

**West Kensington & Gibbs Green Tenants & Residents Associations  
West Ken & Gibbs Green Community Homes**

following testimony, contained in a response (12 December 2011) to the revised SPD, is from a leaseholder who lives on the Gibbs Green Estate:

These 98 flats are extremely well-built, in excellent condition for 50 years old, and designed to a very high standard of comfort and convenience. ....

- 65 sq m of space, including a separate kitchen, hall and upstairs landing
- solid concrete and brick construction, good soundproofing
- large windows in all rooms, front and back
- a balcony big enough to seat two people and dry all your washing
- first floor convenience
- 200 metres from West Kensington station
- very close to useful local shops
- no traffic outside front or back, pleasant views
- free parking
- long-established and friendly neighbours

Why on earth should residents of such a high-quality estate agree to have their homes demolished?

And has the council, and the Mayor, recognised that these two estates suffered no trouble whatever during the summer riots, showing that we do have settled and cohesive communities here?

- 3) Overcrowding is claimed to be slightly above the borough average. Conversely, "an assessment by the Council has also shown that there is significant under-occupancy on the two estates". However, whilst the term 'overcrowding' is intuitively easy to understand (though the basis for the data might be suspect), 'under-occupancy' is not defined; nor is it clear where the data comes from. A far cheaper alternative scenario, of addressing this problem by incentivising older tenants to 'downsize' once their children have left home as promoted by many local authorities, is not even mentioned. Overcrowding and under-occupation are a function of the management of properties (including demand management) and are not a function of the properties themselves. More effective management of the homes is required to solve these problems, not demolition. To demolish decent homes on the grounds they are overcrowded and under-occupied is plainly irrational.
- 4) We do not dispute the connection between multiple deprivation and unemployment and educational and health outcomes which are well established. However, the document then leaps to the conclusion that "there is a strong rationale for *demolition* (our italics) and including the estates within the comprehensive regeneration of the Opportunity Area". How this is expected to improve educational attainment, health outcomes, or the quality of life of the existing residents is not clear. Conversely, recent academic research on outcomes arising from the transfer of council estates to community ownership (Ambrose 2010, Satsangi 2011) shows empowerment delivers a range of significant wellbeing benefits especially to disadvantaged groups and

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vulnerable individuals. The existing social capital on the estates is neither mentioned nor assessed. Instead the report rehearses statistics that we believe are derived from a Council document entitled West Kensington and Gibbs Green Estates Profile that was quoted as a source for this information in the First Draft SPD and is quoted as the source for the same information in the EQIA. Despite several requests, the Council has failed to provide us with a copy of this document.

- 5) It is clearly the intention that the majority of residents will be offered alternative accommodation on the Seagrave Road site and presumably the Council's legal advice is that this will satisfy their legal obligation to provide 'suitable alternative accommodation'. However if this does result in a wholesale movement of the population on the estates to another site, it is likely that the indices of multiple deprivation listed will simply be shifted from one ward/ constituency to another. It is also worth recording here that most current residents simply do not want to move to Seagrave Road, and that it is apparent they will not be offered comparable accommodation (in terms of, for example, gardens, garages or on and off street parking spaces).

### **3. Alternative Options**

Option 1 – The document suggests transfer to a housing association as an alternative 'do nothing' scenario. However, "it is considered that the estate would be unlikely to change physically if this were to happen". This is not substantiated, and, in any event, is contradicted by the vision for the estates published by the residents associations in December 2009, which set out a programme of improvements that certainly included physical improvements (see below in Section 5: Appendix 1). Perhaps the key constraint here is "delivering a satisfactory level of capital receipt to the Council" – although, of course, we have no idea what that is.

As a consequence, Option 1 lumps together no change of landlord with the transformational change to the community and the neighbourhood that would arise from transfer to a community-based housing association.

Option 2 – The statement that infill development "was likely to be a less attractive proposition" is impossible to evaluate without drawings – however, such a partial approach is used widely on regeneration schemes for the obvious reason that large estates are rarely homogenous. There are 5 main built forms on the estate:

- One and two-bedroom flats in 5 tall blocks of nine, ten and eleven storeys (388 homes)
- Maisonettes in four and five storey 'walk-up' blocks on the Gibbs Green estate, mostly of 2 and 3 bedrooms (98 homes)
- Maisonette blocks facing directly onto North End Road and Marchbank Road (75 homes)
- Nearly new housing association stock, mostly 3 and 4 bedroom houses (58 homes)
- Houses built by the Council on the West Kensington estate (141 homes, 30 of which have been sold freehold)

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To treat these very different building types as if they were one and the same is clearly irrational. Given that there is no indication of what this infill development involves we can only conclude that this option has not been *seriously* considered – surely the whole point of an options appraisal.

Neither Options 1 nor 2 reflect the proposals put forward by the residents. According to the statements made by their associations, transferring the estates into community ownership would deliver significant physical changes, could deliver infill development, and might even involve wider redevelopment.

Options 3(a) and 3(B) – Again it is unclear exactly what these two options involve since there are no drawings of any kind provided - so we do not know what a comprehensive regeneration scheme would look like. Even if one makes the simplifying assumption that the dwelling size mix provided would be exactly the same as currently (which given the comments about overcrowding and under occupation is unlikely), the built form is very unlikely to be the same.

#### **4. Economic benefits**

##### **A. Residential Units**

- 1) In the table in 4.2.1, only three tenures appear – local authority, new affordable, and private sector. Whilst the first is clear, and does not change in any option, the others are not defined. Particularly it is not clear if 'new affordable' means housing at HCA 'target' rents (also known as 'social rents'), or if the current HCA definition of 'affordable' is used. The distinction is crucial as 'new affordable' rents are likely to be at up to 80% of market rents, or to be various forms of low cost home ownership, both unlikely to be affordable to people on average incomes in the borough. In all options, the number of 'local authority dwellings' (presumably meaning local authority rented homes at 'social' rents) remains at 531 (presumably an estimate of the current number) – all other new 'affordable' homes are as described above.
- 2) What is clear however is that under Options 3a, 3b and 4 the increase in residential units is almost entirely private units at market values which are very unlikely to be affordable to most current resident of LBHF.
- 3) If Option 4 were pursued rather than option 1, only another 256 'affordable' units would be provided. Indeed, with options 3(a) and 3(b) less 'affordable' dwellings would be provided as against option 1 (258 rather than 542). Given that 531 genuinely affordable homes already exist (and should therefore be set aside in terms of calculation of the affordable housing ratio), it is difficult to see how any of schemes other than Options 1 and 2 come anywhere near meeting the 40% affordable (however defined) housing target in the London Plan.

Option 4 gives a ratio, for example, of 11.3% once the existing 531 units are netted off. It is no surprise, therefore, that "The Mayor of London considers that LBHF's Core Submission Strategy (2011) is not in general conformity with the London Plan, particularly in relation to its affordable housing policy" (Earls Court OA SPD item 6.7), or that Mayor found the planning applications breached six his London Plan housing policies.

##### **B. Employment Impacts**

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In terms of employment impacts, the document attempts to calculate how many new jobs would be created. The statement that demolishing more or less the entire Opportunity Area and building 7,583 new dwellings and large amounts of commercial accommodation would create a lot of temporary construction jobs is self-evident; and it is possible that at least some of these could go to local residents (though residents claim past promises to deliver local jobs through the construction of Earl's Court 2 were not met). What is not clear however is:

- What time period this would be over (as there is no information on phasing)
- Whether the jobs which would be lost during the development period (which could easily be up to 20 years) have been netted off
- How this has been related to the expected performance of the London economy as a whole in the period
- The extent of permanent job losses which would result from the proposals. These include thousands of jobs dependent on the Earls Court Exhibition Centres, the Lillie Road rail depot, and SMEs such as Rootstein (the mannequin manufacturer in Beaumont Avenue).

In light of this, the figures for permanent employment created are, to say the least, highly questionable. To take just one example, the assumed occupancy rates (90% for offices, 90% for retail, and 100% for hotels) seem wildly optimistic.

## **5. Conclusion**

Our conclusion, therefore, is that the Economic Appraisal suffers from:

- A lack of detail and evidence for its conclusions, which appear to be based on a plethora of subjective opinions masquerading as 'facts'
- An obvious ignorance of the character of the estates and the published aspirations of their occupants
- A lack of transparency about how figures are arrived at and a failure to properly define ambiguous terms
- An irrational justification for demolition based on spurious grounds
- A failure to fairly and properly assess the residents' community transfer option

As a result of these serious deficiencies we think that the Economic Appraisal is fundamentally flawed and cannot be relied on as a fair and proper assessment of the economic benefits and disbenefits resulting from the options either by LBH&F for informing its decision as a landlord and planning authority on whether to include the estates in the development, or by the Mayor on whether redevelopment complies with the policies in the London Plan.

*This section was prepared by Keith Colley, B.A. (Hons), FRICS, FCIH, Dip. GM, WKGGCH Independent Board Member.*

## **SECTION 5: ECONOMIC APPRAISAL: EFFECTIVENESS – CONTRIBUTION TO SCHEME OBJECTIVES**

### **Alternative consideration of benefits and disbenefits**

#### **1. The Options in the Economic Appraisal**

The Economic Appraisal identifies five options:

Option 1: Do minimum intervention (reference case) – under this option, LBHF would continue to own, manage and maintain the estates, as well as retain the West Kensington and Gibbs Green halls.

An alternative scenario under Option 1 would be for the Council to make a stock transfer of the estates to a Registered Provider by a competitive process and subject to the tenants' approval. However, it is considered that the estate would be unlikely to change physically if this were to happen. Moreover, it is unlikely that a package of investment and improvement would be forthcoming at a level which would be sufficiently attractive to tenants whilst delivering a satisfactory level of capital receipt to the Council;

Option 2: Minimal intervention and infill development – under this option, LBHF would again continue to own, manage and maintain the estates, as well as retain the West Kensington and Gibbs Green halls. However, opportunities for additional infill development and additional disposal of Council land within and adjacent to the estates would also be brought forward for development. Consideration was given to larger scale partial redevelopment of the estates. However, it was concluded that this was likely to be a less attractive proposition, since it would be less efficient, disruptive, only address a limited range of issues and fail to realise the full scope of benefits;

Option 3(a): Comprehensive regeneration: standalone estate redevelopment – the estates would be comprehensively redeveloped and, in accordance with planning requirements, the differentials in levels between the three land ownerships would be addressed. This would involve substantial engineering costs;

Option 3(b): Comprehensive regeneration: standalone estate redevelopment – in order to test the costs and benefits of the alternative options, a variation of Option 3(a) has also been developed, which assumes the existing levels are maintained. This option is based on a modest infrastructure budget; and

Option 4: Comprehensive regeneration: wider Earl's Court redevelopment – under this option, redevelopment would be undertaken of the combined LBHF, CapCo and TfL land, as part of the comprehensive redevelopment of the Opportunity Area.

Option 1 lumps together no change of landlord with the transformational change to the community and the neighbourhood that would arise from transfer to a resident-controlled housing association. Yet, the Economic Appraisal states: "the estate would be unlikely to change physically if this were to happen".

Option 2 involves the Council retaining the estates and taking up opportunities for infill development.

Neither of these Options reflects the proposals put forward by the residents. According to the statements made by their associations, the transfer would deliver significant physical changes, could deliver infill development, and might even involve wider redevelopment (Appendix 1).

Consequently, the Economic Appraisal fails properly to assess the benefits of the 'alternative scenario', which is community transfer. But, the report also presents a one-sided consideration of the Options' contribution to scheme objectives by failing to identify the disbenefits that would arise from redevelopment.

## **2. Contribution to scheme objectives**

The Economic Appraisal states:

In addition to the analysis of economic and wider benefits, the extent to which each option would meet the stated policy and scheme objectives has been considered as part of the overall assessment of public sector value for money. Option 4 would contribute very substantially to achieving these objectives, as outlined in Table 4.6. The standalone redevelopment options (Option 3(a)/(b)) would make a significant contribution to a number of objectives, but not all. However, Option 1 and Option 2 would only make a minimal contribution. (4.8)

Table 4.6 is headed "Effectiveness – contribution to scheme objectives".

## **3. Alternative consideration**

We do not think the contents of this table adequately reflect the benefits and disbenefits, so we have prepared the following Table 1 to compare the two most important options: community transfer against demolition and redevelopment.

It is apparent that were Table 1 to be used to score the wider economic benefits, the results would favour community transfer over demolition and redevelopment.

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**Table 1: Alternative consideration of Effectiveness – contribution to scheme objectives**

	<b>Option 1: Community Transfer</b>	<b>Option 2: Demolition and redevelopment</b>
<b>To increase supply of housing, providing quality homes on sustainable new developments</b>	Gradual increase in supply of a mix of owner occupied, social rented and 'affordable' housing according to decisions made by the local community. Carefully designed new development infill respects character, and works with estates layout. Increase is sustainable as it is by consent, does not waste decent assets and release embodied carbon, nor place excessive demand on transport and utilities. Potential for redevelopment subject to community decision on what is needed, what could be achieved and how. In line with Government policy on localism and devolving planning and development decisions to local communities. Incremental development tests the economic and environmental sustainability over time without 'silver bullet' solutions, which risk wiping away what is strong about the existing physical and social infrastructure.	Detrimental to scheme objectives due to: unsustainable ten-fold increase in housing in the most densely populated area of the country, which is of the wrong type as it is nearly all unaffordable with no additional social rented homes; unwarranted demolition of decent quality homes and wastage of £15 million of recent public investment; gross over-development that is unsustainable in terms of the environment, the community and transport; damage to the local, regional and national economy through local overload, skewing of investment away from the Thames Gateway (spatial priority 1 of the London Plan) and the loss of thousands of jobs and £billions of commercial income in west London. Very high risks to delivery in any economic environment, let alone in current conditions with reduced access to mortgage finance for individuals and companies. Access to long-term capital funding uncertain, and the development period includes risks over a significant period of turbulence. Development and delivery period uncertain for a development of this scale. Unsustainable due to unacceptable environmental impact.
<b>To create clean and safe neighbourhoods in an area rich in opportunity, where most people of working age work</b>	Cleaner and safer neighbourhood resulting from resident ownership of the housing and closer working with the Police, Schools, health services and other local agencies by a stakeholder, the community owned landlord, with a long term interest in the area. The landlord will deliver a programme of repairs and improvement to external and internal communal spaces; sensitive infill and expansion of community facilities; and estate-based management. Opportunities will be enriched through the provision of a range of community services that will include supporting younger people towards work and by providing access to training and employment specifically focused on the needs of the local community. More of the benefits are therefore retained in the local area. Community owned landlord can exercise choice on whether to contract services or employ local labour direct, and monitor standards of open space maintenance through onsite management and resident control.	Catastrophic impact. Unjustified demolition destroys existing clean, safe and well-loved neighbourhood; excessive construction works dirty area for over a decade, and phasing and demolition unnecessarily creates successive unclean and unsafe areas. No analysis of how existing jobs are affected by the proposal for complete demolition and redevelopment. Unnecessary demolition makes neighbourhood less safe by severely disrupting social networks and family ties, and by cramming far too many people who don't know each other into a small area. Removes existing employment opportunities from the exhibition venues and others in favour of uncertain opportunities that might arise from speculative development. 95% of the new housing would be unaffordable to most working people who currently live in the area. Long-term new jobs created are predominantly low wage service sector jobs in retail and hospitality – the very type of jobs that would be needlessly destroyed or displaced by redevelopment of the area. Very few workers in the new retail and hospitality sector would be able to afford to live nearby, increasing commuting congestion and journey times and contributing to carbon emissions.
<b>To provide a mix of housing type, size and tenure to attract people on a range of incomes, creating mixed and balanced communities</b>	The estates already provide a mix of housing type, size and tenure attractive to people on a range of incomes. Sensitive infill and improvement to external and internal communal spaces will further improve attractiveness of homes and neighbourhood. The estates are a mixed and balanced community of social rented tenants, private tenants, lodgers, leaseholders, freeholders, shared owners and their families. There will be homes affordable to local people at the lower end of the income scale as well as homes for people with higher incomes. Overcrowding and under-occupation will be reduced through proper and informed management with opportunities for grown up children to be housed within the community. This is the only option that provides a stable community and builds on the existing social capital, strengthening it through opportunities for existing residents to stay in the area, as their needs, and those of their families change over time. Large number of family houses with private gardens retained. Community-owned landlord reflects local population's age, ethnicity, sexuality, and gender, and provides services sensitive to its needs.	Grossly distorts the existing mixed and balanced community from 77/23 percent social rented/owners to 8/90 percent social rented/ owners and high rented. No additional social rented housing, which is contrary to London Plan; assumed prices and service charges will be way beyond affordable for the vast majority of local people; only those with the highest incomes would be attracted to an almost mono-tenure high housing cost area; the community would be unmixed and unbalanced, failing to provide homes affordable to the vast majority of local people. Large residential development will attract buy-to-let and foreign investors operating as absentee landlords providing short-term rented housing, with the effect that many residents are unlikely to take a long-term view and invest in their community. Proposed redevelopment would undermine social cohesion and provide infertile ground for future growth of social capital. Increase in the proportion of flats compared to houses, with limited private space.
<b>To allow people to acquire a stake in their home</b>	Leaseholders and freeholders will be allowed to keep the individual stakes they have in their homes. Tenants will preserve their Right to Buy at prices that will not be artificially inflated. Service charges will remain affordable. Members of the community landlord (currently residents from two thirds of households) will be able to elect their neighbours to govern the association and hold their landlord to account. This will ensure local people determine the association's strategic direction and that decisions are based on local need and made with local consent. Community control will boost pride in the area and deliver tighter and more informed management of communal areas. This is the only option that gives existing residents an increased stake in their home and community through a landlord that is a membership organization, owned by the community.	Dispossesses all the individual stakes that owners have in their current homes through buy-outs and CPOs to aid demolition. Removes the democratically accountable stake in their homes residents currently hold through public ownership of the land. Disallows residents the opportunity to exercise their legal right to a community transfer that would give every member of the landlord a real stake in their home and their neighbourhood, democratic accountability, control over leadership, strategy and management. Denies residents a stake through home ownership in the future due to property value inflation assumptions that would place homes beyond the price that is affordable by tenants, even with the Right to Buy, and notwithstanding recent RTB discount increases. The long development period would blight existing freehold and leaseholder properties, with the delivery of any future large scale development viewed as uncertain by lenders, who would then be unwilling to lend for mortgages to buy existing homes in the area, and adjoining the area (as has already happened to owners in Seagrave Road).

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<p><b>To ensure development is of a high quality design and provides a mix of local facilities</b></p>	<p>Energy efficiency and quality of existing homes will be improved. Solutions will be assessed taking account both the physical and management options that will deliver the aspirations for improved homes. The community is in the best position to ensure additional development is of a high quality design and provides the mix of facilities needed for the neighbourhood. Facilities will include a landlord service based in the area within walking distance, new community buildings to provide services additional to housing management and maintenance. A community hub to attract and foster the development of voluntary sector and other services that meet the needs of the local community. Incremental development under community control will avoid risk to design quality of new development and mix of new local facilities posed by an oversized redevelopment at the mercy of global financial markets. 240 private gardens retained. 200 garages retained. 2 Playgrounds, 2 Community Centres, 2 GP surgeries, a primary school and nursery retained and improved.</p>	<p>Impossible to verify. The developer has not provided sufficient information to assess properly the quality and design of the proposed main development. Major risk that over-optimistic values assumed by the developer won't be achieved and that, especially given market caution over speculative property development, future phases won't attract required investment. In these circumstances, it's inevitable that quality and design would be sacrificed, or the development would fail, leaving dereliction and loss of existing local facilities in its wake, or, as per Battersea Power Station, would go bust every decade, causing needless dislocation and disruption for generations. Large-scale developments are more likely to adopt 'cutting edge' technology without sufficient regard to the long-term maintenance issues. Access to the facilities provided is not measured against the current use and national importance of the exhibition facilities on site. High-end hospitality use will not be accessible for the great majority of people living in the area. 240 existing private gardens, 200 garages, 2 Community Centres and a Primary School and nursery, all purpose-built, removed.</p>
<p><b>To improve access to employment and training opportunities</b></p>	<p>Access to employment and training opportunities will be improved by: the association delivering community services that include opportunities to access employment and training; partnership working between the community landlord, local employment agencies and employers; rents, prices and services charges for homes that are affordable to most working people, and will enable them to take up the jobs most commonly offered in the area. The choice of a community owned landlord to employ direct or contract locally gives the opportunity for more employment and training opportunities to be retained locally.</p>	<p>Worsens access to existing direct and indirect employment by: not replacing the exhibition venues; relocating the rail depot, which provides skilled engineering jobs, some of which may be lost altogether; and displacing Rootstein's and other SME employers in the opportunity area. No improvement in access to training opportunities arises from demolishing the estates, as such opportunities are already available from existing local employers, through existing schemes, or could be obtained from any redevelopment adjacent to the estates. Residents say that previous employment opportunities promised from the EC2 development, never materialised.</p>
<p><b>To help to improve educational attainment and health outcomes and secure low levels of crime</b></p>	<p>Educational attainment will be improved by: a stable community environment, greater community cohesion that would especially benefit young people; a range of services and engagement processes to raise aspirations of younger people and assist them to achieve their ambitions. Health outcomes for vulnerable people, especially the elderly and disabled, will be improved by them being supported in their current homes where these meet present needs, able to stay on the estates should these change; not being worried and stressed that they will be forced out against their will; feeling a much greater sense of security and ability to influence what happens to them leading to increased happiness and improved wellbeing; tailored support from a caring landlord. Effective community based action to promote and support multi agency working at neighbourhood level to prevent, identify and respond to crime. Purpose-built Primary School and nursery retained. Stability of community and environment reduces disruption, makes education easy to access and provides environment where improving educational attainment is possible.</p>	<p>Curtails educational attainment outcomes for local children and young adults by: damaging their confidence in believing they can influence what happens around them; imposing long-term uncertainty, insecurity and disruption to their living and future working environment; removing garden space and pride from connection with an historic place. Unacceptable adverse impacts on health outcomes for elderly and disabled people arising from premature deaths caused by the worry and stress from threat of forcible removal, and the dirt, noise and disturbance from living in a building site for more than 10 years. Detrimental impact resulting from loss of gardens, garages and off-street parking to accommodate visiting relatives. Disproportionate negative impact on ethnic minorities and other disadvantaged groups disempowered by imposition of top-down redevelopment. Changing road layouts, disruption to local services such as street lighting, a constantly changing working and residential population over a period of more than ten years and in an ongoing building site provides a fertile environment for crime.</p>
<p><b>To improve transport, accessibility and encourage walking through areas</b></p>	<p>Sustainable increase in dwellings will ensure that transport and accessibility is improved through not soaking up future public transport capacity increase, thereby enabling people who live in, visit or work in the area to benefit from planned expansion; avoid worsening local gridlock and delaying A4 traffic to Heathrow. Improvements sensitive to the character of existing built-form will improve safety and attractiveness and encourage walking through areas. Houses and lifted blocks easily accessible for people with mobility disabilities.</p>	<p>Unacceptable worsening of transport accessibility through massive residential and worker population increase generating unsustainable increase in car use that lengthens gridlock periods on roads around the site; increases costs to the economy by extending trunk route journeys west and to Heathrow; soaks up all projected future public transport capacity expansion; and crowds areas with so many people as to discourage people walking through. Travel time to work increased through provision of low wage jobs, but no commensurate rise in accommodation accessible to those in low waged employment.</p>
<p><b>To increase satisfaction with the townscape, public realm, environment and management</b></p>	<p>Existing high satisfaction with townscape and public realm will be increased by preserving well-loved homes that are part of people's heritage and by sensitively developing infill homes and amenities determined by the community. Local environment transformed through improvements to communal areas with community involvement targeted to embrace all disadvantaged groups. External Environment improved through accountable and responsive estate-based management. Much higher levels of satisfaction with landlord and greater ability for people to influence their surroundings using local knowledge and for the wider good. Much greater pride in the area from residents having taken control to save their estates. Community owned landlord reflects cultural diversity of population in membership and decision-making, providing sensitive service delivery accessible to residents whose first language is not English.</p>	<p>Destruction of the culturally rich mix of existing uses, styles and ages wrecks a locally familiar and globally admired part of London's historic townscape in favour of over-dense blocks in a canyonesque urban landscape overstretching local infrastructure, both existing and proposed. This change is unacceptable: the general public's view of modern non-locally referenced grossly over-dense development is considerably more skeptical than the opinions of architects and their paymasters. Replacement with dozens of blocks up to 30 storeys would: hugely reduce satisfaction with the townscape; be detrimental to the idiosyncratic and diverse heritage of gradual development that is the public realm and is easily capable of improvement; present unsustainable negative impacts on the environment; would create ongoing management costs that would be unaffordable to most people in work; and would present a management challenge that is bound to fail needs and expectations.</p>



## **SECTION 5: APPENDIX 1 RESIDENTS' PUBLISHED VISION**

On 8 December 2009, the West Kensington & Gibbs Green TRAs published the following vision to residents in their newsletter:

### **How we would improve our homes and community**

Everything must be properly examined and set up before we can take over our homes. Once satisfactory arrangements are in place, council tenants and leaseholders will be able to vote on whether to transfer the estates to a resident-controlled association. **This is what would happen if we took over our homes:**

- Our estates would be owned by a community-based landlord, democratically controlled by residents. Our association would be run by residents elected annually by their neighbours, and managed by professionals. We would not force people to move: we, the residents, would decide the future of our homes and community.
- We would set up an estate-based management and maintenance service tailored to meet individual needs - directly accountable to residents. Staff would be out on the estates and patrolling the corridors, taking an active part. **Things would be dealt with straightaway by people we know, from an office round the corner.**
- After taking over, we would sort out overcrowding by moving existing tenants to bigger homes and by housing their grown-up children - before taking in new tenants. And we would provide better choice and help for moving off the estates.
- Over time and under the direction of residents, we would transform the corridors, stairwells and outside spaces into safe and welcoming entrances; we would improve the areas where there is bad behaviour through proper supervision by staff and CCTV, and by putting such areas to constructive use. We would keep the concierge staff and give the big blocks on West Ken a facelift, making it feel even friendlier to live there.
- We would offer secure lift access for the blocks on Gibbs Green, using transparent lifts and shafts. There are ways of funding these and other estate-wide improvements that would avoid costs falling on leaseholders.
- We would improve our community by organising events, activities and opportunities for residents and neighbours. Leading by example, we would inspire and influence the energy of young people to make our estates a place to feel proud of. We would establish our own relationship with the Police by providing homes for Officers so they can live among us.
- Our rights as tenants and leaseholders would be protected. Council Tenants would keep security of tenure and the Right to Buy; the terms of leases would remain unchanged; and we would not compulsorily purchase freeholders. We would keep rents and service charges affordable by being efficient. **All the money collected would be spent looking after the estates and improving our community.**

The Submission from the West Kensington & Gibbs Green Estates Tenants & Residents Associations to the Secretary of State for Communities & Local Government and the Housing Minister, 19 January 2010, which was sent to the Council at that time, included the following intentions decided by the TRA Committees:

5. We will keep open the opportunity for investment from other landowners that could help deliver more affordable rented housing for those in need along with other benefits to the wider area.
10. Subject to any covenants made on transfer, a tenant led stock transfer would not preclude redevelopment: WKCH could enter into agreements with other landowners and developers that could lead to an increase in built development.

## **SECTION 6: REVIEW OF ESTATE REGENERATION – ECONOMIC OPTIONS APPRAISAL REPORT. EQUALITIES IMPACT ANALYSIS NOVEMBER 2011**

NB: The Economic Appraisal by Jones Lang Lasalle/ Amion Consulting is titled Economic Options Appraisal in the Cabinet Members' report and EqIA. Hence, this section of the review adopts Economic Options Appraisal (EOA) as the report's title.

### **1. BACKGROUND**

The decision taken by Hammersmith & Fulham Council's Cabinet's on 7 November 2011 to accept the conclusions of the Economic Options Appraisal (EOA) report supporting the proposed demolition and redevelopment of the West Kensington and Gibbs Green Estates relies on the findings of the Equalities Impact Analysis (EqIA) dated November 2011.

### **2. SUMMARY OF COMMENTS**

The EqIA is not a proper, fair or rational analysis of the equalities impacts of the Options that were identified in the Economic Options Appraisal report.

The EqIA's methodology for assessing the impacts of Options on protected equality characteristics is obfuscated from the outset; the key option is omitted; the most significant impacts are ignored; the selection of impacts is skewed and those that are identified are misconstrued; there are serious discrepancies in the assessments; and the scoring is perverse, leading consistently to an analysis that is biased against sustainable improvement under Options 1 and 2 and in favour of demolition and speculative redevelopment under Options 3(a) and (b) and 4.

These fundamental flaws tend overwhelming to produce an analysis of the impacts of the Options on protected equality characteristics that is spurious, which does not reflect the true impacts, and which is either irrational, or has been framed to bias the scores in favour of a predetermined preference for demolition and redevelopment.

The assessment of the Options' effects on human rights fails to identify the disadvantages faced by minority ethnic people seeking a fair trial; hides the Council's anti-democratic behavior; does not address the Act or identify disbenefits to the economy, the environment and the wellbeing of local residents; does not reveal the illegitimate motive to gain party electoral advantage; and uses 'regeneration' to disguise demolition, for which it provides no justification.

The assessment of the effects on children's rights is invalid as it relies entirely on the previous faulty analysis. The sections on the Council's Community Strategy and Single Equality Scheme don't supply any evidence that demolition would help achieve these policies' objectives. Nor does the EQIA supply any evidence that its preferred outcome would help achieve the duties in the Human Rights Act.

It is impossible to verify the social and occupation data that is relied on to justify demolition as the Council has failed to provide the Profile, despite several promises.

The description of the Council's engagement strategy and key messages from residents is a travesty of the truth, which studiously ignores the obvious fact that the overwhelming majority opposes demolition. The Council's instigation of a compliant client group and its failure to consult through the registered TRAs beaches council policy. The action plan fails to reduce adverse impacts.