

Earl's Court and West Kensington Opportunity Area Joint Supplementary Planning Document

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# CONSULTATION RESPONSES SCHEDULE: ESTATES REGENERATION ECONOMIC APPRAISAL

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**SPD Supporting Evidence Document: Estates Regeneration Economic Appraisal**

ID	First Name	Surname	Organisation Representing	Chapter comments relate to	Section comments relate to	Comment Made	Officer Response
1882	Jonathan	Rosenberg	WK/GG Community Homes, WK TRA, GG/Dieppe Close TRA	Estates Regeneration Economic Appraisal		17. The Estates Regeneration Economic Appraisal study has not been completed. The initial conclusions referred to in the SPD must therefore be revisited and potentially revised before a final draft of the SPD is issued for consultation. Any other sequence would be highly inappropriate.	No change necessary.  The Estate Regeneration Economic Appraisal study has been completed. It assessed the additional economic costs and benefits for the two boroughs of Hammersmith and Fulham and Kensington and Chelsea of five options (including a reference case) for the estates and the wider Earl's Court and West Kensington Opportunity Area.
1945	Jonathan	Rosenberg	WK/GG Community Homes, WK/GG TRAs	Estates Regeneration Economic Appraisal		The Economic Appraisal is an accompanying document to the revised Earl's Court/ West Kensington Opportunity Area Joint Supplementary Planning Document, November 2011, which says of the Economic Appraisal:  The initial conclusions are that estate regeneration as part of a wider Earl's Court masterplan development delivers the optimum benefits. LBHF, as landowner and being responsible for the estates as housing authority, has accepted and endorsed the conclusions contained within the Estates Regeneration Economic Appraisal, subject to the outcome of further consultation with local residents and any required consents from the Secretary of State.	Noted
1946	Jonathan	Rosenberg	WK/GG Community Homes, WK/GG TRAs	Estates Regeneration Economic Appraisal		The Economic Appraisal was also the subject of a decision taken by LBH&F Cabinet Members on 7 November 2011 and was used as the basis for an Equalities Impact Analysis.  The Economic Appraisal states:  AMION Consulting, in conjunction with Jones Lang LaSalle (JLL), has been appointed to prepare an Economic Appraisal Report to assist the London Borough of Hammersmith and Fulham (LBHF or the Council) in considering the possible inclusion of the West Kensington and Gibbs Green estates within a comprehensive phased scheme of regeneration for the Earl's Court and West Kensington Opportunity Area.	Noted.
1947	Jonathan	Rosenberg	WK/GG Community Homes, WK/GG TRAs	Estates Regeneration Economic Appraisal		The conclusion we reach at the end of these comments is that the Economic Appraisal is fundamentally flawed and cannot be relied on as a fair and proper assessment of the economic benefits and disbenefits of 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.	No change necessary  The Estate Regeneration Economic Appraisal is not considered to be 'fundamentally flawed'. It appraised a variety of options for the estates ranging from minimal intervention through to comprehensive regeneration as part of the Earl's Court and West Kensington Opportunity Area. The Economic Appraisal included analysis of the gross and net additional impacts associated with each option. It has informed the Council's decision, as planning authority, about the inclusion of the estates within the proposed comprehensive

						redevelopment scheme for the Earl's Court and West Kensington Opportunity Area. It has also been used to inform the current consultation document about whether or not to enter into a land sale agreement involving the West Kensington and Gibbs Green Estates.
1948	Jonathan	Rosenberg	WK/GG Community Homes, WK/GG TRAs	Estates Regeneration Economic Appraisal	<p>Our specific comments are listed following the structure of the report. However, we have the following general comments on the entirety of the document:</p> <p>1) There appears to have been no consultation whatever during its preparation with the 760 households living on the estate, including with any of the freehold or leasehold owners (including the housing associations which own 58 properties constructed in the last 10 years).</p>	<p>No change necessary</p> <p>The Council has been consulting extensively with residents of the estates over the past two years in order to understand the issues and concerns that they may have over the inclusion of the estates as part of comprehensive redevelopment of the Earl's Court and West Kensington Opportunity Area. The results of these consultations were reviewed as part of the Economic Appraisal.</p>
1949	Jonathan	Rosenberg	WK/GG Community Homes, WK/GG TRAs	Estates Regeneration Economic Appraisal	<p>Our specific comments are listed following the structure of the report. However, we have the following general comments on the entirety of the document:</p> <p>2) The document contains only minimal data about the estate itself to the extent that we cannot even be certain that the authors have ever visited it. There is no mention, for example, of the widely different built forms and design solutions on the estate, or indeed that there is any difference between the West Kensington and Gibbs Green estates, which are simply referred to as if they were interchangeable.</p>	<p>No change necessary</p> <p>The Economic Appraisal was informed by a number of site visits and various contextual analyses, including socio-economic data, market assessments and development appraisals.</p>
1950	Jonathan	Rosenberg	WK/GG Community Homes, WK/GG TRAs	Estates Regeneration Economic Appraisal	<p>Our specific comments are listed following the structure of the report. However, we have the following general comments on the entirety of the document:</p> <p>3) The document generally lists many subjective opinions masquerading as facts. It is written in a semi-formal passive rather than an active style in an attempt to give legitimacy (for example, the use of "it is considered that..." rather than the more straightforward "we think"). This makes it at times difficult to understand. Particularly confusing is the use of the term "regeneration" when what is meant is "demolition".</p>	<p>Change proposed. Options three and four will be amended to refer to 'redevelopment' rather than 'regeneration' to make this clearer.</p>
1951	Jonathan	Rosenberg	WK/GG Community Homes, WK/GG TRAs	Estates Regeneration Economic Appraisal	<p>Our specific comments are listed following the structure of the report. However, we have the following general comments on the entirety of the document:</p> <p>4) The document does not appear to pay any attention to phasing which of course with a massive scheme such as this will have enormous implications. In particular there is no attempt to take into account the fact that a scheme as large and complex as this is very unlikely to proceed smoothly in the current economic climate. The need and availability for development finance is neither identified nor risk-assessed, a stunning omission for an economic analysis written in the middle of the worst financial crisis since the 1930s.</p>	<p>No change necessary</p> <p>The Economic Appraisal analysis included an assessment of phasing, demand and viability in relation to each of the five options. A further assessment of deliverability will be considered as a part of any decision as to whether or not to include the estate within the comprehensive redevelopment scheme for the Opportunity Area.</p>
1952	Jonathan	Rosenberg	WK/GG Community Homes, WK/GG TRAs	Estates Regeneration Economic Appraisal	<p>Our specific comments are listed following the structure of the report. However, we have the following general comments on the entirety of the document:</p>	<p>No change necessary</p>

					5) Throughout it is not clear exactly what is being compared with what, possibly because the tables which back up the published data do not appear to be available and therefore cannot be interrogated. For example, the base data for crime statistics are not referenced, so it is impossible to assess whether the estates are high or low in incidents of current crimes, and therefore what difference is predicted or expected from the redevelopment options.	The socio-economic analysis was based on published Lower Layer Super Output Area data, together with information contained in a Council document (West Kensington and Gibbs Green Estates profiles) that has been supplied to Mr Rosenberg.
1953	Jonathan	Rosenberg	WK/GG Community Homes, WK/GG TRAs	Estates Regeneration Economic Appraisal	Our specific comments are listed following the structure of the report. However, we have the following general comments on the entirety of the document:  6) The document contains many unsubstantiated statements. Since these are generally not referenced, it is impossible to prove or disprove them. However, the lack of an evidence-based approach means, in our view, that this document should simply be ignored.	No change necessary  The Economic Appraisal is based upon a thorough review and analysis of evidence. It comprises a clear and logical assessment of the net additional impacts of the alternative options. Consequently, it has been used to inform the Council's decision.
1954	Jonathan	Rosenberg	WK/GG Community Homes, WK/GG TRAs	Estates Regeneration Economic Appraisal	[bold] 2. Overview [end bold]  1) Very little comment is made on the condition of the existing estates. The document states "the two estates suffer from discontinuous internal roads and poor quality open space".	No change necessary  The condition of the estates was considered as part of the Economic Appraisal. For example, it informed the analysis of future costs.  Currently the roads within the estates only lead to properties within the estates. Footfall is therefore limited and there is reduced natural surveillance. The benefits of including the estates within a comprehensive redevelopment scheme for the Opportunity Area are that the roads would connect through the Opportunity Area, increasing footfall and natural surveillance and help reduce fear of crime.
1955	Jonathan	Rosenberg	WK/GG Community Homes, WK/GG TRAs	Estates Regeneration Economic Appraisal	[bold] 2. Overview [end bold]  2) Taking the highway layout first, the current guidance is expressed in the DCLG/Department of Transport "Manual for Streets", published in 2007. This runs to some 140 pages and its very length demonstrates that street design is a complex subject. However, at no point is there a statement that discontinuous streets are in all cases a poor design solution, and indeed many recent private estates 'suffer' from the same problem.  Broadly, the guidance suggests "A clear distinction can be drawn between streets and roads. Roads are essentially highways whose main function is accommodating the movement of motor traffic. Streets are typically lined with buildings and public spaces, and while movement is still a key function, there are several others, of which the place function is the most important". Providing for movement along a street is vital, but it should not be considered independently of the street's other functions. The guidance suggests a place and movement matrix, with movement of primary importance on (for example)	No change necessary.  Although there is no explicit statement in the Manual for Streets (MfS) that "discontinuous streets are in all cases a poor design solution", it is implied throughout the document that a well connected, permeable network of streets is preferable. For example, at the beginning of the document it is identified that the "main changes in the approach to street design that MfS recommends are as follows: -creating networks of streets that provide permeability and connectivity to main destinations and a choice of routes" (page 13).  Far from considering movement independently of a street's other functions, connectivity and permeability are integral to place making. Connectivity and permeability encourage high numbers of street users, and this in turn contributes to animation, vitality and natural surveillance. As the famous American urbanist and sociologist William H Whyte pointed out "what attracts people most is other people". On page 67, MfS states that pedestrians generally feel safer from crime where "other people are using the street". In terms of a sense of feeling safe from crime, MfS also explains that pedestrians should not feel as though they can be surprised (e.g. at blind

					<p>motorways and arterial roads, and place of primary importance on residential streets. In this context, discontinuous internal roads can be seen as an asset, not a liability.</p>	<p>corners) and should not feel as if they can be trapped (e.g. people can feel nervous in places with few entry and exit points).</p> <p>As you point out, the Manual for Streets is keen to promote a movement hierarchy that prioritises pedestrians and cyclists over motor vehicles. However, it also repeatedly notes that discontinuous streets are unlikely to achieve this objective as they are inconvenient for cyclists and pedestrians who prefer direct routes to their destinations. For example, on page 16 of MfS it is explained that "attractive and well-connected permeable street networks encourage more people to walk and cycle to local destinations", on page 41 it is made clear that "street networks should, in general, be connected. Connected, or 'permeable', networks encourage walking and cycling, and make places easier to navigate through. They also lead to a more even spread of motor traffic throughout the area and so avoid the need for distributor roads with no frontage development. Research shows that there is no significant difference in collision risk attributable to more permeable street layouts" and on page 63 it says that "when designing for pedestrians or cyclists, some requirements are common to both:</p> <ul style="list-style-type: none"> <li>-routes should form a coherent network linking trip origins and key destinations, and they should be at a scale appropriate to the users". MfS goes on to emphasise that a well connected and permeable network of streets can reduce car use on page 45 where it is stated that "MfS encourages a reduction in the need to travel by car through the creation of mixed-use neighbourhoods with interconnected street patterns, where daily needs are within walking distance of most residents".</li> </ul> <p>Integral to prioritising pedestrians and cyclists is the MfS's focus on the importance of 'desire lines' (see page 28). Furthermore, MfS stresses that streets based on 'desire lines' should be well connected into the wider street network in order to serve the needs of all users who wish to travel from one destination to another. The discontinuous streets found in the housing estates in the OA, that only serve specific dwellings rather than connecting with the wider street network, do not respond to the desire lines of pedestrians or cyclists. Conditions such as this are highlighted on page 30 of MfS where it is stated that linkages should be established to ensure that a site is "swiftly integrated into its surrounding".</p> <p>Discontinuous streets also have the disadvantage of compromising visual permeability. In other words, they prevent street users from being able to see where they want to go. As MfS points out "sightlines and visibility towards destinations or intermediate points are important for pedestrian way-finding and personal security, and they can help people with cognitive impairment" (page 63).</p>
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					<p>There is some commentary on "cul-de-sac" type layouts in the MfS. Whilst it is acknowledged that, due to site constraints such as boundaries and topography, this may be the only suitable solution in some locations, the MfS states that the "typical cul-de-sac response creates an introverted layout which fails to integrate with its surroundings" (page 41). Please see figure 4.1 in the MfS which shows that a "typical cul-de-sac response" tends to comprise discontinuous internal streets. This is compared with a "more pedestrian friendly approach that integrates with the surrounding community. It links existing and proposed streets and provides direct routes to bus stops." (Page 41). A similar comparison is highlighted in figure 4.4 on page 44 of the MfS, which compares two illustrations, one of a "dispersed and car-dependent" layout, made up of discontinuous internal streets and one of a "traditional, compact and walkable layout" of connected and permeable streets.</p> <p>This commentary is continued on page 45 with a discussion of the problems found in terms of street layout in designs such as those in the housing estates within the OA. It is acknowledged that "several disadvantages have become apparent with housing developments built in the last 40 years which departed from traditional arrangements. Many have layouts that make orientation difficult, create left-over or ill-defined spaces, and have too many blank walls or façades. They can also be inconvenient for pedestrians, cyclists and bus users."</p> <p>Furthermore, on page 46 it is pointed out that "caution must, however, be exercised when planning for cul-de-sacs, as they may concentrate traffic impact on a small number of dwellings, require turning heads that are wasteful in land terms and lead to additional vehicle travel and emissions, particularly by service vehicles."</p> <p>MfS also points out that "well-connected street networks have significant advantages for service vehicles. A shorter route can be used to cover a given area, and reversing may be avoided altogether. They also minimise land-take by avoiding the need for wasteful turning areas at the ends of cul-de-sacs" (page 75) and that "wherever possible, routing [for waste vehicles] should be configured so that the refuse collection can be made without the need for the vehicle having to reverse, as turning heads may be obstructed by parked vehicles and reversing refuse vehicles create a risk to other street users" (page 97).</p> <p>Finally, in terms of existing streets, MfS explicitly states that urban designers have an obligation to "identify opportunities to repair incomplete or poor quality connections" (page 27).</p> <p>Please note that Manual for Streets is only one of numerous guidance</p>
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						documents that set out the standards and expectations for the design highway networks and it is recommended that they are read in conjunction with one another. For example, the Urban Design Compendium advocated the use of well connected street networks.
1956	Jonathan	Rosenberg	WK/GG Community Homes, WK/GG TRAs	Estates Regeneration Economic Appraisal	<p>[bold] 2. Overview [end bold]</p> <p>3) Having said this, it is difficult to see quite what is meant by 'discontinuous roads'. Thaxton Road provides vehicle access from North End Road to Aisgill Avenue and the southern part of West Kensington. Mund Steet provides vehicle access to the northern part of West Kensington and to Gibbs Green Estate and Dieppe Close. There is a set of bollards halfway up Aisgill Avenue, and there is a closed iron gate at the junction of Gibbs Green and Beaumont Crescent. These are a deliberate ploy to prevent rat-running and joyriding and could be reinstated at minimal cost if it was considered desirable for housing management reasons (which it is not). In any event, the presence of some bollards and a gate is very far from being a rational justification for demolishing 760 decent homes.</p>	<p>No change necessary. By the term 'discontinuous streets', the authorities are referring to dead-end streets that are terminated by buildings, rear gardens or incidental open space and therefore do not offer onward movement potential for street users. There is a number of such streets in the housing estates including:</p> <ul style="list-style-type: none"> <li>-Dieppe Close and Lerry Close, which both have traditional cul-de-sac layouts, terminated by buildings and vehicular turning circles;</li> <li>-Stanier Close, Bellamy Close, Ivatt Place, Thaxton Road and Marchbank Road, which all each terminated by incidental green spaces; and</li> <li>-Franklin Square, which ends at a courtyard parking area that leaves street users with no option other than to park or turn back on themselves.</li> </ul> <p>As you note, Thaxton Road does connect with Aisgill Avenue in one location, but it also leads into a spur road that is terminated at an incidental green space. It is therefore considered discontinuous. Again, whilst Mund Street does have a junction with Gibbs Green, it also has a discontinuous spur road that comes off it into a parking court that offers no onward connectivity.</p> <p>The deliberate obstructions that have been put in place to prevent rat running are not considered to create discontinuous streets. However, it should be noted that such methods of reducing vehicle speeds or restricting vehicular access are discouraged by Manual for Streets (and other Urban Design guidance). On page 87 it is stated that "ideally, designers should aim to create streets that control vehicle speeds naturally rather than having to rely on unsympathetic traffic-calming measures". Furthermore, it also states that "where it is necessary to break a road link in order to discourage through traffic, it is recommended that connectivity for pedestrians is maintained through the break unless there are compelling reasons to prevent it." (page 65)</p>
1957	Jonathan	Rosenberg	WK/GG Community Homes, WK/GG TRAs	Estates Regeneration Economic Appraisal	<p>[bold] 2. Overview [end bold]</p> <p>4) The statement concerning 'poor quality open space' is a purely subjective one not backed up by any evidence whatever – not even photographs of the offending areas. However, the estate as a whole betrays little or no obvious signs of poor management and disinterest amongst residents. So, for example, there is no discernable graffiti, no evidence of uncollected rubbish or dumped cars, play equipment in communal play areas is generally in excellent condition, and so on. The areas of open space already act as a useful 'open lung', are widely used for dog-walking, and provide a habitat for squirrels and birds in a dense urban area.</p>	<p>No change necessary. The statement concerning 'poor quality urban space' refers to the role of open space in the urban grain and layout of the estates rather than any vandalism or dumping. As the MfS states "high-quality open space is a key component of successful neighbourhoods." (page 57).</p> <p>In Urban Design terms the authorities have identified the following problems in relation to the layout of open space in the estates:</p> <ol style="list-style-type: none"> <li>1. there is no variety in open space types. In general, the only open space types provided are relatively small 'incidental green spaces' at the end of discontinuous roads. Pages 54 and 55 of the Urban Design Compendium address why a variety of open space types should be provided.</li> <li>2. the open spaces are not well connected to each other. As a result of the discontinuous internal street layout, the green spaces in the estates tend to be</li> </ol>



						<p>found at dead ends. They can therefore not be said to be either visually or physically well connected. Page 57 of the Urban Design Compendium sets out that "Open space networks are often more useful for visual amenity, recreational use and wildlife corridors than isolated and unrelated landscape elements"</p> <p>3. the open spaces are often not well overlooked and in many cases they confuse the important relationship between public fronts and private backs. As acknowledged in the Urban Design Compendium, it is crucial that public open spaces are well overlooked if they are to be used to their full potential. "Attractive spaces that are well lit and overlooked will be comfortable and safe by night as by day" (page 60, Urban Design Compendium) To achieve good overlooking, or 'natural surveillance' open spaces should be treated as integral, highly visible parts of a well connected and permeable street network and should have buildings fronting onto them. Many of the open spaces within the estates are bordered by the rear garden fences of surrounding dwellings. Not only does this significantly limit overlooking, it also confuses the important relationship between public fronts and private backs. The importance of this is acknowledged in both the Manual for Streets (see page 56) and in The Urban Design Compendium. The latter states that "the most fundamental requirement in structuring built form within development blocks is to make a clear distinction between public fronts and private backs. Buildings which front streets, squares and parks present their public face to the outside world and give life to it. Public fronts and private backs are made distinct when primary access is from the street, the principal frontage. Where this principle is not followed, stand-alone pavilion buildings often expose blank sides, car parking and rear servicing to the street" (page 64).</p> <p>4. the confusion between public fronts and private backs and the poor integration between the street layout and the open spaces can result in a perception that the open spaces within the estates are not public, again meaning that they are potentially underused.</p>
1958	Jonathan	Rosenberg	WK/GG Community Homes, WK/GG TRAs	Estates Regeneration Economic Appraisal	<p>[bold] 2. Overview [end bold]</p> <p>5) The estate does suffer from a lack of private defensible space in some areas, and there is some evidence of a lack of external building maintenance to some of the blocks. However, the estate is generally in reasonable condition for its age and inner London location and indeed is far better than many comparable estates. In any event, spaces can be made more defensible as part of the wider programme of improvements envisioned by residents, easily and for relatively little expenditure.</p>	Noted
1959	Jonathan	Rosenberg	WK/GG Community Homes, WK/GG TRAs	Estates Regeneration Economic Appraisal	<p>[bold] 2. Overview [end bold]</p> <p>6) Certainly there is no justification whatsoever for demolishing the estates on the grounds of poor physical condition or social disintegration (See testimony from Gibbs Green resident below).</p>	<p>No change necessary</p> <p>The Economic Appraisal does not seek to justify the regeneration of the estates purely on the grounds of poor physical and/or social condition. The Appraisal assesses the net additional benefits to the two boroughs of the inclusion or not of the estates within the proposed comprehensive regeneration scheme for the Opportunity Area.</p>
1960	Jonathan	Rosenberg	WK/GG Community Homes, WK/GG TRAs	Estates Regeneration Economic Appraisal	<p>[bold] 2. Overview [end bold]</p>	No change necessary

					<p>7) Generally we think the Economic Appraisal makes the mistake of recommending expensive physical solutions to management and maintenance problems. In other words, it presupposes that the answer to the problems of a deprived community is to demolish the homes they live in. There is a plethora of evidence from academic research and from experience that management and maintenance problems may simply reoccur in new buildings unless their root causes are dealt with. If the poverty of the occupants were to be used as the key criterion for deciding whether properties should be demolished, much of the country's housing stock would need to be destroyed!</p>	<p>The Economic Appraisal has assessed the costs and benefits associated with regeneration and redevelopment of the Earl's Court and West Kensington Opportunity Area. The focus is on the economic impacts of including the West Kensington and Gibbs Green Estates within a comprehensive phased scheme for the Opportunity Area.</p> <p>Appropriate management and maintenance of the stock forms part of each of the options appraised. The management and maintenance costs of the options have been considered and are included within the assessment of the net present value.</p>
1961	Jonathan	Rosenberg	WK/GG Community Homes, WK/GG TRAs	Estates Regeneration Economic Appraisal	<p>[bold] Background to regeneration [end bold]</p> <p>1) The West Kensington and Gibbs Green estates ('the estates' hereinafter) are between 40 and 50 years old. As such, given that there has been almost no new Council house construction since the mid-1980s, they are likely to be amongst the 'younger' buildings in the stock of LBHF. This is doubtless one of the reasons why, as the report acknowledges, "they remain relatively popular with a number of residents".</p>	Noted
1962	Jonathan	Rosenberg	WK/GG Community Homes, WK/GG TRAs	Estates Regeneration Economic Appraisal	<p>[bold] Background to regeneration [end bold]</p> <p>2) Whilst it is a statement of the obvious that buildings tend to require more maintenance as they get older, the statement that "the management and maintenance costs incurred by the Council are expected to increase above that for modern Council owned properties" is not backed by any evidence - not surprisingly given that there are so few of the latter to act as a comparator. This is of course even truer of the 58 housing association homes which are 'nearly new'. Similarly the statement that the "average cost per dwelling of the estate is above the average figure for LBHF housing estates" is not substantiated. There is no analysis of the costs of management and maintenance improvements in any of the options, nor of whether LBHF costs compare favourably (or not) with those of other landlords managing similar housing stock. Similarly, the fact many millions have been spent on the Decent Homes Programme on the estate (including new kitchens and bathrooms, new windows and doors, new roofs, lift refurbishment, etc.) is not even mentioned.</p>	<p>No change necessary</p> <p>The estimated management and maintenance costs are included within the Economic Appraisal. The average cost per dwelling as compared with other dwellings in the Borough has been assessed using Council records of costs incurred. The Council acknowledges that Decent Homes Funds have been spent on the estates and this is accounted for in estimates of future maintenance and management costs. This is one of a range of considerations included within the Economic Appraisal.</p>
1963	Jonathan	Rosenberg	WK/GG Community Homes, WK/GG TRAs	Estates Regeneration Economic Appraisal	<p>[bold] Background to regeneration [end bold]</p> <p>The Economic Appraisal seeks to justify demolition on the woolly grounds of "design obsolescence resulting from increasing housing standards". The following testimony, contained in a response (12 December 2011) to the revised SPD, is from a leaseholder who lives on the Gibbs Green Estate:</p> <p>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. ....</p>	<p>No change necessary</p> <p>The condition of the stock was one of a range of issues considered within the appraisal. The justification for the proposed inclusion of the estates within the comprehensive redevelopment is the overall net benefits to the two boroughs associated with the Earl's Court and West Kensington Opportunity Area Scheme.</p>

					<ul style="list-style-type: none"> <li>- 65 sq m of space, including a separate kitchen, hall and upstairs landing</li> <li>- solid concrete and brick construction, good soundproofing</li> <li>- large windows in all rooms, front and back</li> <li>- a balcony big enough to seat two people and dry all your washing</li> <li>- first floor convenience</li> <li>- 200 metres from West Kensington station</li> <li>- very close to useful local shops</li> <li>- no traffic outside front or back, pleasant views</li> <li>- free parking</li> <li>- long-established and friendly neighbours</li> </ul> <p>Why on earth should residents of such a high-quality estate agree to have their homes demolished?</p> <p>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?</p>	
1964	Jonathan	Rosenberg	WK/GG Community Homes, WK/GG TRAs	Estates Regeneration Economic Appraisal	<p>[bold] Background to regeneration [end bold]</p> <p>3) Overcrowding is claimed to be slightly above the borough average. Conversely, "an assessment by the Council has also shown that there</p>	<p>No change necessary</p> <p>It is acknowledged that effective management can address issues of overcrowding and under-occupancy. However, the focus of the Economic</p>

					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.	Appraisal is on the net additional economic benefits to the two boroughs associated with the inclusion or otherwise of the estates within the redevelopment options for the Opportunity Area.
1965	Jonathan	Rosenberg	WK/GG Community Homes, WK/GG TRAs	Estates Regeneration Economic Appraisal	<p>[bold] Background to regeneration [end bold]</p> <p>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 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.</p>	<p>No change necessary</p> <p>The Economic Appraisal indicates that there is a rationale for estate redevelopment.</p> <p>Comprehensive redevelopment of the Opportunity Area, which will be facilitated by the inclusion of the estates, will generate significant net additional benefits to the two Boroughs which for local residents can benefit from.</p> <p>The Council would be willing to pursue options for local ownership following redevelopment.</p>
1966	Jonathan	Rosenberg	WK/GG Community Homes, WK/GG TRAs	Estates Regeneration Economic Appraisal	<p>[bold] Background to regeneration [end bold]</p> <p>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).</p>	<p>No change necessary</p> <p>The majority of residents will not be offered alternative accommodation on the Seagrave Road site. The current proposal is to provide 25% of the total housing on Seagrave Road as replacement housing.</p>
1967	Jonathan	Rosenberg	WK/GG Community Homes, WK/GG TRAs	Estates Regeneration Economic Appraisal	<p>[bold] 3. Alternative Options [end bold]</p> <p>[underline] Option 1 [end underline] - 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</p>	<p>No change necessary</p> <p>Options 1 and 2 included the potential for improvements and infill development, such as those proposed under the residents' community transfer.</p>

					<p>of improvements that certainly included physical improvements (see below in Section 2 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.</p> <p>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.</p>	
1968	Jonathan	Rosenberg	WK/GG Community Homes, WK/GG TRAs	Estates Regeneration Economic Appraisal	<p>[bold] 3. Alternative Options [end bold]</p> <p>[underline] Option 2 [end underline] - 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:</p> <ul style="list-style-type: none"> <li>- One and two-bedroom flats in 5 tall blocks of nine, ten and eleven storeys (388 homes)</li> <li>- Maisonettes in four and five storey 'walk-up' blocks on the Gibbs Green estate, mostly of 2 and 3 bedrooms (98 homes)</li> <li>- Maisonette blocks facing directly onto North End Road and Marchbank Road (75 homes)</li> <li>- Nearly new housing association stock, mostly 3 and 4 bedroom houses (58 homes)</li> <li>- Houses built by the Council on the West Kensington estate (141 homes, 30 of which have been sold freehold)</li> </ul> <p>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.</p>	<p>No change necessary</p> <p>As part of the Economic Appraisal, various development appraisal and cost models have been prepared, based upon site/estate specific analyses.</p>
1969	Jonathan	Rosenberg	WK/GG Community Homes, WK/GG TRAs	Estates Regeneration Economic Appraisal	<p>[bold] 3. Alternative Options [end bold]</p> <p>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</p>	<p>No change necessary.</p> <p>Options 1 and 2 included the potential for improvements and infill</p>

					significant physical changes, could deliver infill development, and might even involve wider redevelopment.	development, such as those proposed under the residents' community transfer.
1970	Jonathan	Rosenberg	WK/GG Community Homes, WK/GG TRAs	Estates Regeneration Economic Appraisal	<p>[bold] 3. Alternative Options [end bold]</p> <p>[underline] Options 3(a) and 3(B)[end underline] - 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.</p>	<p>No change necessary.</p> <p>The new replacement dwelling size mix would be according to need on the estates at the time redevelopment occurred.</p> <p>The development brief for Option 3 (a) is based on average densities and height restrictions applied to the Estates land, consistent with liaison with LBH&amp;F planning department.</p> <p>Option 3 (b) represents the same densities but is provided by means of a cost sensitivity which assumes that the standalone scheme does not need to reconcile the levels differential across the estates and there is therefore non-compliant with one of the key requirements of the SPD. This key assumption under Option 3 (b) therefore represents a lower infrastructure cost.</p>
1971	Jonathan	Rosenberg	WK/GG Community Homes, WK/GG TRAs	Estates Regeneration Economic Appraisal	<p>[bold] 4. Economic benefits [end bold]</p> <p>A.[underline] Residential Units [end underline]</p> <p>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.</p>	<p>No change necessary.</p> <p>The table in paragraph 4.2.1 of the Economic Appraisal refers to the whole of the Opportunity Area, including the Earls Court and Seagrave Road sites (the Capco site). This makes it difficult to interpret in relation to our work, that did not involve the Capco site, on which a consistent 1,824 units of various tenures would be delivered.</p> <p>The table shows "New Affordable" referring to newly-built affordable housing of various tenures, in line with current planning policy and market practice.</p> <p>Under Option 1, all the "New Affordable" homes (284 homes) shown would be on either the Capco site, or on council-owned land not forming part of the two Estates. For the council-owned land, we have taken into account land receipts from new developments of affordable homes, including a mix of Affordable Rent and intermediate. We did not model the unit mix on the Capco site.</p> <p>Under Option 2, both development on the Capco land, council-owned land and infill development within the two Estates are included (341 homes). On both the council-owned land and infill sites, we again assumed land receipts reflecting a mix of Affordable Rent and intermediate homes. As above, we did not model the unit mix on the Capco site.</p> <p>Under Options 3a and 3b, involving comprehensive estate regeneration, we have assumed that existing Council and housing association homes (including the former RTB units) would be re-provided, but that all additional homes</p>

						<p>would be for private sale. There would therefore be no Affordable Rent homes on the site of the two Estates. We cannot comment on the assumed tenure in the 1,824 units on the Capco land.</p> <p>It is correct that the existing local authority homes are assumed to continue to be let at social rents, under all options.</p>
1972	Jonathan	Rosenberg	WK/GG Community Homes, WK/GG TRAs	Estates Regeneration Economic Appraisal	<p>[bold] 4. Economic benefits [end bold]</p> <p>A.[underline] Residential Units [end underline]</p> <p>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.</p>	<p>No change necessary.</p> <p>Under Options 3a and 3b, involving comprehensive estate redevelopment, we agree that the increase in the total number of homes will be largely made up of private homes.</p> <p>However, private homes still represent a legitimate part of meeting local housing need, as the housing stock in the Borough is insufficient to meet current and projected demand. Moreover, 789 (24%) of the total number of homes under both options would be affordable.</p> <p>In relation to the provision of affordable housing, Option 4 has mind to local policy but also the wider financial constraints involved in delivering the comprehensive site development of the Opportunity area.</p> <p>Options 4 adopts the same assumptions as Options 1 &amp; 2 with regards to in-fill development outside of the estates. Once the existing units have been re-provided, the residual development capacity is utilised for private market housing. This is driven by the commercial need to maximise value outside of the re-provision and has been the basis of the discussion between CapCo and LBH&amp;F regarding the active application.</p>
1973	Jonathan	Rosenberg	WK/GG Community Homes, WK/GG TRAs	Estates Regeneration Economic Appraisal	<p>[bold] 4. Economic benefits [end bold]</p> <p>A.[underline] Residential Units [end underline]</p> <p>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.</p>	<p>Please see our comments under 1972. In addition under Options 3 (a) &amp; 3 (b) we have assumed that additional housing within the estates and outside the re-provision of existing units will be utilised for private housing. Both Options 3 (a), 3 (b) and 4 could provide additional affordable units but this would result to a reduced land receipt. Again due to the capital costs in delivering these options and the obligation to re-provide the existing units - the level of 'new affordable' dwellings has been set accordingly.</p> <p>Option 1 involves in-fill development within an existing social housing estate. The nature of this option yields a higher amount of 'new affordable' due to the limited market opportunity to provide private housing on this in-fill approach</p>

					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.	
1974	Jonathan	Rosenberg	WK/GG Community Homes, WK/GG TRAs	Estates Regeneration Economic Appraisal	<p>[bold] 4. Economic benefits [end bold]</p> <p>B. [underline] Employment Impacts [end underline]</p> <p>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:</p> <ul style="list-style-type: none"> <li>- What time period this would be over (as there is no information on phasing)</li> <li>- Whether the jobs which would be lost during the development period (which could easily be up to 20 years) have been netted off</li> <li>- How this has been related to the expected performance of the London economy as a whole in the period</li> <li>- 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).</li> </ul> <p>In the 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 optimistic in the extreme.</p>	<p>No change necessary.</p> <p>The Economic Appraisal has assessed the potential phasing of development and jobs. As stated in the Economic Appraisal, the development is assumed to take place over 18 years.</p> <p>The Economic Appraisal takes account of displacement (i.e. it nets off jobs that might be lost).</p> <p>In terms of the London economy, the market assessment considered the economic prospects for London. Over the longer term employment is forecast to continue to grow significantly.</p> <p>Allowance has also been made for permanent job losses through the assessment of displacement and deadweight. [Earl's Court].</p> <p>In terms of occupancy rates, the average vacancy rate for retail accommodation in Greater London is [6.5%] and for offices in West London is 8.2%. In relation to the hotels, the occupancy rate refers to the assumption that they will open and trade and not to the level of room/bed occupancy. The employment density assumptions used for hotels take account of room/bed occupancy.</p>
1975	Jonathan	Rosenberg	WK/GG Community Homes, WK/GG TRAs	Estates Regeneration Economic Appraisal	<p>5. [bold] Conclusion [end bold]</p> <p>Our conclusion, therefore, is that the Economic Appraisal suffers from:</p> <ul style="list-style-type: none"> <li>- A lack of detail and evidence for its conclusions, which appear to be</li> </ul>	<p>No change necessary.</p> <p>The Economic Appraisal has been based upon analyses/evidence including socio-economic, economic and financial modelling and market assessments.</p>



					based on a plethora of subjective opinions masquerading as 'facts'	The Economic Appraisal is based upon a thorough review and analysis. It comprises a clear and logical assessment of the net additional impacts of the alternative options.
1976	Jonathan	Rosenberg	WK/GG Community Homes, WK/GG TRAs	Estates Regeneration Economic Appraisal	5. [bold] Conclusion [end bold]  Our conclusion, therefore, is that the Economic Appraisal suffers from:  - An obvious ignorance of the character of the estates and the published aspirations of their occupants	No change necessary.  The Economic Appraisal has had regard to the various proposals (including those of local residents) for the area. Its focus is on the net additional benefits to the two boroughs of the inclusion or not of the estates within the proposed comprehensive regeneration scheme for the Earl's Court and West Kensington Opportunity Area.
1977	Jonathan	Rosenberg	WK/GG Community Homes, WK/GG TRAs	Estates Regeneration Economic Appraisal	5. [bold] Conclusion [end bold]  Our conclusion, therefore, is that the Economic Appraisal suffers from:  - A lack of transparency about how figures are arrived at and a failure to properly define ambiguous terms	No change necessary.  The Economic Appraisal presents the key assumptions and results of the analyses. Technical terms, such as those associated with additionality, are defined in the document.
1978	Jonathan	Rosenberg	WK/GG Community Homes, WK/GG TRAs	Estates Regeneration Economic Appraisal	5. [bold] Conclusion [end bold]  Our conclusion, therefore, is that the Economic Appraisal suffers from:  - An irrational justification for demolition based on spurious grounds	No change necessary.  The identification of the comprehensive redevelopment scheme for the Opportunity Area as the best option is based on a clear analysis of the economic case. Consequently, the report recommends that the Council focuses on progressing this option from an economic perspective. . The decision whether the Council, as housing authority wish to include the estates within any development proposals would need to be informed by a consultation with the estates' residents..
1979	Jonathan	Rosenberg	WK/GG Community Homes, WK/GG TRAs	Estates Regeneration Economic Appraisal	5. [bold] Conclusion [end bold]  Our conclusion, therefore, is that the Economic Appraisal suffers from:  - A failure to fairly and properly assess the residents' community transfer option	No change necessary.  Options 1 and 2 included the potential for improvements and infill development, such as those proposed under the residents' community transfer.
1980	Jonathan	Rosenberg	WK/GG Community Homes, WK/GG TRAs	Estates Regeneration Economic Appraisal	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.	The Estate Regeneration Economic Appraisal is not considered to be 'fundamentally flawed'. It appraised a variety of options for the estates ranging from minimal intervention through to comprehensive regeneration as part of the Earl's Court and West Kensington Opportunity Area. The Economic Appraisal included analysis of the gross and net additional impacts associated with each option. It has informed the Council's decision about the inclusion of the estates within the proposed comprehensive regeneration scheme for the Earl's Court and West Kensington Opportunity Area. It has also been used to inform the current consultation document about whether or not to enter into a land sale agreement involving the West Kensington and Gibbs Green Estates.
1981	Jonathan		WK/GG	Estates Regeneration	[bold] EFFECTIVENESS - CONTRIBUTION TO SCHEME	No change necessary.

		Rosenberg	Community Homes, WK/GG TRAs	Economic Appraisal	<p>OBJECTIVES</p> <p>Alternative consideration of benefits and disbenefits [end bold]</p> <p>1.[bold] The Options in the Economic Appraisal [end bold]</p> <p>The Economic Appraisal identifies five options:</p> <p>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.</p> <p>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;</p> <p>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;</p> <p>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;</p> <p>Option 3(b): Comprehensive regeneration: standalone estate</p>	Options 1 and 2 included the potential for improvements and infill, such as those proposed under the resident's community transfer.
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				<p>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</p> <p>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.</p> <p>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".</p> <p>Option 2 involves the Council retaining the estates and taking up opportunities for infill development.</p> <p>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).</p> <p>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.</p>	
1982	Jonathan	Rosenberg	WK/GG Community Homes, WK/GG TRAs	<p>Estates Regeneration Economic Appraisal</p> <p>2. [bold] Contribution to scheme objectives [end bold]</p> <p>The Economic Appraisal states:</p> <p>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)</p>	Noted.

					Table 4.6 is headed "Effectiveness - contribution to scheme objectives".	
1983	Jonathan	Rosenberg	WK/GG Community Homes, WK/GG TRAs	Estates Regeneration Economic Appraisal	<p>[bold] 3. Alternative consideration [end bold]</p> <p>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.</p> <p>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.</p> <p>[Table 1 affixed]</p>	<p>No change necessary.</p> <p>Options 1 and 2 included the potential for improvements and infill, such as those proposed under the resident's community transfer.</p>
1984	Jonathan	Rosenberg	WK/GG Community Homes, WK/GG TRAs	Estates Regeneration Economic Appraisal	<p>On 8 December 2009, the West Kensington &amp; Gibbs Green TRAs published the following vision to residents in their newsletter:</p> <p>[bold] How we would improve our homes and community [end bold]</p> <p>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. [bold] This is what would happen if we took over our homes: [end bold]</p> <p>✓ 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.</p>	Noted.
1985	Jonathan	Rosenberg	WK/GG Community Homes, WK/GG TRAs	Estates Regeneration Economic Appraisal	<p>On 8 December 2009, the West Kensington &amp; Gibbs Green TRAs published the following vision to residents in their newsletter:</p> <p>[bold] How we would improve our homes and community [end bold]</p> <p>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. [bold] This is what would happen if we took over our homes: [end bold]</p>	Noted.

					<p>✓ 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. [bold] Things would be dealt with straightaway by people we know, from an office round the corner. [end bold]</p>	
1986	Jonathan	Rosenberg	WK/GG Community Homes, WK/GG TRAs	Estates Regeneration Economic Appraisal	<p>On 8 December 2009, the West Kensington &amp; Gibbs Green TRAs published the following vision to residents in their newsletter:</p> <p>[bold] How we would improve our homes and community [end bold]</p> <p>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. [bold] This is what would happen if we took over our homes: [end bold]</p> <p>✓ 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.</p>	Noted.
1987	Jonathan	Rosenberg	WK/GG Community Homes, WK/GG TRAs	Estates Regeneration Economic Appraisal	<p>On 8 December 2009, the West Kensington &amp; Gibbs Green TRAs published the following vision to residents in their newsletter:</p> <p>[bold] How we would improve our homes and community [end bold]</p> <p>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. [bold] This is what would happen if we took over our homes: [end bold]</p> <p>✓ 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.</p>	Noted.
1988	Jonathan	Rosenberg	WK/GG Community Homes,	Estates Regeneration Economic Appraisal	<p>On 8 December 2009, the West Kensington &amp; Gibbs Green TRAs published the following vision to residents in their newsletter:</p>	Noted.

			WK/GG TRAs		<p>[bold] How we would improve our homes and community [end bold]</p> <p>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. [bold] This is what would happen if we took over our homes: [end bold]</p> <p>✓ 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.</p>	
1989	Jonathan	Rosenberg	WK/GG Community Homes, WK/GG TRAs	Estates Regeneration Economic Appraisal	<p>On 8 December 2009, the West Kensington &amp; Gibbs Green TRAs published the following vision to residents in their newsletter:</p> <p>[bold] How we would improve our homes and community [end bold]</p> <p>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. [bold] This is what would happen if we took over our homes: [end bold]</p> <p>✓ 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.</p>	Noted.
1990	Jonathan	Rosenberg	WK/GG Community Homes, WK/GG TRAs	Estates Regeneration Economic Appraisal	<p>On 8 December 2009, the West Kensington &amp; Gibbs Green TRAs published the following vision to residents in their newsletter:</p> <p>[bold] How we would improve our homes and community [end bold]</p> <p>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. [bold] This is what would happen if we took over our homes: [end bold]</p>	Noted.

					<p>✓ 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. [bold] All the money collected would be spent looking after the estates and improving our community. [end bold]</p>	
1991	Jonathan	Rosenberg	<p>WK/GG Community Homes, WK/GG TRAs</p>	<p>Estates Regeneration Economic Appraisal</p>	<p>The Submission from the West Kensington &amp; Gibbs Green Estates Tenants &amp; Residents Associations to the Secretary of State for Communities &amp; 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:</p> <p>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.</p> <p>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.</p>	<p>Noted.</p>