



## **ASH Proposals for Central Hill Estate - Commentary**

### **Background**

Architects for Social Housing have publicly presented option(s) which include the retention of all residential properties on Central Hill and creating new homes, community and office facilities and workshops on in-fill land on the estate, on top of flat and maisonette blocks or where there are currently non-residential buildings.

The range of new homes from the ASH proposals ranges from 120- 250 new homes delivered across 15 sites within Central Hill.

The position for Lambeth Council is that it will review the proposal put forward to see if the proposals are 'deliverable' and meets its priority of 'More and Better Homes'.

To do this there is a need to consider:

- Architectural/Planning issues
- Structural issues of building on top of the flats and maisonettes
- Cost of the units and infrastructure required
- Ability to fund the build and refurbishment of the existing homes

Taking forward the on-line design proposals on ASH's website the following commentary is given. This is not a definitive review as the level of detail on the website is not sufficient to carry out a full appraisal.

The comments below are therefore initial comments that need to be considered. This has been circulated to ASH and the REP prior to a presentation to the group.

The intention is that after the consideration of ASH's more detailed proposals, the conclusions will be included in the Council's engagement process as a scheme which can or cannot be delivered.

### **1. Planning Comments**

Proposals have been prepared by ASH for Central Hill Estate, these are promoted on the basis that they offer a 'no demolition' approach; this is not strictly correct as they do require demolition and redevelopment of the boiler house, the hostel and the community facilities and housing office. Beyond this the proposals create additional residential units across the site through primarily roof level extensions and infill. This appears to include infilling the road which sits below central hill to create street level housing.

The proposals presented are illustrative as planners do not have the level of detail required to make full comment on them, for example the distances between buildings are not apparent, the levels and also the accuracy of the massing shown.

For the additional development on Central Hill, the planning requirement will be that 40% of the homes should be affordable.

## **Building above the Prospect and 'Way' Blocks**

The roof level extensions are focused on the blocks of flats, and on some of the stepped housing. 'In principle' these options are not out of the question, but of course it would depend on whether the buildings could structurally take an additional floor – see Building Control issues. This development would be classed as 'new build' and so will need to adhere to these planning requirements.

The approach of extending the height of some of the stepped housing whilst retaining the rest as is in what is a rather ad hoc arrangement is not logical and the form of the extensions does not relate to the form and design of the existing housing. It is impossible to tell from the images how it is intended to work in terms of entrances, amenity space, quality of accommodation etc. There is also the suggestion of extending onto some of the terraces of the flats, this would not be supported as it would reduce access to private amenity space, potentially resulting in loss of light to units and again seems to undermine any quality in the repeated form by imposing ad hoc additions.

### **In-fill Approach**

Redeveloping on the edges of the estate with taller denser development where it sits adjacent to the lower rise Victorian housing could create an awkward relationship, this is exacerbated by retaining the low level stepped housing

The new fringe housing on Central Hill is shown on stilts at street level, the estate road which sits at the lower level is being built over, and this will have implications in terms of access for vehicles (including refuse and emergency) and car parking. There is also concern about community safety issues, for example, the security of the spaces beneath the housing, as they would be dark and lack natural surveillance. The relationship between these houses and the flats behind looks very tight with potential impact on light, outlook and privacy.

It's not clear how the level changes are being dealt with or indeed if they are. One of the significant issues on the estate at the moment is the ability for residents to move round it easily, it's not easy to navigate, there are long steep ramps, lots of steps and dead ends.

The tower to the rear of the police station is not appropriate; this is not the right site for a building of this scale, particularly given the adjacent building is on the local list – as a building with a local heritage importance.

The scale of the development on the hostel and boiler house sites are also both very bulky. ASH state that 'tall buildings on edge don't affect light', it's not clear what level of analysis has been undertaken but there is concern about the impact on some units within Central Hill and also properties which adjoin the estate, particularly where they are proposing significant increases in height and bulk.

In general the dropping in of blocks into spaces on the estate presents risks in terms of loss of the sense of spaciousness / quality of the landscape experience and loss of trees. In some places there are potentially amenity issues for existing residents.

The original blocks are uniform and somewhat imposed on the landscape. Any infill blocks, by the nature of their constrained sites would need to be tailored individually to the site. This would require a great deal of skill as we would require a degree of harmony between the old and new within the estate. Visual cohesion is likely to reinforce community cohesion.

## Workspaces

Is the boiler house the right site for workspace, what is the demand like in the area, this is a predominantly residential area, would the space just remain empty?

## Pear Tree House

Retains Pear Tree House which is a positive.

## Generally

The introduction of greening is also something that would be supported.

The proposals don't appear to have sought to address some of the key quality of life issues around poor natural surveillance, perceived community safety, pedestrian routes and refuse / recycling management.

## Site Specific Issues

Site	Potential Issues
Block 1	Proposed squat and complex form, may present implications of the amenity of the adjoining existing residents to the immediate north. Implications in terms of loss (and/or replacement of trees) / tree related amenity issues for future residents. A taller, more slender form of development is likely to present a better solution.
Site 2 – open space	Would probably have to accommodate replacement tree planting to replenish losses due to development elsewhere. Consolidation of the built forms at 3 & 4 might result in a less fragmented layout of the open space.
Block 3	Implications in terms of loss (and/or replacement of trees) / tree related amenity issues for future residents.
Block 4	Moving this building might result in a less fragmented layout of the open space.
Blocks, 5, 6, 7, 8 9	Appears to be built over the service road. Implications in terms of vehicular movement, levels and potential loss of trees (and/or replacement of trees) / tree related amenity issues for future residents.
Block 10	Implications in terms of loss of trees (and/or replacement of trees) / tree related amenity issues for future residents. Risk that this block could look slightly incongruous in relation to its wider context.
Block 11	Loss of car parking. Implications in terms of loss of trees ((and/or replacement of trees) / tree related amenity issues for future residents.
Block 12	Loss of car parking. Implications in terms of loss of trees (and/or replacement of trees) / tree related amenity issues for future residents. May present implications of the amenity of the adjoining existing residents to the immediate north. Potential additional height here runs the risk of appearing even more incongruous to the current context.

Block 13	Implications of adverse impact on adjoining existing residents in terms of overlooking / overshadowing. The suggestion of potential for greater height here is likely to worsen the situation.
Block 14	Is the police station within the remit for this estate? A point block in this location is likely to be highly visible in distant views. Historically tall buildings have been avoided on the southern elevated ridges in Lambeth so any development here as a risk of appearing incongruous. Lambeth tall buildings study 2014 also identifies the ridges as inappropriate for tall building development. Visual impact on LB Croydon's adjoining conservation areas likely to be a concern. Setting of the locally listed police station – significant adverse impact. Also potential that it might compete visually with the listed Christ Church tower on Gipsy Hill in wider views.
Blocks 15 and 16	The structural implications of additional accommodation would need to be understood.  Internal circulation / access issues need to be understood.  The split-level nature of the accommodation in these blocks is identified as one of their key flaws. Any roof top accommodation would need to avoid repeating this.

## 2. Architectural Comments

Lambeth have asked PRP to carry out an initial assessment of ASH's proposals. Again, this commentary is based on the information available on ASH's website. If more detailed proposals are forthcoming architects can be procured, through e.g. CABE, to further review.

### Generally

- Refuse and fire access are compromised for the new blocks facing the existing Prospect blocks,
- Overlooking of homes (less than 12m between habitable rooms) for the new blocks facing the existing Prospect blocks,
- Proposed sections show inconclusive Right of Light (ROL) angles where the primary issue is that Sunlight/Daylight (25 degree angle) is being compromised,
- Enlargement of the 3-bed stepped maisonettes would create loss of private terraced gardens and significant reduction to the width of the alleyways,
- 10 storey block contradicts Lambeth planning guidance,
- the 10 storey tower is also outside of estate boundary for the estate,
- the roof-top extensions to the stepped maisonette blocks will need additional lift access (not shown),
- There is no indication of dwelling sizes - so it cannot be seen if they meet minimum housing standards (the mix should affect values and viability),
- As some of the proposed dwellings are new build the ASH proposal will need to show provision for accessibility and wheelchair dwellings (10% - this is currently missing).
- The design of the new roof top dwellings to the stepped maisonettes conflict with the architectural character and design of the original.

- Lift and stair cores are generally not shown or are too small.
- No strategy shown for integration of new drainage and increased discharge into existing outlets and sewers.
- No improvement to the existing external areas to provide step free accessibility.

#### Site Specific Issues

Block 1:	<ul style="list-style-type: none"> <li>• The 7 storey block on corner of Highland Road and Lunham Road creates possible Sunlight/ Daylight issues as the proposed building conflicts with the 25<sup>o</sup> plane taken from lowest habitable room of the adjacent properties.</li> <li>• Scaling of the drawing seems to indicate that the layout does not make provision for refuse or cycle storage within the building (Site 1B).</li> <li>• Mix of dwellings inconclusive (Site 1A).</li> </ul>
Block 2:	<ul style="list-style-type: none"> <li>• Open space</li> </ul>
Blocks 3:	<ul style="list-style-type: none"> <li>• Inconsistent information - the detail extract states 3-4 storey and the accommodation schedule states 4-5 storey.</li> </ul>
Blocks 4:	<ul style="list-style-type: none"> <li>• Inconsistent information - the detail extract states 3-4 storey and the accommodation schedule states 4-5 storey.</li> </ul>
Block 5:	<ul style="list-style-type: none"> <li>• Scaling of the drawing seems to indicate that the layout does not make provision for refuse or cycle storage within the building.</li> </ul>
Blocks 6, 7, 8 & 9:	<ul style="list-style-type: none"> <li>• Scaling of the drawing seems to indicate that the distance between the Prospect block and the new build is less than 12m, creating overlooking issues.</li> <li>• Covering of the existing parking will create single aspect north facing dwellings at ground level of adjacent Prospect block and compromise passive security of car parking area.</li> <li>• The new build maisonettes on upper level landscape deck creates possible Sunlight/ Daylight issues as the proposed building conflicts with the 25<sup>o</sup> plane taken from lowest habitable room of the adjacent properties.</li> </ul>
Block 10:	<ul style="list-style-type: none"> <li>• The block is out of scale to all properties at junction of Central Hill and Roman Rise, creating possible ROL and Sunlight/ Daylight issues as the proposed building conflicts with the 25<sup>o</sup> plane taken from lowest habitable room of the adjacent properties.</li> <li>• The internal corner arrangement of the block will create 3-bed dwellings with insufficient space for garden/amenity space (30 sq.m. minimum Lambeth guidance).</li> </ul>
Block 11:	<ul style="list-style-type: none"> <li>• Block arrangement does not show communal stair core needed for access to upper level 1-bed flat.</li> <li>• Inconsistent information - the detail extract states 6 new homes and the accommodation schedule states 4 new homes.</li> </ul>
Block 12:	<ul style="list-style-type: none"> <li>• Inconsistent information - the detail extract states 10-12 new homes (4-5 storeys) and the accommodation schedule states 10 new homes (4-6 storeys).</li> </ul>
Block 13:	<ul style="list-style-type: none"> <li>• The proposed block creates possible ROL and Sunlight/ Daylight issues with the adjacent flat block on New Green Road as the proposed building conflicts with the 25<sup>o</sup> plane taken from lowest habitable room of the adjacent properties.</li> </ul>
Block 14:	<ul style="list-style-type: none"> <li>• Inconsistent information - the detail extract states 20-25 new homes and the accommodation schedule states 20-30 new homes.</li> <li>• The proposed building footprint will not be able to accommodate 3-bed dwellings at upper levels as Lambeth guidance requires 30 sq.m. minimum garden/amenity space for 3-bed dwellings.</li> </ul>

Block 15:	<ul style="list-style-type: none"> <li>• Additional 1-bed flat will require lift access.</li> </ul>
Block 16:	<ul style="list-style-type: none"> <li>• Roof-top additions will require additional stair and lift core (not shown).</li> </ul>

### 3. Financial position

The cost of building the new homes, workshops and new community/office space is currently not available.

Lambeth will need to assess both the cost and income for the new homes and facilities

Lambeth does not have the ability to borrow to fund any redevelopment\*, the assumption is that the in-fill sites would need to be leased to Homes for Lambeth who would need to borrow to build. For the units built above the blocks there potentially would need to be a complicated arrangement for leasing 'air-rights'; there would also need to be arrangements for access and servicing.

As all blocks within the estate have leasehold interests, the leases of these properties will need to be assessed in relation to the right of Homes for Lambeth to build above their dwellings, without redress to compensation or a change of lease.

As with the Council's consideration of the in-fill building 108 homes, a key issue will be the ability for Homes for Lambeth to raise loans for the refurbishment costs on the homes retained by Lambeth.

Part of any financial assessment will be the tenure mix, both the approach to the 40% affordable – ranging from 'Council level rents' to 80% of market for smaller units; the level of private rented homes and sale values. The profiling of both costs and income is also important for a viable scheme.

If the proposals can be delivered in relation to design and planning requirements, Lambeth will model the costs and the proposed income, to assess whether the scheme is deliverable. The conclusions of which will then be shared with the REP.

### 4. Building above – see also architectural comments

#### Building Control

As the additional units will be self-contained from the flats beneath, the only element that will apply would be L1-A in respect of a new dwelling. In respect of the existing building there is no requirement for any upgrade of thermal insulation or consequential improvements.

The biggest issue will be the structure, Approved document A and this may need to consider progressive collapse, dependent upon its current number of storeys and whether it is capable of taking one or two additional stories. The current height of the building and the new floors may require a lift to be installed should one not exist at present. The new staircase will need to meet current regulations which the old one will not and dependent upon the height of the buildings and number of flats served may need to be discussed.

#### Other Issues

- Will the properties underneath need to be decanted whilst the build takes place?
- How are the water tanks currently on the top of the Prospect blocks be incorporated/re-sited?

## **5. High Rise Block behind the Police Station**

The 10 storey block proposed in front of the Police Station is outside the red-line of the housing estate. If not within the Housing Revenue Account, the land will need to be appropriated from the Council's General Fund, with a required capital receipt.

## **6. Next Steps**

- ASH will present to the REP, considering the comments above.
- A more detailed submission to be given to Lambeth Council ASH which can be further considered.
- A report will be given to the REP in relation to the deliverability of the option(s).
- A summary of these conclusions will be part of Lambeth's engagement with all residents on Central Hill.

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**13<sup>th</sup> April 2016**

\*The position of Lambeth's HRA was presented to the REP in December 2015 – via a presentation and follow-up paper.

A further report to Cabinet in February 2016 gave the investment gap to meet the Council's Lambeth Homes Standard (LHS) had increased to £85 million