 2.1 That Members note the action taken and planned following the Grenfell Tower fire as detailed in this report.

3. POLICY CONTEXT/BACKGROUND

The Grenfell Tower Fire

- 3.1 Grenfell Tower was a 24-storey, 67m high residential tower block in North Kensington built in 1970. The concrete structure's top 22 storeys consisted of 127 flats. The block was managed by Kensington and Chelsea Tenants' Management Organisation.
- 3.2 A major fire seriously damaged the building on 14 June 2017. The fire burned for about 60 hours until finally extinguished. More than 200 firefighters and 40 fire engines from stations all over London were involved in efforts to control the fire. At least 80 people were confirmed or presumed dead, according to the Metropolitan Police Service. Demolition of the tower is scheduled to start towards the end of 2018.
- 3.3 The fire is under investigation and is the subject of a Public Inquiry which opened on 14 September 2017. The early indications suggest that external fire loading may have been at least partly responsible for the rapid fire spread and the cladding of the building has become a focus of concern. The incident has raised a wide range of questions about fire safety and regulation in relation to high rise residential buildings.
- 3.4 The cladding system which was fitted as part of an £8.4 million refurbishment completed in 2016 consisted of an Aluminum Composite Material which was effectively a sandwich of two sheets of aluminum foil covering a 3mm polyethylene core acting as a rain screen. The insulation was Celotex RS5000, which is an insulant that has subsequently been withdrawn from the market. This was all fixed to the original concrete façade of the building.
- 3.5 The fire at Grenfell Tower follows other significant incidents in social housing in recent years which have been widely reported in the Housing and national press:

- fire in Lakanal House, Camberwell on 3rd July 2009 (6 deaths)
- fire at Shepherds Bush House on 18th October 2016 (no deaths)

There are marked similarities between the features of the Lakanal House fire and Grenfell Tower and nationally there are calls for change, including to Building Regulations.

4. CURRENT POSITION

Housing

4.1 The Council has taken swift action to review its fire safety measures in relation to its own high rise housing blocks and to provide residents with a level of reassurance around fire safety measures in place.

4.2 Officers have published information on the Council's website in respect of local authority owned housing stock and advice to residents more widely as per the links below. RBFRS have amended their 'stay put' advice to tenants in high rise blocks and this has been disseminated to all relevant RBC tenants.

<http://www.reading.gov.uk/firesafetyfaq>

<http://www.rbfrs.co.uk/about-us/statement-on-the-grenfell-tower-fire-in-london/>

4.3 As part of its housing stock, Reading Borough Council has three 14-storey blocks of flats in Coley and four 8-storey blocks in Granville Road, Southcote - none of these have panel or cladding systems similar to Grenfell Tower or to those which have been tested by the Building Research Establishment (BRE). Since the Grenfell Tower fire, new Fire Risk Assessments (FRAs) have been completed for all high rise blocks and any actions arising are being implemented. These FRAs have covered communal areas and also a sample number of flats. The Fire Service have additionally visited and visually inspected all of the Council's high rise blocks. These 'audits' are spot checks of communal areas by a highly qualified fire safety inspection officer. As part of the audit the Fire Service Officer will review the Fire Risk Assessment and ensure that actions are being appropriately prioritised and carried out in a timely manner.

4.4 Despite the Council's blocks differing in design to Grenfell Tower, the Council has also appointed an external qualified Fire Engineer to carry out a review of our practice in the areas of management, fire safety measures and safety advice to tenants in high rise and some other flatted blocks. This will include conducting Type 4 'intrusive' Fire Risk Assessments of sample blocks - to include communal areas and an appropriate number of flats in each block. Intrusive assessments involve destructive exposure or opening up parts of the construction to provide greater assurance about the degree of fire 'compartmentation'. Recommendations from this review will inform the Council's planned works programme for our housing stock and may have significant financial implications.

4.5 Reading Borough Council's Housing Property Services uses trained assessors to undertake Fire Risk Assessments on over 350 Council blocks of flats of mixed constructions and storey heights. Prior to the publication of the Local Government Association Guide: Fire Safety in Purpose Built Flats, Fire Risk Assessments were carried out in accordance with the Regulatory Reform (Fire Safety) Order of 2005 which stated that they must be carried out "regularly" and following refurbishment or alteration. The legislation does not set out the frequency at which FRAs are to be produced.

4.6 The introduction of the LGA guide interpreted the Order and set out 4 categories of risk assessment, Types 1 through 4 and also makes recommendations on the frequency of

FRAs and reviews. The Council's programme initially carried out Type 4 risk assessments (invasive within common parts and flats). The programme now carries out a hybrid assessment - covering common parts plus the interface between flats and common parts, with a sample of flats also surveyed. Intrusive survey work is commissioned where indicated as necessary.

- 4.7 Internally, both the Housing Service and Corporate Health and Safety have reviewed current arrangements and made recommendations which are being implemented - including strengthening compliance monitoring and quality assurance in respect of FRAs, fire safety checks and records of these - effectively ensuring that we are adequately 'checking the checkers'. Additional staff have been trained as Fire Risk Assessors and external capacity has been commissioned to ensure that all blocks, the majority of which are low rise and low risk, have had risk assessments completed in line with the LGA guideline timescales by December this year.
- 4.8 The Council has contacted Affinity Housing in respect of the Council's flatted stock managed under the North Whitley PFI contract. Affinity has confirmed that new FRAs have been completed for all flatted blocks which include sampling flats as well as inspecting the common parts. Blocks are considered low rise/low risk with Rockwool (inert) insulation. FRAs are carried out in accordance with LGA recommendations and external assessors used are fully trained. The Council will share and review FRAs with Affinity to ensure consistency of approach, cross-learning and quality assurance.
- 4.9 Discussions are taking place with tenants' representatives to scope a tenants' scrutiny exercise. In the light of issues raised by Grenfell Tower this is likely to focus on how tenants can communicate concerns to the Housing Service and how the Service feeds back.
- 4.10 Officers are not currently aware of any tenants with mobility difficulties above the ground floor in our high rise blocks. However, we have targeted people over the age of 65 who live in our high rise blocks for a Tenancy Audit visit to check for any mobility or other issues. In addition, the service had already commenced a 'tenant census' across the entire housing stock to find out more about the people currently residing in our properties. The census includes a question on disability and this will inform future targeted work. Housing and Sheltered Housing Officers already refer any vulnerable tenants identified to the RBFRS Community Fire Safety Officer for assessment, with their consent. Where vulnerable tenants are identified and their needs might have an impact on a Fire Risk Assessment this is to be flagged with the lead assessor.
- 4.11 Actions taken have also addressed the Council's responsibility to homeless households placed in B&Bs. Overall, the number of households placed in B&B is reducing and this is a clear and driving priority for the authority. However, the service will ensure that occupants in B&B are offered advice regarding safety/fire safety on placement and will encourage occupants to contact the team if they have any safety concerns. Information on living in B&B has been updated and re-sent to all current placements in B&Bs. Providers are being reminded of their responsibilities and encouraged to regularly check systems and ensure that residents are all aware of fire evacuation procedures with accessible information displayed on what to do in the event of a fire. A current system of B&B inspections is in place across Housing and Environmental Health.

Corporate Buildings and Schools

Corporate Stock:

- 4.12 The Council has no Corporate buildings with ACM cladding installed to the structure. The Council has two buildings which are 4 storeys high and over - The Keep which is a

traditionally built brick building and 2-4 Darwin Close, which is a 5 storey concrete framed building. Care homes with sleeping accommodation are low rise and traditionally constructed. There are 12 low rise buildings with various external cladding systems (timber, steel profiled sheet, uPVC boarding and rendered panels) fixed to the external faces of the buildings.

- 4.13 All Fire Risk Assessments to the Council's corporate buildings have been carried out by an approved and qualified consultant on behalf of RBC. 95% of recommended remedial building works arising from the reports have been completed. Management actions arising from the reports have also been actioned with evidence provided to the Corporate H&S Team.
- 4.14 The new Civic Centre does have a small amount of a type of ACM cladding on the ground floor front entrance porch, but this has been confirmed to be acceptable and to be a different manufactured product to that installed at the Grenfell Tower. There is a designed fire evacuation strategy in place with alternative means of escape routes available to anyone in the ground floor reception if required.
- 4.15 Fire Risk Assessment re-inspections have been commissioned for Priority 1 and 2 buildings and these are currently being undertaken.

Schools and Educational Buildings:

- 4.16 The Council has only one school building with ACM cladding installed to the structure. The use of cladding material on buildings of less than 18m is considered to not be a significant risk provided that all other fire measures are in place and the building is not high risk. In the case of this School, the risk profile of the building is very different from the Grenfell Tower building, with no sleeping risk, dual staircases, a policy of immediate evacuation (and evacuation times of 3-4 minutes), automatic fire detection for early warning, and intermediate floors are designed as fire compartment floors.
- 4.17 At Prospect College there are two teaching blocks that are 4 storeys high. Both blocks are traditionally constructed brick buildings. There is a boarding block at Reading Boys School which contains sleeping accommodation, again this building is traditionally brick built.
- 4.18 All recently completed school expansion project and extensions at primary schools have external cladding installed. The cladding specified is not ACM and meets all necessary standards. The recently constructed Reading Girls School does have cladding installed but, again, this is not ACM. All Fire Risk Assessments have been carried out by an approved and qualified consultant on behalf of RBC. 75% of recommended remedial building works arising from the reports have been completed, with all work scheduled for completion in November 2017. Management actions arising from the reports have also been actioned with evidence provided to the Corporate H&S Team.
- 4.19 Fire Risk Assessment re-inspections will be actioned later this year following completion of the current programme of site works.

RBC Oversight of Fire Safety in Schools

- 4.20 Schools which have a Service Level Agreement (SLA) with the Council's Property Services have a fire risk assessment carried out under our contract with an external assessor. Within these reports there is an action plan relating to management and maintenance actions. Schools send RBC a copy of their completed management actions as evidence of compliance. The maintenance actions are completed by Property Services. The dates of completion are added to the Corporate Fire Risk Assessment spreadsheet which provides effective monitoring.

- 4.21 For Maintained schools, Voluntary Aided schools and Academies buying into our SLA - schools complete an annual Health and Safety audit, along with a Compliance audit which includes fire safety. The Council's H&S Team carry out proactive inspections at schools and look at how they manage fire safety including ensuring that routine equipment checks, servicing, fire drills and training take place and are recorded appropriately. If there is non-compliance the school has an action plan and deadlines to ensure the areas of concern are actioned. This is monitored by H&S. This information is added onto the Compliance spreadsheet and is shared at a corporate quarterly risk meeting.
- 4.22 There are four Academies who source their own H&S advice and property maintenance outside of RBC (John Madjeski, Church End, Meadow Park and Battle schools.) Whilst we have had no contact with these schools in respect of fire safety compliance the Department for Education is in direct contact with all Academies to identify any schools that may require improvements in fire risk control.

Cross Tenure Residential Buildings

- 4.23 Across tenures, a total of 88 residential buildings over 18 meters in height have been identified within the Reading Borough Council's administrative area including the 7 Local Authority blocks referred to above. The Royal Berkshire Fire and Rescue Service (RBFRS) have visited each one of these premises in order to review fire safety including an assessment of the external materials used on each block. Where there is a concern over the cladding used, the owner has been asked to send material for testing by the Building Research Establishment (BRE).
- 4.24 At the time of writing a number of tests remain outstanding. However Council Officers and RBFRS are working closely with building owners to ensure that in the interim suitable additional measures are put in place. These measures are in line with DCLG advice as updated on 29 September 2017.

Emergency Response/Mass Fatality Incident

- 4.25 An overview of the Council's arrangements for responding to a similar incident such as Grenfell is outlined below. The implications of a Grenfell type incident on the Council's Emergency Response are as follows:
- a) 24hr Emergency Response staff required
 - b) Receiving evacuees
 - c) Mass fatalities
 - d) Aftercare/memorials
- 4.26 Reading Borough Council has a 24/7/365 Emergency Response Team structured in such a way as to allow it to work alongside Emergency Service partners at GOLD/SILVER and BRONZE level (Strategic, Tactical and Operational) and a suite of emergency plans to cater for incidents such as Grenfell.
- 4.27 Training of our staff to respond to such emergencies is part of an annual cycle. The Council has robust numbers of trained staff at BRONZE and GOLD levels, and whilst sufficient numbers of SILVER staff are in post, training of these SILVER staff is a gap that is in the process of being filled. In September 2017, 27 of the Council's Heads of Service and direct reports attended SILVER training. A further 9 staff will be trained by the end of November to a higher level to manage the Council's Emergency Operations Centre at SILVER level. A small number of fully trained SILVER staff are in place during this interim period.

Receiving Evacuees

- 4.28 The Council has a Rest Centre plan in place to allow it to receive evacuees. Officers would activate our Rest Centre plan when there is a requirement to “receive evacuees that have been made unintentionally homeless” in large numbers. For smaller numbers of evacuees hotel accommodation would be utilised to house the evacuees, and each member of the Council’s Emergency Response Team has been issued with a Corporate Purchasing Card to allow them to book hotel accommodation out of hours for such an evacuation.
- 4.29 Our largest single Rest Centre is Rivermead Sports Centre and this can cater for approximately 500 people (sleeping - seated capacity is nearer 1000). We have many other evacuations centres across the Borough. The Council has stocks of evacuation equipment (airbeds, sleeping bags, pillows, toiletry kits) available to us sufficient to cater for approximately 500 in Reading, over 600 when combined with Wokingham Borough Council’s stocks (which are available quickly and easily to us) and over 800 when combined with all Councils’ stocks across Berkshire. These stocks are stored North/South/East/West either side of the Reading rivers to ensure that some supplies are always close to each corner of the Borough and available in the event of severe weather/flood.
- 4.30 Further to receiving evacuees the Council would have an ongoing duty to provide accommodation to households who cannot return to their properties in line with Homelessness legislation. The Housing Act 1996 determines that a person is considered to be homeless if they have no accommodation to occupy, and that a person would be considered to be a priority need for housing if they are homeless or threatened with homelessness as a result of an emergency such as flood, fire or other disaster. Under these circumstances the Housing Needs Service would work with the evacuees (further to their initial placement in a hotel or rest centre) to provide longer term accommodation in Bed and Breakfast whilst Homeless applications are processed with a view to providing more secure accommodation as and when it becomes available for those who are unintentionally homeless. In the event of a major disaster it is highly unlikely that the Council would be able to provide accommodation for all those affected within the Borough boundaries.

Mass fatalities

- 4.31 Mass fatalities incidents often overwhelm local mortuary capacity and HM Coroner for Berkshire is administered by Reading Borough Council. The six Councils in Berkshire have developed a Temporary Mortuary plan to cater for such mass fatalities incidents. This plan caters for increasing body storage capacity as well as providing a temporary structure and extra staff to run the temporary mortuary on behalf of the Coroner. This plan has been regularly tested in a hypothetical environment but never in a live exercise as costs for setting up a facility are prohibitive for testing purposes (millions).

Aftercare/Memorials

- 4.32 Wider ongoing support and aftercare for those affected by such an incident is the responsibility of individual RBC services (e.g. Council Tax cancellations for those unable to occupy their damaged homes). A reminder of the importance of planning to proactively support victims of such incidents is being picked up by the Council’s Business Continuity Planning process.
- 4.33 Psychological impacts following a Grenfell type incident are a likely possibility and we have plans in place across Thames Valley to access support and aftercare from Council and Voluntary services.

- 4.34 Memorials, anniversaries and charity funds for such incidents are managed by the Council's Communications Team. The Mayor's Fund would likely be used for an incident of this scale.

Access for emergency vehicles

- 4.35 Access for emergency services vehicles was an issue in Kensington and is a known issue for parts of Reading due to parking. The Council will ensure that joint work with RBFRS in respect of high rise residential buildings in the Borough takes into account an assessment of access for emergency vehicles and implications for fire safety measures and evacuation policy where this is a risk area.

5 PROPOSAL

- 5.1 An internal Officer group has been set up to manage subsequent phases of work given the medium to longer term implications of the Grenfell Tower fire incident.
- 5.2 Officers have been in close liaison with RBFRS since the Grenfell Tower incident and a fortnightly telephone call with RBFRS has been instigated to ensure that information is shared in a timely way and matters arising in respect of high rise blocks or other buildings are being addressed. Information from DCLG is shared between the Council and RBFRS to ensure that both parties remain up to speed. Depending on the facts of the case, either the Council or RBFRS will 'lead' discussions with the relevant building's responsible officer to ensure that the interim measures required by the Government are maintained and that appropriate action, including and where necessary the replacement of cladding, are taken forward.
- 5.3 A County-wide Steering group has been convened by RBFRS with representatives of the 6 Unitary Authorities to agree a programme of joint work and facilitate sharing of learning, information and resources. A multi-disciplinary operational team comprising RBFRS and RBC officers will be formed with the remit of holistically reviewing the safety of high rise residential blocks on a prioritised basis. RBFRS are building a risk profile for all high rise premises across Berkshire to inform prioritisation. A Memorandum of Understanding is being developed to clearly describe respective roles and responsibilities.
- 5.4 RBC and RBFRS officers have discussed how the Steering Group might also, in future, prioritise checks on certain non-high rise residential properties such as care homes, sheltered accommodation and other specialist housing where the occupants may be more vulnerable and less mobile. Houses in Multiple Occupation are another accommodation type which, through the County-wide Steering group's joint work, could result in improved safety for residents. Scope of partnership work will depend on the nature of issues arising from high rise residential stock and RBC/RBFRS capacity.

6 CONTRIBUTION TO STRATEGIC AIMS

- 6.1 This report supports the following objectives in the corporate plan:
- Safeguarding and protecting most vulnerable
 - Providing homes for those in most need
 - Keeping the town clean, safe, green and active

7 EQUALITY IMPACT ASSESSMENT

7.1 Not applicable to this report.

8 LEGAL IMPLICATIONS

Overview

8.1 There are several important pieces of legislation which impact on fire safety within dwellings, principally:

- Building Regulations 2010 Part B.
- Housing Act 2004.
- The Regulatory Reform (Fire Safety) Order 2005.

In addition, as noted above, the LGA published guidance in 2012 'Fire safety in purpose builds blocks of flats'.

8.2 The Regulatory Reform (Fire Safety) Order 2005 (the FSO) came into force in October 2006. It does not apply to individual flats but does apply to the common parts of flats such as stairwells, a plant room or caretaker room, shared facilities and lobbies. Guidance on the FSO and its requirements has been issued in a series of guides. Blocks of flats are included, among many other types of residential premises, in the HM Government guide 'Fire safety risk assessment: sleeping accommodation' published by the Department for Communities and Local Government (DCLG). The FSO imposes duties on the 'responsible person' who has control of the premises - usually a company or organisation and usually the freeholder or landlord. Responsibilities also apply in respect of anyone who has a contract or responsibility for maintenance, repairs or for the safety of premises. The FSO is normally enforced by the fire and rescue authority.

8.3 The FSO requires that suitable and sufficient fire risk assessments (FRAs) are carried out - this forms the foundation for the fire safety measures required in a block of flats. The fire and rescue authority will review the FRA at the time they audit a building. Further detail is provided above in this report. An FRA will result in an action plan detailing managerial and physical measures with prioritisation commensurate with the risk. LGA guidance suggests that a low risk, low rise block might need an FRA to be completed every 4 years and reviewed every two years. For blocks with higher risk and over four storeys in height a new FRA every 3 years and an annual review would be more appropriate.

8.4 Material alterations to existing blocks of flats, including alterations to individual flats, are controlled under the Building Regulations 2010, and need to be approved by a building control body otherwise an offence is committed. Even if the block satisfied earlier legislation, proposed alterations must be considered in the light of the current Building Regulations; it is not sufficient to carry out alterations on the basis of the earlier legislation. In practice, any proposals to carry out alterations including to fire alarm systems, means of escape, smoke control arrangements and structural alterations, should be submitted to ensure compliance with regulations.

8.5 The Housing Act 2004 makes requirements regarding the condition of a broad spectrum of housing including both individual flats within a block and the common parts of a block. Local authorities are the enforcing authority for this legislation. Assessment of conditions is carried out using the Housing health and Safety Rating System (HHSRS) - where 'category 1' (more serious) hazards are identified the local authority has a duty to take some form of enforcement action. Under the Housing Act 2004, the housing authority must inspect properties if they become aware of significant fire hazards.

Housing authorities have powers of entry for this purpose. The housing authority may make requirements for improvements in fire precautions. In the event of serious risk, the housing authority has the power to prohibit or take emergency remedial action.

8.6 There is overlap between the Housing Act and FSO. The Housing Act covers flats and common parts whilst the FSO covers common parts. The safety of common parts can sometimes rely on fire safety measures within flats which is an added complexity.

8.7 The DCLG has written out to all LA Chief Executives and stated:

While it is a building owner's responsibility to ensure their buildings are safe ... it is also the statutory duty of local housing authorities to keep local housing conditions under review, with a view to identifying if action needs to be taken, in relation to housing health and safety. I am sure you therefore agree it is of the utmost importance you take active steps to ensure that building owners of residential tower blocks are taking measures to ensure that their residents are safe and feel safe, particularly where buildings have been found to have cladding systems which have failed the combustibility tests.

The DCLG makes clear that they expect LAs to identify buildings with ACM cladding in their area; ensure that necessary remedial actions are taken by building owners; and where necessary to take enforcement action.

8.8 The letter does not make any mention of the Fire and Rescue Service role, responsibilities or enforcement powers nor sets out expectations in respect of joint work. As above, locally RBFRS have inspected all high rise blocks to identify those with potential ACM cladding; advising owners to submit samples for testing; ensuring that interim measures are taken as needed and that expert consultants are commissioned to assess fire safety. The Council is liaising with RBFRS and will support them as needed to ensure full cooperation of building owners and to advise and support residents.

9 FINANCIAL IMPLICATIONS

9.1 There are a number of potential financial liabilities arising which are being factored into financial planning:

a) Works which are advised as a result of external review or mandated through changing regulation to the Council's own housing/other residential stock. Capacity to fund additional safety works has been modelled within the Housing Revenue Account.

b) Resourcing joint work with RBFRS to review cross tenure residential high rise buildings and managing any regulatory actions arising. Provision will be made to fully participate in the next stages of work.

9.2 In addition to the above, there is uncertainty in relation to the financial implications of any Fire Service or any Council using relevant regulatory powers to secure the removal and replacement of cladding (or undertake other critical fire safety works) through direct action where necessary and where the owner fails to take responsibility. This matter was recently raised with the DCLG.

9.3 The company conducting Type 4 FRAs to the Council's Housing blocks will advise on any additional measures required on the basis of the construction, fire protection measures and circumstances of each block. The requirement for future works to improve fire safety will be informed by the commissioned external review but also by recommendations arising from the Grenfell Tower enquiry and emerging industry advice.