

# PPCR Review of the ASH proposal

## Background

### Infill/refurbishment

As an alternative to redevelopment, Lambeth Council explored the option of building on infill sites within the estate to provide new homes and fund the refurbishment of the existing ones. PRP Architects developed an infill scheme for 108 new homes which – combined with refurbishment proposals - was dismissed as financially unviable. The Central Hill Resident Engagement Panel (REP) asked ASH – Architects for Social Housing to prepare alternative proposals.

### The ASH proposal

The latest ASH scheme shows **222** new homes a figure that includes 23 homes on the Hostel site. This site was not included in the original redline area to which the PRP's proposal for 108 new homes was confined.

The police station site (site 14) shown on earlier proposals is not on council land and ASH has removed this site from its revised proposal.

### Core/shared sites

The PRP and ASH schemes both identify a core range of infill sites within the Central Hill Estate and both propose the redevelopment of the Housing Office and Day Centre sites to provide new homes and new community/commercial facilities. The ASH proposal identified a range of sites: sites 1,3,4,12,13,16 and 18; which are marked on the attached plan **Appendix 1**.

Total units shown in ASH proposal for shared sites: **76 units**

### Additional infill sites identified by ASH – Sites 5, 10, 11

The additional infill sites include a new site on the east end of Oakwood Drive (site 5), the hostel site (site 10) and a small site on the corner of Roman Rise and Oakwood Drive (site 11).

Total units shown in ASH proposal for additional infill sites: **40 units**

### ASH identified build-over opportunities – Sites 6,7,8,9,15 and 16

The build-over proposals show roof extensions to the 1-bed Prospect blocks and above the shop (site 15) and the low rise blocks around the edge of the estate (site 16). They also propose new 'edge housing' blocks over Oakwood Drive - the access road below Central Hill (sites 6,7,8 and 9).

Total units shown in ASH proposal for build-over sites: **106 units**

## **Evaluation of the ASH proposal**

The REP asked Lambeth Council to consider the ASH proposals and to this end PRP and Airey Miller evaluated the proposal on design and financial deliverability respectively using ASH's unit numbers and costings.

### **PRP**

PRP's evaluation took the approach of testing the ASH proposals against current design, planning and statutory guidance to ensure that they were compliant in relation to:

- Building Regulations
- National Described Space Standards
- GLA - London Plan
- GLA Housing SPG (Supplementary Planning Guidance)
- Lambeth Local Plan.

Based on these guidance notes, PRP identified 14 core issues on which to test the ASH proposals and used a traffic light approach to develop the perceived risk of not being compliant for each issue:

- red - severe risk
- amber – medium risk
- green – low risk.

The individual risk levels were compiled for each site to give an overall risk factor. This measure identified 9 sites which presented a severe risk, 4 a medium risk and 3 a low risk.

This report was presented to the REP and forwarded to ASH.

### **Airey Miller**

Airey Miller's evaluation of the ASH proposals indicated that they are not financially viable as there was a shortfall in funding new homes even before refurbishment was considered.

### **PPCR**

ASH have not responded to the detail of the PRP report and PPCR as Independent Tenant and Leaseholder Advisors have been asked to look at the ASH proposal in the context of PRP's report and to assess how many of the homes shown in the ASH proposal are viable.

## The PPCR Appraisal

At this stage the purpose of the infill proposals is to identify the capacity for new homes on the Central Hill Estate and to evaluate whether they can cover their own build cost and fund the refurbishment of existing homes. In the light of the compliance issues that have been flagged by PRP in relation to the ASH proposals, this report considers the most recent proposals submitted by ASH - which show a total of 222 new homes - in order to ascertain how many of the units identified are viable.

This report does not consider the detail of the Airey Miller financial reports.

### Evaluation approach

ASH (Architects for Social Housing) is an action group which depends on funding and volunteers to promote its vision for social housing. It does not have the resources available to a commercial firm and as such its scheme cannot realistically be compared with PRP's on a like-for-like basis. As a result, this appraisal aims to consider the individual sites identified by ASH and determine whether the issues of non-compliance raised in PRP's report are issues of detail that can be overcome through design or whether individual site conditions conspire to make it impossible to realistically achieve compliance.

### Compliance

This report focuses on assessing the viability of the sites identified by ASH. The most significant compliance issues identified for these sites are:

- Access (Building Regulations)
- Dual aspect provision (Lambeth Local Plan)
- Overlooking (Building Regulations)
- Security (Secure by Design Principles)
- Size of units (GLA/National Described Space Standards)
- Mix of units (Lambeth Local Plan)
- Fire brigade access (Fire Strategy)

### General compliance issue - Mix of units

The Lambeth Local Plan sets a recommended mix of units for new affordable housing developments as well as guidelines for market rent developments. Both types of development are expected to provide a balanced mix of units, including family sized dwellings.

The ASH proposal currently provides – with the exception of one larger property - only 1-bed and 2-bed units and as it stands would require significant amendment to the design in order to achieve an acceptable dwelling mix. These amendments would result in either a reduction in the total number of units or an increase in the build cost associated with the provision of larger units and as such would significantly impact the viability of the scheme. It has not been possible in this appraisal to assess the extent that this would impact on the feasibility of the scheme

**Appendix 3** gives more information on the Lambeth policy on dwelling mix, the existing ASH mix of units and the mix achieved by PRP in their infill scheme.

### **Shared sites compliance**

Of ASH's 222 proposed units, 76 are built on sites shared with PRP and although some of these have received a red – severe risk - assessment in PRP's report, PRP's own scheme shows that all these sites are viable and that it would be possible to build at least 76 compliant dwellings on the sites identified. Consequently, all new homes shown by ASH on these sites are accepted as viable subject to redesign.

### **Site specific compliance for additional sites**

The feasibility of the individual sites in terms of compliance with current design, planning and statutory guidance is considered in more detail in **Appendix 2** along with consideration of the impact that these proposals could have on existing properties and residents. However, outline feedback can be summarised as follows:

#### **Additional infill blocks**

Sites 5,10 and 11: 40 units

These sites all have the potential to provide additional homes although the block of 14 flats (site 5) and the small block of 3 units (site 11) may be challenged during the planning process. As a result, the unit capacity for site 11 has been reduced to 2 houses to improve its chance of satisfying the planning authorities but the capacity of the hostel site (site10) has been increased from 23 to 26 - a figure shown in an earlier version of the ASH proposals - which is seen to be feasible.

*The additional infill sites could contribute between 26 and 42 new homes subject to planning*

#### **Roof extensions on the Prospect Blocks and existing shops**

site 15: 46 units

The proposal to add lightweight roof extension units over the Prospect blocks and existing shops faces a range of issues which fundamentally challenge the feasibility of this aspect of the ASH scheme. These issues include:

- lift access is required to serve the new flats above the Prospect blocks but could not benefit existing homes
- access to the lift would require deck access along the front or back of the block
- deck access is also required for the proposed units above the shops
- deck access is not compliant with Local Plan policy commitment to providing dual aspect accommodation
- proposed 1-bed flats could not be replicated due to increase in current space standards and replacement with double sized units would half the unit capacity
- current leases do not allow the council to build over existing properties

*As a result of the above issues, we cannot see how the roof extensions are viable.*

### **Roof extensions on edge, low level blocks**

Site 16: 22units

The proposal to add lightweight roof extension units over these blocks also faces issues which fundamentally challenge the viability of the scheme, these include:

- the proposed access stairs conflict with existing external routes/stairs
- deck access required by the scheme is not compliant with Local Plan commitment to dual aspect accommodation
- deck access and private open space areas overlook the private gardens and balconies of the existing homes below.
- current leases do not allow the council to build over existing properties

*As a result of the above issues, we cannot see how the roof extensions are viable.*

### **Edge housing facing the Prospect blocks - built over the access road below Central Hill**

Sites 6,7 and 8: 28 units

These new-build blocks are lifted above the existing access road in order to retain vehicular access - including fire and refuse access - and to achieve level pedestrian/wheelchair access at the upper level from Central Hill. The fundamental challenges to this scheme's viability include:

- overlooking – the edge housing is positioned too close to the Prospect blocks with a separation between habitable rooms of 13m instead of the generally accepted 20m.
- the road space under the blocks is not overlooked by adjacent properties and would not satisfy the standards and objectives set out in Secured by Design principles (a requirement under Lambeth Local Plan policy for community safety).
- deck access required for the upper flats is not compliant with Local Plan commitment to dual aspect accommodation

*As a result of the above issues, we cannot see how these edge housing blocks are viable.*

### **Edge housing facing low level homes - built over the access road below Central Hill**

Site 9: 10 units

This block faces a low level block which is set further back than the Prospect blocks and makes overlooking less of an issue. However, although slightly better overlooked, the space under the deck still conflicts with Secured by Design principles.

Avoiding deck access would make the scheme compliant in terms of providing dual aspect accommodation but would reduce accommodation to 6 x 2-bed houses accessed directly from Central Hill.

*If reduced to 2-storey street properties, this block could provide 6 dwellings – subject to cost and planning consent.*

## Viability

This assessment has used PRP's report to identify the design and technical issues which the ASH scheme has failed to address and considered whether they could be overcome in a revised scheme.

The latest ASH proposal shows a total of 222 new housing units (taking into account additional units associated with the hostel site) and the findings of the viability assessment are as follows:

- **Shared sites** - all housing shown on infill sites also identified by PRP are accepted as feasible 76 viable units
- **Additional infill sites** – dwellings shown on the additional sites identified by ASH have been accepted as feasible although the 3 maisonettes on site 11 have been replaced by two houses and the 23 units on the hostel site have been replaced by 26. 42 potentially viable units
- **Build-over options** – with the exception of site 9, no design solutions were found to overcome identified non-compliance to a range of significant design, planning and statutory guidance issues identified for the Prospect and low level block roof extensions and also the edge housing. Block 9 of the edge housing was seen to be potentially viable although planning, security and cost issues could ultimately challenge the viability of this site. 6 potentially viable units

This shows that 124 units shown on the ASH proposals are considered to be potentially viable.

## Updated financial assessment

Airey Miler have carried out a financial assessment based on building the new homes identified. It is important to highlight that this assessment still uses the ASH costings and does not take into account the changes that would be required in order to better meet the Lambeth Policy on dwelling mix.

As it stands, this assessment shows the scheme to be financially viable in terms of building the new dwellings but not in terms of funding the required refurbishment of the 456 existing tenanted and leasehold homes. If the revised scheme were to proceed, current residents would experience significant disruption and although they would benefit from new community and commercial facilities, there would be no significant improvement to the condition or quality of their existing homes or the accessibility or quality of the wider estate environment.

## Conclusion

The ASH scheme cannot form the basis of a scheme which would meet the Council's requirement to both provide new homes and refurbish existing properties and as such is not considered to be viable.

Pamela Kovachich  
02.10.16