

## Part One

# The Campaign for St. Raphael's Estate

Social, Economic and Policy Contexts



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Aerial view looking north-west to St. Raphael's council estate (*outlined in red*), London Borough of Brent. © Google Earth

# 1. Introduction

St. Raphael's estate is built on land between the North Circular Road and the River Brent in the locality of Neasden, North-west London. The housing is a mix of maisonettes in 4-storey blocks, 3-storey town-houses, flats in 3-storey blocks and bungalows. According to Brent Council's 'Housing Options Appraisal' for St. Raphael's estate, which was published in November 2018, these provide 1,147 homes for over 4,000 residents.<sup>1</sup> 648 of these homes are for social rent, and 158 are leaseholder properties acquired under the Right to Buy; all 806 properties of these properties are owned and run by Brent Housing Management. In addition, there are 322 privately-owned properties, two-thirds of which are among the older houses that line the North Circular to the east, which is known locally as the 'Old Estate'; plus a further 19 homes owned by Network Homes housing association. In addition to these residential properties, the estate has a day nursery and pre-school; a state school for children with special needs aged 4-11; a children's centre, now run by the Barnardo's children's charity, that was previously the residents' community hall; a charity food bank and kitchen for refugee support and homelessness; gardening allotments and children's playgrounds; a largely closed-down parade of shops and commercial units; a church and a former police station now used as meeting rooms by the Residents Association.

The St. Raphael's estate of today was built over two widely separate periods, which Brent Council, as part of its regeneration plans, has divided into Areas A, B and C (*overleaf*). The mostly terraced housing on the Old Estate (Areas B and C) were completed between 1918 and 1938; while the 27 residential blocks on the New Estate (Area A) were built between 1967 and 1982. These different areas have been mapped by the Council's architectural consultants, Karakusevic Carson Architects (KCA), whose calculation of the number of homes on St. Raphael's estate, however, published in November 2019, differs from that provided by Brent Council (1,140 homes rather than 1,147).<sup>2</sup>



In April 2019, Architects for Social Housing was contacted by residents from St. Raphael's estate asking for advice on resisting the demolition and redevelopment of their homes, which is the regeneration option favoured by Brent Council. Since ASH is contacted on a regular basis for such help, we suggested residents first view our film, *The Costs of Estate Regeneration*, which summaries our report of the same name.<sup>3</sup> This is a quick way of introducing residents to what they are facing and how ASH might be able to help them. Residents' response to the film also gives us an idea of the strength of their campaign and their commitment to fighting the combined power of the Council, its private development partners and their contractors, without which any help we can give them is limited.

# St Raphael's - Building Typologies

KEY

St Raphael's Estate (Area A)

Terrace Houses	
Block of Flats	
Bungalows	
Maisonettes	
Total	759 Homes
Area	21.4 ha
Density	35.5 u/ha

The Old Estate (Area B)

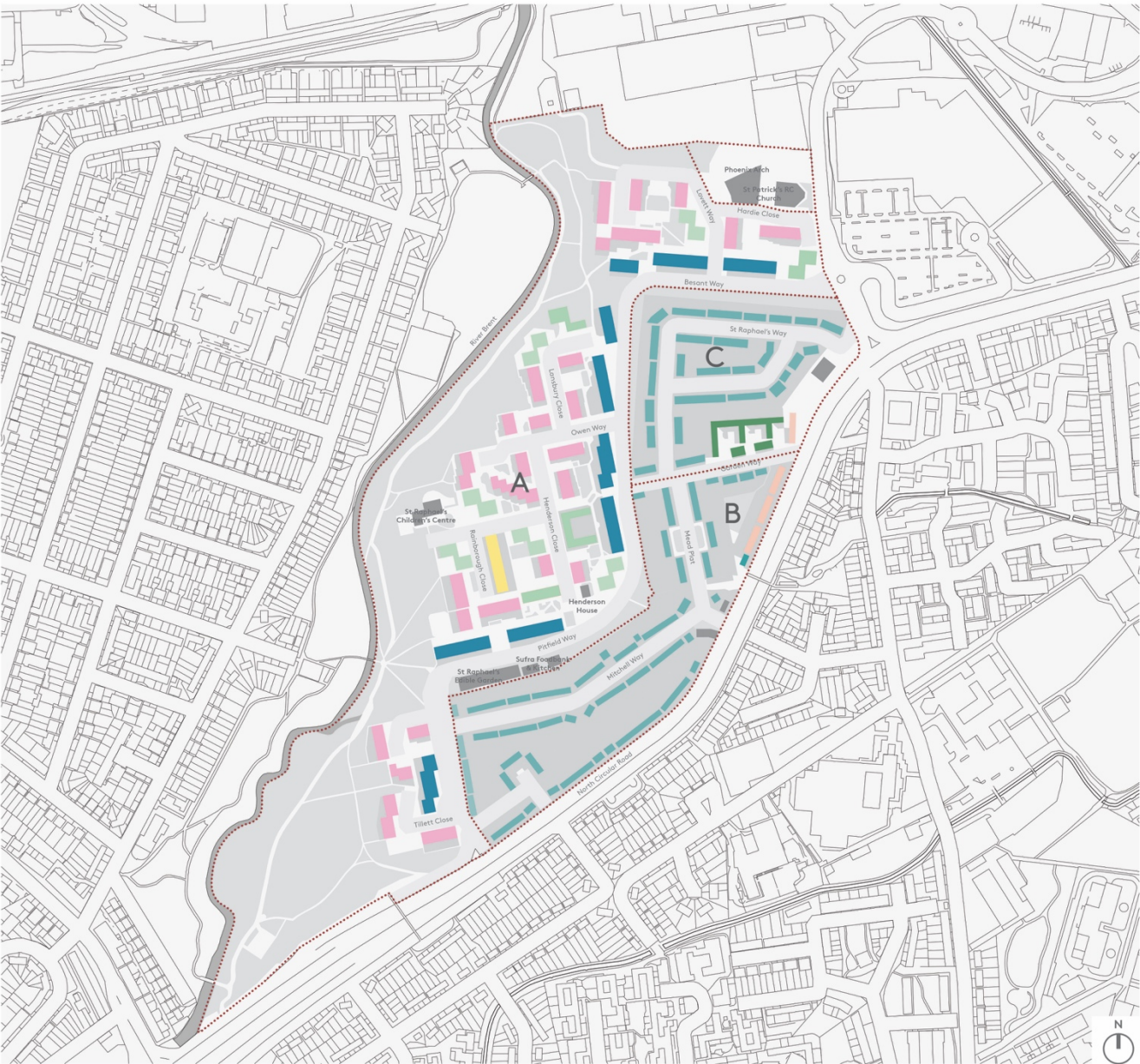
Houses	
Terrace Houses (Deck Access)	
Block of Flats	
Total	220 Homes
Area	6.7 ha
Density	32.8 u/ha

The Old Estate (Area C)

Houses	
Total	161 Homes
Area	4.2 ha
Density	38.3 u/ha

St Raphael's Estate (A) and The Old Estate (B & C)

Total	1140 Homes
Area	32.1 ha
Density	35.5 u/ha



*simply because it's profitable to the investors who are leading us into an uncertain future.'*

**ST RAPHAEL'S ESTATE RESIDENTS PETITION**  
**WE WANT TO STAY IN OUR HOMES**  
**NO TO REDEVELOPMENT/DEMOLITION**

AFTER CAREFUL CONSIDERATION OF THE PROPOSED PLANS FOR ST. RAPHAEL'S EST. BY BRENT COUNCIL. WE THE RESIDENTS WOULD PREFER TO STAY IN OUR HOMES AND CONTINUE LIVING IN OUR COMMUNITY & NOT TO BE MOVED.  
WE THE UNDERSIGN RESIDENTS CHOOSE THE FOLLOWING PLAN:  
REFURBISHMENT WITH INFILLS (LIMITED NEW BUILD ONLY) AND WITH RESIDENTS INVOLVEMENT - NOT REDEVELOPMENT.

[illegible]

**TO: BRENT COUNCIL, THE MAYOR'S OFFICE AND MP FOR BRENT CENTRAL & RELEVANT PARTIES**

*'Although St. Raphael's estate is portrayed as an unpleasant place, this is wrong. There is a strong, united community here which does not want to be separated from their families, stripped of the place they have called home for so long, moved away from neighbours, friends and family,*

At the time of writing, the residents' online petition had collected 296 signatures, and the paper version had received over 600 signatures. This is many times the figures attained by Karakusevic Carson Architects, even with the hundreds of thousands of pounds in funding they and the other consultants have received from Brent Council to push forward the demolition of the estate. Indeed, in the more than two-dozen consultations and events held between the summer of 2018 and autumn 2021, no event has attracted more than 180 residents, with most drawing between 60 and 90, from a total estate population of around 4,000 residents.<sup>5</sup> This lack of engagement not only does not meet the requirement, under Section 105 of the Housing Act 1985, for the council to consult with tenants who are likely to be substantially affected by matters of housing management; but it also indicates the strength of resident opposition to the council's plans, and the failure of Brent Council and its consultants to achieve anything close to a consensus from the St. Raphael's estate community.

That same month, October 2019, at the invitation of Murray Fraser, Professor of Architecture and Global Culture and then Vice-Dean of Research at the Bartlett School of Architecture, University College London, ASH presented our proposals for a design case study of a part of St. Raphael's estate to the Centre for London Urban Design (CLOUD), a design research project being funded by the European Union to investigate comparative proposals for 'socially-mixed housing' in London and Gothenburg.<sup>6</sup> This case study proposed to explore and demonstrate the possibilities for the refurbishment of the existing homes on St. Raphael's estate, increasing its housing capacity through infill development and roof extensions, together with improvements to the community facilities and landscape.

At the end of the year, in December 2019, Brent Council announced that it had revised its plans for St. Raphael's estate. Instead of demolishing the entire estate according to the phased plan that had been sent to residents and passed on to ASH, it was now only proposing to demolish the western part of the estate (Area A).<sup>7</sup> This contains 760 homes, comprised of 522 council tenancies, 219 leaseholder and freeholder properties, and 19 housing association properties owned by Network Homes. We'll return later to what

motivated this decision, and what it told us about Brent Council's motivations for the redevelopment of St. Raphael's estate.

#### St Raphael's - Red Line Boundary



In February 2020, at the invitation of the campaign to save St. Raphael's estate from demolition by Brent Council, Architects for Social Housing gave a presentation to residents of the estate, at a meeting held in St. Patrick's Church (*opposite*), which is located on the northern edge of the estate.<sup>8</sup> At the start of the meeting we asked for a show of hands, and we counted 64 residents from St. Raphael's estate present, although more arrived over the next two hours, making roughly 80 attendants. In addition, we had with us the following work group:

- Geraldine Denning, Lead architect, Architects for Social Housing
- Dr. Simon Elmer, Head of research, Architects for Social Housing
- Julika Gittner, Architect and Design Fellow, University of Cambridge, and PhD researcher, University of Cardiff
- Leonie Weber, Architectural assistant, Architects for Social Housing
- Ben Corbett, Architectural technician, Architects for Social Housing

- Professor Murray Fraser, Professor of architecture, Bartlett School of Architecture
- Dr. Eva Branscombe, Teaching fellow, Bartlett School of Architecture
- Andrea Vasilcin, Architectural assistant, Architectural Association
- Tiffany Hoi Man Cheung, Researcher, Architectural Association
- Janusz Moore, Architectural assistant, Leicester School of Architecture
- Dr. Adriana Massidda, Architect and lecturer, De Montfort University, and Researcher, Down to Earth
- Raha Farazmand, Architect
- Jack Sweet, Architectural assistant
- Sonia Theodosiadi, Landscape architect
- Joseph Asghar, Filmmaker
- Alessia Gammarota, Photographer

Unable to attend the meeting that evening, but working with ASH on this project were:

- Catriona Casey, Architect
- Olande Onitiju, Architectural assistant, Leicester School of Architecture
- Jake McLean, Architectural assistant
- Sam Willis, Architectural assistant
- Robert Wills, Architectural assistant
- Maja Klich, Architectural assistant
- Can Ozerdem, Architectural assistant, De Montfort University, and Researcher, Down to Earth
- Isabel Why, Environmental designer, Model Environments
- Harry Westaway, Environmental designer, Model Environments
- Robert Martell, Quantity surveyor, Robert Martell and Partners
- Peter Miles, Quantity surveyor, Robert Martell and Partners
- Louise Verth and Team, OneNinety Manufacturing
- Tom Robertshaw, Structural engineer, GL&SS — Glass Light and Special Structures

In addition, we had testimony about the demolition and redevelopment of the South Kilburn estate by Brent Council from:

- Pete Firmin, Chair of the Alpha, Gorfield, and Canterbury Tenant and Resident Association



The information we shared that evening, which has not been made available to residents of St. Raphael's estate by either Brent Council or its consultants, including KCA and PPCR, has been researched from the following sources:

- Brent Council
- Karakusevic Carson Architects (KCA)
- Public Participation Consultation and Research (PPCR)
- Deloitte financial services
- Strutt & Parker estate agency
- UK Government
- House of Commons Library
- Office for National Statistics
- Government Building Standards Regulations
- The Crime and Disorder Act 1998
- The Housing Act 1985
- The Housing Act 1988

- The Equality Act 2010
- The Housing and Planning Act 2016
- The Mayor of London
- The Greater London Authority
- Government Indices of Deprivation
- Child Poverty Action Group
- HomeOwners Alliance
- Chartered Institute for Housing
- *Brent & Kilburn Times*
- *Hackney Gazette*
- *Architects' Journal*
- *Building Design*
- *The Guardian*
- *The Times*
- *Evening Standard*

At this meeting, Asif Zamir, the Chair of St. Raphael's Voice — the resident/leaseholder/stakeholder board appointed by PPCR to push through the demolition and redevelopment of the estate — together with a resident employed by Karakusevic Carson Architects to record events, did their best to disrupt our presentation. This included interrupting speakers, shouting down other residents, generally behaving aggressively, and also of accusing ASH of 'scaremongering' and inventing facts. As we always do, therefore, when we published this presentation on the ASH website we provided a link to the source of each statement so that it could be corroborated, defended and used by residents, campaigners and all those who wish to see the best future for St. Raphael's estate, not only for the 760 households whose homes are threatened with demolition, but for the Brent households currently living in temporary accommodation or on Brent Council's housing waiting list.

Finally, we want to end this introduction with three preliminary statements, which we suggested were the key points residents should take away from this meeting, and which the rest of this report will corroborate:

- **The motivation for estate redevelopment is profit**

The proposed redevelopment of St. Raphael's estate is not being undertaken to improve the living conditions of the existing community. It's being done to gain access to the land residents' homes are built on, in order to increase the land's financial value by replacing council homes with the highest-cost properties it is possible to build.

- **Vote 'NO' to redevelopment**

As in all 'regeneration' schemes, the ballot vote for or against the demolition of St. Raphael's estate is the single most important decision in the regeneration process. The economic consequences of this decision will determine everything that happens to the estate afterwards, and if residents vote for what will be presented as 'redevelopment' the consequences for them will be disastrous.

- **There are other and better options**

There is a design alternative to the demolition and redevelopment of St. Raphael's estate that is far more socially beneficial, environmentally sustainable and economically viable for both Brent Council and residents. This is for the refurbishment and improvement of the estate, with the potential to increase its housing capacity to meet housing need in the borough and local incomes.

## 2. Brent Council's Arguments for Demolition

Before ASH made any commitment to producing design alternatives to demolition that would show the benefits of refurbishment, infill development, roof extensions and improved communal facilities, it was important that the residents' campaign first challenged the grounds on which Brent Council was considering the demolition and redevelopment of St. Raphael's estate as a possible option.

In the already-mentioned report, 'St. Raphael's Estate: Housing Options Appraisal' — which was presented to Brent Cabinet on 12 November, 2018, by Phil Porter, the Strategic Director of Community Well-being — it states that the purpose of the proposed regeneration of St. Raphael's estate (whether that is refurbishment, infill or demolition and redevelopment) is 'improving life on the St. Raphael Estate' (paragraph 1.1.). This is ambiguous, as it doesn't say whose life the Council wishes to improve: the current residents or those who will be able to afford the increased rents, service charges and sale prices of the new properties should Brent Council demolish and redevelop the estate.

The report goes on to say that the Council will support building a 'thriving, clean, crime-free neighbourhood', and, depending on which option is taken, 'build brand new homes that properly meet the needs of families who live on St. Raphael's', as well as meeting London's need for 'good quality and genuinely affordable housing' (paragraph 1.2).

It's not clear what the Council means by 'thriving', which is not defined in the report, but residents might seek to clarify what this means for themselves, for instance by demanding the return of their community hall, which is at the heart of any 'thriving' community, and the return of the estate shops the Council has closed down, easy access to which is also key to community relations.

Although the report includes them in the same sentence, being 'clean' and 'crime-free' are not the same thing. If Brent Council is failing to address fly-tipping, for instance, or poor bin collection, it should do so in accordance with its duties as the local authority responsible for doing so. It's not clear what this has to do with a document laying out the grounds for an estate regeneration scheme. If, on the other hand, the bin stores are not meeting their current use, this should be addressed by, for example, having an architectural practice design new bin stores better adjusted to the current needs on the estate. None of this comes within the orbit of a possible estate demolition scheme.

As evidence of what the Housing Options Appraisal calls 'the clear and pressing need to tackle deprivation and reduce economic and social polarisation' on the estate, the following statistics and information are quoted in the report. These are the 6 primary reasons cited by the Council for demolishing and developing St. Raphael's estate:

### 2.1. Poverty

- *'38 per cent of children are living in poverty in St Raphael's compared with 19 per cent across England'.*

### 2.2. Crime

- *'Personal robbery is a prevalent crime on St. Raphael's estate, which increased by 107 per cent from last year, compared to an increase of 52 per cent in the rest of the borough. Also increasing, but to a lesser extent, are assault of wounding/Grievous Bodily Harm (GBH). There is also recorded gang activity on the estate. The Council's Community Safety and*

*Housing Management Teams are working very closely with the Metropolitan Police to try and tackle these issues.'*

### 2.3. Anti-social Behaviour

- *'Littering, burnt-out cars, disruptive children/teenagers.'*

### 2.4. London's Housing Crisis

- *'There are 12,200 households currently in affordable housing need in Brent.'*

### 2.5. Condition of the Housing Stock

- *'In 11 to 30 years asset replacements would be due as they end their life-cycle.'*

And finally, without providing any evidence to justify doing so, Brent Council attributes an undefined causal connection between these social problems (which they call 'crimes') and the design of St. Raphael's estate.

### 2.6. Design of the Estate

- *'The design and nature of the estate is likely to be a contributing factor in these crimes.'* (para 3.15)

In the following section, we'll look at the truth and accuracy of these claims and assertions made by Brent Council about St. Raphael's estate and the community that lives on it.

### 3. The Facts about St. Raphael's Estate

The motivations for comparing poverty levels on a London council estate with poverty levels across the whole of England should be apparent enough, but this is a warning of how statistics can be knowingly and deliberately used to support fraudulent arguments. So let's compare these statistics, assertions and accusations with the facts about St. Raphael's estate.

#### 3.1. Poverty

According to the Child Poverty Action Group, 37 per cent of children in London are living in poverty, and 36.84 per cent in the borough of Brent in 2018.<sup>9</sup> So St. Raphael's estate, where 38 per cent of children are living in poverty, is not exceptional, except in having a population with lower poverty levels than on most London housing estates, which the housing policy of successive UK Government have used as a means for housing the poor. In seven London boroughs, Enfield, Camden, Islington, Westminster, Hackney, Newham and Tower Hamlets, the child poverty rate is above 39 per cent; but their councils are not, presumably, intending to demolish every home within the borough limits in order to 'tackle deprivation'. On the contrary, the Child Poverty Action Group has clearly identified the cause of child poverty, which isn't the design of council estates but the lack of council housing and the spiralling costs of renting on the private housing market:

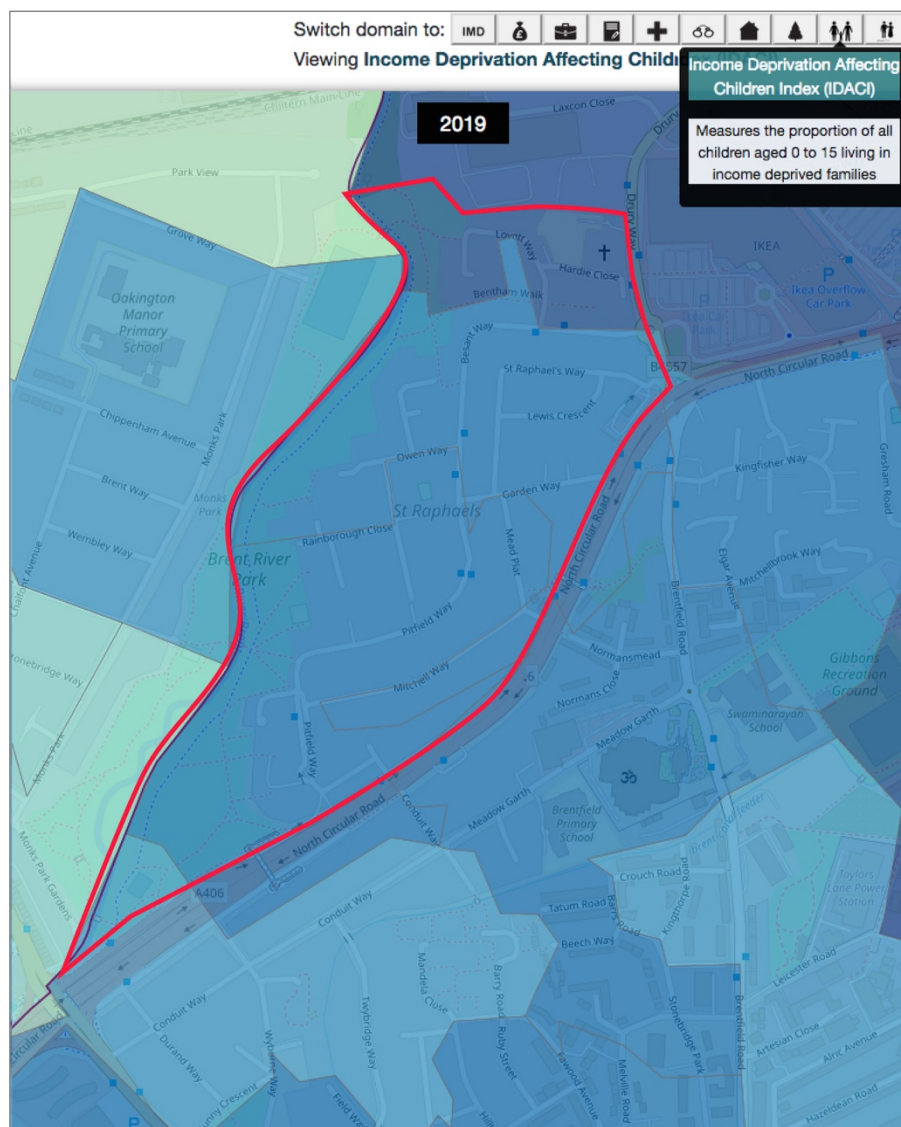
*'Trust for London has made it clear that the cost of housing is the main factor explaining London's higher poverty rates compared with other parts of the country. London's housing costs are soaring and more and more children across the capital are becoming homeless as too many of London's families (both in and out of work) do not have access to affordable, secure, quality housing. More people in poverty live in the private rented sector than any other housing tenure, and the number of*

*children living in poverty in private rented accommodation has tripled in the last decade.'*

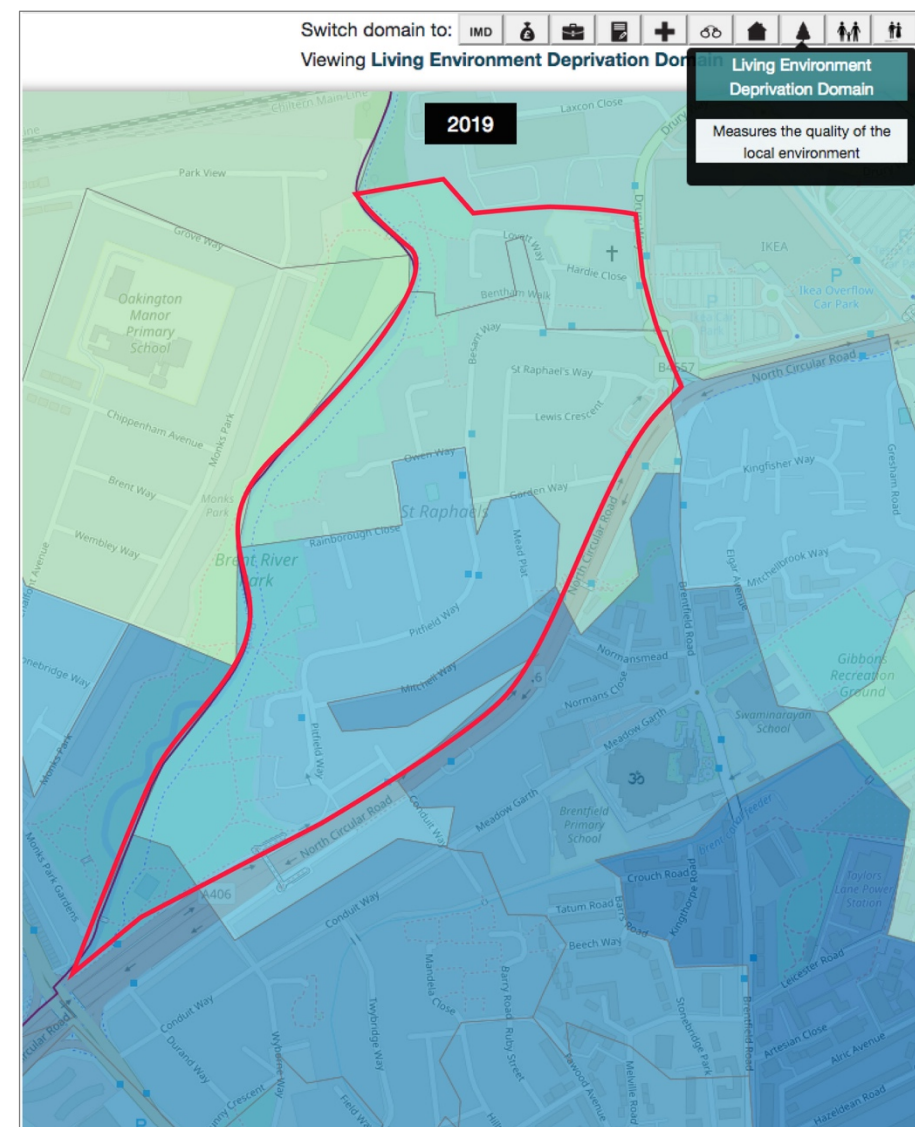
Far from being a cause of child poverty, therefore, as Brent Council implies in its Housing Options Appraisal, the council housing on St. Raphael's estate is, in fact, the final barrier to a lot of families falling into poverty. According to the Government's own 2019 Deprivation Index online map (*following pages*), St. Raphael's estate, despite having average levels of child poverty for London, has a higher quality 'living environment' than the surrounding area of terraced housing.<sup>10</sup> Not only that, but the maps for 2015 and 2019 show that this living environment has improved markedly. ASH regularly uses this source to check the Government data about crime and anti-social behaviour on estates we work with, and the data consistently contradicts what the councils wanting to demolish their homes tell residents, as it does here.

#### 3.2. Crime

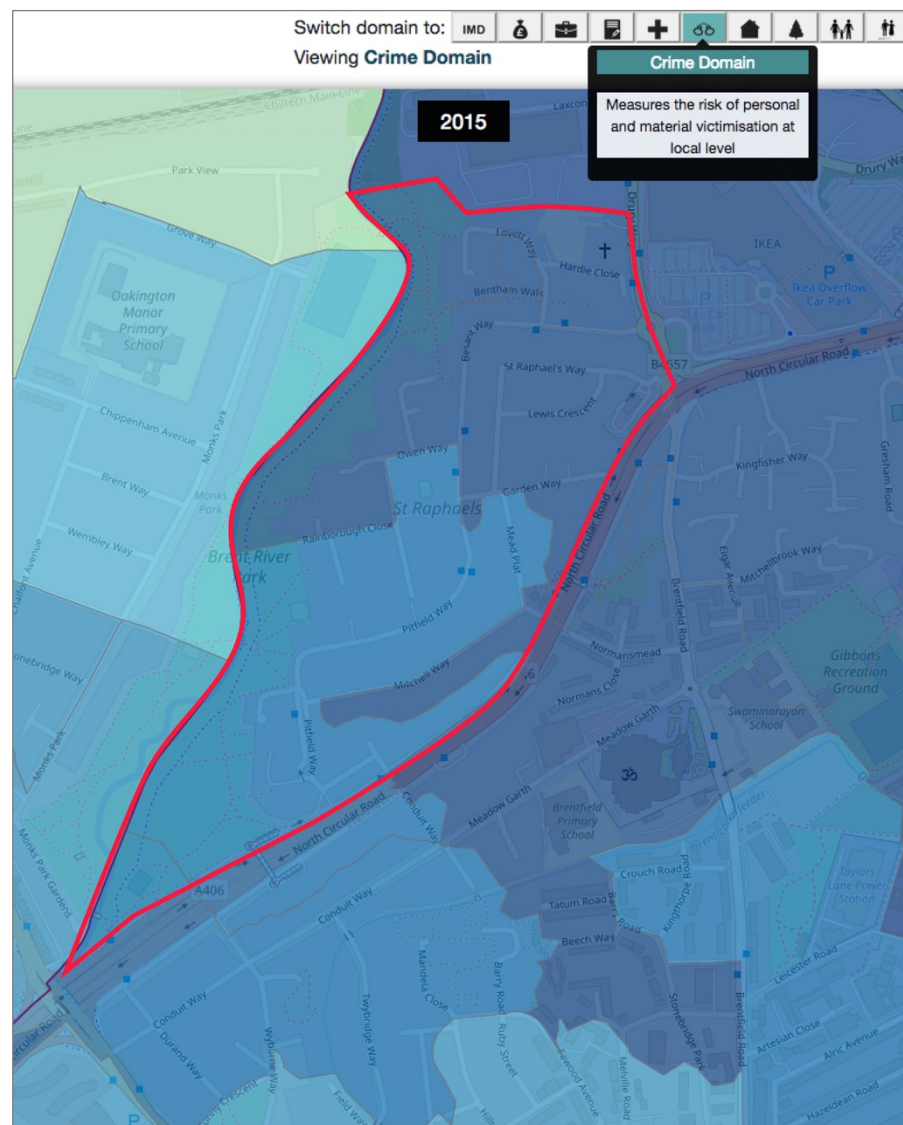
Similarly, Brent Council's cited statistics showing increases in crime rate as a percentage say nothing about what those crime rates are. In fact, the Deprivation Index shows that crime rates on St. Raphael's estate in 2019 were lower than in the surrounding areas to the east and north (which are occupied by terraced housing, IKEA and Tesco). And, just as with child poverty, crime levels on St. Raphael's estate have decreased since 2015. So the causal link the Council has tried to make between the estate and crime does not exist. In fact, far from being a 'sink estate', as Brent Council would have residents believe, St. Raphael's is improving as a place to live, with reduced crime rates, lower income deprivation and an improving living environment.



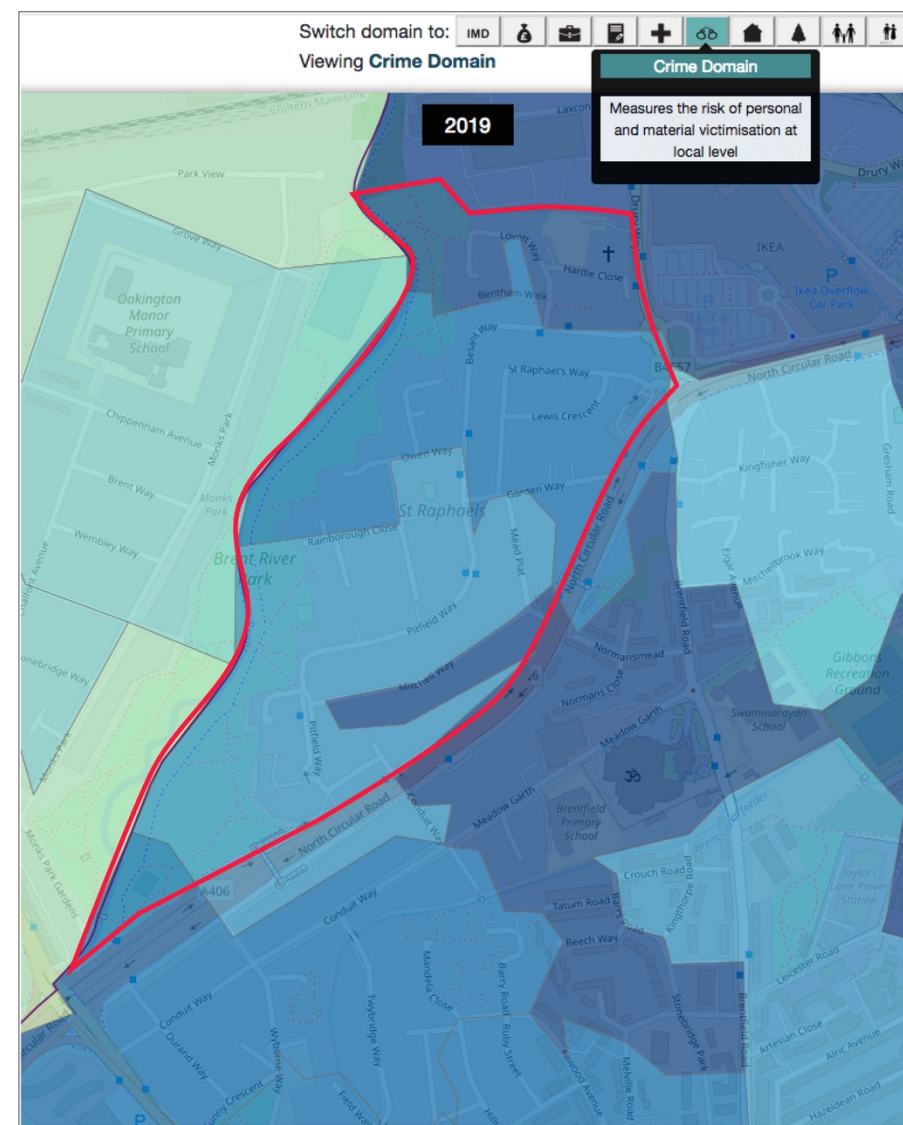
Income Deprivation Affecting Children Index, 2019. Measures the proportion of all children aged 0 to 15 living in income deprived families (*St. Raphael's estate outlined in red*).



Living Environment Deprivation Domain, 2019. Measures the quality of the local environment (*St. Raphael's estate outlined in red*).



Crime Domain, 2015. Measures the risk of personal and material victimisation at local level (St. Raphael's estate outlined in red).



Crime Domain, 2019. Measures the risk of personal and material victimisation at local level (St. Raphael's estate outlined in red).

But even if this were not the case, and crime levels were significantly higher than the average on London council estates and had increased in the past five years rather than decreased, this would be something to be addressed by the local police department and perhaps by local community centres, and in no respect can be addressed by demolishing the homes of what we have calculated as the roughly 2,800 residents living in Area A of the estate. Not only are the statistics quoted by Brent Council in their Housing Options Appraisal deliberately misleading, therefore, cited out of context and incorrect in their assumptions about the living environment they misrepresent, but they are irrelevant as reasons to undertake the demolition of St. Raphael's estate.

Finally, although there are several nurseries and children's centres on the estate, there is no youth club and no sports facilities. Nowhere in the Housing Options Appraisal is the argument made for the causal connection it asserts between the 'design and nature' of St. Raphael's estate and what crime there is, and until the Council commissions a report that clearly demonstrates this connection — one which accounts for the lower crime rate on the estate compared to the surrounding neighbourhood, and takes into account other factors such as the removal of the community hall and the lack of communal facilities such as sports grounds, boxing clubs, youth centres or other places where teenagers and youths might find activities other than crime and so-called 'gang activity' — then the Council is doing nothing more than trading in negative and unfounded stereotypes about working-class and BAME estate communities that should have no place in considerations about how to 'improve life' on St. Raphael's estate.

### 3.3. Anti-social Behaviour

The same arguments apply to the Council's accusation of 'anti-social behaviour' on St. Raphael's estate, for which it cites no evidence beyond unsubstantiated accounts of 'littering, burnt-out cars, and disruptive children/teenagers.'

In responding to this accusation, it's important to understand that 'anti-social behaviour' is defined in the Crime and Disorder Act 1998 as 'conduct which caused, or was likely to cause, harm, harassment, alarm or distress'.<sup>11</sup> As a description of behaviour cited as justification for demolishing an estate of 760 homes, therefore, it is almost meaningless, with the definition relying on the effects of such behaviour, rather than what that behaviour is. It is a matter of record that successive legislation on anti-social behaviour in the UK has been used to expand and facilitate the criminalisation of working-class and BAME communities, and in particular those that live on council estates.<sup>12</sup> But at ASH, we believe that what the law describes as 'anti-social' behaviour is in fact 'social' behaviour conducted in the wrong place — which is to say, in areas where it is likely to cause harm to property, harassment of residents, alarm or distress to the elderly or vulnerable.

As a common example, kicking a football around a football field is clearly not an instance of anti-social behaviour, while kicking a football against the wall of a residential block may well be. The difference between them is not in the actions but in their location, and attempts to criminalise the players for playing in the wrong place is not only a short-sighted attitude to policing, but an example of gross discrimination against working-class and BAME children and youths who, through no fault of their own, do not have access to the spaces and facilities in which such social behaviour can be conducted without the threat of being arrested for anti-social behaviour.

Given which, we can ask what Brent Council has done to provide the social spaces in which residents of St. Raphael's estate can pursue social activities without being accused of anti-social behaviour? And the answers are this:

- Closed down the shops and commercial facilities on the estate
- Privatised the estate's Community Hall
- Transport for London re-routed the 206 bus from the estate to serve shoppers at the local Tesco supermarket
- Failed to provide sufficient play spaces for the estate's numerous children
- Failed to provide sufficient sports facilities for the estate's numerous teenagers

- Failed to provide apprentice workshops for the estate's numerous young adult residents
- Failed to provide communal facilities for the estate's elderly residents
- Provided a day nursery and pre-school
- Provided a charity food-bank and kitchen for refugee support and homelessness

One of the more duplicitous of Brent Council's claims for why St. Raphael's estate should be demolished is that it lacks facilities, including limited retail amenities (para 3.14). Yet it is the Council that has closed down the shops on the parade at the centre of the estate, and handed over its former community hall to Barnardo's charity, depriving residents of a place to meet. Since this is standard practice by councils prior to implementing an estate demolition scheme, it's hard not to see in these actions a cynical attempt to stop residents organising opposition to the Council's plans. And yet, the same Council has the temerity to accuse young residents of 'anti-social behaviour', citing disruptive children and teenagers and littering (para 3.18).

Given this catalogue of failures, it is not the residents of St. Raphael's estate who should be threatened with the demolition of their homes, but Brent Council that should be facing removal from office for failing in its duty to the residents of St. Raphael's estate to provide them with the infrastructure and communal facilities and spaces that are crucial to a 'thriving' community and 'improving life on the St. Raphael Estate'. And, once again, how demolishing the homes of 760 households is meant to address anti-social behaviour is not something that Brent Council has even bothered to argue.

### 3.4. London's Housing Crisis

Further on in the Housing Option Appraisal, under the heading 'Housing Need in Brent' (para 4), the report states:

- *'There are 12,200 households currently in affordable housing need in Brent who are unable to afford their own housing.'* (para 4.2)

- *'The fundamental point is that there is not enough social housing, and the housing which is available in the private sector is becoming more expensive and unaffordable to many people.'* (para 4.7)
- *'The draft London Plan sets Brent a target of 29,150 new homes over the period 2019/20 to 2028/29 of which the Strategic Target for affordable housing is 50% (14,575).'* (para 4.8)

Given the generous layout of the estate and the building typology of some of its blocks, 'building brand new homes', as the Housing Options Appraisal states, is certainly possible without demolishing the homes that are already there. This could be achieved through infill housing development on land currently underused or which could be better used, as well as through light-weight timber construction on top of existing housing blocks. The latter is an increasingly common practice these days, and a current example of such a proposal is on the Mile End estate in Tower Hamlets, which will add an additional 142 residences to the estate without demolishing a single existing home.<sup>13</sup>

Since the Council has said that one of their motivations for putting St. Raphael's estate up for 'regeneration' is that it wants to build 'genuinely affordable housing', residents should hold them to this claim. However, 'genuinely affordable' is neither a tenure type nor a rent level, so this is a deliberately misleading and vague description of so important a motivation. 'Affordable housing', as ASH has laid out in our report on *The Costs of Estate Regeneration*, encompasses and is increasingly composed of so-called 'shared ownership' properties that have been shown to be unaffordable to the average Londoner.<sup>14</sup> But so-called 'affordable' housing also includes London Living Rent, a Buy-to-Let scheme for households earning up to £60,000/year, and London Affordable Rent, which is around 60 per cent higher than social rent. None of this can be described as 'genuinely affordable' housing, and certainly not to the vast majority of the current residents of St. Raphael's estate. If Brent Council is intent on meeting London's housing crisis, it should start by producing a report on what the housing need is in Brent, and particularly the ward of Stonebridge, not in terms of bedroom numbers but of tenure type. Since the appraisal admits that the 'demand for social housing





by far exceeds supply’ (para 4.6), why is the Council proposing to build so-called ‘affordable housing’? Until Brent Council can show how it will be able to meet housing need in the borough by demolishing and redeveloping St. Raphael’s estate, there is no basis to its claim that doing so will somehow address London’s crisis of housing affordability.

### 3.5. Condition of the Housing Stock

Between August and September 2018, a survey of the condition of the housing stock on St. Raphael’s estate was conducted on behalf of Brent Council, and the findings, published in the Housing Options Appraisal in November 2018, were as follows:

- The survey revealed the properties to be ‘in a reasonable state of repair’ (para 3.5).
- The spending on responsive repairs over the previous 5 years was an average of £624 per property, per annum (para 3.6).
- Over the next 30 years, a total of £32.7 million investment is likely to be required for the 806 Council-owned properties (both tenants and leaseholders).
- The level of investment required per property (£1,353 per annum) is considered to be ‘in line with expectations with respect to an estate that is maintained and meets the Decent Homes Standard’.
- No major investments are required in the next 5 years.
- Beyond this, however, more investment is required, particularly from years 11 to 30 (2029-2048), when asset replacements would be due as they ‘end their life-cycle’.

To clarify, £624 per annum over the past 5 years is a tiny expenditure by Brent Council on the maintenance of residents’ homes, and any degradation in their existing state of repair will be down to this relative absence of maintenance. The anticipated annual spend per annum of £1,353 per home over the next 30 years is also low, and most likely less than residents’ current service charges, certainly when spread between tenants and leaseholders, who pay far more.

Finally, the bulk of this investment is anticipated to come between 2029 and 2048, as parts of the estate require ‘replacement’. Importantly, the Housing Options Appraisal attributes this to the estate’s assets reaching what they assert is the ‘end [of] their life cycle’.

It’s very important that residents understand what this quoted phrase does and doesn’t mean. As residents informed us, Karakusevic Carson Architects, which was brought in by Brent Council to draw up a masterplan for the redevelopment of the estate, told residents that their homes had ‘come to the end of their natural life span’. This is something that residents are told again and again by consultants paid by councils and housing associations to justify the demolition and redevelopment of their homes. But while it’s true that certain elements of the homes — such as windows, water pipes, roofing or kitchens — might have come to the end of their ‘design life’, this does not mean that the homes of which they are a part are ‘at the end of their natural life span’ and must therefore be demolished. This false argument is something that residents need to be able to refute when used by Brent Council in order to convince residents to vote for the demolition of their homes, so we’ve thought it necessary to include the following explanation.

The description of council estates as being ‘at the end of their natural life span’ is a phrase ASH hears used all the time by architects and councillors to support their decision to demolish estates across London, such as the Heygate, Aylesbury, Central Hill, etc. Spoken by an accredited expert to a non-expert resident, the resident often feels compelled to trust the voice of the consultant, believing in the independence, or at least the professional duty of care, that they rightly believe the architect owes to the resident above and beyond the architect’s contract with the client and their employer.

Residents on estates in the process of being ‘regenerated’ (which is to say, demolished) are put through a large number of extremely stressful experiences. Unfounded stereotypes are quoted as fact, specifically, as we have just seen, around the supposed relationship between the architecture of the estate and crime and anti-social behaviour, the isolation of the estate from the surrounding neighbourhood, and the claim that residents’ homes have

‘reached the end of their natural life span.’ The proposed solution to these supposed failings in the architecture and/or build quality of an estate is the proposal to demolish residents’ homes.

However, the argument that all the council estates built between 1950 and 1980 have come to the end of their ‘natural life’ is at best naive, and at worst dishonest and opportunistic. There is, in fact, such a thing as a ‘design life’ to a building, which lenders, insurers and owners call on when they lend, insure or borrow money against a certain project. This determines how long someone can safely assume that a given building, bridge, school or other structure will last, in order to ensure that it is mortgageable. As the ‘Guide to durability of buildings and building elements, products and components (Building Standards 7543)’ makes clear, the ‘60-year design life’ of a building, which is repeatedly quoted by architects and councillors intent on demolishing housing estates, is used to determine repayments against debt raised for its construction. This is, in fact, why most of the council estates built in the 1960s will now have paid off their 60-year loans, and are now actually making money for the councils.

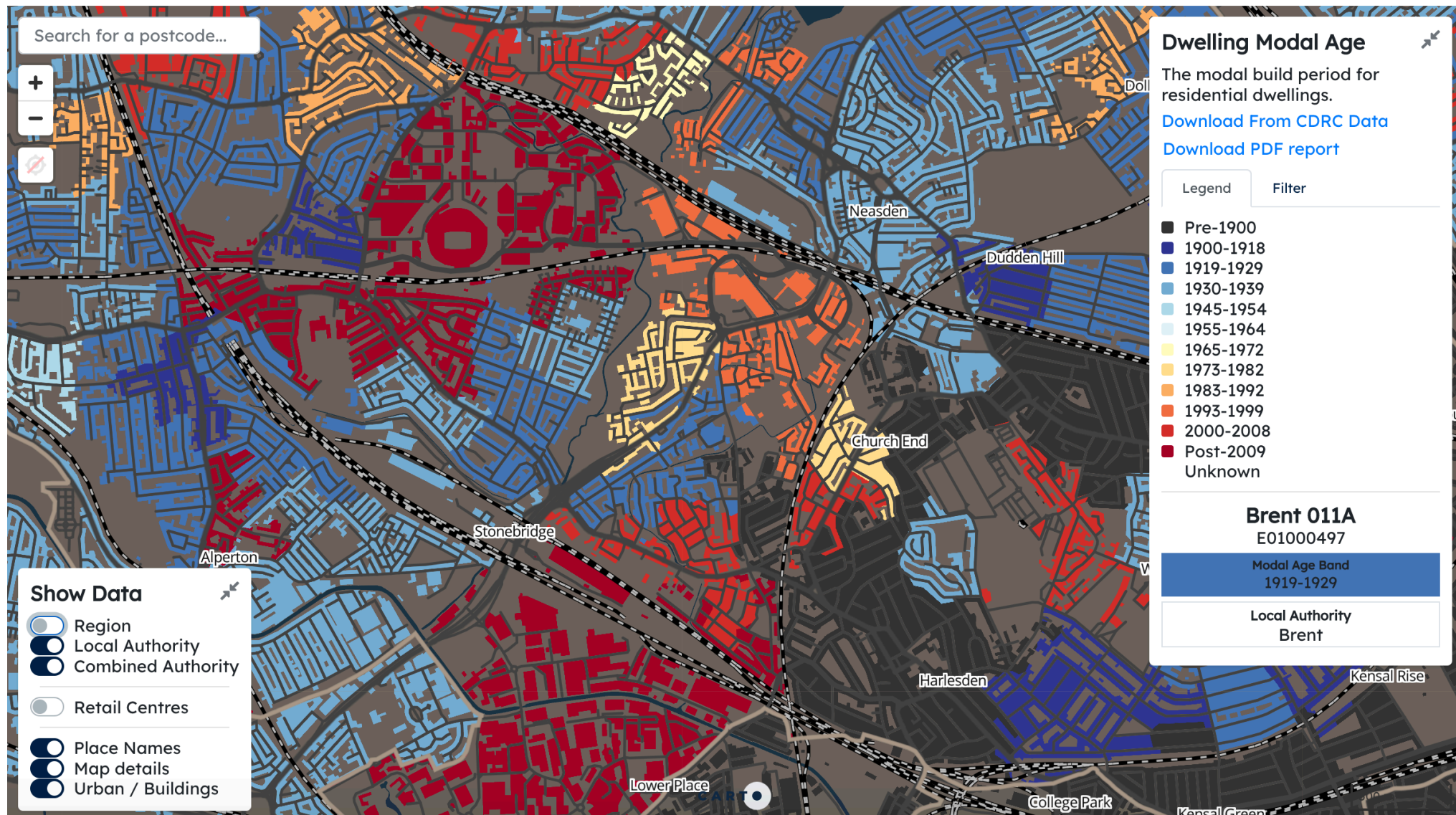
TABLE 1. CATEGORIES OF DESIGN LIFE FOR BUILDINGS			
CATEGORY	DESCRIPTION	BUILDING LIFE FOR CATEGORY	EXAMPLES
1	Temporary	Agreed period up to 10 years	Non-permanent site huts and temporary exhibition buildings
2	Short life	Minimum period 10 years	Temporary classrooms; buildings for short life industrial processes; office internal refurbishment, retail and warehouse buildings; (see note 1.)
3	Medium life	Minimum period 30 years	Most industrial buildings; housing refurbishment
4	Normal life	Minimum period 60 years	New health and educational buildings; new housing and high quality refurbishment of public buildings
5	Long life	Minimum period 120 years	Civic and other high quality buildings

However, just because parts of a building (their roofs, windows, heating, water pipes, etc.) have a design life of 5, 10 or 20 years, this does not mean that the whole housing estate has ‘come to the end of its natural lifespan’ and must therefore be torn down. In the current era, when architects are lining up to put

their name to declarations against climate change, the fundamental understanding of the ‘life’ of a building needs to change in ways that won’t be good for the accounting or marketing department of an architectural practice. And therein lies a problem. How can an architect be ‘independent’ when such advice would conflict with the hugely increased profits they will make from a billion-pound demolition and redevelopment scheme such as that proposed for St. Raphael’s estate, compared to a hundred million-pound refurbishment and infill option? How can an architect be said to be ‘independent’, when recommending refurbishment contradicts the wishes of their client — in this case Brent Council — to demolish an estate and redevelop it at greater densities and with a greater percentage of higher value properties that will increase the value of the land and that of the surrounding neighbourhoods?

The obvious response to an architect’s assertion that residents’ homes have ‘passed their use-by date’ and are ‘no longer fit-for-purpose’ is to ask that architect: ‘How old is the house you live in?’ The chances are it is at least as old as the estate they are arguing must be demolished, and probably much older. According to an English Housing Survey stock report conducted in 2008, 80 per cent of our country’s housing stock was built before 1980, and 60 per cent before 1964.<sup>15</sup> Does this mean we should recommend the demolition of all our Victorian terraces and Georgian squares? Obviously not. An online map (*overleaf*) of the age of the dwellings near St. Raphael’s estate shows that the homes Brent Council has falsely and inaccurately claimed are ‘at the end of their life cycle’ are in reality many years and even decades younger than those to the west and south, and indeed than most of the residential dwellings in the London Borough of Brent.<sup>16</sup>

In our experience — and in the experience of the genuinely independent surveyors and structural engineers with whom ASH has worked on numerous housing estates — the majority of buildings built in the 1960s to 1970s are of a *better* build quality, and their components have a longer ‘design life’, than those being built today. On all the estates with which ASH has worked — including Knight’s Walk, Cressingham Gardens, Central Hill, West Kensington and Gibbs Green and Northwold estates — the assessments of structural engineers and surveyors employed by the relevant Council have been that the



Dwelling modal age of residential buildings in the London Borough of Brent (St. Raphael's estate in yellow at the centre). © Centre for Data Research

structure is in good working order, and not in need of demolition. It's not surprising, therefore, that this is also the assessment of St. Raphael's estate. Many individual buildings, or components of buildings, may be in need of significant refurbishment, but this should be part of the ongoing maintenance of the estate, and paid for by residents' rent and service charges. As part of an environmentally sustainable architectural practice, a local authority's sustainable urban strategy, or a landlord's sustainable approach to asset management, refurbishment and infill must be the default option to the maintaining of our social housing stock.

Given which, the deliberate mis-use of phrases such as 'past their natural life span' and 'no longer fit for purpose' by architectural practices to describe homes that can and should be refurbished and maintained is disingenuous at best, and more obviously deliberately misleading, in bad faith, professionally dishonest, an abuse of their duty of care to those they are advising, acting against the best interests of the users of their services, and putting the commercial interests of their own companies above the best interests of the resident community.

### 3.6. Design of the Estate

Finally, even were child poverty levels on St. Raphael's estate appreciably higher than on other council housing estates in London; even if crime levels were demonstrably higher than the surrounding area and increasing rather than decreasing; even if anti-social behaviour were not a result of the withdrawal, closing down and privatisation of the estate's communal and commercial facilities — even if these were all true, which they are not — nowhere has Brent Council even bothered to make the argument why these 'crimes', as they call them, are a result of the design of the estate, or how demolishing the estate would eradicate them, except insofar as the demolition of the estate will lead to the eviction of the community and its replacement with residential properties and facilities only affordable by a wealthier demographic than the current one. Precisely what that demographic is, and at who the new development is targeted, is something we'll return to later; but

not only are Brent Council's assertions about poverty, crime and anti-social behaviour inaccurate, made out of context and deliberately misleading, but they have no relevance to the decision as to why St. Raphael's estate should be demolished and redeveloped rather than maintained, refurbished and improved.

Indeed, the implication of the Council's proposal is that the only way to address poverty, crime and anti-social behaviour is to get rid of the poor, the criminal and the anti-social by making them homeless and forcing them to move elsewhere. In other words, the argument for citing these social ills as a reason to demolish St. Raphael's estate is one founded on the ugly principle of 'social cleansing', in which residents not wanted by the Council are simply forced out of the borough to become someone else's problem. This is the only reason we can see for citing anti-social behaviour as justification for demolishing and redeveloping an estate of 760 homes.

Given the lack of validity, and even honesty, in Brent Council's stated reasons for putting St. Raphael's estate up for 'regeneration', what then are the real reasons for their plans to demolish and redevelop the perfectly serviceable homes of 760 households in a thriving community of around 2,800 residents, two-thirds of whom rely on their secure tenancies and council rents to be able to afford to live in the London Borough of Brent?

## 4. Brent Council's Reasons for Redevelopment

We said earlier that, in December 2019, Brent Council announced that it had reduced its plans for St. Raphael's estate to what it designated as Area A, the far newer homes built between 1967 and 1982 and located to the west of the estate, bordering the Brent River Park and with a view to the north-west of Wembley Stadium, one of the London landmarks identifiable to foreign investors in UK property. In this section, we want to look at the various reasons for this decision, and what it reveals about Brent Council's motivations for putting St. Raphael's estate up for 'regeneration'. As we will see, it has nothing to do with improving the lives of the existing residents, and everything to do with maximising the value of the land on which their homes are built.

### 4.1. Uplift in Sales Values

To accompany this decision, on 9 December, Brent Council's Strategy Director published a report on the 'Future St. Raphael's Masterplanning'.<sup>17</sup> This contained, in Section 5, an initial Financial Viability Appraisal of the costs of demolishing and redeveloping the various parts of St. Raphael's estate, which the Council had divided into Areas A, B and C. As we said in the Introduction, it is the financial viability of the scheme that will determine what gets built in place of the demolished homes, and this appraisal contains Brent Council's estimations of the costs of doing so.

The estimated cost for compulsorily purchasing the 139 privately-owned properties in Area C, which constitutes 86 per cent of all homes in this area, is £65.4 million, resulting in a Financial Viability Assessment gap (or shortfall) of £67.4 million. The estimated cost of compulsorily purchasing the 115 privately-owned properties in Area B, which constitutes 52 per cent of all homes in this area, is £53.6 million, resulting in a Financial Viability Assessment gap of £53 million. From these figures, Brent Council draws the

following conclusions justifying the decision not to demolish and redevelop Areas B and C of St. Raphael's estate, despite it being built between 1918-38, and therefore far older than Area A:

- *'Developer's profit allocation of 20% of total development value for private and 6% of affordable housing.'*
- *'Uplift in sales values are not considered achievable across the whole area given the impact of the North Circular Road.'*
- *'These costs, together with the current anticipated sales values of £7,000 per square metre, renders the scheme financially unviable.'*

In contrast, Brent Council's Financial Viability Assessment for Area A, despite being built between 1967 and 1982 — and therefore, as we have seen, in better condition — showed a greater opportunity for making a profit. The estimated cost for compulsorily purchasing 225 (in fact 219) privately-owned properties in Area A (which also contains 522 council-tenanted properties) is £78.5 million (considerably more than in areas B and C). However, because the leaseholder and freeholder properties constitute only 30 per cent of all homes in Area A, compared to 52 per cent and 86 per cent in, respectively, Areas B and C, the Financial Viability Assessment gap is only £22 million. From these figures, Brent Council draws the following conclusion on the financial viability of demolishing and redeveloping the 760 homes in Area A of St. Raphael's estate:

- *'The positive impact of a redevelopment scheme of this scale, with a waterfront location, should attract uplift sales values of up to £7,500 per square metre, as evidenced elsewhere in the borough.'*
- *'The potential for achieving higher sales values justifies further investigation into the viability of redeveloping St Raphael's Estate (Area A).'*

- *'The density, design, build costs and sales values of any potential scheme need to be considered in much greater detail in order to arrive at a viable scheme.'*

What these conclusions make clear is that the reasons for 'regenerating' St. Raphael's estate given to residents by Brent Council have no bearing on their real motivations; that by 'regeneration' the Council means demolition and redevelopment; that the deciding factor in the decision to demolish and redevelop the 760 homes in Area A is the profit margins from building properties 'with a waterfront location', with the potential for 'higher sales value'; and that the viability of the scheme can and will be attained by increasing the 'density' and 'sales values' of the new-build properties against the 'build costs'. In other words, what has been presented to residents as a process of 'regeneration' is in reality a land grab to generate as large a profit as possible from building high-cost properties along the River Brent. In summary, therefore, these are the key reasons for Brent Council's change of plan:

1. Areas B and C are made up of terraced housing built considerably earlier than the housing blocks in area A, and most are privately owned. 204 of the 322 freehold properties and 24 of the leasehold properties on St. Raphael's estate are located in Areas B and C, which only contain 126 council-tenanted homes. By leaving these areas out of the so-called 'regeneration' of St. Raphael's estate, the huge cost of compensating owners for their demolished properties is removed.
2. At the same time, by removing this large proportion of home-owners from the ballot, the decision to demolish the estate will overwhelmingly be taken by council tenants, who make up 522 of the 760 households in Area A, compared with 219 leaseholders and freeholders. In our experience of working with estate communities threatened with 'regeneration', the totally inadequate compensation councils offer home-owners for their demolished homes typically inspires them to be at the forefront of resistance to the Council's plans, while council tenants are more disposed

to believe the Council's empty promises to rehouse them in brand new properties for the same rental rates and service charges.

3. The noise and pollution from the North Circular Road are the major failings in this development site, and the biggest barrier to the prices of the market-sale properties the Council plans to build on the redevelopment. By leaving the part of the estate lining this very busy road untouched, that threat to the value uplift of the land is removed. By the same token, the sought-after green land to the west of the estate — which runs down to the Brent River, borders the more affluent neighbourhood on the farther side, and has those sought-after views of the new Wembley Stadium — is now the exclusive concern of Brent Council. This is where developers will be able to charge the prices they will need to recoup the costs of demolition, compensation and redevelopment, which in turn have been reduced by this smaller area occupied primarily by council-tenanted homes.

## 4.2. Attracting Investors and Home-owners

This isn't speculation. St. Raphael's isn't the only council estate in the London Borough of Brent to be targeted for demolition and redevelopment. The South Kilburn estate is some 17 years into the redevelopment process, and by looking at what's happening there now we can get an idea of what lies in store for the residents of St. Raphael's estate should Brent Council demolish their homes too.

The actual property prices for the redevelopment of South Kilburn estate are from the Financial Viability Report published in December 2019 by the multinational financial services network, Deloitte.<sup>18</sup> This report, which has been removed from Brent Council's website but which ASH has downloaded to our website, includes, in appendix 4, a 'Sales and Marketing Report' by the UK estate agents and property consultants, Strutt & Parker, in which it lists the following sales prices on phase 4 of the redevelopment (1B2P means a 1-bedroom, 2 person dwelling, etc):

Type	Count	Total SQFT	GDV	Ave £ Dealing	Ave £PSF
1B2P	36	20,166	£19,890,500	£552,514	£987
2B3P	12	8,426	£8,070,000	£672,500	£958
2B4P	32	24,840	£23,885,000	£746,406	£961
3B5P	12	11,503	£10,585,000	£882,083	£920
3B6P	6	8,168	£9,265,000	£1,544,167	£1,135
Studio	9	3,820	£3,952,500	£439,167	£1,035
<b>Totals/Aves</b>	<b>107</b>	<b>76,923</b>	<b>£75,648,000</b>	<b>£706,991</b>	<b>£983</b>

As a further indication of whom these properties are targeted at, underground carparking space for residents of the new development is on sale for £45,000. And yet, despite these extraordinary sales prices for the kind of high-cost, market-sale, river-front properties Brent Council wants to build on the land cleared of residents' homes, in its Housing Options Appraisal for St. Raphael's estate the Council writes (para 4.14):

*'South Kilburn is recognised as an exemplar regeneration programme delivering a new mixed neighbourhood and delivering not only new homes but also an infrastructure and public realm which addresses the entrenched problems experienced on this estate for a number of years.'*

Again, Brent Council's solution to the perceived 'problems' on council estates is to socially cleanse the existing community; and residents of St. Raphael's estate — tenants, leaseholders and home-owners — shouldn't be in any doubt that this is what demolition and redevelopment will mean for them. But it might be asked: who could possibly afford these prices? Clearly beyond not only the residents of St. Raphael's estate but the residents of the London Borough of Brent, for whom are these half-a-million to over-a-million-pound properties being built?

Well, interestingly, in their 'Sales and Marketing Report', Strutt & Parker answer precisely this question. In their buyer profiles for Phase 4 of the redevelopment of South Kilburn estate, there are four 'established buyers' at which the new properties are targeted:

- Professional couples
- UK investors for their families
- Overseas investors
- Commercial investors

Strutt & Parker's descriptions of these categories of buyers are so inimitable, so distant from the demographics and purchasing power of the current residents, that we can't do better than reproduce them in full opposite.

Ask not for whom our homes are being demolished, our communities socially cleansed, and our publicly-owned land sold to private developers — it is for the likes of these. The purchasing power of these investors is the primary financial motivation for the estate regeneration programme. And as Brent Council has said, it is at these investors that half the new development will be targeted, with the other half designated as 'social/affordable' housing. In fact, residents should expect that the majority of this so-called 'affordable' housing will be shared-ownership properties — as is in fact the norm on estate redevelopment schemes in London — with the remainder a mix of rent-to-buy properties and so-called 'affordable' rent, with only a tiny proportion, if any, homes for social rent. In the following section, we'll look at the consequences of redevelopment for the existing residents of St. Raphael's estate.

## South Kilburn Regeneration Phase 4: Development Report - December 2019

**STRUTT  
& PARKER**

BNP PARIBAS GROUP

### BUYER PROFILES: ESTABLISHED BUYERS

The following groups are likely to make up the core demographic of established buyers at the development.

#### PROFESSIONAL COUPLE

**Who they are:**

- Early to mid 30s. Double income, no children
- Joint income of £150,000 - £250,000
- Example: one is a lawyer in the City and the other is a senior client director at a brand agency
- Shop at Waitrose (would shop at Whole Foods if there was one close by)
- Eat out twice a week and entertain once every two weeks (dinner parties for 6-8 people)
- Aspire to live in Hampstead, but are priced out of the prime locations

**What they want:**

- Currently renting in Hampstead, and with combined savings can afford up to c.£800,000
- 2 bedroom flat
- Require – convenience, transport, gym, bars, restaurants, retail, green space
- They have one car between them and would require a parking space. They both have bikes and skis and will require space to store these. One may own a motorbike or scooter



#### UK INVESTOR FOR FAMILY

**Who they are:**

- Mid 50s-60s
- The family home is in the Home Counties
- Typically the parents of two children, who have decided to invest in a property for their children and/or their own retirement
- Their children are mid 20s young professionals working and renting in London
- They have a house worth £3.5m and savings which they will use for a purchase

**What they want:**

- 1 or 2 bedrooms (both bedrooms to be of a similar size as one could be rented out)
- Good growth prospects and a competitive rental yield
- Require – Convenience, transport, security, amenities, space for parents to stay
- Decent open-plan space with room for a desk in bedroom/sitting room



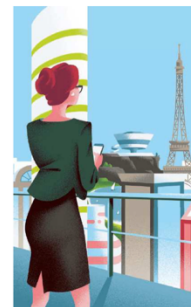
#### OVERSEAS INVESTOR

**Who they are:**

- Wealthy, with a child who aspires to go to a London University
- Live in Hong Kong, Singapore, Istanbul, Moscow
- Child will attend university in 1-10 years' time and the flat will be bought as an investment as well as a base for the child
- In the short term the flat may be rented out to young professionals
- In the long term the flat will be occupied by a member of the family

**What they want:**

- Recognised, traditional area
- 1 / 2 / 3 bedrooms (all bedrooms to be of a similar size as one could be rented out)
- Good growth prospects and a competitive rental yield
- Require: convenience, transport, security, amenities, space for parents to stay
- Security is a definite requirement
- Proximity to good universities
- Looking for a decent open-plan space with room for desk in bedroom/sitting room



#### COMMERCIAL INVESTOR

**Who they are:**

- Successful businessperson working in a high-powered role or running own business.
- Based anywhere in the world
- See London as a safe haven for investment and own a diversified property portfolio
- Flat will be held for the medium to long term and is destined to be rented out

**What they want:**

- 1 / 2 bedrooms (all bedrooms to be of a similar size)
- Good growth prospects and a competitive rental yield
- Competitive pricing compared to comparable schemes
- Require – Convenience, transport, security, amenities
- Competitive service charge



## 5. The Consequences for Residents of Demolishing their Homes

### 5.1. Inadequate Compensation for Owners

Of the residents who will suffer from the demolition and redevelopment of St. Raphael's estate, it is perhaps leaseholders and freeholders who get the worst deal. Let's start with the estimated value of the existing homes on which home-owners will expect to receive compensation, according to the Council's own figures (para 5.8 of its Financial Viability Appraisal):

- 1-bedroom flat: £210,000
- 2-bedroom flat: £265,000
- 3-bedroom maisonette: £320,000
- 3-bedroom townhouse: £400,000
- 4-bedroom townhouse: £430,000



- Plus 10% home loss compensation
- Minus balance of mortgage for leaseholders

In its Housing Options Appraisal, Brent Council has stated that the highest demand for housing in the borough is for 'two- and three-bedroom houses' (para 4.5). And since the Greater London Authority's minimum space standards for new dwellings for a new-build 2-bedroom/4-person flat is 70 square metres, at £7,500 per square metre for the sale price on which its Financial Viability Assessments have been made, that's at least £457,500 the developer will be asking for a market-sale property on the redeveloped St. Raphael's estate — and far more for larger properties. GLA minimum space standard for a new-build 1-bedroom/2-person flat is 50 square metres; for a 3-bedroom/4-person maisonette it's 74 square metres, for a 3-bedroom/6-person townhouse it's 95 square metres, and for a 4-bedroom/7-person townhouse it's 108 square metres. From these figures, we can calculate the following sales prices for the properties on the new development.<sup>19</sup>

- 1-bedroom/2-person flat: £375,000.
- 2-bedroom/3-person flat: £457,500.
- 3-bedroom/4-person maisonette: £555,000.
- 3-bedroom/6-person townhouse: £712,500.
- 4-bedroom/7-person townhouse: £810,000.



A quick calculation will show that these property prices are 72-88 per cent higher than the Council's evaluations of the value of the homes it wants to demolish to make way for them, placing them far out of the financial reach of most of the estate's leaseholders and freeholders, and all but the wealthiest of the residents of the London Borough of Brent, where the average income is £23,000 per annum.<sup>20</sup> Undeterred by this economic reality, Brent Council hasn't ruled out even higher sales values of £7,750 per square metre 'to reflect large-scale regeneration impact' (para 5.8), and to make up the £22 million viability gap on the redevelopment of Area A. And even then, to make the scheme financially viable, Brent Council has assumed that the tenure split on the new development will be '50% social/affordable 50% private' (para 5.8). However, the results of other London estate redevelopments show that, by the time the project is completed, far less than 50% of the redevelopment will be for even 'affordable' housing, and far less of that for social rent.

### 5.2. Loss of Homes for Social Rent

According to figures published in the 'London Plan Annual Monitoring Report 16', the most recent available, of the 27,519 net conventional completions in major planning permissions (10 residential units or more) in London in 2018/19 (*Table 3.8 overleaf*), 21,249 (77 per cent of the total) were for market sale; 3,099 were intermediate, meaning shared ownership or shared equity schemes; 1,514 were for affordable rent, meaning up to 80 per cent of market rate; and just 1,663 (6 per cent) were for social rent.<sup>21</sup> In the London Borough

of Brent, where 1,510 residential units were completed on major schemes, 54 were for affordable rent, 163 for social rent, 208 were intermediate, and 1,085 (72 per cent of the total) were market. Residents of St. Raphael's estate should expect similar percentages (72 per cent market properties rather than 50 per cent, and 10 per cent for social rent), which are even worse than those in Brent Council's Financial Viability Appraisal, if they vote for the demolition and redevelopment of their homes.

**Table 3.8 Net conventional completions in major planning permissions by tenure 2018/19**

Borough	Market	Social rented	Intermediate	Affordable Rent	All tenures	Affordable %
Barking and Dagenham	414	148	46	14	622	33%
Barnet	1,587	-80	36	40	1,583	0%
Bexley	212	-192	103	182	305	30%
Brent	1,085	163	208	54	1,510	28%
Bromley	411	23	57	42	533	23%
Camden	301	213	39	13	566	47%
City of London	331	0	0	0	331	0%
Croydon	377	-33	211	80	635	41%
Ealing	589	160	231	129	1,109	47%
Enfield	218	-7	11	66	288	24%
Greenwich	1,219	54	61	38	1,372	11%
Hackney	1,133	14	118	10	1,275	11%
Hammersmith and Fulham	634	64	139	0	837	24%
Haringey	109	0	12	0	121	10%
Harrow	648	-40	37	135	780	17%
Havering	212	13	17	6	248	15%
Hillingdon	702	14	26	25	767	8%
Hounslow	553	72	153	126	904	39%
Islington	457	274	58	0	789	42%
Kensington and Chelsea	27	0	0	0	27	0%
Kingston upon Thames	245	0	29	3	277	12%
Lambeth	439	135	87	49	710	38%
Lewisham	803	259	161	177	1,400	43%
Merton	70	3	2	0	75	7%
Newham	2,024	3	181	53	2,261	10%
Redbridge	394	25	108	0	527	25%
Richmond upon Thames	189	0	34	36	259	27%
Southwark	2,360	183	391	45	2,979	21%
Sutton	239	65	60	6	370	35%
Tower Hamlets	1,168	49	120	73	1,410	17%
Waltham Forest	194	35	113	41	383	49%
Wandsworth	1,320	9	217	62	1,608	18%
Westminster	585	37	27	9	658	11%
London	21,249	1,663	3,093	1,514	27,519	23%

As examples of which, comparable estate demolition and redevelopment schemes have produced the following figures:

- The Heygate estate: 1,214 homes demolished, 2,535 new properties built, with a net loss of 952 homes for social rent.
- The Woodberry Down estate: 1,980 homes demolished, 5,557 new properties being built, with a net loss of 600 homes for social rent.
- The Colville estate: 438 homes demolished, 925 new properties being built, with 449 units of 'Affordable Housing'.
- The South Kilburn estate: 1,534 homes demolished, 2,694 new properties being built, with 1,208 units of 'Affordable Housing'.

### 5.3. Increase in Rents from Social to Affordable

Neither the Council nor their contractors have produced — or at least made available to residents — a financial viability assessment of the full costs of demolishing and redeveloping St. Raphael's estate; but based on the report, also from the Strategic Director, Community and Well-being, titled 'Future St. Raphael's Masterplanning', and our own report on *The Costs of Estate Regeneration*, ASH's initial rough estimate of just replacing the existing homes was as follows:

- **Compulsory purchase orders on leaseholders and freeholders**  
219 leaseholders and freeholders = £78.5 million
- **Home loss payment for leaseholders and freeholders**  
10% of value of privately-owned properties = £7.85 million
- **Home loss and disturbance payments for council and HA tenants**  
541 @ £10,000 per home = £5.41 million
- **Demolition of existing homes and estate infrastructure**  
760 homes x £50,000 per home = £38 million
- **Replacement of existing homes and infrastructure including**  
760 homes @ £320,000/property = £243.2 million
- **Total cost of demolishing and replacing the existing estate**  
£373 million

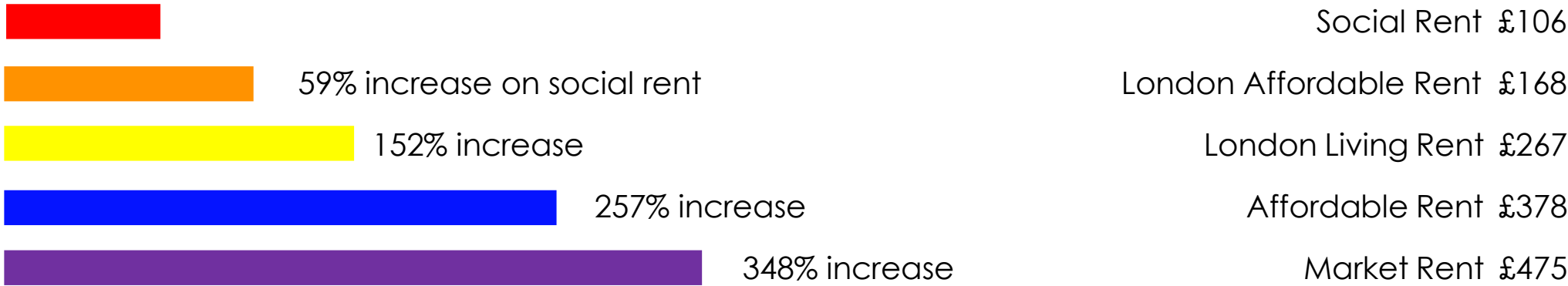
This, we should recall, is before a single additional residence or communal facility has been built. But before Brent Council allocates how many of the new properties will be let at some category of ‘affordable rent’ or sold as shared-ownership or market-sale properties, and even before their investment partner takes their 20 per cent profit from the rent and sale of those properties, these costs of more than a third of a billion-pounds will have to be found. By comparison, the cost of refurbishing the existing homes and estate infrastructure up to the Decent Homes Standard Plus is about 10% of the cost of demolishing and merely replacing the existing homes:

- 760 homes x £50,000/home including estate infrastructure = £38 million

We’ll look at these figures in greater detail in Part Two, Section 9 of this report. But what the huge costs of compensating, demolishing and developing housing in London’s artificially high property market means is that any new development on land cleared of residents’ homes will have to be overwhelmingly for market sale properties, with the resulting mass loss of homes for social rent, the majority — if not all — of which will be replaced by ‘affordable’ housing at best. In reality, though, the decades-long process of demolition and redevelopment of so large an estate is so disruptive to

residents that many will take the offer of rehousing elsewhere, either in the London Borough of Brent or further afield, with the resulting social cleansing of the community. As for the residents without secure council tenancies or those renting privately from leaseholders, these will have no claim whatsoever to any putative ‘right to return’ Brent Council may extend to secure council tenants. Again, this does not equate to the Council’s stated claim of creating a ‘thriving’ community.

Even for the handful of households from the 522 existing council tenancies that are able to return to the new development, the table below shows the comparative rent levels for a 2-bedroom residential property in the London Borough of Brent in 2020-2021, and the increase in housing costs they will face should St. Raphael’s estate be demolished and redeveloped as a mix of London Affordable Rent, London Living Rent, Affordable Rent and Market Rent. For clarity, the social rent levels for current residents of St. Raphael’s estate were supplied to us by the residents themselves; the increased rental costs for the various types of ‘affordable’ housing are from the Greater London Authority Affordable Homes Programme, 2016-2023; and market rents in Brent were taken from a commercial property-search website.<sup>22</sup>



Comparative rent levels per week for a 2-bedroom residence in the London Borough of Brent in 2020-2021

## 5.4. The Scam of Shared Ownership

This huge — and for most council tenants prohibitive — increase in housing costs for the households granted the opportunity to return to the greatly reduced number of rental properties on the new development is bad enough. Perhaps even worse, however, will be the fate of the 219 leaseholders and freeholders, who make up nearly a third of the residents living in Area A of St Raphael's estate threatened with demolition, and who will be offered 53-58 per cent of the sale price of the replacement market-sale properties in compensation for their demolished homes, minus the outstanding mortgage. This will, at best, compel them to enter into so-called 'shared ownership' deals. At worst, most of the leaseholders and freeholders will be forced to accept the inadequate compensation and move out of London altogether in order to afford a new property, assuming that they are able to get a new mortgage.

Shared ownership makes up an increasing majority of so-called 'affordable housing', which all three of the political parties running London's councils have adopted as the primary deal offered to existing leaseholders whose homes they want to demolish as part of an estate 'regeneration' scheme. A shared ownership deal means the buyer needs a 25 per cent share in the new property. However, this only gives them the tenancy rights of an assured tenant. They don't become the owner of the property until they have purchased 100 per cent of the shares, the price of which will increase with the value of the property, and until that time they remain an assured tenant. In addition, leaseholders have to find 2.75 per cent of the value of the unpurchased shares in annual rent. Furthermore, although they may own just 25 per cent of the property, tenants are liable for 100 per cent of the service charges for the maintenance of the property. Finally, if they default on their rental or service charge payments, the latter of which can be increased at the discretion of the landlord, shared ownership tenants lose not only their home but also their down-payment on the property as well. The properties will be owned not by the Council but by a designated housing association that, in common with all estate redevelopments, will be handed the responsibility for the affordable housing component of the new properties. For all these

reasons, shared ownership is one of the more corrupt outcomes of the UK estate regeneration programme, and one of the biggest scams to come out of the housing crisis since the Right to Buy.<sup>23</sup>

## 5.5. Socially Segregated Housing

And it's not just the lack of replacement homes for social or even affordable rent for the 522 council-tenant households whose homes will be demolished to make way for this private redevelopment of largely market-sale properties. To achieve the sales prices these properties will command, the economic segregation between the few remaining tenants and even fewer leaseholders and the new investors and property owners will be mapped out in the new development as social segregation. In Deloitte's Financial Viability Report for Phase 4 (NWCC) of the South Kilburn estate redevelopment it states:

*'In our opinion, the key alteration affecting achievable values in the NWCC proposals are as follows:*

### *1) The relocation of some affordable units to the West Block*

*'We understand that the developer is planning to carry out the preferred option of providing a separate entrance and clean core for the affordable accommodation in the West Block. We do therefore not expect the relocation of the 28 affordable units to affect the values of the private units.*

*'In order to maintain achievable values and a good sales rate within the private portion of the scheme, the 28 affordable units within the West Block should not have access to the private residents' designated facilities within the scheme.'*

It's unclear to us how it's even legal to make such a statement of intent to design and build economic segregation into the fabric of London housing, let alone for Brent Council to adopt it as part of their housing policy; but it's

important to note that this is a decision made not by the Council but by the property developer, which has no interest in rehousing council tenants and, once the Council sells the land from which residents' homes have been cleared, will unilaterally decide what gets built on it. For this reason, the resulting segregation of private properties and home owners from residents in the 'affordable' housing is standard practice in London's estate redevelopment schemes, and the few residents of St. Raphael's estate that are able to return to the new development will find themselves similarly segregated in separate housing blocks without access to the new private-access facilities Brent Council has promised them.



Examples of such social segregation being built into new developments are rife in the UK, and especially in London, where uplifts in land values can only be achieved by building gated developments of high-cost properties with privately-run facilities from which the surrounding community is banned. A recent example of this practice is the redevelopment of the Lillian Baylis School as a market-sale properties within the Ethelred estate in Lambeth (above). This came to the public's attention when it was incorrectly reported that children living in the 'affordable housing' block of the new development, which is run by the Guinness Partnership housing association, didn't have access to the play area in the private development run by the property

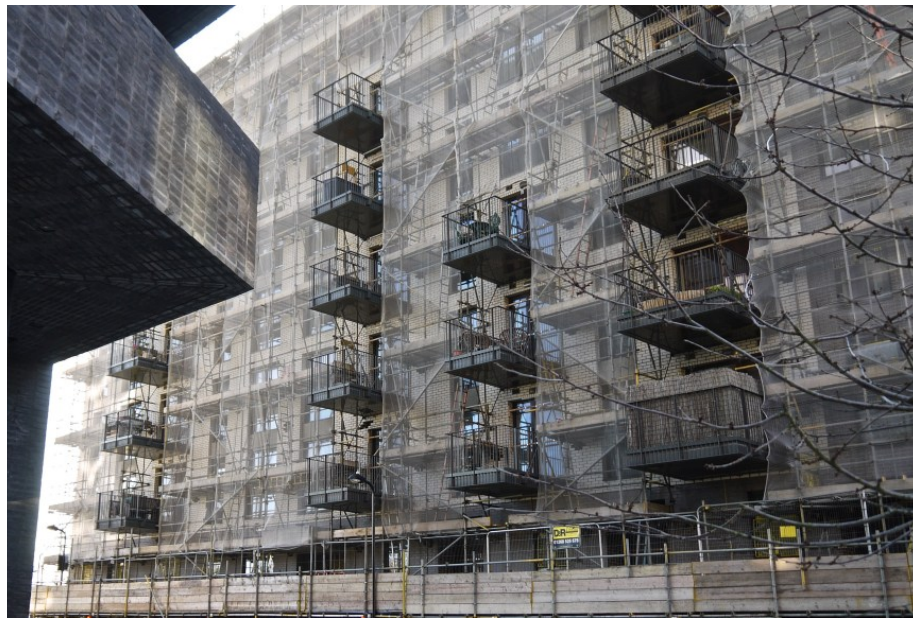
developer, Henley Homes.<sup>24</sup> In reality, the whole of the redevelopment, which was designed by Conran and Partners — including its community facilities, gym, children's play area and manicured lawns — is a gated community from which not only the residents of the 'affordable housing' block are prohibited access but the whole of the Ethelred estate community the Lillian Baylis School once served before it was closed down by Lambeth Council.<sup>25</sup>

## 5.6. Slum Housing Conditions

Social segregation of housing, however, isn't the only consequence of estate redevelopment. Contrary to what residents are told by the Council, its consultants and the architects, the new development — and in particular its 'affordable housing' component — will be of poorer quality than the homes residents live in now. In addition to the South Kilburn estate redevelopment, the other estate 'regeneration' residents have been told to look at, with visits organised by the architects, is the Colville estate redevelopment in Hackney. This was designed by KCA, the same architects appointed by Brent Council to push through the demolition and redevelopment of St. Raphael's estate. Despite our best efforts, no-one from ASH was able to attend these visits to the Colville estate redevelopment, which is still ongoing; but we know a lot about it already, having published a case study on its consequences for residents titled 'Public Subsidies for Public Profit: The Colville Estate Regeneration' in February 2019, a shorter version of which, published by *Vice* magazine, brought forth paroxysms of rage from KCA's founder, Paul Karakusevic.<sup>26</sup>

And well it might. Phase 1 of the Colville estate scheme began in 2010 with the demolition of Bridport House, which was replaced the following year by 8- and 5-storey blocks of 41 homes, all for social rent. These provided accommodation for some of the tenants decanted from their homes in phases 2 and 3 of the scheme — though the majority were rehoused in temporary accommodation elsewhere in the London Borough of Hackney. However, the award-winning Bridport House has been plagued with problems since it was completed, with tiles falling off the roof, cracks opening in the brick cladding

and water damage to the flats.<sup>27</sup> Built over a large Victorian sewer, the new block had to be erected without concrete foundations; and the lightweight, quick-to-assemble, cross-laminated timber construction was then rushed through in order to qualify for a slice of HCA funding. Celebrated as the first council housing to be built in Hackney in forty years, Bridport house was under scaffolding throughout 2019 (*below*) as engineers tried to work out how to fix its numerous problems, which included the base of one of the metal balconies falling off.



A hurried 8 weeks to design by Karakusevic-Carson and 10 weeks to construct by Wilmott Dixon, it took Hackney Council 7 long years to respond to council tenants' calls to address its problems. After engineers reported that the insulation in the cladding may not meet building regulations on fire safety and be a danger to residents, fire wardens were placed on 24-hour watch in Bridport House.<sup>28</sup> Hackney Council subsequently offered tenants of the new slum housing block temporary accommodation. ASH has collected numerous similar examples of the poor quality and even lack of safety in the new developments being thrown up by developers who care little for the well-being

of the council tenants living in them, leaving it to councils to pick up the pieces of their Jerry-built slum housing. Under the wholesale marketisation of housing provision in the UK, this is now not the exception but the rule.

Behind their brightly-coloured facades, this is the quality of housing in which the residents who can afford to return to the 'affordable housing' on the redeveloped St. Raphael's state can expect to be housed. The fact that Brent Council and KCA chose this disastrous estate redevelopment as a show-case for St. Raphael's estate is a demonstration of the regard in which they hold residents, though we don't doubt that residents who attended KCA's field trips were shown the three-quarter-of-a-million-pound market-sale properties as examples of what they would be offered, rather than the slum housing in which the Colville estate's former council tenants are housed.

## 5.7. Increases in Service Charges

Closer to home is the South Kilburn estate, which like the Colville estate has been recommended to residents of St. Raphael's estate as a model redevelopment. In 2013, as part of the redevelopment of the South Kilburn estate, Chase, Franklin and Hollister Houses were completed by London and Quadrant (L&Q) housing association. Immediately, there were complaints by residents, not just from council tenants but also by the assured tenants in the so-called shared ownership properties, and even by private residents. These included complaints of regular disruption to water supply, loss of hot water and heating, leaking balconies, damp and mould, and a malfunctioning door-entry system. Indeed, in his talk to residents of St. Raphael's estate at the meeting ASH organised in February 2020, Peter Firkin, the Chair of the Alpha, Gorfield, and Canterbury Tenant and Resident Association, emphasised the slum quality of the new homes on the redevelopment. In response, Leaseholders commissioned a survey of the buildings, which found 'serious design faults that can only get worse if not dealt with immediately'. Like Hackney Council, L&Q ignored requests for repairs from tenants 'for years'. In addition, in the 6 years since residents had moved into the new homes, service charges for the residents in Chase House had increased by 136%. For

assured tenants in shared ownership properties they were even higher, rising from £130 to £280 per month.<sup>29</sup>

## 5.8. Loss of Security of Tenancy

In its Housing Options Appraisal, Brent Council has made a series of promises to residents with secure council tenancies that are contradicted by existing regulations about housing associations in the UK. This is important, since even the insufficient and more expensive 'affordable' housing on the redevelopment will be built and run not by Brent Council but by its housing association partners, which were initially identified in its options appraisal (para 5.4) as the Peabody Trust and Network Homes, the latter owning the 19 properties already built on the estate.

This has significant consequences for council tenants. Under Section 35 of the Housing Act 1988, housing associations were only permitted to offer new tenants assured (inaccurately called 'lifetime') tenancies.<sup>30</sup> They could not offer secure tenancies, which were exclusively the right of councils. However, the 2015 Regulatory Framework for social housing removed even this requirement, granting housing associations the power to offer fixed-term tenancies to all new tenants.<sup>31</sup> Furthermore, in its partnership arrangements (para 5.16), Brent Council states that:

*'On St. Raphael's the Council will seek to explore with its partners and Council whole owned companies such as I4B and First Wave Housing, to be able to deliver/manage private sale or market rent housing products, as well as retention of social housing by the Council alongside Network Homes and Peabody Trust.'*

Wholly-owned companies are commercial development and letting vehicles. Their shares are owned by the Council, but they operate under housing association legislation. Again, in the next paragraph of the appraisal (para 5.17), Brent Council confirms that the two partners it wants to start engagement with are Network Homes and the Peabody Trust. The reason the

Council gives for their appointment is that both housing associations 'are seen as a good fit with the Council's ethos as they promote social rent as an option within their suite of tenures.' In reality, however, housing associations are universally replacing social rent with affordable rent, and increasingly building rent-to-buy and shared ownership properties. According to the Chartered Institute of Housing, between 2012 and 2020 housing associations and councils have converted 116,000 homes for social rent to so-called 'affordable' rents, leading to a net loss of 209,351 homes for social rent.<sup>32</sup> Every one of these housed a tenant or family now struggling to find increased rent and service charges or, more likely, living in temporary accommodation.

A more accurate statement of Brent Council's choice of the Peabody Trust is given in what is almost a slip of the tongue, when they say that the housing association has 'a pipeline of new homes, which will be open to residents of St. Raphael's to move into'. This confirms that many residents whose homes are demolished will not return to the redeveloped estate. Indeed, the Council goes on to say that:

*'Network Homes and Peabody Trust could utilise their existing or future housing, where possible, to assist with rehousing residents who move away from St. Raphael's.'*

Why would council tenants with secure tenancies wish to move away from the redevelopment of St. Raphael's estate, which is supposedly being undertaken to improve their living conditions, unless there are not enough replacement tenancies to rehouse them and/or they cannot afford the increase in rent and service charges by the housing associations running the affordable housing tenures? In any case, the Council is quite clear about its own motivation for redeveloping the estate. This is to create what it calls 'a more balanced estate than one which is a mono-tenure Council managed estate'. This clearly shows that Brent Council's housing association development partners do not intend to re-provide all 522 of the existing council-tenure properties, even at 'affordable' rents. Brent Council will instead move as many council tenants as they can into housing association properties elsewhere in the borough or across London.

## 5.9. Living on a Building Site

Finally, there is the damage to residents' health of living on a building site for 10, 15 or even 20 years while the estate is demolished and redeveloped in phases, each dependent upon the financial viability of the project adjusted for developer profit, investor returns and a fluctuating property market. On the South Kilburn estate, the 'regeneration' process of demolition and redevelopment had been going for 15 years when Peter Firmin came to talk to residents of St. Raphael's estate in February 2020, and had been estimated to take a further 15 years to reach completion in 2035. We should remember that between 35 and 40 per cent of carbon emissions in the UK are produced by the construction industry. If St. Raphael's estate is demolished and redeveloped over a similar time period, residents will have to live with:

- Dust particles and fuel pollution released during the demolition of the existing housing stock, communal buildings and estate infrastructure;
- Carbon emissions from the transportation of the debris and waste away from the demolished estate;
- Carbon emissions from the transportation of material, construction machinery, heavy goods vehicles and workers for the redevelopment on the cleared land;
- Carbon emissions from the construction of between 2,000 and 2,500 new residential properties, communal buildings and infrastructure.

All these carbon emissions, together with the noise pollution of demolition, transportation and construction, will have a sustained and significant negative effect on the lives and health of residents and neighbours of St. Raphael's estate, including elderly residents and school children, for the next 30 years.

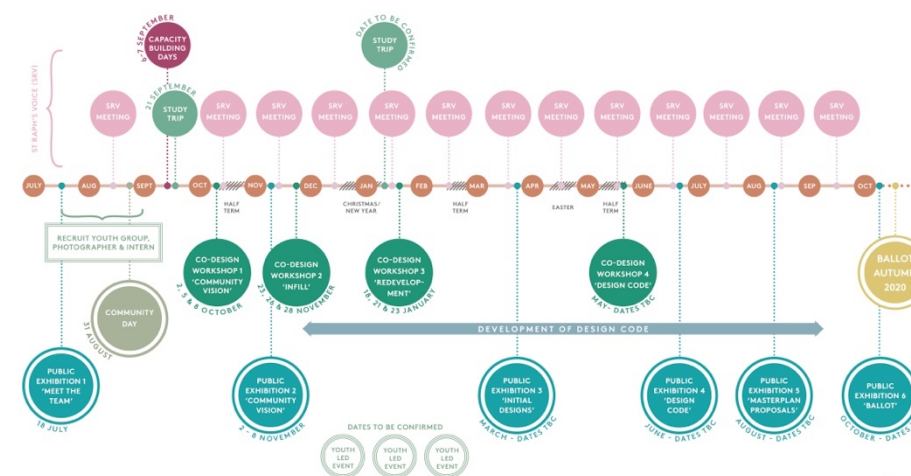
## 6. The Resident Ballot



### 6.1. Who Votes for What?

Under the London Mayor's policy on Resident Ballots for Estate Regeneration Projects — which he published in July 2018 and whose numerous failings ASH has analysed in detail — it is possible for councils to hold ballots 'prior to the procurement of a development partner and/or prior to finalising the precise specification of works' (para 8.5.1).<sup>33</sup> It is extremely important, therefore, that residents challenge this procedure, because until a development partner is found residents will be balloted on nothing more than promises from Brent Council that will have absolutely no legal or contractual hold on what will get built should residents choose the demolition option. And since the ballot will be held 'prior to finalising the precise specification of works', there are no measures to stop the Council's development partners changing their 'Landlord Offer' after the vote has been cast.

As it is, although the ballot has been repeatedly delayed, the timeline Brent Council originally produced for the 'regeneration' process made it clear (in words removed from the subsequent and revised timelines but which can be read above) that the Council and Cabinet would make the decision 'whether to move forward with infill or redevelopment' months before residents get to vote whether or not they agree with them. Residents won't be balloted, therefore, on the infill option if the Cabinet chooses the demolition and redevelopment option, but only on whether to vote for redevelopment, with no other option available. The Cabinet's decision, supposedly, will be on the basis of what a later timeline describes as 'community preference'.<sup>34</sup> But until the ballot is held, how can Brent Council possibly claim to know what that preference is?



### 6.2. The Landlord Offer

Once again, to get an idea of how the resident ballot will be conducted by Brent Council, we can look at the ballot for phase 4 of the demolition and redevelopment of the South Kilburn estate, and at the details of the landlord offer to residents. This was published by Brent Council in the autumn/summer of 2019 in 'South Kilburn Landlord Offer: Our promise to you'.<sup>35</sup>

#### What is the question?

- 'Are you in favour of the proposal to continue the regeneration of South Kilburn?'
- 'You can vote either YES or NO.' (p. 11)

### What does the question mean?

- *'If we continue the regeneration, the affected blocks will be demolished and rebuilt on a phased basis.'*
- *'In the event of a majority NO vote, work on buildings that is already underway will continue. However, the Council will have to reconsider if the rest of the programme is affordable. This might mean that we cannot build the planned new council homes and services.'* (p. 11)

This is a veiled threat by Brent Council that, unless residents vote for the demolition of their own homes, the promised 'affordable' housing component of the redevelopment, and in particular any homes for social rent it might contain, will not be built. This will have a negative impact on the council tenants whose voted for their homes to be demolished in the expectation of returning to homes for social rent on the affordable housing of the redevelopment. This in turn will lead to tensions within the estate community, inevitably turning those who voted YES and those who vote NO against each other, and inviting the former to put pressure on the latter. Unfortunately, ASH has seen use these kinds of tactics used by the councils on all the estates with whose residents we have worked. Indeed, Peter Firmin spoke of this happening on the South Kilburn estate redevelopment, where Brent Council used a single vote for the entire estate rather than for individual blocks, some of which had been deprived of maintenance for years, and where residents were desperate for new homes.

If residents vote YES, however, the threats are replaced with ultimatums that are made to encourage as many households as possible to move off the estate and into accommodation elsewhere, not pending the exercise of their Right to Return to the new development, but permanently. If residents of St. Raphael's estate have any doubts that the purpose of demolishing their homes is to socially cleanse their community from the land on which they are built, they should attend closely to the following offers, inducements and ultimatums with which the residents of the South Kilburn estate have been confronted.

## 6.3. To Council Tenants

*'If we continue the redevelopment of South Kilburn, council tenants, and people living in temporary accommodation, will get:*

- *a new home on the estate, or the option to move to another council home/housing association property elsewhere if you prefer.'* (p. 4)

*'You will receive one offer of accommodation that meets the housing need of your household. Your offer will be either:*

- a) 'A permanent move within South Kilburn to a new home;*
- b) 'A permanent move within South Kilburn to an existing council property;*
- c) 'A permanent move outside South Kilburn, if you prefer, within the borough.'* (p. 5)

*'If you want to move off the estate, we will try to relocate you to your area of choice. However, this will be dependent on suitable homes to match your needs being available.'* (p. 5)

In other words, Brent Council is telling residents: vote YES to the demolition of your home, take what we're offering in compensation, move elsewhere in the borough or if possible outside, replace your secure council tenancy with a council home if we've got one, but more likely with a housing association property, and, above all, don't come back — 'if you prefer', of course.

We've already looked at what happens when a council tenant with a secure tenancy becomes a tenant in a housing association, but it's worth returning to these consequences, which are determined not by the empty promises of Brent Council but by the legislation of the UK. The following facts show the extent of the lies residents are being told to persuade them to vote for the demolition of their homes.

- *'All tenants who move into council properties will be offered a lifetime tenancy.'* (p. 6)

**Fact:** The Housing and Planning Act 2016 reduced Secure Tenancies for new homes to a maximum of 10 years and a minimum of 2 years, so this is a blatant lie concealed behind the term ‘lifetime tenancy’.<sup>36</sup> Like ‘genuinely affordable housing’ — another favoured promise of councils — this has no legal definition under UK housing legislation, and is used exclusively by councils and their consultants to deceive tenants into believing they will be given a secure tenancy, which UK housing legislation is systematically phasing out.

- *‘All tenants who move into housing association properties will be offered a tenancy which has been designed with the same terms and conditions as the council tenancy, such as: the preserved right to buy.’ (p. 6)*

**Fact:** As we’ve seen, the Housing Act 1988 meant housing associations can only offer tenants assured tenancies or assured shorthold tenancies, and now, following the 2015 Regulatory Framework, even fixed-term tenancies; so this, again, is a blatant lie. It is true, however, that following the Housing and Planning Act 2016, housing associations can now offer the Right to Buy to their tenants, home-ownership being a stated policy of UK housing legislation.

- *‘There will be a small increase in rent for new homes.’ (p. 6)*

**Fact:** London Affordable Rent, as set by the London Mayor’s Homes for London: Affordable Homes Programme 2016-2023, is as follows:

	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23
Bedsit and 1-bedroom	£144.26	£150.03	£155.13	£159.32	£161.71	£168.34
2 bedrooms	£152.73	£158.84	£164.24	£168.67	£171.20	£178.23
3 bedrooms	£161.22	£167.67	£173.37	£178.05	£180.72	£188.13
4 bedrooms	£169.70	£176.49	£182.49	£187.42	£190.23	£198.03
5 bedrooms	£178.18	£185.31	£191.61	£196.78	£199.73	£207.93
6 or more bedrooms	£186.66	£194.13	£200.73	£206.15	£209.24	£217.82

This compares to the social rent currently being paid by council tenants on St. Raphael’s estate, which in 2020/21 was as follows:

	2020/21
1-bedroom flat	£95.00
2-bedroom flat	£106.00
3-bedroom maisonette	£133.30
3-bedroom townhouse	£124.63
4-bedroom townhouse	£138.35

As can be seen, London Affordable Rent is between 60 and 75 per cent higher than social rent in the London Borough of Brent. For council-tenant households, this cannot by any stretch of the imagination be called a ‘small increase’. Once again, then, Brent Council is lying to tenants.

- *‘Service charges are calculated based on services provided and will vary for each development.’ (p. 6)*

**Fact:** As we’ve seen, according to testimony from residents on the earlier phases of the South Kilburn estate redevelopment, service charges increased 136 per cent in 6 years. Added to the increases in rents, this makes the ‘small increase’ of the former an even less factual description of the huge increases in housing costs for the few council tenants able to return to the housing association homes being let for London Affordable Rent on the new development.

## 6.4. To Leaseholders and Private Owners

- *‘If we continue the redevelopment of South Kilburn, as a leaseholder you will get:*
- *‘The choice of either buying a new property on the estate on a shared equity basis (where possible) or selling your home back to the council and leaving the estate.’*

- *'Market value for your home plus 10% home loss payment (resident leaseholders), or 7.5% home loss payment (investor leaseholders).'* (p. 8)

As we've seen, the inadequate compensation Brent Council has estimated offering leaseholders for their demolished homes is 53-58 per cent lower than the price of the properties they anticipate building at £7,500 per square metre; and between 38 and 45 per cent of the price their property consultants, Strutt & Parker, anticipate selling the new properties on phase 4 of the Kilburn estate redevelopment. And, once again, as they are with council tenants, Brent Council aren't shy of suggesting the solution to this inadequacy is for leaseholders to 'leave the estate' and not exercise their Right to Return. Moreover, the longer leaseholders delay such a move, the less they are likely to get for their demolished home, whose 'market value' will decrease with the managed decline of the estate and its eventual transformation into a building site.

- *'There are a number of housing options for leaseholders. They include:*
  - *'Shared equity (subject to availability). You will own a share of the property with the council or housing association owning the remaining share. You will not have to pay rent.'* (p. 8)

It's true that taking up Brent Council's shared equity deal would relieve leaseholders and private owners of the rent those entering into a shared ownership deal would have to pay; but a shared equity deal would require them to invest all of the Council's compensation for their demolished home in the new property. And as with a shared ownership deal, until the former leaseholder owns 100 per cent of the property, they'll only have the rights of an assured tenant, though one with responsibility for 100 per cent of the service charges and maintenance costs on what remains the housing association's property.

- *'Existing council property swap (resident leaseholders only). This enables you, as a leaseholder, to transfer your equity into a vacant council social rented unit that is not due for demolition.'* (p. 9)

This is, in effect, privatisation by stealth, turning the few social rented flats owned by Brent Council into leaseholder properties, thereby reducing the already dwindling stock of Council-owned properties for social rent ('not due for demolition'). Such a deal is completely incompatible with Brent Council's admission, in its Housing Option Appraisal, that 'demand for social housing by far exceeds supply' in the borough (para 4.6).

- *'Shared ownership. You own a share of the property, and pay rent to a housing association on the remaining share. You can increase your ownership percentage over time.'* (p. 9)

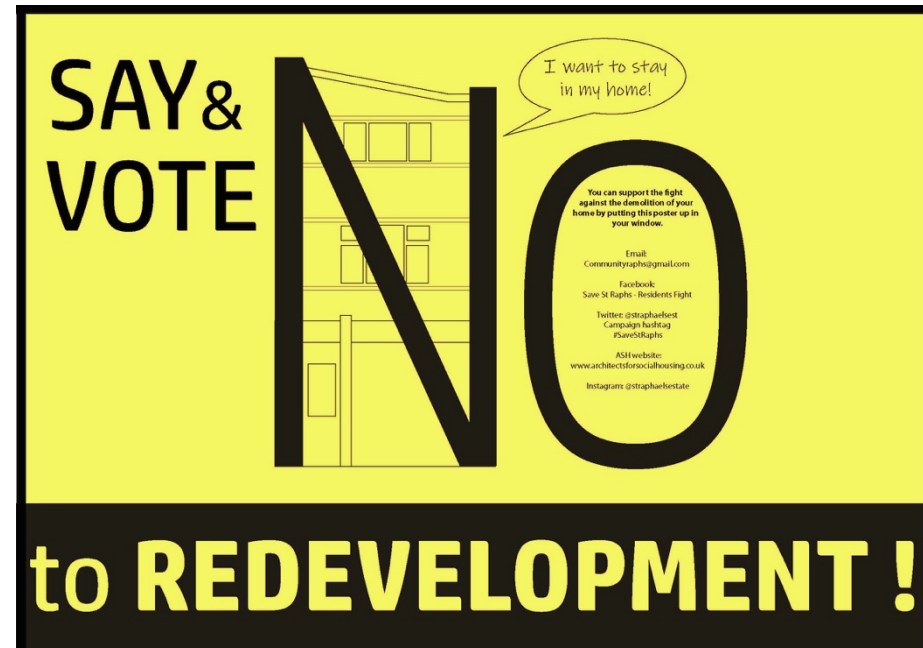
As we've already seen, former leaseholders or freeholders investing in shares of a property under a shared ownership deal will remain no more than assured tenants until they own all the shares. And it bears repeating that, until they do, they will have to find 2.75 per cent of the value of the unpurchased shares in annual rent.

As an hypothetical example of what this will mean in practice, a former leaseholder on St. Raphael's estate, living in a 2-bedroom home for their family of four, receives £265,000 in compensation for their demolished property. As a resident leaseholder, they also receive a further 10 per cent home-loss compensation, taking their total compensation up to £291,500. However, they still have 25 per cent of their mortgage to pay, so this £66,250 is deducted from the total, reducing their compensation from the Council to £225,250. With this, they invest in a new 2-bedroom/4 person property on the redevelopment. However, since it is being sold for £525,000 (70 square metres x £7,500), they can only purchase 40% of the shares. As an assured tenant with the housing association that owns the property, this leaves them having to find an additional rent of £720/month, plus service charges, which, as we've seen on the Kilburn South estate, were £280/month in 2019 and rising, so about £1,000/month, which is many times their previous monthly mortgage repayments. For a couple that have invested their life's savings in a council property, possibly through Right to Buy, possibly purchased from a previous council tenant who exercised their Right to Buy then left the estate, this huge increase in housing costs is likely to be prohibitive. Indeed, as Brent

Council is open about saying in this Landlord's Offer to both tenants and leaseholders, this is precisely the purpose of demolishing and redeveloping council estates.

In reality, it could be far worse than this, because if the leaseholders received their compensation in, say, 2022, when their home was demolished, and they buy the shares in the shared ownership property in, at the very earliest, 2027, the property will have increased in price. UK residential property values increase at anything up to 10 per cent per year, so when they enter into the shared ownership deal, the £550,000 property is now priced at £750,000, which is what an equivalent property on the South Kilburn Estate is selling for.<sup>37</sup> This means they can only afford a 30 per cent share in the property, and their rent rockets to £1,200 per month. This is why leaseholders whose homes are demolished by estate 'regeneration' schemes almost never return to the redevelopment, for the simple reason that they cannot afford to do so. Indeed, with the compensation they are offered for their demolished homes, most cannot afford to stay in London, and are forced to move elsewhere in the UK.

Given the mass of documentation for everything we presented to residents at the meeting in February 2020 and in greater detail in this report, it can be seen that it not ASH that is spreading fear among residents — as we were accused of doing by Public Participation Consultation and Research and, at their behest, by the Chair of St. Raphael's Voice. On the contrary, and as can be verified by anyone choosing to look at the documents to which we have linked every statement of fact, it is Brent Council and its paid consultants — PPCR, KCA and others — that are deliberately withholding this vital information from residents. Until this factual information about the disastrous consequences for residents of demolishing and redeveloping their estate, as well as the alternative to demolition ASH has designed and costed, is made available to the residents, any ballot vote on the future of St. Raphael's estate must be regarded as invalid.



Save St. Raphael's campaign ballot poster and its display in residents' homes.

## 7. The Campaign to Save St. Raphael's Estate

The contradiction between the evidence we have presented here of the universally negative results of estate redevelopment and the putative reasons Brent Council has given for demolishing St. Raphael's estate raises several questions that residents should ask themselves as well as Brent Council and the consultants it has employed to promote the destruction of their community:

- Where will the 522 council-tenanted households on the demolished St. Raphael's estate be rehoused, and at what rent levels, service charges and tenure types?
- How will the 219 leaseholders and freeholders whose homes will be demolished be able to afford the shared-ownership and market-sale properties the Council's development partners will have to build in their place to cover the costs of demolition, compensation, redevelopment and their own profit margins?
- How do half-a-million-pound-plus properties on a 'waterfront location' meet housing need in the London Borough of Brent, where the average income is £23,000 per annum and the greatest demand is for social housing?
- How is this blatant land grab and social cleansing of a long-standing community supposed to improve the lives of the residents of St. Raphael's estate?

### 7.1. Environmental Impact Assessment

There are several ways the campaign to save the estate from demolition can go about opposing the demolition of their homes and community. While ministers, councillors, policy-writers, developers, architects and, indeed, the UK public has shown itself to be largely indifferent to the UK's estate regeneration programme so long as it doesn't affect them personally, there

has been far greater concern about the impact of the building industry on the environment in which we all live. Although ASH's main concerns are for the economic consequences of estate demolition schemes and the devastating social impacts they have on all residents, tenants and leaseholders alike, the campaign to save St. Raphael's estate should try to hold Brent Council, the architectural profession and the London Mayor to their respective commitments to reducing the impact of the building industry, and the decisions they make in respect of it, on the environment.

In Chapter 9, titled 'Sustainable Infrastructure', of The London Plan, which was published in March 2021 by the Mayor of London, it states (Policy S1.2):<sup>38</sup>

*'Major development should be net zero-carbon. This means reducing greenhouse gas emissions in operation and minimising both annual and peak energy demand in accordance with the following energy hierarchy:*

- 1) *be lean: use less energy and manage demand during operation*
- 2) *be clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly*
- 3) *be green: maximise opportunities for renewable energy by producing, storing and using renewable energy on-site*
- 4) *be seen: monitor, verify and report on energy performance.'*

In July, 2019, Brent Council itself declared a 'Climate and Ecological Emergency', and in a motion resolved:<sup>39</sup>

*'To enshrine the principle that developments could and should fund projects that reduce carbon emissions elsewhere in the borough.'*

On 30 May, 2019, Architects Declare launched 'UK Architects Declare Climate and Biodiversity Emergency', which to date has received the signatures of

over 1,200 architectural practices (although not of Karakusevic Carson Architects).<sup>40</sup> One of its commitments is to:

*'Upgrade existing buildings for extended use as a more carbon efficient alternative to demolition and new build whenever there is a viable choice.'*

And on 12 September, 2019, the Architects' Journal launched the Retrofirst Campaign, which includes the commitment to:<sup>41</sup>

*'Promote the reuse of existing building stock.'*

*'Support a whole-life carbon approach in construction by insisting that all publicly-funded projects look to retrofit solutions first.'*

## 7.2. Conditions of Mayoral Funding

Closer to the concerns of ASH, and most probably the 522 tenant-households in Area A of St. Raphael's estate, is the loss of homes for social rent that will result from the demolition of their homes. And here too the campaign can appeal to the Mayor of London's housing policy, and try to hold Brent Council to its requirements, upon which any funding from the GLA — which the Council has assumed in its Financial Viability Appraisal — is conditional. In Chapter 4 of The London Plan, 'Housing', it states (Policy H8 'Loss of existing housing and estate redevelopment'):

### **Demolition and replacement of affordable housing**

*'Before considering the demolition and replacement of affordable homes, boroughs, housing associations and their partners should always consider alternative options first. They should balance the potential benefits of demolition and rebuilding of homes against the wider social and environmental impacts and consider the availability of Mayoral funding and any conditions attached to that funding.'*

*'Demolition of affordable housing, including where it is part of an estate redevelopment programme, should not be permitted unless it is replaced by an equivalent amount of affordable housing floorspace. Affordable housing that is replacing social rent housing must be provided as social rent housing where it is facilitating a right of return for existing tenants. Where affordable housing that is replacing social rent housing is not facilitating a right of return, it may be provided as either social rent or London Affordable Rent housing. Replacement affordable housing should be integrated into the development to ensure mixed and inclusive communities.'*

Since Brent Council has offered tenants of St. Raphael's estate the Right to Return to the redevelopment, Policy H8 requires the replacement of all demolished homes for social rent with new dwellings for social rent. However, there are numerous ways around this requirement that councils implementing estate demolition schemes have developed over the twenty or so years of the programme. The most typical of these is to subject the estate to a process of managed decline that includes destroying green areas, stopping rubbish collection, and moving tenants on their housing waiting lists with a history of social problems and criminal behaviour into any vacant housing. Added to the prospect of 20 or more years on a building site and the unlikelihood of residents being able to afford to return to the redevelopment, the decline of the living environment in which residents have to live persuades many of them to take the council's offer to be rehoused elsewhere. By the time the estate is finally and fully demolished, therefore, the number of homes for social rent in which residents with a secure council tenancy are living is reduced by anything up to a half, and it's these numbers — and not the original number of social-rent tenancies — that the Council will use when estimating how many homes for social rent it has to build on the redevelopment.

That said, council tenants facing the threat of being evicted from their demolished homes and secure tenancies should do their best to hold Brent Council to this policy requirement not only to replace their home at the same rent level and tenure type, but that doing so is a condition of the council

receiving the GLA funding it is counting on to make the scheme financially viable.

Finally, since delivering our presentation to the residents of St. Raphael's estate in February 2020, the London Mayor, in the *Affordable Homes Programme 2021-2026: Funding Guidance*, which was published in November 2020, added a further condition to councils and development partners applying for GLA funding for estate redevelopment schemes (para 36).<sup>42</sup>

*'The Affordable Homes Programme 2021-26 provides funding for estate regeneration projects where the grant is used for additional homes. Funding will not be available for units that replace homes that have been, or will be, demolished.'*

This can cut two ways. Either Brent Council will announce that, without the £60,000 per property for London Affordable Rent and £28,000 per property for London Living Rent and Shared Ownership properties provided on the new development, the Council and its development partners are unable to cover the costs of demolishing the estate, compensating leaseholders and redeveloping the land, including the 760 demolished homes, and that the scheme is financially unviable.

Or, Brent Council and its development partners will announce that, given this lack of funding, the new development will have an even greater increase in properties built and higher densities, with an even higher percentage of market-sale properties than promised, even less 'affordable' housing, an even higher percentage of which will be for shared ownership and shared equity deals, with few if any homes for London Affordable Rent and none for social rent.

We note here that, since the *Affordable Homes Programme 2016-21: Funding Guidance* was originally published in November 2016, the Mayoral funding for London Affordable Rent units has changed.<sup>43</sup> As shown by the accompanying document, 'Building Homes for Londoners: Funding Prospectus', which was

published in May 2018, the grant was originally £100,000 per unit for social rent and London Affordable Rent.<sup>44</sup> However, in the Funding Guidance for 2021-2026, published in November 2020, the new document refers the applicant back to the older, now redundant Guide, for the grant rates, and the 2016-2021 Guide has been edited retrospectively to show the new funding grant, which is now £60,000 per unit, and for London Affordable Rent alone. Presumably, the Mayor has done this to try to conceal the fact that the new grant is 40 per cent less than the old one without drawing attention to the fact. What this shows is two things. First, that the Mayor has deliberately tried to conceal this huge reduction in funding for the most affordable rental type funded by his office. And second, that there is no longer any Mayoral funding to incentivise councils, housing associations and property developers to build homes for social rent over those for London Affordable Rent, which in Brent, as we have seen, is 59 per cent higher. No-one who has followed and read the consistently disastrous housing policy implemented under the Mayor's Homes for Londoners programme should be surprised by this.

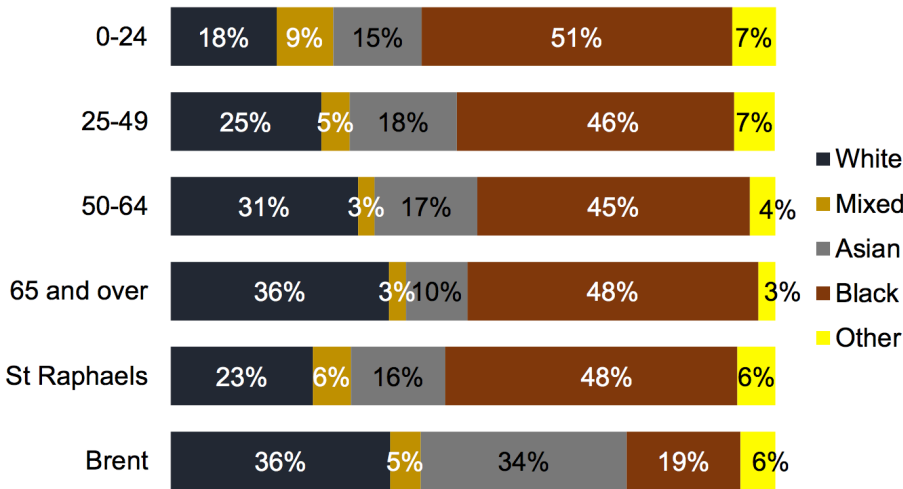
### 7.3. Equality Impact Assessment

In the same Chapter 8 of The London Plan it states (para 4.8.3):

*'The Mayor is clear that when considering options to deliver estate regeneration projects, boroughs, housing associations and their partners should always consider alternative options to demolition first. They should balance the potential benefits of demolishing and rebuilding homes against the wider social and environmental impacts of this option.'*

Beyond the environmental impact the demolition of and redevelopment of St. Raphael's estate would have on the London Borough of Brent, there is also the social impact it would have on the current residents, who, under the Equality Act 2010, have characteristics protected by UK legislation. These are that, under its Public Sector Equality Duty, Brent Council cannot discriminate against anyone based on their age, sex, race, disability, sexual orientation, gender reassignment, religion or belief, pregnancy or maternity or marriage.

In its Equality Analysis, which was published on 25 November, 2019, drawing on the Census of 2011, the ethnicity of residents within the boundary of all of St. Raphael's estate (Areas A, B and C) was as follows (below).<sup>45</sup> 48 per cent of the estate was Black, 23 per cent was White, 16 per cent was Asian, 6 per cent was of mixed ethnicity, and 6 per cent from other ethnic groups. This differed significantly from the London Borough of Brent as a whole, in which 19 per cent of residents were Black, 36 per cent were White, 34 per cent Asian, 5 per cent were of mixed ethnicity, and 6 per cent from other ethnic groups.



On St. Raphael's estate, therefore, the percentage of the population that was Black was two-and-a-half times that in the borough overall. Brent Council, therefore, is under the legal obligation to ensure that their plans to demolish and redevelop St. Raphael's estate will not disproportionately negatively impact the residents, and by doing so discriminate against them based on their protected characteristic, in this case their ethnicity. Despite this legal requirement, in its Equality Analysis, Brent Council repeats the same statement over and over again when estimating the impact the demolition of St. Raphael's estate will have on every one of the protected characteristics of residents:

*'The judgement to date on the potential impact of the policy or proposal on groups with each protected characteristic is based on the intention that housing, transport, environmental and community improvements, and development opportunities will on the whole have a positive impact, however until the options are developed this cannot be analysed.'*

Finally, this sham equality analysis concludes:

*'We are unable to assess the impact until the masterplan options have been developed.'*

As we've shown in this report, none of the consequences of demolition and redevelopment can by any stretch of the imagination be described as having a 'positive impact' on the existing residents of St. Raphael's estate, and Brent Council has failed to provide any evidence that it does. On the contrary, the evidence we have presented here shows, conclusively, that the demolition and redevelopment of the homes of the 760 households on Area A of St. Raphael's estate would have a universally negative impact, and indeed be catastrophic for most of them. By pursuing these plans, therefore, Brent Council is meeting neither its Public Sector Equality Duty to residents, in violation of their protected characteristics under the Equality Act 2010, nor the requirements of The London Plan on which its access to GLA funding is conditional.

## 7.4. Case Study of the Alternative to Demolition

Finally, there is a fourth way to save St. Raphael's estate from demolition, and with it the social cleansing of the community from their homes, and that is to do what Brent Council and its consultants, Karakusevic Carson Architects, have failed to do. This is to produce a feasibility study for a design alternative to demolition, one that will retain, refurbish and improve the housing and communal facilities on the estate, and thereby keep the existing community intact, while at the same time increase the housing capacity of the estate, not with properties for capital investment but with homes that meet the housing

need in the London Borough of Brent, which means, above all, council homes for social rent. Beyond the information and advice for residents we've collected in this report, this is where Architects for Social Housing can be of greatest help to the resident campaign to save St. Raphael's estate from demolition.

What does ASH want to demonstrate with their feasibility study?

- That we can improve the 'quality of life on St. Raphael's estate' for existing residents, as Brent Council listed in its Housing Options Appraisal as one of the reasons for putting the estate up for 'regeneration', as well as extend the life-span of the existing buildings.
- That we can improve and extend the community facilities and landscaping of the estate to support a 'thriving neighbourhood', which Brent Council also identified as a reason for regenerating the estate.
- That without the financial costs consequent upon demolition, Brent Council can 'build brand new homes' for social-rent in order to meet 'local housing need' and 'the needs of families', another aim the Council gave for regenerating the estate.
- That demolition is not necessary to achieve any of these stated aims of Brent Council.
- That, to the contrary, the demolition and redevelopment of St. Raphael's estate will result in the social cleansing of the existing community; in the unnecessary loss of 522 council homes for social rent; in their replacement with so-called 'affordable housing' that few residents and most Londoners cannot afford either to rent or buy; in the driving up of house prices and housing costs in the local neighbourhood; and in a considerable and negative environmental impact on Neasden.

How does ASH propose to do this architecturally?

- By producing a design case study of a portion of St. Raphael's estate showing the possibilities for refurbishment, infill development and improvement for existing and future residents.

- By producing a design case study showing the possibilities of refurbishing and improving, or re-providing, the estate's commercial and communal facilities.
- By exploring the possibility of roof extensions to the existing housing.
- By exploring the possibility of infill development in appropriate areas that will add significant numbers of additional housing for social rent, the tenure type in highest demand in the London Borough of Brent.
- By exploring the possibility of improving the public realm and landscape on the estate.
- By exploring the replacement of the disused police building (now Henderson House) with a community-run boxing club or with similar community facilities for the estate's young residents.

What does ASH need to do produce this feasibility case study?

- The full Financial Viability Assessment of Brent Council's plans to demolish and redevelop St. Raphael's estate, showing on what unit numbers, tenure types, rent levels and sale prices their proposals have been costed. This should be published and made available to the public before residents make any balloted vote on the future of their homes.
- A costed Financial Viability Assessment of a refurbishment and infill option for Area A of St. Raphael's estate, showing the number, tenure type, rent levels and sale prices of the dwellings such an option could provide.
- An independent Environmental Impact Assessment of the carbon cost and environmental impact of demolishing and redeveloping St. Raphael's estate.
- The means, including access to suitable venues and the distribution of information, to advise and inform as many residents as possible about the social, environmental and economic costs to them of demolishing and redeveloping St. Raphael's estate, and what it will mean for them, their families and their homes.

In Chapter 4 of The London Plan, in an overdue admission of the negative impact of estate demolition schemes on residents, it states (para 4.8.6):

*'Given the impact of estate regeneration schemes on existing residents, it is particularly important that information about the viability of schemes is available to the public even where a high level of affordable housing is being delivered.'*

It is quite understandable that Brent Council, like every other council implementing an estate redevelopment scheme, has withheld the Financial Viability Assessments for their proposals, for it is these that will show the actual (and not merely promised) number, sale price and tenure type of the properties they have to build in order to recoup the costs of demolition and compensation and the profit margins of their development partners. The claim that councils all make, that they cannot make such assessments until they have decided on a final option and appointed a development partner is, quite simply, a lie. As the partial information published in the Housing Options Appraisal shows, the financial consultants appointed by the council are making such assessments of the different options at each stage of the process. Under the requirements for funding published in The London Plan, each and every one of these should be made available not merely to residents but also to 'the public', and in not doing so Brent Council is, once again, in violation of the London Mayor's housing policy and not meeting the requirements for GLA funding.

Before Brent Council thinks of balloting residents to choose between, on the one hand, the demolition and redevelopment option in which they have invested some £850,000 in pushing and, on the other, a refurbishment and infill option they have all but dismissed from the start, it should pay an architectural practice separate from Karakusevic Carson Architects, which has been given the brief for the demolition and redevelopment option masterplan, to produce an option up to feasibility study stage for the refurbishment and infill of the estate, have their proposals costed by an independent quantity surveyor, together with an assessment of its financial viability. Only this will allow residents to compare the benefits of such an option against the social, economic and environmental costs of demolition and redevelopment, how many new residences each option will produce, and — most importantly of all — what relative tenure and costs those new homes

will be. To this end, and in the absence of any such payment, ASH has produced a feasibility case study of St. Raphael's estate, which may be read and viewed in Part Two of this report.

## 8. Conclusion

There are three key points to take away from Part One of this report, the contents of which, we hope, we have established as true and factually verifiable statements, not only about Brent Council's proposals for St. Raphael's estate but also about London's estate 'regeneration' programme.

### **1. The motivation for estate redevelopment is profit**

The proposed redevelopment of St. Raphael's estate is not being undertaken to improve the living conditions of the existing community. It's being done to gain access to the land residents' homes are built on, in order to realise the land's latent financial value. This is to be accomplished by replacing council homes with the highest-cost properties possible, and which are targeted at UK, foreign and offshore investors.

### **2. Vote 'NO' to redevelopment**

The ballot vote for or against the demolition of St. Raphael's estate is the single most important decision in the regeneration process. The economic consequences of this decision will determine everything that happens to residents afterwards, and if they vote for redevelopment the consequences for them will range from bad to disastrous.

### **3. There are other and better options**

There is a design alternative to the redevelopment of St. Raphael's estate that is far more socially beneficial, environmentally sustainable and economically viable. This is for the refurbishment and improvement of the estate, with the potential to increase its housing capacity to meet housing needs and local incomes in the London Borough of Brent.

## Endnotes

1. See Brent Council, 'St. Raphael's Estate - Housing Options Appraisal. Report from the Strategic Director of Community Well-being', 12 November, 2018.
2. See Karakusevic Carson Architects, 'St. Raphael's Masterplan', November 2019.
3. See Architects for Social Housing, *The Costs of Estate Regeneration: A Report by Architects for Social Housing*, 2018.
4. See 'St. Raphael's Estate Residents Say No to Regeneration'. Change.org
5. See Brent Council, 'Journey so far'.
6. See Architects for Social Housing, 'St. Raphael's Estate: ASH presentation to the Bartlett School of Architecture (housing design research workshop)', 5 February, 2020.
7. See Brent Council, 'Decision details. St. Raphael's Masterplanning'.
8. See Architects for Social Housing, 'Saving St. Raphael's Estate: ASH presentation to residents, St. Patrick's Church', 26 February, 2020.
9. See Child Poverty Action Group, 'Child Poverty in London Facts'.
10. See Government Indices of Deprivation: 2019 and 2015.
11. See The Crime and Disorder Act 1998.
12. See Simon Elmer, 'Rioting, Legislation and Estate Demolition: A Chronology of Social Cleansing in London, 1999-2019', *Architects for Social Housing*, 16 October, 2019.
13. See 'Ian Ritchie gets go-ahead for East End estate scheme', *Building Design*, 9 August 2019.
14. See Anna White, 'A high price to pay: is shared-ownership "affordable" for the average Londoner? You must be joking', *Evening Standard*, 23 October, 2018.
15. See Office for National Statistics, 'English Housing Survey: Housing stock report 2008'.
16. See CDRC Mapmaker, 'Dwelling Modal Age: The modal build period for residential buildings'.
17. See Brent Council, 'Future St. Raphael's Masterplanning. Report from Strategic Director, Community Well-being', 9 December, 2019.
18. See Deloitte, 'Financial Viability Report, NWCC Site', December 2019.
19. See Mayor of London, 'Good Quality Homes for all Londoners. Module C – Pre-consultation draft. Housing Design, Quality and Standards: Supplementary Planning Guidance', 2020.
20. See Payscale, 'Average Salary in Brent, England: London'.
21. See Mayor of London, 'London Plan Annual Monitoring Report 16, 2018/19', March 2021.
22. See Mayor of London, *Homes for Londoners: Affordable Homes Programme 2016-2023*; 'London Living Rent'; and home.co.uk.
23. On the scam of shared ownership, see HomeOwners Alliance, 'Shared Ownership: What to watch out for'; Giles Peaker, 'The hidden dangers of shared ownership', *The Guardian*, 3 September, 2013; Giles Peaker, 'Shared ownership comes with risk – here's what to watch out for', *The Guardian*, 15 September, 2016; and Alexandra Goss, 'The scandal of shared ownership schemes', *The Times*, 30 September, 2018.

24. See Harriet Grant and Chris Michael, 'Too poor to play: children in social housing blocked from communal playground', *The Guardian*, 25 March, 2019.

25. For the typically rhapsodic description of this privatised, gated and segregated development, see the pages titled 'Baylis Old School' on the Henley Homes and Conran and Partners websites.

26. See Simon Elmer, 'Public Subsidies for Private Profit: The Colville Estate Regeneration', *Architects for Social Housing*, 21 February, 2018; an abridged version of which appeared as 'Hackney Council is Demolishing an Entire Estate to Build More Luxury Housing', *Vice*, 7 March, 2019.

27. See Emma Bartholomew, 'Mystery of Bridport House: Why is award-winning Hoxton council block still defective seven years on?', *Hackney Gazette*, 30 August, 2018.

28. See Emma Bartholomew, 'Bridport House: Now Hackney Council installs 24/7 fire wardens in ill-fated block as engineers spot suspect insulation', *Hackney Gazette*, 1 April, 2019.

29. See Nathalie Raffray, 'High service charges and no hot water for weeks on end', *Brent & Kilburn Times*, 16 May, 2019.

30. See The Housing Act 1988.

31. See Elizabeth Parkin and Wendy Wilson, 'Social housing: flexible and fixed-term tenancies (England)', 2 September, 2018. House of Commons Library.

32. See the Chartered Institute for Housing. 'UK Housing Review 2021 highlights shocking fall in numbers of social rented homes', 29 March, 2021.

33. See 'GLA Capital Funding Guide: Section Eight. Resident Ballots for Estate Regeneration Projects'; which ASH has analysed in 'Manufacturing Consent: GLA Capital Funding Guide: Section Eight. Resident Ballots for Estate Regeneration Projects', *Architects for Social Housing*, 20 July, 2018.

34. See Brent Council, 'Future St. Raphael's Estate: Proposed Timeline and Activities'.

35. See Brent Council, 'South Kilburn Landlord Offer: Our promise to you', Summer/Autumn 2019.

36. See the Housing and Planning Act 2016, Schedule 7. 'Secure tenancies, etc: phasing out of tenancies for life'.

37. See Statista, '12 month percentage change in house prices in the United Kingdom (UK) from July 2007 to August 2021'.

38. See Mayor of London, 'The London Plan: The Spatial Development Strategy for Greater London', March 2021.

39. Brent Council, 'Declaring a Climate and Ecological Emergency', 2nd Motion selected by the Labour Group, 8 July, 2019.

40. See 'UK Architects Declare Climate and Biodiversity Emergency', 30 May, 2019.

41. See 'RetrofitFirst: a new AJ campaign championing reuse in the built environment', *Architects' Journal*, 12 September, 2019.

42. See Mayor of London, *Homes for Londoners: Affordable Homes programme 2021-2026. Funding Guidance*, November 2020.

43. See Mayor of London, *Homes for Londoners: Affordable Homes programme 2021-2026. Funding Guidance*, November 2016.

44. See Mayor of London, 'Building Council Homes for Londoners: Funding Prospectus', May 2018.

45. See Brent Council, 'Future St. Raphael's Masterplanning: Appendix F. Equality Analysis (EA)', 25 November, 2019.

