



Formal Consultation with Secure Tenants with Homes in Phase 2b, South Kilburn

April 2013

Responses to representations on three Proposals:

- 1) **Proposal 1: Statutory consultation in connection with seeking approval of the Secretary of State for use of Ground 10A of the Housing Act, 1985**
- 2) **Proposal 2: Consultation in connection with Intention to make a Compulsory Purchase Order on properties currently occupied by Secure Tenants, South Kilburn**
- 3) **Proposal 3: Consultation in connection with draft Allocation Policy for Secure Tenants with homes Phase 2b, South Kilburn**

1) Proposal 1: Responses to representations on statutory consultation in connection with seeking approval of the Secretary of State for use of Ground 10A of the Housing Act, 1985

No	Date of Representation	Representor	Comment	Response	Date of Response
1	4 th April 2013	Secure Tenant	I think that as a Secure Tenant it is important that I am involved in the process. In my view it is a good idea to apply to the Secretary of State for formal approval, however, I did believe that the proposal had been already agreed. Again, it is crucial that tenants are kept up to date with the developments.	The Council notes your view that it is a good idea to apply to the Secretary of State for formal approval of the Council's proposed redevelopment scheme for Phase 2b. You note that you thought this approval is already in place; the Council has only previously sought the Secretary of State's consent in relation to Phase 1 of the South Kilburn regeneration programme.	26 th April 2013
2	8 th April 2013	Secure Tenant	I have no comments however agree with this first proposal.	Thank you completing the Comments Form in response to Brent Council consulting you, a Secure Tenant of Phase 2b of the South Kilburn regeneration programme, on its proposal to apply to the Secretary of State for use of Ground 10A of the Housing Act, 1985. The Council notes your agreement with this proposal. The Council's Executive Committee will consider all of the comments received by the Council in response to the notice of formal consultation from Secure Tenants living with Gloucester House, Durham Court, Masefield House and Wordsworth House, which form Phase 2b of the South Kilburn regeneration programme. Subject to the Executive Committee's approval, the Council intends to proceed with its application for consent to the Secretary of State to rely on Ground 10A of Schedule 2 of the Housing Act 1985 to obtain	26 th April 2013

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No	Date of Representation	Representor	Comment	Response	Date of Response
				vacant possession of homes occupied by Secure Tenants in Phase 2b, South Kilburn. The Council will write to you again in the coming months to let you know the outcome of this. Please feel free to call me on the number above if you have any queries. If you would like to speak to someone independent of the Council then you can obtain information and advice from First Call (Independent Resident and Tenant Advisor) on Freephone: 0300 365 7150.	
3	22 nd April 2013	Secure Tenant	I think what you are doing is making life better for everyone [Refers to individual housing needs].	The Council notes your preference to move to a new home along Cambridge Avenue, near Kilburn Park Tube Station. The Suitable Offer of a replacement home made to you and your household will depend on the housing need of you and your household, preferences in terms of location that you may have which are recorded at the Housing Needs Assessment Visit by the South Kilburn Re-housing Team and lastly, the length of your tenancy. The Council takes these factors into account when deciding which Secure Tenant should be allocated which replacement home.	26 th April 2013
4	23 rd April 2013	Secure Tenant	The most of my generation (70s) prefer it where we are. One thing the flats are bigger, whereby the new flats will be smaller. Where are the community centres we were promised mainly to keep the young generation out of mischief? The new flat that I will move to will be smaller than what I have.	The Council notes your comment that most people of your generation (70's) prefer it where you are. The Council understands the impact of Secure Tenants having to move from their current homes in Phase 2b to a replacement home in accordance with the Allocation Policy to enable their current homes to be brought forward for development as part of the South Kilburn regeneration programme is likely to be greater for older Secure Tenants. To	26 th April 2013

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				<p>address this, the South Kilburn Re-housing Team will help each Secure Tenant through the re-housing process. This will include identifying Secure Tenants' re-housing needs and requirements, informing them about the re-housing and move process, keeping them updated with the project and move timescales and supporting residents throughout the whole process. The Re-housing Team will be able to allocate additional support and services to assist older Secure Tenants when moving home. For example, offering a packing and unpacking service to help older Secure Tenants with the move. You also made a comment about that the new flats will be a lot smaller. Each household's property size and layout will vary, as will the size and layout of the new home they are allocated. The majority of existing properties in South Kilburn are at or slightly over Parker Morris Standards. All new homes will be built to the Mayor's Design Guide standards. Please find a summary of the associated sizes below. The room layouts within each unit will vary.</p> <table border="1"> <thead> <tr> <th>Size of flat</th> <th>Parker Morris Standards</th> <th>Mayor Design Guide</th> </tr> </thead> <tbody> <tr> <td>1bed</td> <td>44.59</td> <td>50</td> </tr> <tr> <td>2 bed</td> <td>56.67</td> <td>61- 70</td> </tr> </tbody> </table>	Size of flat	Parker Morris Standards	Mayor Design Guide	1bed	44.59	50	2 bed	56.67	61- 70	
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				<table border="1"> <tr> <td>3 bed</td> <td>79.00</td> <td>47-95</td> </tr> <tr> <td>4 bed</td> <td>86.4</td> <td>90-99</td> </tr> </table> <p>In your comments, you ask where are the community centres that the residents of South Kilburn were promised as part of the regeneration scheme. The masterplan does not incorporate the provision of new community centres. The masterplan does, however, incorporate a new Healthy Living Centre and a new combined school. There are a number of existing, established community centres within South Kilburn currently provided services for young people including the OK Club, Granville Centre.</p>	3 bed	79.00	47-95	4 bed	86.4	90-99	
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2) Proposal 2: Responses to representations on consultation in connection with Intention to make a Compulsory Purchase Order on properties currently occupied by Secure Tenants, South Kilburn

No	Date of Representation	Representor	Comment	Response	Date of Response
1	7 th March 2013	- Independent Resident Advisor - Tenant Representative	General Comment - We are unaware of any regeneration scheme where CPO powers are used to end Secure Tenancies. The process whereby a Court Order is required clearly offers comfort to tenants in instances where a rehousing offer has not been accepted. Therefore, we would welcome sight of the Council's legal advice and precedents that will	CPO's have been used in many regeneration schemes to end secure tenancies, such as Nuneaton and Bedworth Borough Council, Camp Hill Estate, Nuneaton and in Stockton. Unfortunately, we are unable to release Counsel advice sought about this matter. It has copyright and can only be used for the purpose for which it was obtained. As you know, in the event that properties currently	27 th March 2013

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			support this change in policy and loss of "security of tenure".	occupied by secure tenants are acquired by compulsory purchase, we propose to use an independent appeals body to independently resolve disputes as to the suitability of a suitable offer of alternative accommodation. However, the South Kilburn Re-housing Team will continue to work with tenants to agree voluntary relocation in accordance with the Allocation Policy.	
2	2 nd April 2013	Independent Resident Advisor	CPO and Ground 10a – I note your comments on the legal advice and precedent for the use of CPO powers to end secure tenancies. Clearly it would have provided more comfort for ourselves and tenants if CPO powers had been used in this way on one of the major London regeneration schemes. I note that there is copyright on the legal advice, but any general information on the opinion offered and the identified schemes would be most helpful.	We understand that schemes where CPOs have been used before are Nuneaton and Bedworth Borough Council at Camphill Estate and at a scheme in Stockton. We also understand that this will be the approach taken on the Earls Court Hammersmith and Fulham Scheme in London and that the approach was also adopted for the London Olympics site. Regarding your request for general information on Counsels' advice, we can confirm that we are proceeding as he has advised.	15 th April 2013
3	4 th April 2013	Secure Tenant	I believe this measure should only be used as an extreme last resort. If this measure were to take effect, tenants should be given timely notification and should have all aspects of the Compulsory Purchase Order explained to them clearly and in depth.	With regards to your comments in relation to the formal consultation on the Council's proposal to promote a CPO on properties within Phase 2b, including those currently occupied by Secure Tenants. As stated on page 8 of the booklet sent as part of the consultation, the Council would only use a CPO to recover possession of existing homes occupied by Secure Tenants in Phase 2b where it needs to be assured the timetable for regeneration could be complied with. This proposal was explained in detail at a presentation given at the	26 th April 2013

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				<p>Tenant's Steering Group on 4th April 2013. However, if you were unable to make this meeting, I would be happy to meet with you or any other Secure Tenant within Phase 2b to explain this proposal.</p>	
4	17 th April 2013	Tenant Representative	<p>CPO & Ground 10A Thank you for the clarification. It remains of concern that the "CPO" approach is largely untested and could be open to challenge. We are aware that whilst it may have been under consideration on other regeneration projects, this approach may not have been adopted due to the potential pitfalls. We would hope that the Council has been advised to seek the advice of the Secretary of State before consulting on the proposed twin approach to seeking possession of secure tenant's homes.</p> <p>Right to Return Whilst I understand the problems caused by the Council's underprovision of new 1 bed units, there is no valid reason for the agreed "Right to Return" commitment to be renege on. It is understood that whilst a new home in Phases 1b or 2a cannot be guaranteed, those residents that are happy with a two phase move could easily have the option of moving to a new 1 bed in a later phase. A very</p>	<p>With regards to your comments on the use of CPO on properties occupied by Secure Tenants and the Right to Return issue; the Council's position on these points was made clear in previous responses. As confirmed in paragraph 7.2 of the draft Allocation Policy for Phase 2b, the Council cannot guarantee that Secure Tenants with a one bedroom housing need will be offered a new home within Phase 1b and Phase 2a Redevelopment Sites, however, they will be made a Suitable Offer of alternative accommodation.</p> <p>With regards to the Stage Two appeal where a CPO is confirmed, we accept that, in order to comply with public law principles and/or the Human Rights Act, any appeals process that the Council operates must be fair and must be operated fairly. Subject to this, however, it is within the Council's discretion to decide on the exact process that it adopts.</p> <p>Essentially, the appeals process that the Council is proposing to adopt is a two stage process that involves a decision by South Kilburn's Re-housing Project Manager in the first instance and, if the Secure Tenant does not agree with the outcome of this initial appeal, an appeal to and decision by a</p>	23 rd April 2013 (Carbon copy sent to Resident Independent Advisor 26 th April 2013)

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			<p>limited number of tenants are likely to accept take this option, but it would protect the integrity of the “South Kilburn Offer” as understood by the TSG, ourselves and the Council’s Exec. I would welcome the Council’s urgent commitment that this remains an option for all rehoused South Kilburn tenants.</p> <p>Permanent Moves outside South Kilburn The point being made was that the Council could guarantee the Decent Homes Standard being met on Brent properties offered outside South Kilburn.</p> <p>Stage One Appeal with or without CPO The appeal process as intended to accompany the 10a process is in reality quite distinct from that for the intended CPO approach. If tenants in Phase 1 failed to fulfil the eligibility requirements for appealing against an offer, they retained the ability to challenge its suitability at the possession hearing. Under the CPO approach, all tenants can rely on is the Council’s Stage 1 and 2 appeal process, so it is even more essential that it is both fair and accessible.</p> <p>Stage Two Appeal where CPO is confirmed As Secure Tenants would be losing their</p>	<p>more senior officer within the Council. The Council is proposing that this more senior officer be the South Kilburn Programme Manager and we will amend the draft Allocations Policy to make this clear. In addition, the Council is proposing that, when the South Kilburn Programme Manager makes his/her decision, (s)he must consider the decision of the independent body.</p> <p>The Council has taken legal advice on the appeals process proposed and is satisfied that it is fair and is not in breach of the Human Rights Act. In addition, it goes beyond any process that the Council is obliged to offer to Secure Tenants (and/or any other resident) for appealing the Council’s offer of suitable alternative accommodation under CPO legislation or otherwise.</p> <p>Paragraph 12.4 of the Allocation Policy has been amended as follows:</p> <p>12.4 Stage Two Appeal: where CPO is confirmed</p> <ul style="list-style-type: none"> • <i>If the Secure Tenant wishes to appeal the South Kilburn Re-housing Project Manager’s decision and a CPO has been confirmed in relation to the Secure Tenant’s existing home, the Secure Tenant must do so within 10 working days of having received such decision by writing to the South Kilburn Programme Manager at the address below:</i> <ul style="list-style-type: none"> ➤ <i>specify the reasons why they do not agree with the South Kilburn Re-housing Project</i> 	

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			<p>right to have their tenancy determined in court, it is essential that the verdict of the independent body is binding in all cases. If this is not the case, we would regard the appeal process as proposed as a potential breach of Article 6 of the Human Rights Act 1998.</p>	<p><i>Manager's decision and</i></p> <ul style="list-style-type: none"> ➤ <i>enclose any further evidence to support their belief that the Council's offer is not a Suitable Offer (e.g. medical evidence) and</i> ➤ <i>state that they wish to make a further appeal against the Council's offer.</i> <ul style="list-style-type: none"> • <i>Further appeals should be sent to: South Kilburn Programme Manager Community Resource Centre, William Dunbar House, Albert Road, Kilburn, NW6 5DE</i> • <i>If a further appeal is received within the allowed time, the South Kilburn Programme Manager will refer the appeal to an independent review body to be appointed by the Council and notified to Secure Tenants prior to any such appeal arising. The independent review body will carefully review the Suitable Offer made to the Secure Tenant and any representation made by the Council and will advise the South Kilburn Programme Manager whether it considers that the Suitable Offer is suitable alternative residential accommodation on reasonable terms within the meaning of section 39 of the Land Compensation Act 1973 within 15 working days of the independent review body receiving from the South Kilburn Programme Manager a copy of the Secure Tenant's further appeal.</i> • <i>Within 10 working days of receiving the view of the independent review body:</i> <ul style="list-style-type: none"> ➤ <i>the South Kilburn Programme Manager will</i> 	

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				<p><i>assess the appeal taking into account the view of the independent review body, the information provided by the Secure Tenant and the individual circumstances of the Secure Tenant and their household and decide whether they agree with the Secure Tenant's further appeal; and</i></p> <ul style="list-style-type: none"> ➤ <i>the Council will inform the Secure Tenant of the decision of the South Kilburn Programme Manager and, if the South Kilburn Programme Manager agrees with the Secure Tenant's further appeal, the Council will make another offer of an alternative home on the basis that it is a Suitable Offer meeting the needs of the Secure Tenant.</i> • <i>If the independent review body does not consider that the Suitable Offer is suitable alternative residential accommodation on reasonable terms within the meaning of section 39 of the Land Compensation Act 1973, in most cases it is likely that the South Kilburn Programme Manager will agree with the view of the independent review body, agree to the Secure Tenant's further appeal and make an alternative offer. There may be circumstances, however, in which the South Kilburn Programme Manager disagrees with the decision of the independent review body and decides not to do so. If this is the case, when the Council writes to the Secure Tenant to notify them of the outcome of their further</i> 	

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				<p><i>appeal, the Council will explain why it disagrees with the view of the independent review body.</i></p> <ul style="list-style-type: none"> <i>If the independent review body considers that the Suitable Offer is suitable alternative residential accommodation on reasonable terms within the meaning of section 39 of the Land Compensation Act 1973, it is likely that the South Kilburn Programme Manager will agree with the view of the independent review body and not agree to the Secure Tenant's further appeal. Where the South Kilburn Programme Manager does not agree to the Secure Tenant's further appeal, the Council will expect the Secure Tenant to move to the home set out in the Suitable Offer. If the Secure Tenant does not then the Council will take all necessary steps to secure possession of the Secure Tenant's home as summarised at paragraph 8 above.</i> 							
5	22 nd April 2013	Secure Tenant	I do hope that everything runs well. I do hope the rooms are as big as what I have at the moment.	<p>You make a comment in relation to the size of the new homes. Each household's property size and layout will vary, as will the size and layout of the new home they are allocated. The majority of existing properties in South Kilburn are at or slightly over Parker Morris Standards. All new homes will be built to the Mayor's Design Guide standards. Please find a summary of the associated sizes below. The room layouts within each unit will vary.</p> <table border="1"> <thead> <tr> <th>Size of</th> <th>Parker Morris</th> <th>Mayor Design</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Size of	Parker Morris	Mayor Design				26 th April 2013
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				flat	Standards	Guide	
				1bed	44.59	50	
				2 bed	56.67	61- 70	
				3 bed	79.00	47-95	
				4 bed	86.4	90-99	
6	23 rd April 2013	Secure Tenant	A lot of my generation prefer separate WC, not to have them in the bathrooms. [Refers to individual circumstances].	The Council notes your preference to have a separate toilet from your bathroom. The bathroom and toilet design and specification will accord with the requirements set out in the Mayor's Design Guide. Within some of the larger family homes, a second separate toilet will be provided but in smaller properties the toilet will be incorporated within the main family bathroom.			26 th April 2013
7	25 th April 2013	Secure Tenant	No 4 on page 8 says the Council must rehouse Secure Tenants. These tenants need to know that there will be another permanent homes nearby if that's what they want. As it stands now the Council cannot guarantee that every tenant in a one bed flat for e.g. will be re-housed in the same; instead, because there aren't enough permanent one bed flats some people will have to wait till 2016/17 at least to get a permanent one bed flat in	Thank you completing the Comments Form in response to Brent Council consulting you, a Secure Tenant of Phase 2b of the South Kilburn regeneration programme, on its proposed policy to promote a Compulsory Purchase Order (CPO) under section 226(1)(a) of the Town and Country Planning Act 1990 on properties currently occupied by Secure Tenants. In your comments you refer to the Council's duty to re-house Secure Tenants. You also refer to Secure Tenants with one bedroom housing needs having to wait until 2016/17 to be permanently re-			8 th May 2013

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			<p>the area. The Secretary of State must be aware that this is the case and only approve the demolition if those tenants that don't want to wait until 2016/17 and beyond can be permanently re-housed in 2014 not three years later. This means that everyone who wants the permanent flat in 2013 should be guaranteed it, otherwise their present home shouldn't be demolished. Even though tenants who go into temporary accommodation after the demolition may get a second compensation payment, if a tenant doesn't want to move twice they shouldn't have to. It's clear that there isn't enough new homes for all tenants. (Even though a large number of the new flats that are being built now on land which was used for only Council housing are being sold on the private market, no wonder Council tenants will not get a permanent home after demolition). Don't approve the CPO or demolition until everyone who is wanting permanent, same style accommodation in the area can be allocated it in 2014. Also, those who are willing to go into temporary must have the assurance of a second payment not just the possibility – regardless of how long they're in</p>	<p>housed. Paragraph 7.1 of the draft Allocation Policy confirms that all Secure Tenants living within Phase 2b will be made one Suitable Offer of alternative accommodation. Paragraph 7.2 of the draft Allocation Policy set out the re-housing process and options for Secure Tenants with one bedroom needs and confirms that due to a shortage of certain sized replacement homes, mainly one bedroom homes, the Council cannot guarantee that Secure Tenants living in Phase 2b with one bedroom needs will be offered a new home within Phase 1b and Phase 2a Redevelopment sites. The Secretary of State will be made aware of the one bedroom shortage when the Council's seeks its approval for the use of Ground 10A of the Housing Act, 1985.</p> <p>Secure Tenants with one bedroom housing needs will be made one Suitable Offer of alternative accommodation which would be: 1) within South Kilburn (permanent move) to either a new home on the new developments or to an existing Council property that is not due for demolition; or 2) outside South Kilburn (permanent move); or 3) within South Kilburn (temporary move). This section of the Allocation Policy has been updated to confirm that, where Suitable Offers of permanent alternative accommodation within or outside South Kilburn cannot be identified, Secure Tenants with a one bedroom need will be offered a temporary home within a block due for demolition as part of the South Kilburn regeneration</p>	

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			temporary accommodation.	<p>Programme. The Secure Tenant will remain in the temporary home until it is required for demolition as part of the South Kilburn regeneration Programme, at which time the Secure Tenant will be made a Suitable Offer of a new replacement home. This guarantees the Secure Tenant the 'right to return' to a new home on the estate.</p> <p>The draft Allocation Policy also set out information on Suitable Offers of a new home within Phase 1b and Phase 2a redevelopment sites of the South Kilburn regeneration programme. Phase 1b and Phase 2a redevelopment sites comprise homes to be built in Cambridge Avenue, Chichester Road, Rupert Road and the Bronte and Fielding House site as part of the South Kilburn regeneration programme. On 4th April 2013, at a presentation to the Tenant Steering Group, it was clarified that, if a Secure Tenant in Phase 2b is allocated a permanent new-build home within South Kilburn, it is likely to be located within the Phase 1b redevelopment sites along Cambridge Avenue, Chichester Road and Rupert Road. Therefore, at the time of writing, it is envisaged that Secure Tenants living in Phase 2b will not have to wait until 2016/17 to be made a Suitable Offer of alternative accommodation.</p> <p>You also raise a point regarding a second Home Loss payment to be made Secure Tenants who move into temporary accommodation. As outlined in paragraph 4.7 of the Home Loss and Disturbance Policy for Secure Tenants with homes in South</p>	

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				<p>Kilburn (appendix 2 of the draft Allocation Policy), where a Secure Tenant occupies a temporary home for over twelve months then they may be entitled to a second statutory Home Loss Payment and Disturbance Payment once they move to their permanent new home within the South Kilburn regeneration programme. A second payment of Home Loss Payment and Disturbance Payment will only be made if the Secure Tenant has a legal entitlement to a second payment at the time of the Secure Tenant's move to their permanent new home within the South Kilburn regeneration programme.</p> <p>The Council's Executive Committee will consider all of the comments received by the Council in response to the notice of formal consultation from Secure Tenants living with Gloucester House, Durham Court, Masefield House and Wordsworth House, which form Phase 2b of the South Kilburn regeneration programme. The draft Allocation Policy for Secure Tenants with homes in Phase 2b, South Kilburn, which includes the proposal to make a CPO on properties in Phase 2b currently occupied by Secure Tenants, will be updated in light of the comments received and will be presented to the Council's Executive Committee for adoption. A final copy of the Allocation Policy will be sent to you once it has been adopted.</p> <p>Please feel free to call me on the number above if you have any queries. If you would like to speak to someone independent of the Council then you can</p>	

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				obtain information and advice from First Call (Independent Resident and Tenant Advisor) on Freephone: 0300 365 7150.	

3) Proposal 3: Responses to representations on consultation in connection with draft Allocation Policy for Secure Tenants with homes Phase 2b, South Kilburn

No	Date of Representation	Representor	Comment	Response	Date of Response
1	7 th March 2013	- Independent Resident Advisor - Tenant Representative	<u>6.2 Change of Circumstances</u> In the previous policy agreed at TSG, the Council could only refuse to consider a change in household size in exceptional circumstances. This would seem a more reasonable response to any changes in housing need.	Having reviewed this internally, we are in agreement to reintroduce the wording relating to exceptional circumstances which was in the Allocation Policy for Phase 1. Paragraph 6.2 of the draft Allocation Policy for Phase 2b now reads as follows: <i>'The Council reserves the right to refuse to accept any changes to a Secure Tenant's household composition which would mean providing a larger replacement home. However such consideration would only be considered in exceptional circumstances'</i>	27 th March 2013
2	7 th March 2013	- Independent Resident Advisor - Tenant Representative	<u>7.0 Rehousing Process and Options</u> As discussed yesterday, the document should make clear that all tenants have the option of moving to a new home in South Kilburn. Obviously in some instances this will follow a temporary move on or off the estate. The rehousing policy and accompanying documents	The 'Re-housing Process and Options' section of the draft Allocation Policy has been re-drafted so it firstly deals with secure tenants with a one bedroom housing need and then goes on to deal with secure tenants with a housing need of two bedrooms or more. The 'right to return' of all secure tenants is confirmed in paragraphs 7.2.3 and 7.3.3.	27 th March 2013

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			should make clear that this "Right to Return" exists.		
3	7 th March 2013	- Independent Resident Advisor - Tenant Representative	<u>7.3 Suitable Offer outside South Kilburn</u> Are temporary homes decorated or is there a decorations allowance.	Temporary homes in South Kilburn will have normal void works undertaken before being re-let. These works may include decoration, if required. No decoration allowance is provided.	27 th March 2013
4	7 th March 2013	- Independent Resident Advisor - Tenant Representative	<u>7.4.2 Disturbance Payments</u> Only Home Loss payments are subject to 12 months residence qualification, not disturbance payments.	You are correct in saying there is no 12 month qualifying period applying to disturbance. However, an entitlement to a disturbance payment will be in accordance with Council policy (including the Land Compensation Act 1973). Home Loss Payments and Disturbance Payments have been individually defined in the attached to make this clearer.	27 th March 2013
5	7 th March 2013	- Independent Resident Advisor - Tenant Representative	<u>7.5.3 Moves outside South Kilburn</u> It is unclear why only this group would need to sign a declaration not to approach Brent in future for rehousing. Not least as they may still be Brent tenants but outside South Kilburn.	Having reviewed this internally, the insertion relating to the signing of a declaration not to approach Brent in future for rehousing has been removed.	27 th March 2013
6	7 th March 2013	- Independent Resident Advisor - Tenant Representative	<u>9.0 Rent Levels</u> As discussed yesterday, rent levels for new homes will always be higher than those of existing stock even after rent convergence. The document should be amended to reflect this.	Clarification on this point was sought from the Assistant Director of Strategic Finance within the Council who has confirmed that convergence of council rents with target rents is still scheduled for financial year 2015-16. After the Housing Revenue Account settlement between central government and local authorities in April 2012, it is the case, at least for Brent, that convergence at this date has firmed up.	27 th March 2013

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7	7 th March 2013	- Independent Resident Advisor - Tenant Representative	<u>11.0 Disturbance Payments</u> 11.1 As 7.4.2 re Disturbance Payments 11.3: Could add: <ul style="list-style-type: none"> • Removal Expenses (not just van) • Replacement/Refitting of Carpets and Curtains • Services Disconnection/ Reconnection 	See response to 7.4.2 above The draft Allocation Policy has been amended to include these examples of disturbance payments. Compensation for the second hand value of carpets and curtains where no carpet and curtains are provided in replacement home has been included in the policy rather than replacement/refitting of carpets and curtains.	27 th March 2013
8	7 th March 2013	- Independent Resident Advisor - Tenant Representative	<u>13.0 Appeals Procedure</u> All tenants should be notified of Appeal timescales with offer letter	Agreed that all tenants should be notified of appeal timescales with their offer letter; the draft Allocation Policy has been updated to reflect this (see paragraphs 12.1 and 12.3 of the draft Allocation Policy).	27 th March 2013
9	7 th March 2013	- Independent Resident Advisor - Tenant Representative	13.2 – Stage 2 Appeal - No CPO Will Ground 10a proceedings follow an unsuccessful appeal or would Council await confirmation of CPO	Following an unsuccessful appeal where no CPO has been confirmed, the Council will seek possession by Court proceedings under the Housing Act Schedule 2 Ground 10A. This method will be used by the Council for Secure Tenants in Phase 2b, until the Council has confirmation of a CPO in respect of the homes concerned. After that point, and even if the Council are part way through the Ground 10A process, the Council shall proceed to secure possession by agreement or using the compulsory purchase powers derived from the confirmed CPO in place of the Ground 10A process. The only circumstances in which the Council may continue to use the Ground 10A process, following confirmation of a CPO, is if the Council consider that continuing to use the Ground 10A process is likely to result in it recovering possession of the	27 th March 2013

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				property more swiftly than using its compulsory purchase powers. This is confirmed in paragraph 8.1 of the draft Allocation Policy.	
10	7 th March 2013	- Independent Resident Advisor - Tenant Representative	13.4 – Stage 2 Appeal - CPO Obviously this section is in draft form, and you will need to develop further proposals on the nature of the "independent" body, its role and remit.	The appeals section of the draft Allocation Policy has been amended since our meeting on 5 th March 2013. Secure tenants will have their Stage 2 appeals under CPO reviewed by an independent body rather than having a hearing. This is the review mechanism currently utilised by LB Brent for homelessness application appeals. The Council would advocate Secure Tenants having help and support to prepare the documentation to give to the independent body for review.	27 th March 2013
11	28 th March 2013	Tenant Representative	At the meeting I raised the issue of rent convergence and that the information officers were giving members of the Executive and South Kilburn secure tenants was misleading. Thus, in the October 2012 report to the Executive: "3.9 The Executive should note Council rents are set to converge with the HCA Target Rent in the next few years, although inflation rates are likely to determine the pace of this convergence, it is predicted to take place between 2014 -2016." In fact, only rents of similar properties are set to converge. Thus, rents for new build council properties are set to	Target Rents On 18 th July 2011 the Council's Executive agreed to set rent levels at Target Rent levels for affordable development as part of the South Kilburn regeneration programme, to reflect the fact that the programme will not be in receipt of grant funding that was previously relied upon. Instead, homes for rent are cross subsidised by building homes for sale. Charging target rents was seen as the only realistic way of affording the whole regeneration programme without grant funding that would require new 'Affordable Rent', at 80% of market rent, to be charged. Rent Convergence Policy The Government introduced a rent convergence policy to have a sensible pattern of council and housing association rents across the whole	10 th April 2013

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			<p>converge with rents of new build RSL properties, but rents for 40 year old council properties will never converge with rents of new build RSL properties under current rent convergence. It's so obvious really as the formula rent is based on a combination of individual property values and average earnings in each area.</p> <p>...Let's be clear, Target Rents for new-build RSL properties in South Kilburn are likely to be 20% to 30% higher than council rents for 40 year old properties, and it is important that members of the Executive and council tenants affected by the regeneration are clear about this, and this is where "The Executive should note Council rents are set to converge with the HCA Target Rent in the next few years" is so misleading</p>	<p>country, to address the fact that council rents are currently below target rents. Under the Government's rent convergence policy, all social landlords in England are asked to set their rents in the same way, based on a single formula. The process of moving to this single system is called 'rent restructuring' and convergence is set for 2015-16. The principles for rent convergence were that the Government wanted the rents charged by social landlords to be fair and affordable. It believed that their rents should:</p> <ul style="list-style-type: none"> • remain affordable in the future; generally be well below those charged by private landlords; • be linked to the size, location and condition of the home; and • be similar to rents for other council and housing association properties of a similar size, location, and condition. <p>After consulting councils, housing associations, tenants' groups and other interested groups, the Government produced a formula for setting rents. This formula for setting rents is specifically based upon the value of the property and local earnings and is intended to lead to convergence. However, once convergence is reached, rent levels should be similar for council and Registered Provider properties of a similar size, location and condition.</p> <p>Rent Convergence & South Kilburn regeneration</p>	
12	2 nd April 2013	Independent Resident Advisor	<p>Rent Levels - Section 9.1 of the Rehousing Policy repeats the Council's fundamental misunderstanding of rent convergence. Target rents for existing Brent properties can never equal or even approximate to the rent for new RSL homes. If the Council and tenants are not clear on this matter, it will undoubtedly lead to major issues with the future rehousing programme.</p>		15 th April 2013

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				<p>programme Rents charged for new build properties such as those being build as part of the South Kilburn regeneration programme are likely to be different to the rents on existing dwellings in the same area. However, the overall rise in rents nevertheless provide good value for money as Secure Tenants are moving into brand new properties. The Council accepts that the information it provided in paragraph 9.1 of the draft Allocation Policy in relation to rent levels of new affordable homes on South Kilburn is not clear for which it apologises. A letter will be issued to all Secure Tenants in the near future seeking to clarify this point.</p> <p>The Council proposes to replace Paragraph 9.1 of the draft Allocation Policy with the following:</p> <p><i>9.1 'Secure Tenants who are allocated a new replacement home in South Kilburn will pay higher rent than for their current second-hand Council property.</i></p> <p><i>This is due to two reasons:</i></p> <ol style="list-style-type: none"> <i>1. Council rents are below the rents charged by Registered Providers, which are known as target rents</i> <i>2. The higher value associated with a quality new build home, compared with a lesser quality second-hand Council property, will be reflected in a higher target rent</i> 	

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				<i>The Council has set rents in accordance with its policy that will lead to Council rents and target rents for properties of a similar size, location and condition becoming more equal by 2016. However, even after 2016, there will be a difference in the rent charged for existing second-hand Council properties in South Kilburn, compared with new homes for rent from Registered Providers, built as part of the South Kilburn regeneration programme. However, the overall rise in rents provide good value for money as Secure Tenants are moving into brand new homes. Secure Tenants who are allocated a new replacement home in South Kilburn under this policy will pay the relevant target rent from the date of relocation’.</i>	
13	2 nd April 2013	Independent Resident Advisor	Right to Return – As we discussed, the allocation policy needs to make clear that all tenants have the option to move to a new home in South Kilburn. At the moment, Section 7.2.2 implies that the Council can permanently relocate one bedroom tenants in old homes outside South Kilburn at its behest. The allocation policy should clearly state that all tenants have the option of moving to a new home in South Kilburn, although for one bedroom tenants it may need to follow a protracted temporary move. This is how we understand the “Right to Return” as previously agreed with the TSG.	Paragraph 7.2 of the draft Allocation Policy states that, due to a shortage of certain sized replacement homes, mainly new one bedroom homes in Phase 1b and Phase 2a Redevelopment Sites, the Council cannot guarantee that Secure Tenants with one a bedroom housing need will be offered a new home within Phase 1b and Phase 2a Redevelopment Sites. The Council cannot offer a guaranteed ‘right to return’ to all Secure Tenants with a one bedroom housing need as less one bedroom properties are being built than the existing number of one bedroom properties within South Kilburn. However, all Secure Tenants with a one bedroom housing need will be made one Suitable Offer of alternative accommodation as	15 th April 2013

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				<p>follows:</p> <ol style="list-style-type: none"> 1. Suitable Offer (permanent) within South Kilburn – either on the new development or an existing Council property that is not due for demolition, as outlined in draft Allocation Policy. 2. Suitable Offer (permanent) outside South Kilburn, as outlined in draft Allocation Policy. 3. Suitable Offer (temporary) within South Kilburn – if Suitable Offers of permanent alternative accommodation within or outside South Kilburn cannot be identified, Secure Tenants with a one bedroom housing need will be offered a temporary home within a block that is due for demolition as part of the South Kilburn regeneration programme. The Secure Tenant will remain in the temporary home until it is required for demolition as part of the South Kilburn Regeneration Programme, at which time the Secure Tenant will be made a Suitable Offer of a new replacement home. This guarantees the Secure Tenant the ‘right to return’ to a new home on the estate. <p>Which of the three Suitable Offers will be made to Secure Tenants, which is at the discretion of the Council, will depend the following three factors:</p> <ol style="list-style-type: none"> 1) The re-housing need of the Secure Tenant 	

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				<p>e.g. one bedroom/two bedrooms or more, medical or other needs; then</p> <p>2) The preference of the Secure Tenant recorded at the Housing Needs Assessment Visit by the South Kilburn Re-housing Team e.g. if a Secure Tenant wants to move outside South Kilburn; and lastly:</p> <p>3) The length of tenancy: priority will be given to those Secure Tenants with the longest tenancies.</p> <p>This was not communicated to Secure Tenants in the draft Allocation Policy, which was an omission. The clarification being issued on the Rent Level issue will also include clarification on how the South Kilburn Re-housing Team will make allocations to Secure Tenants, as outlined above.</p>	
14	2 nd April 2013	Independent Resident Advisor	Permanent Moves outside South Kilburn – 7.22 and 7.32 of the draft policy on moving outside the area now qualifies whether replacement homes will meet the Decent Homes Standard, whilst the previous draft did not. Can it be explained why this change is necessary?	<p>The wording in the updated draft of the Allocation Policy was changed from '<i>will meet the Decent Homes standard</i>' to '<i>likely to meet the Decent Homes standard</i>' as the Council cannot guarantee that all replacement homes outside South Kilburn will meet the Decent Homes standard but, they are likely to.</p> <p>Where a Secure Tenant moves to a new home outside South Kilburn, the Council may carry out improvement works to that home that assist the Secure Tenant to settle in. This wording can be included within 7.2.2 and 7.3.2 of the draft Allocation Policy.</p>	15 th April 2013
15	2 nd April 2013	Independent	Stage One Appeal with or without CPO	Secure Tenants had ten working days to lodge an	15 th April 2013

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		Resident Advisor	(12.1 & 12.3) – The 10 day appeal timescale from offer may not always be reasonable in all cases, as it may not prove possible to arrange viewings in the first few days following the offer letter.	appeal under the Allocation Policy for Phase 1. This timescale was not raised as an issue by Secure Tenants. This timescale will remain as ten working days.	
16	2 nd April 2013	Independent Resident Advisor	Stage Two Appeal: where CPO is confirmed (12.4) – It will be of concern to tenants that the Council seeks to reserve the right to disagree with the independent appeals body on making a further offer. It is not clear why this should be necessary, surely the decision of the independent body take precedence or it would seem to be of limited value for tenants.	The Council will be guided by the independent body and the independent body will provide a forum for the Tenant to put its views however the Council will ultimately take the decision which itself will be governed by general law.	15 th April 2013
17	2 nd April 2013	Independent Resident Advisor	Appendix 1 – Schedule of Blocks I understand from the February Exec report that No's 113-128 Carlton House are not now scheduled for demolition.	113 to 128 Carlton House are still scheduled for demolition but not as part of Phase 3 of the South Kilburn regeneration programme. The report to the Executive in February 2013 removed 113 to 136 Carlton House which was included in the definition of Phase 3 in error in the report to the Executive in October 2012. It also sought to include 8 to 14 Neville Close in Phase 3 which was previously excluded. Residents in 113 to 128 Carlton House were written to as part of the consultation with residents and stakeholders on the feasibility study currently being undertaken on the redevelopment of Peel Precinct, 8 to 14 Neville Close and 97 to 112 Carlton House (together defined as 'Peel') to advise	15 th April 2013

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				<p>them that Peel project does not currently include the demolition of 113 to 128 Carlton House. Including 113 to 128 Carlton House within the Peel project may result in the Peel project not being financially viable or deliverable. The impact of including 113 to 128 Carlton House will be carefully assessed during the feasibility study. If the study shows that including 113 to 128 Carlton House within the Peel redevelopment site will have no effect on the financial viability or ability to deliver the Peel project, then it's inclusion in the project may be considered. In accordance with the South Kilburn Masterplan, 113 to 128 Carlton House are currently programmed to be brought forward as part of Phase 4a of the South Kilburn regeneration programme, between 2019-2021.</p>	
18	4 th April 2013	Secure Tenant	<p>With regards to the draft Allocation Policy I believe it is very important that tenants have an insight into the criteria for allocation.</p> <p>It is important that we have an understanding of how homes will be allocated and the factors that will be taken into consideration.</p> <p>Tenants ill need to be confident that allocation of homes is implemented on a consistent and fair basis.</p>	<p>You made comments in response to the consultation on the draft Allocation Policy for Secure Tenants with homes in Phase 2b. You note that it is important that Secure Tenants have an understanding of how the new homes will be allocated. This point was made clear in a follow up letter to all Secure Tenants with homes in Phase 2b on 17th April 2013.</p> <p>The Council's Executive Committee will consider all of the comments received by the Council in response to the notice of formal consultation from Secure Tenants living with Gloucester House, Durham Court, Masefield House and Wordsworth House, which form Phase 2b of the South Kilburn regeneration programme. Subject to the Executive</p>	26 th April 2013

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				<p>Committee's approval, the Council intends to proceed with its application for consent to the Secretary of State to rely on Ground 10A of Schedule 2 of the Housing Act 1985 to obtain vacant possession of homes occupied by Secure Tenants in Phase 2b, South Kilburn. The Council will write to you again in the coming months to let you know the outcome of this.</p> <p>The draft Allocation Policy for Secure Tenants with homes in Phase 2b, South Kilburn will be updated in light of the comments received and will be presented to the Council's Executive Committee for adoption. A final copy of the Allocation Policy will be sent to you once it has been adopted.</p>	
19	5 th April 2013	Secure Tenant	<p>Re points 5.4.2 & 5.4.3 – some clarification is required here. If a couple requires a 2-bed flat for medical reasons they should not be classed as under occupying and therefore should not be liable for the under occupancy charge. This is particularly important as most couples needing 2 bedrooms for reasons of health/disability would be hardest hit by the withdrawal of benefit. It is important therefore that the allocation team should be able to specify to the rent department that people with such problems are not classed as under occupiers and that they have been given a 2-bed flat because of a legitimate need.</p>	<p>Thank you completing the Comments Forms in response to Brent Council consulting you, a Secure Tenant of Phase 2b of the South Kilburn regeneration programme, to get your views on the draft Allocation Policy for Secure Tenants with homes in Phase 2b, South Kilburn.</p> <p>Your comments relate to paragraphs 5.4.2 and 5.4.3 of the draft Allocation Policy which is part of the Needs Plus section of the Policy. The size and type of replacement home offered to a Secure Tenant will depend on a Secure Tenant's household make up and any medical issues affecting the Secure Tenant or any household members, as set out in paragraphs 5.1 and 5.2 of the draft Allocation Policy.</p> <p>[Note regarding medical information submitted].</p> <p>The Council's Executive Committee will consider all</p>	26 th April 2013

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				<p>of the comments received by the Council in response to the notice of formal consultation from Secure Tenants living with Gloucester House, Durham Court, Masefield House and Wordsworth House, which form Phase 2b of the South Kilburn regeneration programme. The draft Allocation Policy for Secure Tenants with homes in Phase 2b, South Kilburn will be updated in light of the comments received and will be presented to the Council's Executive Committee for adoption. A final copy of the Allocation Policy will be sent to you once it has been adopted.</p> <p>Subject to the Executive Committee's approval, the Council intends to proceed with its application for consent to the Secretary of State to rely on Ground 10A of Schedule 2 of the Housing Act 1985 to obtain vacant possession of homes occupied by Secure Tenants in Phase 2b, South Kilburn. The Council will write to you again in the coming months to let you know the outcome of this. Please feel free to call me on the number above if you have any queries. If you would like to speak to someone independent of the Council then you can obtain information and advice from First Call (Independent Resident and Tenant Advisor) on Freephone: 0300 365 7150.</p>	
20	10 th April 2013	Internal Stakeholders (Brent Housing Partnership and	Paragraph 5.3.2 (where children of different sexes are above the age of 7 years, they will be allocated separate bedrooms) - the DWP calculation is	Paragraph 5.3.2: The Phase 2b Allocation Policy will be amended to align with the borough wide Allocation Policy in relation to the age children of different sexes will	12 th April 2013

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		Housing Policy)	different to the Council's, and the proposal is to align them. Therefore the gender rule will be boy and girl can share up to the age of 10. Replace 'bedroom tax' with 'size criteria for social housing'.	be expected to share a bedroom. Therefore, the Council proposes the following amendments to Paragraph 5.3.2 of the draft Allocation Policy: Proposed new wording of Paragraph 5.3.2 of the draft Allocation Policy, Phase 2b: <i>5.3.2 'Children of different sexes will be expected to share a bedroom up to the age of 10. Where children of different sexes are above the age of 10, they will be allocated separate bedrooms'.</i> Paragraph 5.4.2: Replace the wording 'the Government is introducing a bedroom tax as part of welfare reform...' with 'the Government has introduced size and criteria for social housing as part of welfare reform...'	
21	10 th April 2013	Internal Stakeholders (Brent Housing Partnership and Housing Policy)	Paragraph 5.4 (Needs Plus) – state this exceptional and at the discretion of the Council. Part of the consideration will be based on ability to meet the rent.	To amend Allocation Policy at paragraph 5.4 to state that Needs Plus is exceptional and at the discretion of the Council. As this principle is exceptional, there is no need for it to go to the Allocation Panel. The Council proposes the following amendment to Paragraph 5.4.1 of the draft Allocation Policy: Proposed new wording of Paragraph 5.4.1 of the draft Allocation Policy, Phase 2b: <i>5.4.1 The Needs Plus principle will only apply to a Secure Tenant living in a home with 3 bedrooms or more where the Secure Tenant's household has more bedrooms than are needed based on the housing needs</i>	12 th April 2013

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				<p><i>assessment criteria set out above. The Needs Plus principle is exceptional and at the discretion of the Council: the offer of one more bedroom than the Secure Tenant would otherwise qualify for will be based on the Secure Tenant's ability to pay the rent on a replacement home larger than they need. The offer is intended as an incentive for the loss of a larger property and adjusts the basic housing needs assessment to offer one bedroom more than the Secure Tenant would otherwise qualify for.</i></p>	
22	22 nd April 2013	Secure Tenant	<p>Is it going to be all electric? It would be nice if gas is a choice we can have. Please let me know long in advance so that we can view the flat. [refers to individual housing preferences].</p>	<p>You also asked if the new homes will be all electric, rather than gas. The majority of the new homes built in South Kilburn will not have a gas supply. All appliances within the new homes will be electric. The Council's Executive Committee will consider all of the comments received by the Council in response to the notice of formal consultation from Secure Tenants living with Gloucester House, Durham Court, Masefield House and Wordsworth House, which form Phase 2b of the South Kilburn regeneration programme. Subject to the Executive Committee's approval, the Council intends to proceed with its application for consent to the Secretary of State to rely on Ground 10A of Schedule 2 of the Housing Act 1985 to obtain vacant possession of homes occupied by Secure Tenants in Phase 2b, South Kilburn. The Council</p>	26 th April 2013

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				<p>will write to you again in the coming months to let you know the outcome of this.</p> <p>The draft Allocation Policy for Secure Tenants with homes in Phase 2b, South Kilburn will be updated in light of the comments received and will be presented to the Council's Executive Committee for adoption. A final copy of the Allocation Policy will be sent to you once it has been adopted. Please feel free to call me on the number above if you have any queries. If you would like to speak to someone independent of the Council then you can obtain information and advice from First Call (Independent Resident and Tenant Advisor) on Freephone: 0300 365 7150.</p>	
23	25 th April 2013	Secure Tenant	<p>I do not agree with the Council's proposal to seek to change the age of children of opposite sex sharing a bedroom from the age of 7 to 10 years. I am a secure tenant and I have been paying rent and Council Tax since 1995. Currently I am waiting to be re-housed to 3 bedrooms from March 2014. I would appreciate if the Council consider that I have paid my rent and Council Tax and grant me the chance to be re-housed as promised to 3 bedroom from March 2014. The new proposal should only be to those on benefits for years.</p>	<p>Thank you completing the Comments Form in response to Brent Council consulting you, a Secure Tenant of Phase 2b of the South Kilburn regeneration programme, to get your views on the draft Allocation Policy for Secure Tenants with homes in Phase 2b, South Kilburn.</p> <p>Your comments relate to the change to the Allocation Policy for Phase 2b in relation to the age children of different sexes will be expected to share a bedroom. As explained in the follow up letter sent to all Secure Tenants with homes in Phase 2b, South Kilburn on 17th April 2013, the Council has changed its borough-wide Allocation Policy so it applies the same criteria as the Department of Work and Pensions when assessing the number of bedrooms required by a household. The Allocation Policy for Phase 2b needs to align</p>	26 th April 2013

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				<p>with the borough wide Allocation Policy. Therefore, paragraph 5.3.2 of the Allocation Policy has been updated to <i>'say children of different sexes will be expected to share a bedroom up to the age of 10. Where children of different sexes are above the age of 10 years, they will be allocated separate bedrooms'</i>.</p> <p>You note in your Comments Form that the policy in relation to the age children of different sexes will be expected to share a bedroom should only apply to people on benefits for years. Please be advised that this policy applies to all people, regardless of whether they are on benefits or not.</p> <p>The Council's Executive Committee will consider all of the comments received by the Council in response to the notice of formal consultation from Secure Tenants living with Gloucester House, Durham Court, Masefield House and Wordsworth House, which form Phase 2b of the South Kilburn regeneration programme. The draft Allocation Policy for Secure Tenants with homes in Phase 2b, South Kilburn will be updated in light of the comments received and will be presented to the Council's Executive Committee for adoption. A final copy of the Allocation Policy will be sent to you once it has been adopted.</p> <p>Please feel free to call me on the number above if you have any queries. If you would like to speak to someone independent of the Council then you can obtain information and advice from First Call (Independent Resident and Tenant Advisor) on</p>	

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24	23 rd April 2013	Secure Tenant	<p>Kilburn is the most central district in London. [Refers to individual circumstances]. All my life I loved Kilburn, so I am happy to remain there.</p>	<p>Freephone: 0300 365 7150.</p> <p>The Council notes your preference to move to a new home within South Kilburn. The Suitable Offer of a replacement home made to you will depend on your housing need, where you would like to move to which is recorded at the Housing Needs Assessment Visit by the South Kilburn Re-housing Team and lastly, the length of your tenancy. The Council takes these factors into account when deciding which Secure Tenant should be allocated which replacement home.</p> <p>The Council's Executive Committee will consider all of the comments received by the Council in response to the notice of formal consultation from Secure Tenants living with Gloucester House, Durham Court, Masefield House and Wordsworth House, which form Phase 2b of the South Kilburn regeneration programme. Subject to the Executive Committee's approval, the Council intends to proceed with its application for consent to the Secretary of State to rely on Ground 10A of Schedule 2 of the Housing Act 1985 to obtain vacant possession of homes occupied by Secure Tenants in Phase 2b, South Kilburn. The Council will write to you again in the coming months to let you know the outcome of this.</p> <p>The draft Allocation Policy for Secure Tenants with homes in Phase 2b, South Kilburn will be updated in light of the comments received and will be presented to the Council's Executive Committee</p>	26 th April 2013

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				<p>for adoption. A final copy of the Allocation Policy will be sent to you once it has been adopted. Please feel free to call me on the number above if you have any queries. If you would like to speak to someone independent of the Council then you can obtain information and advice from First Call (Independent Resident and Tenant Advisor) on Freephone: 0300 365 7150.</p>	