Part Three

The Social Cleansing of St. Raphael's Estate

Design Options by Karakusevic Carson Architects

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1. Introduction

In February 2018, after a year's consultation, the Mayor of London published Better Homes for Local People: The Mayor's Good Practice Guide to Estate Regeneration. In Chapter 3, under the title 'Full and Transparent Consultation and Involvement', the guide stipulates that:

'Residents should be closely involved in shaping the priorities for estate regeneration and options for achieving these priorities. To achieve this, options appraisals should be open and transparent. They should assess the full range of social, economic, and environmental costs and benefits of different options.'

Two years later, on Saturday 7 March, 2020, Karakusevic Carson Architects (KCA) held a public exhibition of their 'initial designs' for the future of St. Raphael's estate (*opposite*). The third public exhibition held to promote the redevelopment of St. Raphael's, it was held in St. Patrick's church, to the immediate north of the estate. In addition to a few residents from the estate, present that day were the following:

- KCA's team of architects, led by Sam McDermott, an Associate at KCA and project leader on the St. Raphael's estate scheme;
- Kathryn Eames, the Interim Senior Project Manager on the St. Raphael's
 estate scheme appointed by Brent Council, and also the Director of
 Accordus Ltd, a private company she established in January 2019 to coordinate and deliver regeneration and development projects for both
 public and private sector clients;
- Several members of Public Participation Consultation and Research (PPCR), one of four consultancies employed by Brent Council to convince residents to vote for the redevelopment of St. Raphael's estate;
- Several members of the board of St. Raphael's Voice (SRV), the steering group composed of residents selected by PPCR to represent and lead the









760 households on St. Raphael's estate through to the demolition of their homes.

At the request of Community Raph's, the resident campaign to save St. Raphael's estate, Architects for Social Housing attended this exhibition, and in this, Part Three of our report, we have published our analysis of the design options put forward by KCA, as well our criticisms of the exhibition's lack of information for residents about these options required by *The Mayor's Good Practice Guide to Estate Regeneration*, and what they would mean for them, socially, economically and environmentally, should they be implemented by Brent Council and its development partners.

Neither Brent Council nor Karakusevic Carson Architects published the contents of the March exhibition online until October 2020.² ASH, therefore, when we first published our response to the options, reproduced the photographs of the display boards we were able to take at the exhibition. Unfortunately, these are not high quality and incomplete, due to the obstruction we faced from members of KCA and PPCR, who either stood in front of the boards and refused to move, and in one instance demanded that a member of ASH delete photographs she had taken from her phone.

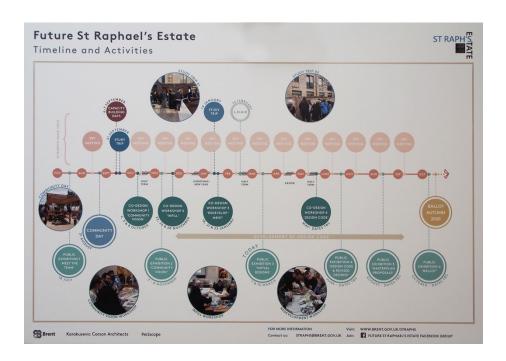
Also unfortunately, this sort of aggressive behaviour is typical of the consultants employed by councils. Indeed, prior to our meeting with residents in February 2020, in which we presented the information collected in Part One of this report, PPCR circulated lies about ASH and our previous work on the Central Hill estate in Lambeth, for which PPCR had been employed by Lambeth Council for similar ends.³ However, this behaviour is in no respect restricted to the reaction to the presence of ASH, being directed above all at residents who form resistance to the Council's plans. Indeed, part of ASH's role is to give moral support to residents being bullied, and in some instances threatened, into voting for demolition. One member of St. Raphael's Voice was evicted from the board for being one of the organisers of the campaign to save St. Raphael's estate and for arranging for ASH to come and speak to residents about the consequences of demolition and the alternatives available. In a letter from the Chair of SRV, this resident was accused of

breaching the Board's Code of Conduct. Drawn up not by residents but by PPCR, this states that Board members:

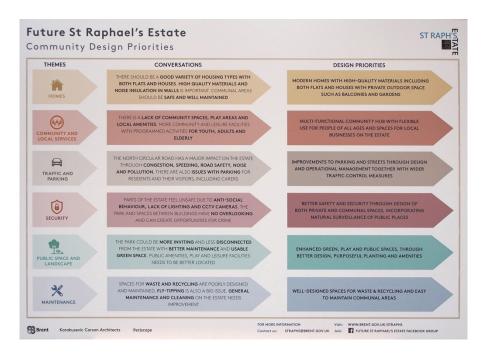
'Must not be actively involved in nor promote any campaign in opposition to the proposals for St. Raphael's estate, this includes actively canvassing the community, speaking to the press, written information, social media or any other form of campaign.'

Since Brent Council, KCA and SRV are all ostensibly looking at all the options for the future of St. Raphael's estate, including infill options, it is unclear how the save St. Raphael's campaign's call for refurbishment and infill is in violation of this code. Nor why, in contrast to this extra-legal veto on the actions of residents, Brent Council is permitted to employ an army of consultancies and spend close to £850,000 promoting the single option to redevelop the estate. In reality, of course, it is all too clear that the decision to demolish St. Raphael's estate has been made unilaterally and in advance of the consultation process by Brent Council, and that steering groups like St. Raphael's Voice, community engagement consultancies like Beyond the Box and Thorncliffe/Your Shout, and design practices like The Glass House and Karakusevic Carson Architects, are there not to consult with and give voice to residents but to promote the plans of Brent Council and its private development partners.

2. Timeline and Community Design Priorities



The focus of the exhibition was a series of design options developed by Karakusevic Carson Architects for both infill housing and the redevelopment of the estate. According to the timeline for the project on the first exhibition board, in June 2020 these 6 options were to be reduced to 2: one for infill and one for redevelopment. This would be followed in late August by masterplan proposals, and then, in October, by the resident ballot. What wasn't made clear on these boards, and which most residents we spoke to were unaware of, is that the ballot would not be for a choice between the infill and redevelopment options. That decision will be made by Brent Council's Cabinet at some unidentified time, most likely before the masterplan proposals, but possibly after. Just as residents were in the ballot for the South Kilburn estate, which has been recommended to St. Raphael's residents as an 'exemplary' regeneration, the infill option will be removed before the ballot, and residents

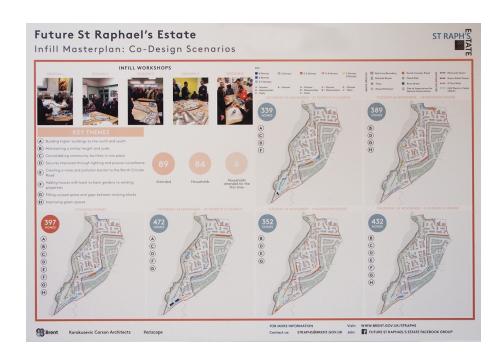


on St. Raphael's estate will simply be asked whether they are in favour of redevelopment.

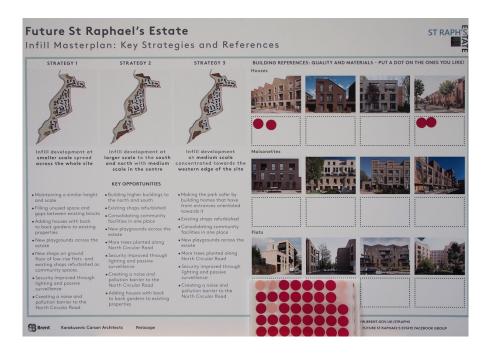
The second exhibition board contained a reprisal of the vague warnings, unsubstantiated assertions and lazy stereotypes about St. Raphael's estate and its community that ASH refuted in detail at our presentation to residents on 25 February, 2020. In short, St. Raphael's estate is not a crime-ridden, polluted dumping ground of falling down homes isolated from the Brent River Park — as KCA suggests — but a long-standing, socially and racially mixed community with a low crime rate, living in housing in good condition bordering a beautiful parkland. However, we will refer back to these trumped-up accusations, and look first at how the designs proposed by KCA address the perceived shortcomings in the estate's housing, community services, traffic,

security, public space and maintenance. A close look at the reality of KCA's designs, informed by the information not presented to residents at the exhibition, reveals that the quality of housing for the existing residents will be worse, the estate's community services privatised and segregated, the traffic on the estate increased, its public space lost and the maintenance of resident's homes neglected. While we have shown with factual evidence — rather than KCA's unsubstantiated assertions — that St. Raphael's estate is a safe, green, well-designed and remarkably successful estate whose homes are in good condition, but whose community facilities have been taken away from residents and privatised by the Brent Council, KCA's proposals for redevelopment will either reduce or remove altogether residents' enjoyment of these benefits of living on St. Raphael's estate.

3. Infill Scenarios and Site Constraints



Viewing the exhibition boards, we were pleased to see that no less than three infill options had been developed by KCA. There was a time, before ASH began designing proposals for residents threatened with losing their homes, when councils would require a single infill option, whose deliberate inadequacy was sufficient to preclude it from consideration. These three options aren't as bad as that — although, given the lack of variety and vision in their proposals, they appear to have been developed in order to give the impression that they will be considered by the Cabinet or voted on by the residents, when in reality neither will happen. Brent Council, which like all councils has had its budget slashed by successive Conservative governments, is spending in the region of £1 million pound just to bring this project to ballot, and it hasn't spent this huge amount in order to meet housing need in the London Borough of Brent, or to improve the living conditions of



the estate's residents. Like every other council implementing the estate 'regeneration' programme in London, Brent Council has undertaken this project to realise the potential uplift in the value of the land on which St. Raphael's estate is built. And just as on every other estate regeneration scheme on London's lucrative land, demolition of the existing homes and their replacement with the highest price property possible is the option upon which Brent Council has focused all its efforts. This includes the employment of architects and consultants paid to convince residents into voting for the redevelopment option. This was the purpose of the exhibition held in St. Patrick's church.

Despite this purpose, since Brent Cabinet decided to put St. Raphael's estate up for regeneration in November 2018, at the time of the exhibition a mere 84

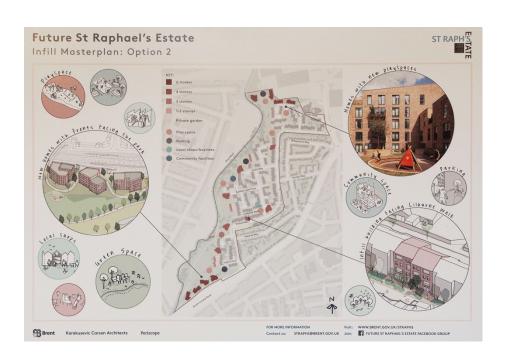
households for the infill options and 80 households for the redevelopment options have been engaged by Karakusevic Carson Architects in their consultation workshops.4 To put this in context, that's not much more than the 70-80 residents who attended ASH's first presentation to residents on the 25 February. This was also held in St. Patrick's church, but was arranged and paid for not by Brent Council and its army of consultants, but by the resident campaign to save St. Raphael's estate from demolition. More importantly, there are 760 households on St. Raphael's estate, so KCA's consultation since they were appointed in July 2019 had engaged just 10 per cent of households on the redevelopment option.⁵ Since this option will demolish residents' homes, privatise the redevelopment, increase their housing costs to prohibitive levels or force them off the estate altogether, this is a damning indictment of Brent Council's efforts to engage with residents on the future of their homes. On these figures alone, these options cannot be called a consultation with any democratic mandate, and are, rather, a cynical process of manufacturing consent for a programme whose consequences for residents are deliberately withheld from them. In Part Three of this report, we'll look in detail at how this exhibition of KCA's designs colludes in this process of manipulation, deception and misinformation. Let's start with the infill options.

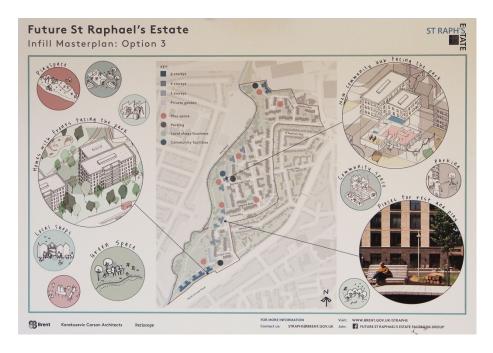
3.1. Infill Option 1

323 new dwellings of a similar height to existing homes spread across the estate; new shops on the ground floor of low-rise housing; refurbishment of existing shops as community spaces; with improved bin facilities and new playgrounds.









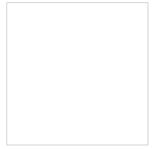
3.2. Infill Option 2

438 new dwellings, with higher-density housing 6-storeys high to the north and south of the estate; community facilities consolidated in an extension of the Barnardo's children's centre bordering the Brent River Park; refurbishment of existing shops; with improved bin facilities and new playgrounds.

3.3. Infill Option 3

377 new dwellings concentrated to the west of the estate, with blocks to the north and south 6-storeys high; community facilities consolidated in a new building in place of the demolished Banardo's children centre; refurbishment of existing shops; with improved bin facilities and new playgrounds.

3.4. The Models of the Infill Options







These models show clearly that nearly all the proposed infill housing is on the green land to the west of St. Raphael's estate, with higher density housing to the north and south. Very little infill housing has been proposed between the existing housing blocks, none on the long strip of green land to the south of Pitfield Way where it runs east-west, and no consideration of the possibilities for lightweight timber-roof extensions on existing housing blocks.

We asked the representatives of KCA at the exhibition why no housing had been proposed on the strip of land on which the Hephzibbah Day nursery and Sufra food bank and kitchen are currently built, and they said that, since the Mitchell Brook runs from east to west beneath this land, it could not support additional housing. They also said that any new housing would overlook the housing on the Old Estate to the south. Apart from the fact that the presence of the nursery and food bank shows that the land over the brook can support at least one-storey buildings, and most likely lightweight timber-framed buildings higher than that, the housing to the south is separated by gardens between 15 and 20 metres long, so there is little chance of overlooking unless Brent Council built a line of towers there. Moreover, the Mitchell Brook, according to KCA's own map (opposite) does not run under this strip of green land, but directly under Pitfield Way as it runs west to east, a road being the most logical way to cover a brook. At the very least, this area could support extensive community facilities to replace those privatised by the council; as well as much-needed shops to supplement the seemingly permanently closed ones on Lilburne Walk; with possibly some housing overhead. Unfortunately, KCA had not considered any of these possibilities in their three infill options.



Their estimated additional figures of 323, 438 and 377 new dwellings for the respective infill options, therefore, are gross underestimations of the number of new dwellings that could in reality be added to St. Raphael's estate if so desired, and far fewer than the roughly 600 new homes for which has ASH found space. This is important, as Brent Council would be able to cite these figures against their stated wish, in their Housing Options Appraisal, to house the 12,200 households in 'affordable housing' need in the London Borough of Brent. Presenting these figures in this way, therefore, compared to the redevelopment options we will look at below, is deliberately misleading as a comparison of their relative benefits and possibilities. Since there are already 760 existing homes on the estate, even these deliberately reduced estimates of the number of possible additional homes brings the total number of dwellings on St. Raphael's estate up to, respectively, 1,083, 1,198 and 1,137.

So that it's absolutely clear: ASH does not maintain that the net number of homes should be the overriding factor in the regeneration of St. Raphael's estate. Meeting the housing need of Londoners and maintaining existing London communities is our priority. But we believe — and ASH has demonstrated this in our own feasibility study of the infill, refurbishment and improvement options — that there could be far more housing built without demolishing the existing homes, and as part of a far better proposal for the future of St. Raphael's estate.

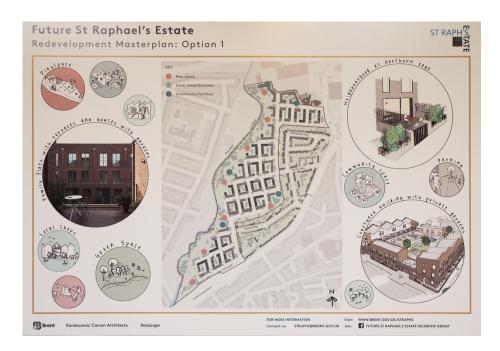
4. Redevelopment Scenarios and Key Strategies

4.1. Redevelopment Option 1

2,000 new dwellings, comprising 1,700 flats, 150 maisonettes and 150 houses; with 50 per cent market housing and 50 per cent affordable housing; community facilities across the whole site; privatised courtyards within the housing blocks; with improved bin facilities and new playgrounds.

These designs are so crude and unimaginative that this option appears to have been proposed merely to bracket the intended choice. However, the indicative number of a total of 2,000 dwellings, of which Brent Council has estimated that 50 per cent will be 'affordable', means that over 50 per cent of that affordable housing would have to be for social rent to rehouse the residents of the 522 existing council tenancies on St. Raphael's estate. There is no estate regeneration scheme in London that has come even close to producing that. As we saw in Part One of this report, according to the latest figures from the Mayor of London, of the 1,510 new residential dwellings completed in major planning permissions in the London Borough of Brent in 2018-19, only 163 were for social rent — less than a third the number Brent Council is claiming it will build on St. Raphael's estate alone. This is despite being far advanced in the redevelopment of the South Kilburn estate, where council homes for social rent are being systematically replaced with properties for shared ownership and market sale. So when Brent Council and its consultants tell council tenants on St. Raphael's estate that they will all be rehoused on the new redevelopment on social rents, they are either being very optimistic or they are deliberately lying to residents. Our guess is the latter.

Homes for social rent, however, won't be the only thing lost to a redevelopment option. According to our calculations, St. Raphael's estate contains 288 maisonettes, 240 town-houses and 213 flats (plus 19 housing association homes of different types and sizes for which we don't have the breakdown, so will leave out of these calculations). Even before any proposed



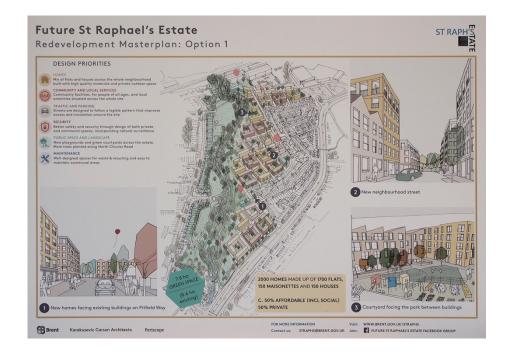
infill option adds to their number, therefore, this redevelopment option will mean a loss of at least 138 maisonettes and 90 townhouses. And by 'lost' we mean to the eventual property developer's motivation to cram as many flats into as high and as many residential blocks as possible. Yet in their design priorities laid out in this exhibition, KCA has stated that its proposals will provide a 'good variety of housing types with both flats and houses.' The truth is that St. Raphael's estate already has a huge variety of housing types — no less than 8 by our calculations — and far more than the repetitive monoblocks being proposed by KCA.

It is no surprise, therefore, that the details on the breakdown of proposed housing types are not provided by KCA for the infill options, since they would clearly foreground the preferability for residents of an infill option over demolition and redevelopment. Just as it's no surprise that, while the infill

option masterplans specify the number of storeys in each proposed housing block, this information is absent from the presentation of the redevelopment options. The accompanying drawings (*opposite*) show housing blocks up to 6-storeys high, but they do not identify their locations on the site, and stick-figure drawings are not commitments. This lack of information on all the redevelopment options can only be missing in order to deceive residents about the density of the eventual redevelopment, which is of concern to residents used to living on a mid-rise housing estate.

By the same token, the percentage of market-sale and 'affordable' housing, set at 50/50 on these redevelopment options, has not been provided for the infill options. Why? The obvious answer is because, in the absence of the huge costs of demolition, compensation for leaseholders and freeholders and replacement of the existing homes before a single additional dwelling has been built, such a breakdown would be far more weighted in favour of affordable and, most importantly, social-rent housing. In ASH's proposals, which have been costed by quantity surveyors, we have been able to set aside 50 per cent of the proposed infill housing for social rent — increasing, rather than diminishing, the tenure and rental type most in demand in London. Again, all this information is missing from KCA's masterplans, and it should be clear why.

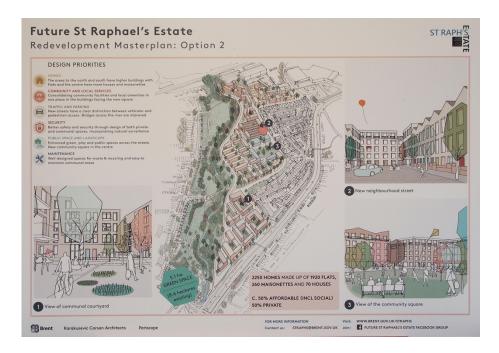
As for KCA's claim that these new dwellings will be built out of 'high quality materials', a look at the mass of complaints by residents on the Colville estate redevelopment — also designed by KCA — and the South Kilburn estate redevelopment — also implemented by Brent Council — will show that, far from being an improvement on the homes demolished to make way for them, the housing crisis in London has led to a rash of cowboy builders throwing up sub-standard homes and then refusing to carry out the remedial work for years on end. Similar complaints on the Oval Quarter redevelopment in Brixton, the Orchard Village redevelopment in Rainham, the Portobello Square redevelopment in Notting Hill, and the Solomon's Passage development in Peckham show that such complaints are the norm and not the exception in new-build housing in London.⁶



Council tenants will not be surprised to hear that this practice is nowhere more prevalent than in the shoddy blocks thrown up by housing associations in order to discharge the council's duty to rehouse the few residents it hasn't been able to decant permanently from their council homes. In the case of Solomon's Passage, thrown up by Wandle Housing Association with the help of funding from the London Mayor, the entire affordable housing block had to be demolished just 6 years after it was built, causing huge disruption to the lives of residents.⁷ And in Bridport House, as we saw in Part One, the social housing block designed by KCA as part of the Colville estate redevelopment, after seven years of complaints residents have been moved out and rehoused while engineers work out how to fix their shoddily-built housing.⁸

So when KCA and Brent Council promise residents the new development will be of highly quality than the homes they currently live in and which, after 50 years, still meet the Decent Homes Standard, they should take such promises with a pinch of salt, because that's the only assurance they will get.

4.2. Redevelopment Option 2



2,250 dwellings, comprising 1,920 flats, 260 maisonettes and 70 houses, in blocks of unspecified storeys, but higher to the north and south of the development; with 50 per cent market housing and 50 per cent 'affordable' housing; community facilities consolidated in one place facing a new square; privatised courtyards within housing blocks; with improved bin facilities and greatly reduced playgrounds on what's left of the Brent River Park.

Apart from the loss of no less than 170 townhouses, what is clear from this option is that the market properties — which the council estimates will have to be put on sale for between £550,000 and £1.5 million to recoup the costs of demolition, compensation and redevelopment — will be built alongside what the council characterised in its Financial Viability Appraisal for the redevelopment as a 'waterfront location' bordering the Brent River. This exclusively private development, built and managed by whatever property developer the Council grants the lease on the land to, will even be accessed via a new road driven through the park to the west of the existing estate, and

running roughly where the riverside path is now. The redevelopment of St. Raphael's estate, therefore, will very clearly be split into two — or more accurately three — separate areas:

- The bulk of the 'affordable' housing rental provision (London Affordable Rent and London Living Rent), located in dense, 6-storey and higher blocks to the south of the estate on the undeveloped land bordering the North Circular Road;
- 2. The 'affordable' housing properties (including shared ownership and shared equity deals, with perhaps some rent-to-buy properties) located to the north of the estate, opposite the huge IKEA carpark.
- 3. The private housing development (market sale and market rent), located where the bulk of the current estate is, but with housing blocks built across to the banks of the River Brent.

Apart from providing a sound and pollution barrier between the North Circular Road and the private riverside development, in all three redevelopment options the affordable housing component, built and managed by Brent Council's chosen housing associations, will be for all intents and purposes a separate housing estate. This means that, in all likelihood, residents of the 'affordable' housing blocks will not have access to the segregated community facilities for the private development.

As we showed in Part One of this report, this is precisely what has been done on the South Kilburn estate redevelopment — as Brent Council published in Deloitte's Financial Viability Assessment of December 2019 — 'in order to maintain achievable values and a good sales rate within the private portion of the scheme.' The truth, which Brent Council is withholding from residents of St. Raphael's estate during the consultation process, is that investors who will pay between three-quarters and one-and-a-half million pounds for waterfront properties don't want to share their gyms, saunas, swimming pools, bars, whole-food shops, patisseries and other luxury amenities with the housing association tenants the current residents of St. Raphael's estate will become if they vote for redevelopment.

With such exorbitant sale prices required to make a redevelopment option financially viable, it's the money of these investors — and not the council's empty promises in resident charters not worth the paper they're written on — that will determine the segregation of the new developments into 'affordable' and private housing. Indeed, once Brent Council has granted the lease on the land to the property developers, it will have no more say on what they build there or who they allow onto their development, and neither will the charters it signed with residents. The property development will be in every respect private.

It's unbelievable, therefore, that KCA can honestly describe such an option as fulfilling its design priorities to produce an 'enhanced green, play and public spaces'; or that it will reduce the impact of the North Circular road on 'traffic noise and pollution'. Driving an access road through the existing park bordering the Brent River, building 6-storey-plus housing for market sale up to the edge of that road, reducing the green space on the estate from 8.6 hectares to 5.1 hectares, replacing the public spaces of the existing estate with privatised communal courtyards, and subjecting what's left of the ecology of the Brent River and the corridor for wildlife along this stretch to additional noise and pollution from the cars accessing the private development bordering what's left of the park - quite clearly does none of this. And offering a small, sanitised square of greenhouse-grown turf to the east of the redevelopment in an attempt to reduce the 3.5 hectares of genuine grass and tree space built over does nothing to lesson either this loss or the damage to the living environment. In reality, this option does the exact opposite, and KCA's hand-drawn images of playing children and picnicking families are deliberately trying to deceive residents about the consequences for them of voting for such a development option.

4.3. Redevelopment Option 3

2,125 dwellings, comprising 1,730 flats, 245 maisonettes and 150 houses, in blocks of unspecified storeys, but higher in the 8 blocks built along the Brent River; with 50 per cent market housing and 50 per cent 'affordable' housing;



community facilities to the south and north of the private central development; privatised courtyards within housing blocks; with a new central park replacing the almost entirely built-over river-side park.

In this third option, the full extent of the social segregation planned by Brent Council between existing residents (or at least, those who can afford to return to the limited number of 'affordable' rent homes on the new development) and the owners and residents of the luxury properties to the north becomes blatant. In Option 3, the current park along the Brent River all but vanishes as, to the west of the access road introduced in redevelopment Option 2, an almost continuous wall of 7-storey plus apartment blocks will not only colonise the former play areas of the children of St. Raphael's estate, but also block any view of either the river or the new Wembley Stadium on which these properties will be sold to foreign investors.

Part of the purpose of what councils and developers call 'placemaking' is to sell high-price properties to overseas investors who know little of London and have no intention of living in the residences they buy. Glossy marketing photographs of these river-side properties, with a night sky illuminated by the lit-up arch of Wembley Stadium and the assurance that all the community facilities are exclusively for residents of the private development (and no mention of their proximity to the North Circular Road), is the kind of image required to sell three-quarter of a million pound-plus properties in Zone 3 to investors from China, Malaysia, Russia or, indeed, the Home Counties of England — all of whom, as we saw in Part One, have been identified by Strutt & Parker estate agents in the buyer profiles for the South Kilburn estate redevelopment.

So that residents are clear about whom the demolition and redevelopment of their homes will benefit, these buyers include:

- **Professional couple.** City lawyer and senior client director, earning between £150,000 and £200,000 per annum, who want to purchase a 2-bedroom flat close to a Waitrose or Whole Foods shops.
- **UK investor family.** Mid-50-60s, lives in the Home Counties, with £3.5 million in savings and two children, both young professionals, for whom they have decided to invest in a 1 or 2-bedroom property in London.
- Overseas investor. Lives in Hong Kong, Singapore, Istanbul or Moscow, described simply as 'wealthy', whose child will attend a London university in up to 10 years' time, and who want to invest in a 1-3 bedroom flat that they will let out on the private-rental market until then.
- Commercial Investor. Described as 'successful, high-powered or owning their own business', based anywhere in the world, who sees London's property market as a safe haven for their money, and wants to purchase a 1- or 2-bedroom flat with good sale-growth prospects to add to their property portfolio, and will rent it out for the competitive income revenue.

If the existing residents of St. Raphael's estate think for a moment that they will be rehoused in these riverside blocks, they should think again very carefully. The so-called 'affordable' housing provided won't be anything like enough to house all the existing tenants, even in housing association properties for London Affordable Rent that is currently 60 per cent higher than



council rent on St. Raphael's estate. And what 'affordable' housing will be provided will, once again, be located primarily to the south of the estate.

That said, in this segregated housing association development, at least, KCA is fulfilling one of its key strategies for this option, which is to 'create a noise and pollution barrier to the North Circular Road'. What KCA hasn't revealed is that this barrier will be built with the housing blocks of the 'affordable' housing tenants, which like the Old Estate to the east and north will act as a noise and pollution buffer between the North Circular Road and the private development bordering the Brent River.

To entrench this segregation, in Option 3, Pitfield Street, along the south of the private development, continues west across a new bridge to the semi-detached housing on the other side of the Brent River; and Besant Way continues across another bridge to the north. This creates a clearly-demarcated area that will most likely be patrolled by a private firm of security guards and lined with numerous CCTV cameras to maintain the 'exclusivity'

on which every new private development in London is sold to those few who can afford the property prices.

In compensation for the almost total loss of the park between these two new road bridges, KCA has proposed a central park between what they call the 'family homes' lining the access road to the west and the terraced housing blocks lining Pitfield Road to the east and south. This allows them to claim that Option 3 will, in fact, re-provide 6.5 hectares of green space, which, although a loss of 2.1 hectares on the existing green space, is less than the 3.5 hectares lost in option 2.

This is disingenuous at best, at worst deliberately misleading. 'Green space' is not a strip of grass that can be bought in a shop and laid down on land recently cleared of demolished council homes, which is exactly what KCA are proposing in this option. The park that runs along both sides of the River Brent for nearly a mile between the North Circular Road to the south and the Great Central Way to the north is an ecological unity. Not only does it provide a green corridor for hundreds of animals, thousands of birds and millions of insects moving across this part of North-west London, but its acres of grassland, its hundreds of trees, its thousands of flowers and grasses, its millions of fungi and, indeed, the river itself, is a mutually sustaining and interdependent eco-system that has developed over the past fifty years since St. Raphael's estate was built in the 1960s.

It is typical of the arrogance with which estate demolition schemes are implemented that neither Brent Council nor Karakusevic Carson Architects has bothered to produce an impact assessment of the role this fragile ecosystem plays in reducing the trillions of tons of carbon monoxide produced by the traffic on the North Circular Road. Yet, at the same time, they blithely claim that destroying this eco-system will, according to KCA, 'enhance green spaces' and reduce pollution. This isn't disingenuous or misleading or deliberately deceiving; this is blatant lying.

As we discussed in Part One, In July 2019 Brent council formally declared a climate and ecological emergency. Among its stated plans to address this

emergency was the commitment to 'promote the importance of local biodiversity and natural habitats', and 'deliver reductions in carbon emissions by supporting renewable alternatives'. In chapter 5 of the London Plan 2016-2021, titled 'London's Response to Climate Change', the London Mayor — on whose funding for the scheme either the council or a housing association will rely to build the affordable housing component of the new development — stated that 'Development proposals should make the fullest contribution to minimising carbon dioxide emissions.' And over 1,200 architectural practices have so far signed up to UK Architects Declare Climate and Biodiversity Emergency, which commits to 'upgrade existing buildings for extended use as a more carbon efficient alternative to demolition and new build whenever there is a viable choice'. Absent from their signatories, significantly, is Karakusevic Carson Architects.

It is not surprising, therefore, that neither Brent Council nor KCA have bothered to produce an impact assessment of the huge environmental cost of their proposals. This includes:

- The embodied carbon in the 760 existing buildings that will be lost to demolition;
- The dust particles and fuel pollution released during their demolition;
- The carbon emissions from the transportation and disposal of the demolition waste:
- The carbon emissions from the manufacture, transportation and construction of the new development of 2,000-2,250 new properties;
- The carbon emissions from increased total energy use in the new development and on the new roads;
- The environmental damage and biodiversity loss from the destruction of the Brent River Park.

The fact that Brent Council is consulting residents on these options without producing any of this information about their negative effects isn't just blatant lying; this is disregard for the health and well-being of the St. Raphael's estate community and the constituents of the London Borough of Brent.

4.4. The Models of the Redevelopment Options







Like three pairs of different-coloured trainers that are otherwise identical but vary considerably in price, architectural design options are developed to justify the selection of a compromise. In this case, our best bet is on Option 3 for the private development along the River Brent; Option 2 for the 'affordable' housing bordering the North Circular Road to the south; and, for the shared 'ownership' and rent-to-buy properties to the north, where the options vary little except in their extent, whichever one brings the scheme to financial viability once the developers have taken their 20 per cent profit margins — so most likely Option 2 again.

These options, it should be remembered, are merely masterplans, designed to convince residents to vote for the demolition of their homes. In other words, they're as good as it's going to get. The actual built development will be designed after the resident's ballot vote, and possibly by a different architectural practice that will be selected by Brent Council after the contract is put out to tender. The development that actually gets built — and about which residents of St. Raphael's estate will have no say whatsoever — will most likely be different to these masterplans in ways that will always be for the worse. That is to say: at the expense of the affordability and tenure of the 'affordable' housing component, in order to generate greater profit for the developer, resulting in the loss of even more green space, the further increase in the height of the buildings, the privatisation of even more community facilities, and possibly the gating of the private development, as in the Lillian Baylis School redevelopment we looked at in Part One.

As we said before — and it bears repeating because it can't be emphasised enough — once Brent Council hands over the lease on the land to the private development partners and grants planning permission for their proposals, it will have no say on the sale price of the properties, the tenure of the housing, the privatisation of the facilities or who has access to them. That means segregated housing, gardens and amenities and gated communities, since it is these that create the 'exclusivity' on which the elevated property prices will be sold. And, since it is from the private developer's profits that the council will recoup its costs and be compensated for the land it sold them, the likelihood of Brent Council's planning department not granting permission to whatever the developer demands is little to none. Once again, our money is on the latter.

At this stage in the regeneration process, all Brent Council wants to establish by these masterplans is the financial viability of the scheme. Such an assessment is based on the tenure, rental levels, service charges and sale prices of the new development. It goes against the principles of 'full and transparent consultation and involvement', therefore, defined by *The Mayor's Good Practice Guide to Estate Regeneration*, that these options do not clearly identity the location of the affordable housing provision, the numbers of homes for social rent, London Affordable Rent, London Living Rent, Affordable Rent, Shared Ownership and Shared Equity that compose this provision; and that they do not identify the sale prices of the new properties Brent Council is claiming to build in order to meet the housing needs of constituents in a borough where the average salary is £23,000 per annum.

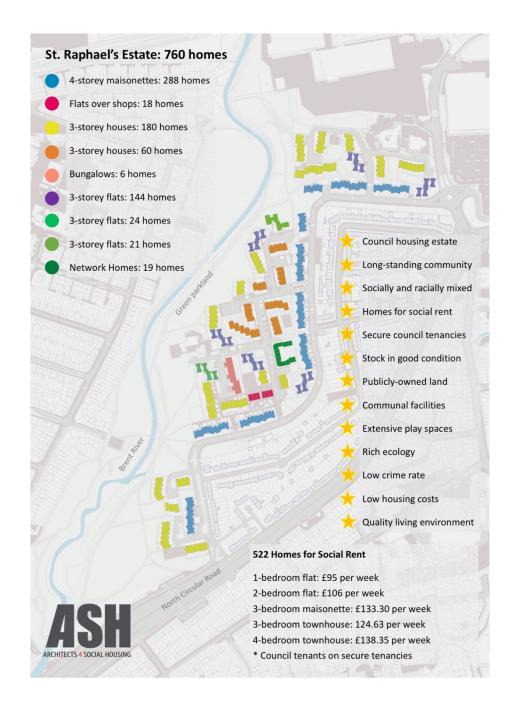
To recall in greater detail what these principles are, under the title of 'Open and transparent options appraisals' (page 13), *The Mayor's Good Practice Guide to Estate Regeneration* specifies that these should:

- 'Include the rationale, aims and objectives of the project in the context of delivering better homes for local people.
- 'Include technical and financial appraisals that have influenced any decisions on options. These should be available in an accessible format with non-technical summaries.

- 'Assess the full range of social, economic, and environmental costs of different options.
- 'This assessment might include: any expected costs resulting from changes in rents, service charges, energy bills and any other impacts on household expenditure.'

The exhibition of these options by KCA provided *none* of this information. This exhibition, therefore, does not conform to the Mayor's definition of good practice in either transparency, residents' involvement or fullness of consultation. Asking residents to make a judgement about these options — let alone vote on them — in the context in which they were presented is like showing a council tenant into a Ferrari showroom in Knightsbridge and asking them which car they'd like to have, with the implication being that they can afford any of them — except that no-one needs a Ferrari, whereas everyone needs a home. As ASH has shown, few, if any, of the residential properties proposed by Brent Council and designed by Karakusevic Carson Architects will be affordable either to the current residents of St. Raphael's estate — tenants, leaseholders or freeholders — or to 'local people'.

To canvas residents' responses to these design options, and then to use these responses to justify the Cabinet's unilateral choice of a redevelopment option, is therefore nothing short of fraudulent. Under the Architectural Research Board's *Architects' Code: Standards of Professional Conduct and Practice*, 2017, it is incumbent upon architects, at least — if not upon council officers running their own private regeneration companies or consultancies making money from deceiving residents — to act in the best interests of the users of their products. If those products are built on the ruins of the 760 homes (opposite) that will be demolished to make way for this privatised, environmentally ruinous and socially segregated scheme, Karakusevic Carson Architects has a duty to inform residents what the consequences are of choosing one of their redevelopment options. Anything less is an abnegation of their duties as architects and their role as professional consultants to whom residents look for an honest opinion.



5. Good Practice in Consultation on Estate Regeneration

In the complete absence of such transparency in the consultation of residents by KCA, PPCR or Brent Council, ASH — using KCA's own masterplans for redevelopment Option 2 for the 'affordable' housing development and Option 3 for the private development — has produced a composite masterplan that includes some of the information required by *The Mayor's Good Practice Guide to Estate Regeneration*, and which, according to this guide, must be provided for residents at every stage of the consultation process, based on the plans, assumptions and estimates on which the proposals have been made at each successive stage.

When residents have asked Brent Council officers, PPCR consultants, KCA architects or the SRV board members for this information, they have been met with the universal reply that nothing has been decided yet. This is a lie. Tenure types for housing associations, whether one appointed by Brent Council or formed by Brent Council as a wholly-owned commercial development and lettings company, are set by Government legislation, not by the Council, and they don't include the secure tenancies council tenants currently have but will lose if they vote for redevelopment.¹²

Equally, increases in rental charges from social rent to London Affordable Rent, London Living Rent, and Affordable Rent are not set by Brent Council but by the London Mayor in his Homes for Londoners programme; just as the conditions and rents for Shared Ownership schemes are set by the Government; and Government funding to build such tenure types is allocated according to meeting these rents.¹³

As we showed in Part One of this report, the decision by Brent Council to abandon the regeneration of the old estate (Areas B and C of the original site) and concentrate on the new estate (Area A) was based on a Financial Viability Appraisal that can be read in summary in the Report from the Strategic Director, Community Well-being to Brent Cabinet published in December

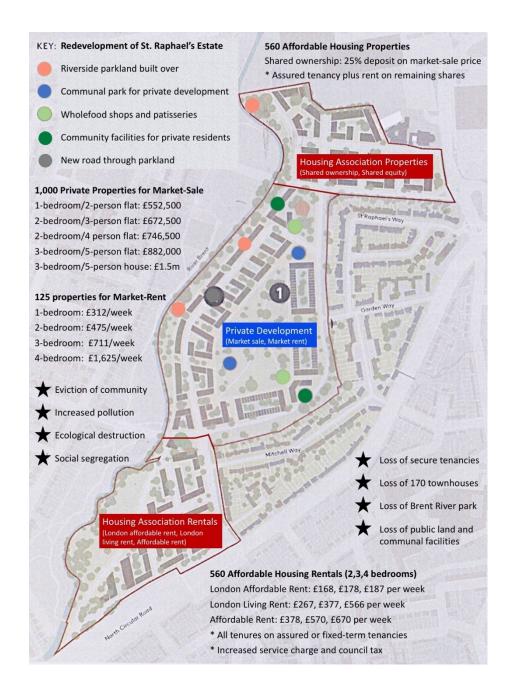
2019. As we looked at in Part One, however, even market-sale properties sold between £375,000 for 1-bedroom flat and £810,000 for a 4-bedroom townhouse resulted in a viability deficit of £22 million, and the report explicitly stated that 'the potential for achieving higher sales values justifies further investigation into the viability of redeveloping St Raphael's Estate (Area A)' (para 5.9). This means the actual built properties will have to be even more expensive to make a redevelopment scheme viable.

However, as the report also stated (para 5.6): 'An initial Financial Viability Appraisal (FVA) carried out at this stage is hypothetical because there is no masterplan upon which to assess costs.' That was in December 2019. The exhibition of KCA's masterplans for the different options was held in March 2020, so the financial consultants for Brent Council would have updated their financial viability assessments based on these higher sale values. ASH formally invited Brent Council, therefore, to make these assessments public, so that residents could clearly see the sale prices of the properties with which Brent Council was intending to replace their council homes. We say 'invited', but these are the 'technical and financial appraisals that have influenced any decisions on options' required by *The Mayor's Good Practice Guide to Estate Regeneration*, and it was and is therefore incumbent upon Brent Council to provide that information. Until they do, their consultation with residents has no validity.

Residents, however, can't wait for Brent Council to hand over this and the other information that will determine their futures, including the full viability assessments for all the KCA options, both infill and redevelopment. Until it is forthcoming, therefore — and Brent Council has thus far refused on the excuse that the information is 'commercially sensitive'¹⁴ — ASH has made our own assumptions about the prices of the new properties based not on the unviable figures quoted in the report to Brent Council, but on the viable figures quoted in Brent council's 'Financial Viability Report' for the South Kilburn

estate redevelopment, which was also published in December 2019, and which we looked at in Part One of this report. Since this report went public it has been removed from Brent Council's website — which, again, is in contradiction of the Mayor's guidelines on transparency and openness — but fortunately not before it was downloaded by us. Based on these sale prices (which are for a financially viable scheme and not one with a £22 million shortfall) and the rental levels set by the London Mayor for 2020/21, ASH has produced this composite masterplan (*opposite*) containing some — but by no measure all — of the information residents must be given if they are to make an informed decision about the future of St. Raphael's estate.

We shouldn't forget that, by the time any council tenants, leaseholders or home-owners who are in the financial position to enact their Right to Return to the redevelopment are able to do so in 5, 10 or even 20 years' time, both sales-prices and rents will have been raised considerably by the housing associations that own and manage the 'affordable housing' and by the property developers and estate agents that do the same with the market properties. By then, the Council will have long ago washed its hands of its former council tenants. As we saw in the Landlord Offer Brent Council has made to the residents of the South Kilburn estate, this is the barely concealed and increasingly explicitly stated purpose of estate redevelopment. The masterplan opposite shows how it could be done. Indeed, when we published this image online in March 2020, the reaction from Brent Council, the Cabinet Member for Regeneration, Property and Planning, Public Participation Consultation and Research and St. Raphael's Voice - which consisted of furious denials and accusations against ASH of 'spreading misinformation' told us how close to the mark we had come in our estimations.



6. The Duties of Architects in Estate Regeneration

There is a parallel between the ecological destruction consequent upon the demolition and redevelopment of St. Raphael's estate being proposed by Brent Council and the social disaster this will inflict on its resident community. As part of our visit to the KCA exhibition, ASH joined the information stall organised by Community Raph's outside, and we spoke to several residents from one of the housing blocks. One resident - a woman whose identity we won't reveal for fear of reprisals against her by Brent Council — has lived on the estate since it was first built in the 1960s, and is a council tenant of one of the townhouses. This is lived in by three generations of her family. The house has been adapted to her needs as someone living with a disability, and the garage has been turned into her ground-floor bedroom. Above her lives her daughter, and on the top floor live her grandchildren. Her extended family, however, doesn't end there. She knows everyone in the terrace of 12 townhouses, and all the kids call her 'mother', not only because she looks after them when their own mothers go out to work, but because they have known her all their lives. In addition, at the end of the block is an elderly resident who is 94 years old, and whom she looks after, doing her shopping and other chores. The residents of the block come from many different ethnic backgrounds. 'Multicultural', she called it. This is what a community is mutually sustaining, interdependent, having evolved organically over many years. She was terrified at the thought of her home being demolished.

When councils, developers, architects and consultants talk about building 'vibrant new communities' in place of the long-standing ones they are intent on destroying, they show how little they know about community. Just as the ecology of the parkland running alongside the River Brent can't simply be reproduced in a new central park, so too the community of St. Raphael's estate can't be picked up and moved like a piece of rolled-out turf, and it can't be replicated. In our experience, the middle-class professionals employed in estate 'regeneration' schemes have little knowledge or understanding of the intergenerational support networks that sustain the largely working-class

communities that live on council housing estates. It's hard to overestimate the potential consequences of this ignorance. Based on what has happened on other demolished large estates such as the Ferrier, the Heygate, Woodberry Down, West Hendon and the Aylesbury, it is more than likely that many of the numerous elderly members of the St. Raphael's estate community will not survive the upheaval of their lives that Brent Council intends to inflict upon them, let alone live to return to the dense blocks of flats the Council or its chosen housing association will offer to a few of those residents. And if even one of them dies during the decant process, Brent Council and its Cabinet will have their deaths on its hands.

The majority of residents, as on every other estate redevelopment scheme in London, will be shunted off to council flats and housing association properties across the borough or beyond, never to return. They won't be offered houses in which three generations of their families can live. The support networks of their communities will be as ripped up and scattered to the winds as the trees and grasses of the riverside parkland. And in their place will be residential properties owned by non-resident owners, rented out to young professionals who can afford their exorbitant rents or desperate enough to enter into the various shared ownership, shared equity, rent-to-buy and help-to-buy schemes open to households earning enough to afford them. That means households earning up to $\mathfrak{L}60,000$ per annum for London Living Rent and $\mathfrak{L}90,000$ per annum for Help to Buy just for the so-called 'affordable' properties.

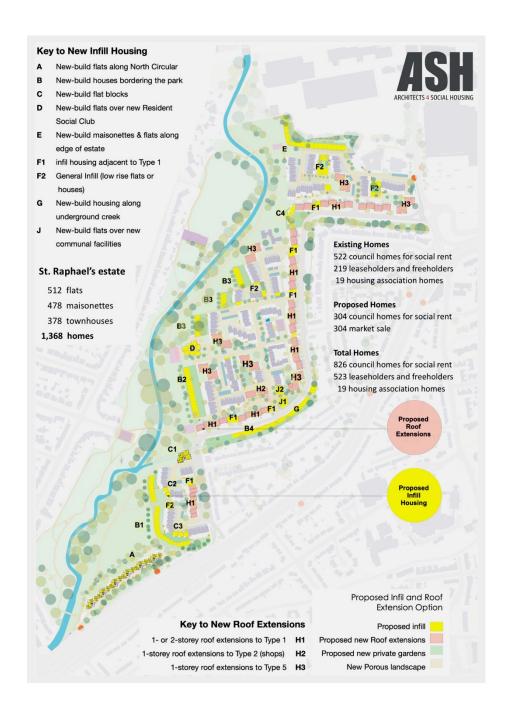
At least 50 per cent and up to 75 per cent of the new properties, however, will be for market sale and rent at prices far beyond the means of even these middle-income earners, and few of their buyers will live in them. This isn't a model of housing provision that is sustainable socially, economically or environmentally. It is a scorched-earth policy of developers and investors destroying council estate communities and exploiting the housing crisis for

their own profit. What the consequences of KCA's redevelopment options demonstrate is that the most socially beneficial, environmentally sustainable and economically viable option for the future of St. Raphael's estate is for the refurbishment and improvement of the existing housing and infrastructure, with the resident-approved option for infill housing and roof extensions.

If the architectural profession, in the wake of the Grenfell Tower fire, has rediscovered a social conscience and the courage to give voice to it, it will publicly denounce this scheme for the demolition, redevelopment and privatisation of St. Raphael's estate, and hold Karakusevic Carson Architects answerable, under *The Architects Code*, for its role in promoting this scheme to residents who look to them for honest and open advice, not to be party to the manipulations and deceptions of Brent Council and its community consultants. Since so many architects, and not only those working for KCA, appear to have forgotten what these codes are, we remind them that they include the duties to:

- Be honest and act with integrity;
- Promote your services honestly and responsibly;
- Consider the wider impact of your work (including advising your client how best to conserve and enhance the quality of the environment and its natural resources);
- Carry out your work faithfully and conscientiously;
- Be trustworthy;
- Maintain the reputation of architects;
- Have respect for others.

The architectural profession's collusion in the twenty-five-year estate 'regeneration' programme must stop. 15 It is a fact unacknowledged by the profession that, of the more than 1,200 architectural practices that have put their signatures to the UK Architects Declare Climate and Biodiversity Emergency, dozens are collaborating on pushing through over 100 estate redevelopment schemes as environmentally damaging, socially destructive and financially unsustainable as the St. Raphael's estate scheme. In London alone, these include, but are not limited to, the following practices and estates:



- Adam Khan (Marian Court, Tower Court and Tustin estates)
- AHMM (West Kentish Town estate)
- Alison Brooks (Dollis Valley, South Acton, South Kilburn and Thamesmead estates)
- Allies and Morrison (Gascoigne, Heygate, South Acton, Thamesmead and West Hendon estates)
- astudio (Ebury Bridge estate)
- Avanti (Grahame Park estate)
- BPTW (Elmington, Ham Close, Heathside, Lethbridge, Loughborough Park, Pepys, Silwood, Stockwell Park and Teviot estates)
- Cullinan Studio (Eastfields, Maitland and Stonebridge estates)
- **David Chipperfield** (Colville estate)
- dRMM (Heygate and Tustin estates)
- Fletcher Priest (Northumberland Park and Woodberry Down estates)
- Hawkins\Brown (Agar Grove, Alton, Aylesbury, Bridge House, Grange Farm, Kingsbridge and Northumberland estates)
- Haworth Tompkins (Aylesbury, Robin Hood Gardens estate)
- HTA Design (Allen Court, Andover, Avenue Road, Aylesbury, Clapham Park, Dollis Valley, Ebury Bridge, Ferrier, Heygate, Kender, New Avenue, Ravensbury, Redbrick, South Acton, Waltham Forest, Winstanley and York Road estates)
- Jestico + Whiles (Colindale, Garratt Lane, Grahame Park, New Union Wharf and Wood Dene estates)
- JTP (Waterloo Road estate)
- Levitt Bernstein (Aylesbury, Aberfeldy, Achilles, Bermondsey Spa, Eastfields, Gascoigne, Golf Links, Granville Road, Ocean, Rayners Lane, Redbrick, South Acton, Winstanley and York Road estates)
- Maccreanor Lavington (Alma, Heygate, Joyce Avenue and Snell's Park estates)
- Mae (Agar Grove, Aylesbury, Church Street, Grahame Park and Knight's Walk estates)
- Make (Heygate estate)
- Metropolitan Workshop (Carpenters, Leopold, Robin Hood Gardens and Westbury estates)
- Mikhail Riches (Thamesmead and West Hendon estates)

- Pollard Thomas Edwards (Alma, Austin Road, Avondale Drive, Barnsbury, Havelock, Lefevre Walk, Maryon Grove, Packington, South Lambeth and Thames View East estates)
- Pozzoni (Mills Grove and Westhorpe Gardens estates)
- PRP (Central Hill, Clapham Park, Crossways, Geoffrey Close, Haggerston, High Path, Mardyke, Morris Walk, Myatts Field North, Silwood, Stockwell Park, West Kentish Town, West Kingsland and Wornington Green estates)
- Stockwool (Denby Court, Tarling and Woodberry Down estates)
- Studio Egret West (Balfron Tower, Ferrier, Love Lane and Thamesmead estates)
- TateHindle (Alton and Heygate estates)
- Waugh Thistleton (Woodberry Down estate)
- White Arkitektur (Gascoigne estate)
- **ZCD** (Cambridge Road estate)

It is, perhaps, to the credit of KCA that it is one of the few architectural practices not to indulge in this example of collective 'greenwashing'—although, given the long list of council estates in whose demolition it has collaborated, this isn't surprising for a practice described by the *Evening Standard* as London's 'go-to architects for estate regeneration':

 Karakusevic Carson (Alma, Bacton, Broadwater Farm, Claredale, Colville, Fenwick, Grahame Park, Joyce Avenue and Snell's Park, King's Crescent, Ledbury, Nightingale and St. Raphael's estates)

It is time for all architects to speak up and out against the profession's indefensible collusion in the UK estate demolition programme, and in more than signed petitions about saving the environment that require no action from them or changes to their professional practices.

Endnotes

- 1. See Mayor of London, *Better Homes for Local People The Mayor's Good Practice Guide to Estate Regeneration*, February 2018. ASH's response to the consultation was published as 'The Good Practice Guide to Resisting Estate Demolition: ASH response to the GLA', *Architects for Social Housing*, 8 March, 2017.
- 2. See Karakusevic Carson Architects, *St. Raphael's Estate: Your Home, Your Future*, October 2020.
- 3. In an e-mail to the Chair of St. Raphael's Voice that was circulated to residents, PPCR claimed that the exhibition of ASH's initial design proposals to save Central Hill estate from demolition, which we presented at a consultation held in Christ Church Hall, Gypsy Hill, in February 2016, was attended not by 120 residents from the estate but by random passersby; that our designs were developed not by qualified architects and architectural assistants with years of training and decades of experience but by students as part of their undergraduate degrees; that our proposals had not been financially costed by Robert Martell and Partners, a quantity surveyors with over 25 years' experience that performed the same service for our designs for St. Raphael's estate; that we provided misinformation and caused confusion to residents rather than having the support of 77 per cent of resident households and the signatures of over 700 people; and that our work with residents did 'more harm than good'. Since Central Hill estate, which in December 2014 was condemned to demolition by Lambeth Council, is still standing in March 2022 (though as we go to press the estate is under renewed threat of demolition), ASH undoubtedly did do harm to these plans, and to the financial bonuses PPCR would have expected to receive for pushing these plans through. However, ASH's three years of pro bono work for the residents of Central Hill estate is collected and available to read in Central Hill: A Case Study in Regeneration, where it is preceded by positive endorsements from some of the most senior architects and academics in the UK. This should, we trust, refute the blatant lies spread by PPCR in their attempt to discredit ASH to residents of St. Raphael's estate. But it should also identity PPCR as professionally untrustworthy and unfit to receive public funding; and we recommend that residents on any other estate 'regeneration' scheme should refuse to accept them as consultants employed by their council or housing association.

- 4. See Brent Council, 'Agenda, decision and minutes', Cabinet, Monday, 12 November, 2018.
- 5. See Brent Council, 'St Raphael's residents help appoint award-winning architect, after quizzing potential partners', 4 July, 2019.
- 6. See Fanny Malinen, 'Redeveloped into Fuel Poverty: The Story of Myatts Field North', *Novara Media*, 24 July, 2016; John Harris, 'Leaking sewage and rotten floorboards: life on a "flagship" housing estate', *The Guardian*, 6 February, 2017; Emma Dent Coad, 'Catalyst Housing development Portobello Square "won't last ten years" says workman', 18 March, 2017; 'Condemned blocks of flats ordered for demolition or refurbishment just six years after they were built', *Southwark News*, 12 May, 2016.
- 7. See Bridie Witton, 'Poorly-constructed new homes face demolition in Peckham', *News Shopper*, 30 May, 2018.
- 8. 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.
- 9. It's unclear from KCA's images how they calculated what they say is the 8.6 hectares of existing green space on the estate; but as we showed in Part Two of this report (page 66), ASH has calculated the total existing green space on St. Raphael's estate as 10.55 hectares. If KCA's calculations are inaccurate, this would further increase the amount of green space lost to their redevelopment options.
- 10. An example of the changes that happen between resident ballot and planning approval is the redevelopment of Knight's Walk, part of the Cotton Gardens estate in Kennington. In November 2015, Lambeth Council, with the agreement of most of the residents, proposed to Cabinet the partial demolition of Knight's Walk according to an option drawn up by Mae Architects. This was to entail the demolition of just over half of the existing homes 18 out of a total of 33 and the development of 82

new and replacement properties. 1 of these was to be a replacement freehold property and 17 would be replacement homes for social rent; while of the 64 proposed additional properties, 25 were to be for social rent, and 39 for private rent. By December 2017, however, when Lambeth Council submitted the planning viability report for public consultation, the total number of new and replacement homes had risen to 84, an addition of only 2; but the total number of homes for social rent homes had now been reduced from 42 to just 14, 3 less than the 17 that would have to be demolished. Worse still, the promised 25 new homes for social rent had been replaced by 13 in the new category of 'tenancy strategy rent homes', which are for new council tenants and let at double social rent levels, plus 12 intermediate rent homes, with the remaining 45 homes now designated as 'market rate'. On 20 March, Lambeth's Planning Application Committee resolved to grant full planning permission to the proposal. Again, this absence of correlation between what residents are promised and what councils and developers build is the norm, and not the exception, in estate redevelopment schemes. See Simon Elmer, 'Knight's Walk: The Good Practice Guide to Gentrification', Architects for Social Housing, 16 April, 2018.

- 11. See Architects Registration Board, *The Architects Code: Standards of Professional Conduct and Practice*, 2017.
- 12. See Shelter, 'Secure housing association tenancies', last updated 27 September, 2019; and The Housing Act 1988.
- 13. See Wendy Wilson, 'Rent setting: social housing (England)', House of Commons Library, 11 March, 2019; and 'Affordable home ownership schemes', Gov.uk.
- 14. Freedom of Information Request to Brent Council, 2 March, 2021.
- 15. For the legislative history of this programme, see Simon Elmer, 'Rioting, Legislation and Estate Demolition: A Chronology of Social Cleansing in London, 1999-2019', *Architects for Social Housing*, 16 October, 2019.