World's End Residents' Association

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Home Ownership Team
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(also at hm-homeownership@rbkc.gov.uk)

26th February 2026

Dear Sir/Madam,

Re: Section 20 Notice for MW2330 (described as "Communal Lighting Works")

I am writing on behalf of the Committee of the World's End Residents Association (WERA) with regards to the Section 20 notice for the above major works (ref. MW2330, "Communal lighting works"). The WERA Committee wishes to make the following observations as well as repeat its previous requests for additional information.

Lack of consultation

The WERA Committee is extremely disappointed that the Council did not see fit to consult or even notify it of its intention to carry out these works before S20 notices were served on the estate's leaseholders.

The first the WERA Committee heard of these works was when leaseholders started receiving S20 notices.

This is not normal.

WERA Committee members cannot recall a time where the Council or the TMO proceeded to serve S20 notices on the estate's leaseholders without having first consulted, or at the very least notified, the WERA Committee beforehand. The TMO, for all its many, many failings, consistently consulted the WERA Committee about proposed major works well before they had reached the point where S20 notices were to be served on the estate's leaseholders. The Council had managed to do the same up to now but has failed to do so in this instance. It has therefore failed to meet the low standard previously set by the TMO. The WERA Committee wishes to understand why this has happened.

E1. Why has the Council failed to consult or even notify the World's End Residents Association about these proposed major works before proceeding to serve Section 20 notices on the estate's leaseholders?

Once the WERA Committee became aware of the proposed major works multiple attempts were made to obtain further information about the proposed works and those managing the proposed works through the only contact point provided in the S20 notices – the Home Ownership Team.

The WERA Committee's Chair, Ms. Eryl Wrage, emailed the Home Ownership Team on the 29th of January 2026 requesting more information about the proposed works. As no response was forthcoming she emailed the Home Ownership Team for a second time on the 5th of February 2026. Again, there was no immediate response.

Ms. Wrage eventually received a response to her emails on the 17th of February 2026, a full 19 calendar days, 13 working days, after the first email was sent. The response confirmed receipt of the email but did little else. It did not provide any of the information requested. It did however mention the infamous RBK&C cyber-attack, apparently suggesting that this was somehow preventing a full and proper response.

If the cyber-attack is preventing the Council from answering requests for additional information in a timely manner and preventing the Council from providing the information requested, then the cyber-attack appears to have rendered the Council operationally dysfunctional. If the Council is operationally dysfunctional then it is arguably incapable of carrying out a meaningful S20 consultation of the estate's leaseholders and the Council should refrain from doing so until the situation has meaningfully improved. To do otherwise risks making a mockery of the entire process.

A second response was received 24th of February 2026, 26 calendar days, 18 working days after the first email. This response provided very little of the information requested. It repeated many of the claims made in the S20 notice verbatim. It provided no additional information on why the works had been deemed necessary or how and why the selected product ("Thorlux SmartScan Lighting") was deemed appropriate. It did provide the name of the project manager but not their contact details and suggested that the Association refrain from trying to make contact. It also suggested that the lack of meaningful consultation was due to the "low cost" of the works. The average person is unlikely to consider proposed expenditure of £281,945 and leaseholder recharges of up to £500 "low cost".

As a direct result of what can only be described as an appalling standard of communications the WERA Committee is not much wiser as to who is managing the proposed major works, on what basis the Council has deemed the works necessary, and on what basis the new lighting solution it proposes to install ("Thorlux SmartScan Lighting") has been deemed the best choice.

The use of frameworks agreements

We believe that the proposed major works mark the first time that a framework agreement/contract is being used to carry out major works on the World's End Estate. Given the very significant differences between major works that make use of framework agreements/contracts and those that do not the WERA Committee would have expected the Council to make a meaningful effort to explain those differences to the estate's leaseholders prior to or as part of a S20 consultation. The S20 notice as served does none of this. As a result, is it extremely likely that many of the estate's leaseholders will be expecting there to be further formal consultation about the proposed works before they proceed when in practice that is unlikely to be the case. This is yet another failure in communication.

The need for the proposed works

The Section 20 notice states that *"the proposed works are required due to the current age and condition of the existing systems, and to comply with modern standards"*.

The notice also states that: *"The current systems have been in place for many years, are in poor condition, and have reached the end of their serviceable lifespan. They also no longer meet current safety and compliant standards"*.

Finally, the notice then goes on to claim that the proposed replacement lighting systems *"… will avoid the need for ad hoc reactive repairs in future …"*.

No evidence is provided to justify any of these claims. It should not have to be said, but simply stating something does not make it so.

The background to the estate's existing communal lighting systems is as follows:

The estate's existing communal lighting systems were installed as part of two previous major work schemes. The first was the refurbishment of the estate's communal walkways that took place between 2003 and 2005. These included the complete replacement of the entirety of the communal lighting systems serving the estate's walkways, including all the wiring, conduits and fixtures. The second was the communal redecoration and refurbishment works carried out between 2005 and 2007, which did the same for the communal lighting systems within the seven tower blocks. The communal lighting systems the Council is proposing to replace are therefore at most between 19 and 23 years old if we ignore the fact that many if not most of the light fixtures have been replaced at least once during various bouts of lighting improvement works since then (all of which were recharged to the estate's leaseholders). No part of the existing communal lighting system dates back to the construction of the estate, as some might foolishly believe or wish to claim.

Following receipt of the Section 20 notice a full visual inspection of the communal lighting system in the affected blocks was carried out. The visual inspection indicated that the system was in a perfectly serviceable condition and found no evidence to suggest that the existing communal lighting system required wholesale replacement. If anything, the visual survey revealed a communal lighting system that was working well – there was no sign of seriously damaged conduits or wiring, the vast majority of light fixtures were working properly, the number of light fixtures in need of any attention whatsoever was under 0.5% of the total.

In addition, a review of the amounts being spent on maintaining the existing communal lighting system on the estate does not reveal a significant increase over time. The Council is not spending an ever-increasing amount of money on maintenance and current maintenance costs do not in any way support or justify the claim that the system has reached the end of its serviceable life.

Given this it is difficult to understand the basis for the claims being made. The communal lighting systems are not particularly old and do not appear to be in a poor condition and current maintenance costs are stable by historic norms (if anything the Council is spending less in real terms than it did just a few years ago). If the Council does have meaningful evidence that the existing communal lighting systems are in a poor condition and

have reached the end of their serviceable life, then the WERA Committee would very much wish to review said evidence with a view to having it independently assessed.

E2. Please provide the WERA Committee with whatever evidence has been collated to justify the claims being made with regards to the age and condition of the estate's existing communal lighting system.

Should the Council be unable to provide any meaningful evidence the Committee's view shall remain that the works are NOT necessary.

The claim is made the estate's existing communal lighting system does not meet certain standards, including "current safety and compliant standards", but fails to identify any of the standards in question or explain how the system fails to meet them.

E3. Please identify the specific standards being referred to and describe how the current communal lighting system fails to meet them.

The claim is made that installing the new system will avoid the need for reactive maintenance going forward. This claim as written is unrealistic as all lighting systems require maintenance and it seems unlikely that "Thorlux SmartScan Lighting" will be any different (the manufacturer certainly does not claim otherwise). Given prior experience the WERA Committee believes that the new system is likely to require maintenance from day one and to suggest otherwise is grossly misleading. If, however, the Council does truly believe this claim, then it should provide leaseholders with a cast-iron guarantee that should the new lighting system be installed that no reactive maintenance will be necessary and that, as a result, leaseholders won't be recharged for any maintenance to the lighting system going forward.

E4. Please explain the rationale behind the claim that the new system will not require reactive maintenance going forward. Please confirm that the Council is willing to back up this claim by guaranteeing that leaseholders will not be recharged for any reactive maintenance to the new proposed lighting system should it be installed.

The proposed works appear to be an improvement

The WERA Committee has reviewed the marketing literature for the proposed replacement communal lighting system, "Thorlux SmartScan Lighting". The proposed installation of this product clearly goes well beyond replacing the existing communal lighting system on a like-for-like, or near-like-for-like, basis. The proposed product provides significant additional functionality beyond that provided by the existing system and well beyond that required by relevant building and fire safety standards. This is clearly reflected in its elevated cost, equivalent to nearly £700 per replacement light fixture.

Many of the leases on the World's End Estate are of a non-improving nature. That is to say that the leases make the leaseholder liable for the Council's repair and maintenance costs as well as major works that are of a "repair and maintenance" nature. The leases do not however make leaseholders liable for any improvements the Council may wish to make. If the Council wishes to spend large amounts of money on improvements, it is perfectly free to do so but many leaseholders are not liable for those costs under the terms of their leases.

Based on the marketing material reviewed and given the complete lack of evidence justifying the works noted above, the WERA Committee is of the opinion that these works

represent an improvement and are thus not fully rechargeable in many cases. This question is not touched upon at all in the S20 notice as served, but we assume the Council is of the view that the works are not an improvement and are thus fully rechargeable in all cases. If that is indeed the case, it needs to explain its rationale given the evidence to the contrary.

E5. Please provide the rationale by which the Council has concluded that these works are not an improvement and thus fully rechargeable in all cases.

Summary

The Committee of the World's End Residents Association would appreciate it if you please could address all the issues/question listed above, namely:

1. Please explain why the Council has failed to consult or even notify the World's End Residents Association about these proposed major works before serving S20 notices on the estate's leaseholders.

2. Please provide the WERA Committee with whatever evidence has been collated to justify the claims being made with regards to the age and condition of the estate's existing communal lighting system.

3. Please identify the standards being referred to (in the S20 notice), including the "current safety and compliant standards" specifically cited, and explain how the current communal lighting system fails to meet them.

4. Please explain the rationale behind the suggestion that the new system will not require reactive maintenance going forward. Please confirm that the Council is willing to back up this claim by guaranteeing that leaseholders will not be recharged for any reactive maintenance to the proposed lighting system in future should it be installed.

5. Please explain why the proposed works are not an improvement given that the marketing materials for the selected product "Thorlux SmartScan Lighting" clearly suggest that it would be a significant functional improvement over the existing and this is clearly reflected in its cost. Please explain how the Council has determined that the works are fully rechargeable in all cases.

Finally, the WERA Committee still wishes to discuss these works with the relevant project manager. Please confirm that the project manager identified in the email of the 24th of February 2026, Mr. Christopher Flack from the M&E Capital Delivery Team, can meet the WERA Committee to discuss these works well before any works commence on site.

The WERA Committee would very much appreciate it if the above issues could be addressed as soon as practically possible.

Thank you.

Yours sincerely, on behalf of the WERA Committee:

Mr. Jules Montero, World's End Residents Association.