

## **Pete Apps - Housing and residential journalist of the year**

*Downturn: why is L&Q cutting its surplus in half and what does it mean for the sector*

<https://www.insidehousing.co.uk/insight/insight/downturn-why-is-lq-cutting-its-surplus-in-half-and-what-does-it-mean-for-the-sector-60054?Preview=1>

After breaking the news of L&Q's surplus cut, Pete produced a long read looking at the causes and consequences for the rest of the sector. An ability to secure a candid interview with the organisations' executive team at a time of such uncertainty for the landlord and immediately after breaking a big story about the organisation from a whistleblower speaks to one of Pete's key abilities as a trade magazine journalist – to be able to maintain the trust and respect of organisations needed to gain access while also holding them to account. The finished piece is a stylish written and important read – demonstrating Pete's strong grip of the issues affecting the sector he covers.

*How to make blocks with Grenfell-style cladding safe: the story of three towers in Plymouth*

<https://www.insidehousing.co.uk/insight/insight/how-to-make-blocks-with-grenfell-style-cladding-safe-the-story-of-three-towers-in-plymouth-61284?Preview=1>

Cladding removal has been the big story in the social housing sector in the two years post-Grenfell – but one of the big questions has been why it is taking so long. Pete sought to address this issue in the thoughtful way of a trade magazine journalist. Securing an invite to Plymouth to go behind the scenes on their cladding removal project on three towers, his report is a detailed and important read for those facing up to similar questions about how to make their buildings safe. The piece was revelatory – opening up the details of one of these jobs to a mass audience for the first time: for reasons of commercial confidentiality and fears about safety, the precise details of cladding removal work had generally been kept very quiet. It also demonstrates Pete's ability to handle human stories and present a complex story in an engaging way.

*NHBC signed off more than 50 towers with Grenfell-style cladding*

<https://www.insidehousing.co.uk/news/news/nhbc-signed-off-more-than-50-towers-with-grenfell-style-cladding-systems-investigation-reveals-60442>

One of the biggest stories in the housing sector since the Grenfell Tower disaster is the proliferation of buildings with the same type of cladding. One of the questions which has haunted the sector since the fire is how so many of these systems – which according to the government are non-compliant – came to be signed off by building control.

Pete's investigation in March, which also published as a detailed long read, sought to help answer this question, providing details of which building control organisations signed off the various blocks. As well as posing tough questions for the NHBC – which had signed off the most – this also provided evidence that the problem was industry-wide, not a one off 'bad apple'.

The data was gathered through the Freedom of Information Act, with industry experts enlisted to help draft the request. The information was then prised out of as many councils as possible, using in one instance an appeal to the Information Commissioner's Office to force the release of the data after an unlawful refusal. The end result was an important addition to the sum of knowledge about how our system of building regulation went so wrong.



After L&Q revealed it is likely to cut its surplus by £158m this year, *Peter Apps* asks what this means for the financial model which has defined the housing association sector since 2010

**I**n the memorable words of Martin Lawrence in *Bad Boys II*: “This shit just got real.” Since the era of historically low government grant for housing was born in 2010, critics have warned it will only really be tested by a property downturn.

What will happen to housing associations which have begun driving income from the open market to top up grant cuts when the market next gets tough, they said? Well, we are about to find out.

ing update last Thursday that the £348m it booked in 2017/18 will be cut almost in half to £190m in 2018/19, citing a “downturn in the property market” among other factors.

#### Surplus cut

L&Q is the shining light of the cross-subsidy model. Since its expansion into open market developments from 2010 onwards, the giant London housing association has grown its profits exponentially and successfully converted this cash into thousands of new affordable homes.

But after years of growth, the organisation will sharply reverse this trend this year. The 102,000-home organisation told investors in a trad-

So, what does this mean for L&Q? And perhaps, more importantly, what does it mean for the modern housing association model full stop?

It is important at the outset to state that L&Q is an outlier simply because of how much more money it has been

**“We’ve put in buffers to make sure the market doesn’t kill us”**

making than everyone else in recent years. In 2017/18, it made the largest surplus in the sector by almost double. The reduced surplus of £190m it is projecting would have been the largest in the sector by almost £15m in 2017/18.

It has also always built contingency for a downturn into its business ▶

# Downturn: what next?

model. As Fiona Fletcher-Smith, director of development and sales at L&Q, says: “We’ve put in a lot of buffers for ourselves to make sure the market doesn’t kill us. I wouldn’t say we’re totally relaxed, but that’s why we’re still going to come out with a £190m surplus at the end of it.”

## Extra costs

The property market downturn is also just one part of a bigger picture, accounting for around a third of the £158m reduction in its surplus.

A substantial chunk of the rest (some £40m) comes from increased spending on the homes it manages. Ms Fletcher-Smith says much of this is post-Grenfell fire safety work. While the government has funded cladding removal, L&Q is paying for improvements to fire stopping, fire doors, fire alarm revamps and in some cases sprinklers to its homes.

“The cladding is actually the easy bit, the rest is a multitude of smaller jobs that when you’ve got 100,000 homes really starts to add up,” she says.

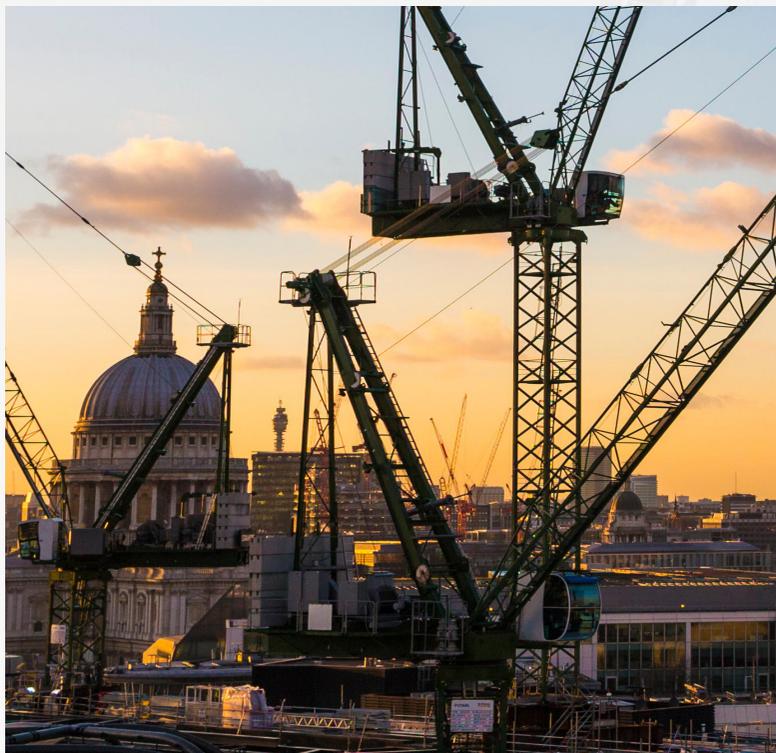
L&Q owns more tower blocks than anyone else (200) but this is a cost which will clearly be felt across the sector and is indicative of the way the business model is changing post-Grenfell.

A focus on existing tenants, quality and safety has shot up the agenda, reflected in the recent Social Housing Green Paper, the review of building regulations carried out by Dame Judith Hackitt and new legislation. But higher investment in existing stock means lower surpluses.

L&Q has also decided to take on extra work. It introduced a new void standard this year, which commits it to bring relets up to the standard it provides for new builds. This is not cheap. It has also taken a financial hit, Ms Fletcher-Smith reveals, by refusing to take handover of some 200 properties built by contractors due to poor quality. This has hit margins but Ms Fletcher-Smith says it was the right choice. “The quality of new build has a dreadful reputation and I want to make sure L&Q is stepping out of that space,” she says.

These increased costs come amid the downturn in the property market. In this regard, L&Q is not really talking about falling house prices.

Robert Grundy, head of housing at Savills, explains that in London market prices have only dropped sharply in the prime end. Elsewhere in the



## “[Associations] must create some hiatus in development activity”

capital, he says, they have been “going sideways for a couple of years”.

The concern expressed by L&Q is more about the slowdown in the number of transactions, driven particularly by uncertainty around Brexit.

Analysis by Savills shows a 9.1% drop in transactions in the capital in the year to October 2018 and a close to 20% drop since 2015. This squeeze is only likely to have increased as March approaches. “Everybody is holding their breath,” says Ms Fletcher-Smith. While this is still primarily a London phenomenon, she says L&Q has seen the slowdown spread out of the capital in recent months, particularly to Essex and the other Home Counties.

We may not know the exact extent of the impact of this on other associations for a while. L&Q has taken a proactive stance, but housing associations are not obliged to issue ‘profit warnings’ to investors in the way publicly listed companies do and only a handful publish half-year results.

These contain some signs of the same issues but on a smaller scale. Notting Hill Genesis, for example, reported a 25.8% fall in terms of its

surplus for the first six months of 2018/19 from £75.7m to £56.2m and is budgeting a surplus for the full year at £97.5m, down from £119.3m last year.

Clarion, meanwhile, the UK’s largest housing association, reported a small dip in operating surplus for the first three quarters of 2018/19, recording £232m compared with £243m last year - which it attributed to cost rises “driven predominately by an increased volume of compliance and safety work”.

What is certain is that L&Q is far from the most exposed to the fluctuations of the property market. Two organisations took more from open market sales than L&Q’s £120m in 2017/18: Places for People which took £157.5m and Peabody which recorded £135.1m.

But looking at the percentage of income from market sales, L&Q drops to 20th with 11.7% of its £1bn income coming from market sales. West London’s Catalyst Housing tops this list, making 28.2% of its £214m turnover from market sales, rising to 39.2% when shared ownership properties are included.

This measure also shows exposure is not limited to large, London-based providers. The top 10 associations by the percentage of turnover from market sales includes six with a total turnover of less than £100m which operate outside the big city (Broadacres, Chelmer Housing Partnership, Curo,

Swan, Ocean Housing Group and North Hertfordshire Homes - now known as Settle).

What would these organisations do if income from sales dried up? The fear is that many may be forced to turn off the development tap.

## Determined to develop

“It depends on the degree to which any given association is dependent on that sales income,” says Mr Grundy. “It must create some hiatus in development activity if they are in a part of the world where transaction volumes have been affected.”

Susan Hickey, chief financial officer at Peabody, adds: “Our policy has always been not to risk what we can’t afford to lose if the market should turn. If there’s more risk in the system, it’s quite likely there’s going to be fewer affordable homes built.”

She says the organisation is “scrutinising more closely” its investment opportunities but is “determined to keep going”.

For its part, L&Q has insisted it will not reduce development. “We are very determinedly not turning the tap off because organisations like us can be counter-cyclical,” says Ms Fletcher-Smith. “But where in the past when you’re in a rising market you will say yes to every opportunity, what we’re signalling now is that we will be far more discerning about what we do.”

One way through a downturn is to flip schemes designated for market sale to rent. Mr Grundy points out there are “ready buyers” in the market for a portfolio of private rented homes. But not every scheme is suitable. The other option is to convert to affordable or social rent. But this needs what the existing model provides too little of: government grant.

Ms Fletcher-Smith says L&Q has opened conversations with government about upping grant levels to help the sector through Brexit. She says officials have been “very receptive” but there are distractions.

“Poor old government, it’s a question of how much headroom they’ve got at the moment,” she says. “It all leads back to that bloody ‘B’ word.”

Indeed it does. Among its many implications, that word could be driving us towards something commentators have warned of for some time: a reckoning over the sustainability of the low-grant model, which has been the norm since 2010. We will learn what comes next soon enough. ■

# A tale of **three** towers



There are still more than 150 social housing blocks encased in ACM cladding. *Peter Apps* travels to Plymouth to find out how the removal work is going

**J**ohn Clark, chief executive of Plymouth Community Homes (PCH), is drowned out for the third time by the abrupt screech of a worker's drill. He is sitting in a flat on the first floor of one of the tower blocks his company manages in the city.

The drilling is happening because the cladding that has been wrapped around this tower and its two neighbours for the past 20 years is aluminium composite material (ACM) - two thin aluminium sheets wrapped around polythene. And that, as we saw in devastating fashion at Grenfell Tower in London on 14 June 2017, will burn like petrol if ignited.

PCH, which manages 16,000 former Plymouth City Council homes in the city, has three towers with ACM cladding that requires removal: Tamar, Tavy and Lynher Houses in the city's Mount Wise area.

The buildings are identical 1960s towers, 19 storeys high, containing a total of 270 homes and 325 residents. Located close to the mouth of the River Tamar, they are a familiar sight to the many boats that drift across Plymouth Sound each day.

These are just three of the 158 social housing towers that have been identified post-Grenfell as having ACM cladding, only 46 (29%) of which have had the necessary remediation work completed. Two years on from the fire, this feels like slow progress.

So *Inside Housing* has travelled to Devon to find out what stripping cladding from a high-rise actually involves.

"Residents would have liked it if we'd have done this in six months. But we knew from the start that the priority has to be doing it right," explains Mr Clark.

## Good intentions

Plymouth City Council clad the Mount Wise towers in 1999, primarily to protect them against the weather - 40 years of roaring south-westerly gales and horizontal rain had taken their toll on the concrete, which was beginning to become porous. The buildings' insulation also needed improving and there was a desire to give the ageing towers a colourful facelift.

The system the council picked was common: Alucomat ACM cladding panels and Rockwool mineral wool insulation. This is less combustible than the cladding at Grenfell, which had ACM and plastic foam insulation. It's also in line with the building guidance in force at the time. But thanks to the petrol-like polythene, it's still very dangerous.

PCH, of course, did not know this before Grenfell happened. But six days after the fire, it posted a sample panel to the Building Research Establishment (BRE) for testing. It also

**Previous page: Lynher, Tamar and Tavy Houses in Plymouth were covered in Grenfell Tower-style cladding to protect them from the weather**

**Below: Two of the towers have now had the cladding removed but will still need a new insulation system fitted next year**



**“There was never a question that we wouldn't be able to afford to do it”**

checked fire doors and smoke alarms in the towers, and drafted in a local security company to provide waking watch services while it waited for the results.

It conducted its own test, too - it took a piece of the cladding to a local fire station, where a firefighter applied a blowtorch to it. It caught fire, but self-extinguished, giving the association some comfort.

But when BRE's test results came back, they were clear - the cladding had to be removed. And that is where things got tricky.

"The fabric of the building [would have] let water in. There are gaps you could put your hand through," explains Sue Shaw, PCH's director of

homes, neighbourhoods and regeneration at PCH. "So we were in a position where we couldn't just take the cladding straight off."

The answer was both simple in design and complex in execution. Scaffolding would have to be erected and covered with weatherproof sheeting. Then the cladding could come off inside it and be replaced with a completely non-combustible material.

As Ms Shaw explains, this is not a straightforward process: "You can't have a situation where people can't see out - you can't put people in a bag. Most jobs like this don't get done while [the building is] occupied."

PCH therefore needed something

transparent. And fireproof. And robust enough to withstand Plymouth's rainstorms.

"You wouldn't believe how difficult it was to find something. Our consultant [Bailey Partnership] came up with essentially the only material there is," says Ms Shaw.

This material is triple-stitched debris netting. Before attaching it to the towers, they tested it with a hosepipe to ensure it was water-resistant.

It has worked. Inside, the homes look a little dim - as if it is constantly raining outside - but daylight makes it in and the view is unobstructed. PCH has also provided special 'daylight' light bulbs to further help. ▶

**Below: Residents Leanne and John Fox are happy with PCH's work**



**“It’s about keeping people on board and not just hiding because it’s getting a bit difficult”**

Housing officers told *Inside Housing* that one autistic tenant is relieved he can still count the boats in the harbour every morning. Another tenant is still being visited by the friendly seagull he feeds every day, which he has affectionately named ‘Steven Seagull’.

On top of this, the scaffolding had to be made entirely from steel - for fire safety reasons, not a single timber board was allowed. Procuring all this steel was a lengthy process. For safety reasons, contractor Mi-space had to work from the top of the block down, so it was necessary to have the scaffold entirely in place before it could begin. Workers also had to use completely non-sparking tools. Putting all this in place took time.

“The complexity is 95% of [the delay] in getting off the cladding,” explains Mr Clark. “The bit that’s difficult to get across to the media and the government is that doesn’t mean nothing is happening.”

PCH accelerated a £600,000 programme of sprinkler work planned before Grenfell. That is now complete, with the sprinklers boxed in and visible only as small white discs in residents’ homes. You would miss them entirely if they weren’t pointed out.

It also filled in decorative gaps in the brickwork in the stairwell that could have provided a route to the cladding panels for fire. The 21 leaseholders in the block were offered cut-

price 60-minute fire doors (double the legal minimum) that had previously been installed in tenants’ homes and had been made in PCH’s own factory. They were also protected from the cost of other remedial work.

### The cost of safety

This is because all of this does cost money. Removing the cladding from the three blocks comes in at £11.8m.

The government stepped in last June with grant to cover the work, but PCH had previously allocated funds in its business plan to do it. It had intended to cancel other work to make space: a project to fit insulation on another block in the city was, for example, halted on the day it was due to begin.

“We don’t have that £11.8m to spend twice, so it would have meant delays to other blocks around the city. There was never a question that we wouldn’t be able to afford to do it,” says Mr Clark.

The remaining works come in at £1.2m, which it has also found space for in its business plan; the largest single cost - the sprinklers - was already planned.

There is also the question of loan security. Mr Clark explains that the clad towers were swapped out of loan portfolios to avoid the issue. But it is the kind of thing that could trigger a loan covenant breach at an

association that had more affected towers and fewer alternative properties available to act as security. “Some insurers are taking [the towers] down to zero value - so it would have an impact on your business,” says Mr Clark.

Another tough challenge has been evacuation. The buildings have switched from ‘stay put’ to ‘full evacuation’ in the event of fire. Getting 325 people out of the three towers safely is a challenge: it requires knowledge of those with mobility issues, for example.

PCH has placed details of vulnerable residents in a box at the bottom of each tower block. Residents have been told to leave flats and wait on landings if there is a fire, while fire wardens or firefighters climb the stairs to help them evacuate.

This has been tested for real: a few weeks before *Inside Housing’s* visit, a chip pan caught alight, triggering a block-wide evacuation; in another incident, someone set off an alarm as an act of anti-social behaviour - and was later prosecuted.

PCH staff estimate it took around 30 minutes to clear the blocks in these instances, although some residents did refuse to leave. The CCTV of the operation has been sent to the government’s building safety experts to study.

Throughout all this, the association has given considerable thought to

communication with residents. “It’s about keeping people on board, keeping that trust so people know something is happening, and not just hiding because it’s getting a bit difficult,” explains Mr Clark.

There have been residents meetings, new plasma screen TVs installed in lobbies to provide updates and flat visits. Liaison officers working for Mi-space have identified resident shift workers, so the company can keep works away from their flats while they sleep during the day.

*Inside Housing* drops by the community centre to see how this has been going down with residents. There we meet John and Leanne Fox. John - who speaks with a gentle West Country accent - explains their experience, as he shows off several wool-len toys he has crocheted.

“We’re quite happy for it to be done,” he says. “There are some people who are moaning about it because they don’t know what’s going on, but they should have been coming to the meetings.”

Leanne says her claustrophobia made her nervous about the loss of daylight, but she is happy with how PCH dealt with it.

The couple are among those who need help to be evacuated from their flat. “When the alarms went off at 10 at night, I did feel dizzy and panicky. But I wasn’t too scared, because I knew the sprinklers would knock it out if it got too bad,” Leanne says.

Back in the office inside one of the towers, while workers use their sparkless drills outside the window, Mr Clark explains that when the cladding was discovered, PCH offered all the residents the chance to move out of the towers if they wanted to.

“It was only a handful of people who decided to,” he says. “The thing that really surprised me is that when properties are advertised here, people still move in, even though they know about the issues.”

The project to remove the towers’ cladding has been complex, but the fundamentals are simple: prompt action, meticulous planning and open communication with those affected.

Two of the blocks are now completely stripped of the dangerous material, although fitting the new insulation system will continue into next year.

But across the country, the work to truly make high-rises safe - both social and privately owned - will roll on for much longer than that.

As it stands, only 5% of affected private blocks have been remediated. And we have not even started identifying dangerous non-ACM systems.

As the nation grapples with these problems, there are lessons to be learned from Plymouth. ■

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## NHBC signed off more than 50 towers with Grenfell-style cladding systems, investigation reveals

NEWS 08/03/19 7:00 AM BY PETER APPS

The National House Building Council (NHBC) signed off more than 50 towers now known to have dangerous Grenfell-style cladding systems, an *Inside Housing* investigation has revealed.



Investigation has revealed.



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Who's been signing off Grenfell-style cladding?



NHBC accepts claim for Grenfell-style cladding removal from private development



The Paper Trail: the Failure of Building Regulations

Under the system in place in England since the mid-1980s, developers can choose whether to use a local authority inspector or pay a private company, known as an approved inspector, to do this service.



The NHBC is England's largest private provider of building control services – the official procedure for checking new developments are built in line with regulations.

The data obtained by *Inside Housing* reveals the NHBC provided completion certificates on 52 of the affected towers, including 39 in the east London borough of Tower Hamlets.

The 172 towers for which data has been gathered, represent 38% of the 457 private and social sector blocks known to have dangerous cladding.

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As well as the NHBC, the figures revealed firms including HCD Building Control, now part of fire safety consultancy Bureau Veritas, signed off six; MLM, one of the largest private building control companies in the country, signed off five; and Carillion, the collapsed outsourcing giant, signed off four through its building control arm.

A spokesperson for the NHBC said: "Building control does not remove the obligation of the person carrying out the work to achieve compliance with the building regulations.

"Without specific information about individual buildings, we cannot provide a more detailed response.

"However in discharging our duty as an approved inspector, NHBC Building Control Services would need to be satisfied, as far as reasonably practical, that the builder has complied with the building regulations in force at the time that the building was constructed."

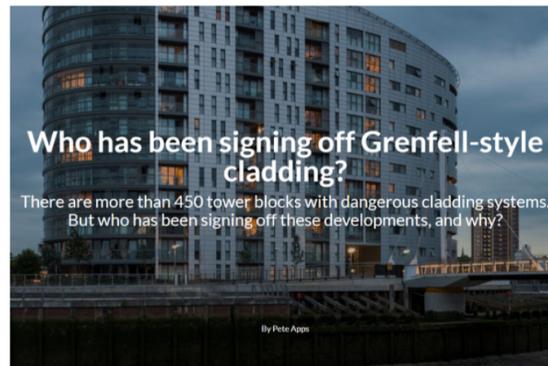
A spokesperson for Bureau Veritas added: "Bureau Veritas helps its clients by offering services and solutions that ensure standards and regulations – including building regulations – are adhered to. HCD Building Control was acquired by Bureau Veritas in March 2016.

"Our activities are closely monitored by the Construction Industry Council, who are satisfied with the measures the business takes to ensure no conflict of interest exists between our building control and fire activities.

"Due to client confidentiality, Bureau Veritas cannot comment on individual projects."

As many councils are reluctant to provide information on tower blocks with Grenfell-style cladding, *Inside Housing* requested data on whether the block was signed off by a private, public or NHBC inspector.

This means that for many of the councils it was not possible to identify the specific private inspector which provided the certificate.



[CLICK HERE TO READ THE FULL INVESTIGATION](#)

The 64 signed off directly by local authorities comes despite recommendations of the review of building regulations by Dame Judith Hackitt to give local authority inspectors primary responsibility for high rises in future.

The government has argued since Grenfell that the use of ACM cladding systems did not comply with building regulations or the official guidance – although this has been widely disputed by the industry.

Industry figures have said the requirement in the official guidance that 'external surfaces' of buildings should be 'Class 0' led to the widespread use of ACM, the vast majority of which was certified to this standard.

But the government argues that cladding should in fact have met the standard of 'limited combustibility' based on a separate standard for 'insulation' and 'filler material'.

*Inside Housing* revealed last summer that government officials were specifically warned in 2014 about the Class 0 standard resulting the widespread use of ACM, promised to act and didn't.

As well as Class 0 cladding panels, many dangerous systems, including the one used on Grenfell, contain combustible insulation materials.

one used on Grenfell, contain combustible insulation materials.

This is only permitted in the guidance if justified through 'full-scale test data'. Building control inspectors accepted 'desktop studies' – assessments of new systems from previous test results – from 2014 onwards.

But in 2016, the NHBC published a guidance note saying it would not even require desktop studies on several 'common' cladding systems – including ACM.

The government declined to comment due to the ongoing inquiry.

### The NHBC statement in full



Raising Standards. Protecting Homeowners

"Builders are responsible for ensuring they comply with the Building Regulations. The Building Control Body, which could be NHBC Building Control Services Ltd (BCS), a local authority or another Approved Inspector, assists the builder in achieving compliance with the applicable Building Regulations and Guidance. NHBC BCS do this through the appraisal of plans and details provided by the builder as well as risk based inspections at certain stages of the build process.

"Building control does not remove the obligation of the person carrying out the work to achieve compliance with the Building Regulations.

"Without specific information about individual buildings we cannot provide a more detailed response. However in discharging our duty as an Approved Inspector NHBC BCS would need to be satisfied, as far as reasonably practical, that the builder has complied with the building regulations in force at the time that the building was constructed."

### The 'Class 0' debate explained



- ▶ Since the Grenfell Tower fire, the government has insisted that its official guidance, Approved Document B, required cladding panels to be of 'limited combustibility'. But many industry figures disagree, saying that the standard the guidance set was 'Class 0' or 'Euroclass B'.
- ▶ Approved Document B sets limited combustibility as the standard for 'insulation materials/products' in paragraph 12.7. It sets Class 0 or Euroclass B as the standard for 'external surfaces' in paragraph 12.6.
- ▶ Paragraph 12.7 says that "insulation product, filler material etc" must be of limited combustibility. In a letter to social landlords on 22 June, the government said that the word 'filler' in this context covered the plastic in between the aluminium sheets in the cladding.
- ▶ But experts have disputed this view, pointing out that the cladding itself does not have an insulation function.
- ▶ The cladding used on Grenfell was certified to Class 0 and so would apparently have met the official standard for external walls.
- ▶ This debate remains crucial in assessing the liability for the removal of cladding, much of which is also rated Class 0, from hundreds of tower blocks nationwide.

### The Paper Trail: The Failure of Building Regulations

Read our in-depth investigation into how building regulations have changed over time and how this may have contributed to the Grenfell Tower fire:



## The Paper Trail: the Failure of Building Regulations

Pete Apps, Sophie Barnes and Luke Barratt

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### Inside Housing Spotlight



*Inside Housing Spotlight* is a series of pieces showcasing the best of our investigative and data journalism.

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David Sugden 08-Mar-2019

Congratulations on digging out this vital information. The AI's are just that, Inspectors, and should have been satisfied that the materials used met the requirements. They obviously did not in fact do that otherwise they would not have "signed off" the materials.

Reply



John Palmer 08-Mar-2019

"NHBC began as the National House Builders Registration Council (NHBC) in 1936. Created to tackle the sub-standard building practices seen in the inter-war years, it was an important voluntary venture into \*\*\*self-regulation\*\*\* and consumer protection by the industry." [www.nhbc.co.uk/AboutNHBC/OurHistory/]  
"NHBC is governed by a Council of Members comprising approximately 60 people drawn from organisations or groups who have an interest in raising standards in UK house building. They include mortgage lenders, lawyers, consumer groups, architects, surveyors and house builders." [www.nhbc.co.uk/AboutNHBC/Howwearerun/]

Reply

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