

Subject: Re: Letter to OSC from the Coalition Against Asset Stripping ahead of OSC Meeting on Monday 21st September

Dear Councillors,

We are writing ahead of today's Overview & Scrutiny Committee meeting because we have serious concerns not only about the Council Asset Strategy 2026-30 and the proposed Voluntary and Community Sector Leasing Policy, but about the level of scrutiny, evidence and consultation underpinning these proposals.

Since July 2026, community members have had to undertake much of the detailed scrutiny we would have expected OSC to undertake before these proposals were allowed to progress.

Even in the limited time available to us, that scrutiny has uncovered significant gaps and potentially far-reaching implications that were not meaningfully explored when these documents came before OSC in July 2026.

VCS Leasing Policy

We have already submitted a detailed list of questions to the Council concerning these proposals. To date, we have not received substantive responses to many of them. Instead, some of the most revealing information has emerged through Freedom of Information requests.

The FOI disclosures have shown that, at the point the VCS Leasing Policy came before Overview & Scrutiny:

- there was no completed VCS Property Review;
- there was no complete property dataset underpinning the policy;
- no financial modelling had been undertaken;
- no options appraisal had been undertaken;
- the Equality Impact Assessment had not considered affordability or whether VCS organisations could be financially impacted by the policy; and
- the impact on secondary tenants who could nevertheless be directly affected by the policy had not been considered.

It is particularly concerning that the policy itself repeatedly referred to a VCS Property Review and described conclusions said to have emerged from that work, when the information subsequently disclosed through FOI shows that there was no completed review at the point the policy came before OSC.

Similarly, a policy with potentially significant financial consequences for community organisations was brought forward without financial modelling, without an options appraisal and without affordability having been properly considered through the Equality Impact Assessment.

These are precisely the kinds of issues we would have expected pre-decision scrutiny to identify. Instead, community members have had to establish them afterwards through FOI.

A strategy which anticipates a smaller estate

One of our key concerns is the gap between the reassurances given at OSC and what the Asset Strategy itself says.

Councillors were repeatedly reassured that the Strategy was not about disposing of community assets or shrinking the community estate.

Yet the Strategy explicitly points towards a “smaller, better-used and more affordable estate” and acknowledges that, in some localities, the community estate may become smaller.

It also links consolidation to savings, concentrates services into fewer buildings and allows released assets to be disposed of. If frontline services are to be protected while the estate becomes smaller and property costs are reduced, then the release of assets is plainly an anticipated consequence of the model.

The issue is therefore not whether disposal is the stated purpose of the Strategy, but whether a smaller publicly owned estate and future disposals are an anticipated consequence of it. If so, that needs to be stated clearly and properly scrutinised.

Lack of consultation around these policies

We have found that few VCS organisations were consulted before the policy went to OSC.

Since raising our concerns with Leadership, some organisations have been contacted at very short notice and given only around three days to provide feedback to the policies. We have also seen different drafts circulated: some organisations received Version 11, while others received Version 13. If organisations are being consulted on a policy, they should at the very least be consulted on the same version and given adequate time to respond. This raises serious questions about whether the process amounts to meaningful consultation.

The same concern applies to the wider Asset Strategy. The Council cites its budget consultation as evidence that residents would prefer more efficient use of buildings and land to reductions in frontline services. But agreement with the general principle that Council property should be used efficiently cannot reasonably be treated as agreement with every consequence of this particular Strategy.

- Were residents asked whether they supported a smaller community estate?
- Were they asked whether the Council should increasingly rely on school, partner or third-sector premises in place of Council-owned community space?
- Were they asked about moving additional Council functions into libraries?
- Were they asked whether market sale should be the default disposal route?
- Were they asked about Community Asset Transfer?

Community Asset Transfer

We have taken the laborious step of comparing the Interim Council Asset Strategy 2025-30 with the subsequent Strategy.

On page 17, the Interim Strategy’s asset-review methodology expressly identified asset transfer alongside open-market disposal as a possible route where an asset was released.

We can find no equivalent Community Asset Transfer route within the latest version of the Strategy set to be presented to Leadership.

- Why was asset transfer included within the Interim Strategy but not carried through into the later document?
- Was this an intentional policy change? If so, who made that decision?
- Before any community asset becomes surplus and proceeds towards market disposal, why should the Council not be required to consider whether community ownership represents a viable alternative?

We cannot see evidence that these questions were explored at OSC.

What happened to the 2018 Community Asset Review?

Following Grenfell, the Council undertook a Community Asset Review in 2018.

We have submitted an FOI request specifically asking what happened to the recommendations and outputs from that review and how they have informed the current Asset Strategy. At the time of writing, that request remains outstanding beyond the normal response period.

Given that the Council has been considering these issues since at least the 2018 Community Asset Review, we would expect the Strategy now before councillors to be considerably more robust.

Instead, community members have been able, within a matter of weeks, to identify major questions which remain unresolved.

Before councillors approve another major strategy concerning community assets, they should therefore know:

- What did the 2018 Community Asset Review recommend?
- How much Council resource and officer time went into that work?
- What happened to its outputs? And why have they not been published?

If these issues have been under consideration since 2018, the current Strategy should not contain this many unanswered questions.

The role of libraries

The Strategy proposes establishing Customer Delivery at Kensington Central Library with satellite digital and triage provision at North Kensington and Chelsea libraries. It describes relocation of Customer Delivery into libraries as a first step, while five Children's Services teams have already been relocated into Kensington Central Library (albeit into an office space previously let to a private tenant).

Customer Delivery routinely involves residents who may be distressed, vulnerable or experiencing crisis.

- Have the safeguarding or privacy implications of moving those interactions into public library environments been assessed?
- Where has this change been consulted upon with library users and staff?

- How much library and community space could ultimately be given over to other Council services in the name of consolidation?

The need for further scrutiny

For all of the reasons above, we do not believe the Strategy should proceed to Leadership without OSC looking at it again in substantially greater depth.

We therefore ask the Committee today to:

1. Recommend that the Council Asset Strategy does not proceed to Leadership in October until it has returned for meaningful pre-decision scrutiny.
2. Undertake substantive scrutiny of the issues raised in this letter and require a clear, point-by-point response to the concerns and questions set out above.
3. The OSC report itself to the Council for its failure to properly scrutinise both the Asset Strategy and the VCS Leasing Policy and ask for an external investigation into how the OSC could fail in this basic function.

Yours sincerely,

Coalition Against Asset-Stripping