

**IN THE GRENEELL TOWER INQUIRY**  
**AND IN THE MATTER OF**  
**THE INQUIRIES ACT 2005 AND**  
**THE INQUIRY RULES 2006 (SI 2006/1838)**

**PHASE 2, MODULE 3**  
**RYDON MAINTENANCE LIMITED**  
**OPENING SUBMISSIONS**

**A INTRODUCTION**

1. Module 3 concerns active and passive fire safety measures internal to the building, management of the building, compliance under the Regulatory Reform Order 2005 (**RRO**), fire risk assessment, including complaints and communication with residents. The Inquiry has directed that Module 3 will be split into 3 topics, as follows:
  - a. Topic 1 - residents' complaints regarding fire safety risks, doors and the quality of workmanship during the refurbishment and the response of the TMO and RBKC to those complaints;
  - b. Topic 2 - the obligations of the TMO and RBKC under the RRO and their compliance with those obligations;
  - c. Topic 3 - active and passive fire safety measures inside the tower and management of maintenance of the building, specifically:
    - The TMO's maintenance regime;
    - Lifts;
    - Fire doors (flat and stair doors);
    - Smoke control system (including Building Control approval of that system); and
    - Gas works at the tower, including riser replacement works.

2. RML does not in this **Opening** seek to anticipate what may be said by other **Core Participants**, specifically **RBKC** and **KCTMO**, or by specialists involved in works relating to the issues identified for **Topic 3**, nor the oral evidence that witnesses may give, noting that no RML employees or ex-employees have been called to give oral evidence in **Module 3**. RML seeks to assist the **Inquiry** by concisely summarising its role insofar as relevant to **Module 3**, and reserves the right to address matters further by way of opening oral submission and in its closing submissions for **Modules 1–3**, if appropriate to do so.

**B TOPIC 1 – RESIDENT COMPLAINTS RELATING TO FIRE SAFETY AND RBKC/THE TMO RESPONSE**

3. **During** the course of the project RML engaged resident liaison staff to liaise with residents to answer queries and respond to any concerns, as well as liaise with **KCTMO**. Additionally it is usual in large scale construction projects for there to be snagging items and matters which may require attention after **Practical Completion** and which are attended to during the **Defects Liability Period**. The **Defects Liability Period** for the Grenfell Tower refurbishment project was not due to expire until July 2017. As explained in RML’s company statement filed in November 2018, RML liaised with **KCTMO** and with relevant subcontractors about a variety of outstanding matters both before and after **Practical Completion**. Where evidence of any such issues is given in **Module 3** which relates to matters within RML’s responsibility, then RML stands ready to assist the **Inquiry**.

**C TOPIC 2 – OBLIGATIONS OF THE TMO AND RBKC UNDER THE RRO**

4. RML reserves the right to address this topic further following review of the **Openings** of **KCTMO** and **RBKC**, and of the factual and expert evidence presented in **Module 3**, to the extent that these raise issues upon which RML is able to assist the **Inquiry**.

**D TOPIC 3 - ACTIVE AND PASSIVE FIRE SAFETY MEASURES INSIDE THE TOWER AND MANAGEMENT OF MAINTENANCE OF THE BUILDING**

5. RML does not address matters unconnected to its refurbishment works (**KCTMO**’s maintenance regime and works relating to gas riser replacement

works) but remains ready to assist the Inquiry in the light of the factual and expert evidence given in Module 3, to the extent that these raise issues upon which RML is able to assist the Inquiry.

6. RML refers to the following specific points at this stage, without prejudging the oral evidence to be given on this topic:
  - a.* In relation to **lifts**, RML does not understand Mr Howkins' Report to identify matters within the scope of RML's works which affected the functionality of the lifts in a relevant way on the night of the fire.
  - b.* In relation to **flat and stair doors**, RML's role in the refurbishment project related to the installation of new doors for the new flats created below level 4 of Grenfell Tower and painting of communal areas including fire doors. RML had no involvement in the flat fire door replacement programme initiated by KCTMO in 2011-2012.

**DAC Beachcroft LLP**  
**Solicitors for Rydon Maintenance Limited**

**19 March 2021**