



Registered Charity no. 276264

## RBKC HOUSING STRATEGY CONSULTATION PAPER

The Chelsea Society, founded in 1927, exists to protect the interests of all those who live and work in Chelsea and to enhance the unique character of this part of London. We have around a thousand members.

Housing is one of the key challenges which Chelsea faces and we welcome the opportunity to comment on the new draft of the Council's housing strategy. We regret the fact that the document in question was not sent to us directly. If the Council is serious about involving local civil society in its key decisions, it should be more pro-active in contacting relevant organisations and not simply assume that they will pick up what is under consideration by browsing its website.

Property values in Chelsea are among the highest in the country and many houses and flats are bought not to be lived in or rented out, but as stores of value, often by foreign investors. The Chelsea Society welcomes the presence in our community of people from overseas, which adds to its traditional international character. But we regret the phenomenon of properties which are empty for much of the year. The Council's draft strategy paper, which seems to be focussed principally on issues relating to the northern part of the borough, makes no mention of this problem. It should; and it should propose remedies for it.

We are however lucky in Chelsea to have a disproportionately high number of residents in Council - or Housing Association-owned accommodation. This contributes to the diversity and social cohesion of the borough and is something which the Chelsea Society would wish to see preserved and enhanced in the future.

The Council needs to take the lead in this. Private developers are interested only in sales which maximise profit and will not build affordable housing unless they are forced to do so. Philanthropic individuals or organisations of the kind which financed the Peabody or Sutton estates in the past do not exist anymore. The Housing Associations which have inherited these estates do not have the resources to add to them. Indeed, they could sell off their holdings in Chelsea in order to finance their activities elsewhere.

We therefore welcome the Council's recognition of its primary role in ensuring the availability of social and affordable housing. We endorse the six key priorities set out in the draft paper and we support the aspirations and aims which the Council sets out in it. But it is in some areas lacking in detail on how the Council proposes to achieve these aspirations and aims. Our comments are designed to introduce more specificity to the paper; and to ensure that it addresses certain additional issues which are of particular relevance to Chelsea.

## Social Housing

The commitment to build 300 new homes at social rent is a good step forward. But over what timescale would they be constructed and where would they be located? There are hints in the document that "infill" on existing estates is one of the policies being contemplated. We wonder what this would in practice mean. Would it be achieved by increasing the height of existing buildings? Or by reducing the amount of green space available, ie removing gardens or playgrounds? The Council needs to explain what it considers an acceptable level of "infill"; and to avoid the impression that its aim is effectively to cram more social housing into what would become isolated ghettos, rather than to spread social tenancies throughout the borough and thus assist social cohesion.

The Council should also review the eligibility criteria for the allocation of social housing. The present policy is based on a complicated points system. One effect of this is that individuals, couples or families with two children or fewer with long-standing connections to the borough are disadvantaged by comparison with those who have arrived recently with large families. There is also no preference for those who work in the public sector in the borough and who contribute to the provision of its vital public services.

The Council should therefore develop a suite of new, imaginative and innovative plans to provide accommodation in the borough for such key workers, particularly in the large health care and education sectors. This would add the necessary demographic richness to otherwise increasingly sterile or homogeneous areas. It would also, by reducing transport needs and costs, ease traffic congestion and pollution and improve everyone's quality of life.

The Council should also recognise that the high cost of property in the borough means that families who are housed by the Council should not expect the same size of accommodation as might be thought appropriate elsewhere. Those who rent or buy in the private sector in Chelsea often have to content themselves with a smaller house or flat than they might otherwise have wished. The same should apply to those whose accommodation is provided by the Council. There should normally be a limit of three bedrooms for any social housing provided within the borough itself. Families on the Register who need more than this should be accommodated elsewhere.

In addition the Council should abandon the policy of addressing social housing pressure by building any further tower blocks of the Grenfell type. They serve only to create the further ghettoization of the economically disadvantaged, with all the social problems which result. Rather, the Council should ensure that an architectural design and style is used which creates homes that people wish to live in, and which produces a socially cohesive community. This means:

- Reasonable population densities and low rise buildings (maximum five or six floors);

- A small number of households per building where flats are built (three buildings of ten flats is preferable to a single building of thirty flats);

- The provision of space for social amenities (doctors, dentists, community centres, youth clubs etc) and small scale commercial activities);

- Ensuring a reasonable amount of green space, either to each individual dwelling (in the case of houses) or communally;

- The availability of public transport.

Finally the Council should make a public commitment never under any circumstances to dispose of any land which it owns in Chelsea. Once

lost, such land can never be recovered for public benefit. When Council-owned properties are thought to need re-development, the Council should undertake this itself, using money from its reserves if necessary. The shameful precedent of Thamesbrook (where a Council - owned care home was sold to the private sector for luxury development without any replacement even now of the units lost) must never be repeated. Nor should the impression be created, as happened recently in the case of the Cremorne estate, that the future of publicly owned housing is dependent on the transfer of some units to the private sector.

## Affordable Housing

Promoting genuinely affordable housing is indeed, as the document recognises, the key to meeting the borough's needs. We welcome the steps which the Council has in mind for achieving this, including the requirement for the provision of 35% affordable housing from residential developments of 650 square metres or more.

But the success of this policy will depend critically on two factors: the definition of affordable housing; and the rigour with which the policy is enforced.

Given the high level of market rents and prices in Kensington and Chelsea, definitions of affordable or intermediate housing based on a percentage of average rents are unlikely to be genuinely affordable for many people. It is important therefore that the starting point of any definition is what, say, a public sector worker in the health or education sector can afford. Council housing must be priced at a rate that does not require families in full time employment to be dependent on benefits to pay the rent. The document recognises the problem, but it is not clear how the Council proposes to address it.

This applies to the Council's own development plans. What, for example will be the rents for the 300 units of non- social housing which the Council is committed to build? Will these be genuinely affordable or are they designed to provide revenue at market levels. The Council needs to be transparent about its intentions: not least so as to dispel any impression that it is behaving like a commercial property developer.

Furthermore it is not enough to "encourage" the private sector to build affordable housing. It needs to be required to do so where powers exist. The demand for luxury accommodation in Chelsea is so high that

developers have no incentive to invest in anything else unless there is a requirement under planning rules to do so. And when such a rule exists, experience shows that they will do their best to evade it or mitigate its impact, using the many firms of lawyers and consultants who advertise their services for helping them do so.

The 35% requirement needs therefore to be toughly enforced. Developers should not be allowed to buy their way out of it, by making what are often spurious claims about the practical difficulties in combining commercial and affordable housing on a single site. It should be unacceptable, for example, for a developer to argue that commercial and affordable rent tenants cannot share the same entrance to a building.

Our impression is that the Council is too reluctant to challenge claims by developers that the provision of affordable housing in particular cases is not viable; and too ready to accept payments in lieu. We urge the Council to be far tougher in implementing its policy than it has been hitherto. We welcome the stated intention only in exceptional circumstances to permit the provision of affordable housing on another site. In the case of developments in Chelsea we would expect that in such exceptional circumstances the alternative site would be in Chelsea, and not in another part of the borough.

### Relations with Housing Associations

Housing Associations have traditionally been an important source of social and affordable housing in Chelsea. But some have now transformed themselves into what are essentially property development companies who view their holdings in Chelsea as assets available to finance developments elsewhere. We welcome the strong line which the Council took in rejecting the recent planning application by Clarion in respect of the Sutton Estate and the subsequent designation of this estate and the adjoining one as a conservation area. We hope that the Council will now explore ways in which all or part of the Sutton Estate could be taken into Council ownership.

### Transparency

We would urge the Council to improve transparency in the way it implements its housing policies. There should be a discrete section on the Council's website which lists each year's income and expenditure on the housing budget, together with identification of all the properties acquired by the Council for social and affordable housing and all those made available by the private sector as a consequence of the 35% planning requirement. The amounts of the rents involved should also be published. If any payments in lieu are still being made they should be listed as well, together with an indication of how these revenues have been used.

## Consultation

We commend the Council's commitment to public consultation about its policies and its wish to involve local communities in decisions about housing. But we hope that the mechanics of such consultation can be improved. Far too often the level of actual engagement is pitifully low in terms of households reached; and decisions are sometimes made on the basis of feedback from less than 5% of households, many of whom are self-selected or selected on the basis of an existing relationship with the Council. If consultation is to be genuine it needs to be done broadly and widely, and must include The Chelsea Society and the relevant Chelsea Residents' Associations . Of course it is difficult to force people to take part. But the Council needs to develop more imaginative ways of encouraging them to do so.