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**‘Partnering with London to deliver an
innovative new homes model’**



Apex airspace response to the Draft London Plan response.

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Response from: Apex Airspace Development, 91-93 Baker Street, London, W1U 6QQ

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Apex Airspace is a specialist property developer that utilises Airspace above existing buildings within the capital to provide much needed homes for Londoners. Our research has detailed that there is potential for London's rooftops to deliver a minimum 180,000 homes, based on a single storey extension of developable rooftops. Apex Airspace is energised to unlock this new land supply totalling some 3,600 acres, for both private market and affordable new homes. Our specialised model embracing Off-Site Modular Construction, means we can deliver these homes at twice the rate of traditional development whilst reducing disruption for building users and neighbours.

Summary

- We welcome the draft London Plan (LP) and agree that the central priority must be to increase the supply of new homes. If this priority is to be achieved and London is to build the 66,000 new homes a year it needs a faster way to deliver, which is consistent with our delivery model for airspace development.
 - We consider that until brownfield land supply is exhausted, we should desist from considering scale use of greenbelt land. Apex considers that the 180,000 home opportunities atop existing buildings should be utilised and prioritised in proposed land uses.
 - We particularly welcome plans for densification across London, including the sparsely populated outer suburbs, providing much needed clarity for developers, housing associations and London boroughs. Where there is existing or planned public transport infrastructure, we should be building more new homes.
1. Set out below are high-level comments on the proposals followed by detailed comments on some paragraphs.

Chapter 1 Planning London's Future (Good Growth Policies)

GG2 Making The best use of Land

- Apex Airspace believe that there is significant untapped development potential across the capital atop its existing buildings. By being able to create asset value from roof top space you reduce the need to encroach on the supply of new land
- Paragraphs 1.2.2.

The key to achieving this will be taking a rounded approach to the way neighbourhoods operate, making them work not only more space-efficiently, but also better for the people who use them. This will mean creating places of higher density in appropriate locations to get more out of limited land, encouraging a mix of land uses

Airspace developments can play an important part in delivering this proposal. By being able to increase density whilst diversifying the existing stock to create new mixed use development in areas where people want to live across the capital

- **Paragraph 1.2.3.**

The benefits of this approach are wide-ranging, going well beyond the simple ability to provide more homes and jobs. High-density, mixed-use places support the clustering effect of businesses known as ‘agglomeration’, maximising job opportunities. They provide a critical mass of people to support the investment required to build the schools, health services and public transport infrastructure that neighbourhoods need to work

- We agree that the ‘agglomeration’ effect of clustering effect of business is critical to the local amenities and communities of Londoners, by intensifying the density of the suburbs these businesses can be supported and encouraged to thrive, in using our model no land needs to be lost to this increase of density. This allows the status of the critical mass of people being retained over time by injecting new homes in areas that already have established amenities and a social structure for people in any demographic to live a healthy life.
- We welcome the Mayors plan to proactively explore the potential to intensify the use of land, by promoting higher density development. We particularly agree with the targeting of sites that are well connected by means of different transport hubs.
- We are also hugely in favour of maximising opportunities to use infrastructure assets for more than one purpose, by using our model we can help explore the many efficiencies that can be made, such as reducing maintenance costs and increasing asset value.

GG3 Creating a Healthy City

- We welcome that the new London plan has acknowledged the impact that the urban environment has on peoples mental and physical health. Our unique approach allows the expansion of existing communities across the capital reducing the impact on the local environment .
- A further point on health is it removes the inconveniences and detrimental effects of living next to a construction site. Traditional methods of construction can cause amongst others, noise pollution, dust, anxiety. All of which can lead to mental health problems in already vulnerable people. By using a prefabricated model where the construction process is managed within a factory these potential issues are removed from the process.

GG4 Delivering Homes Londoners Need

- Londoners need a diverse range of housing tenures, as such our model can incorporate any kind of tenure and can introduce new housing stock to established housing stock and increase the density of that particular accommodation type. The flexibility of our model allows us to manipulate tenures in parts of London that were previously deemed too difficult to develop for affordable housing. This allows us to target any demographics that are in

most need either first time buyers, retirement properties, affordable housing and Private Rent.

- We appreciate the unique housing problem that faces the vast number of Londoners entering the housing market our approach helps alleviate this problem by removing the initial barriers to entry by unlocking development potential in London’s housing market. This will increase the supply at a reduced cost which will help reduce the overall house price of any given area.

- **1.4.3**

The lack of supply of the homes that Londoners need has played a significant role in London’s housing crisis. The 2017 London Strategic Housing Market Assessment has identified a significant overall need for housing, and for affordable housing in particular. London needs 66,000 new homes each year

- The pull of London as a cosmopolitan hub is increasing the population by a rate that the city can’t cope with. It is crucial that this demand is met by quicker supply and currently policy does not act cohesively to allow large construction projects to increase the supply by traditional construction methods. By using modular method of construction we reduce construction time and costs in the urban areas this gives the potential to increase the volume of homes delivered per year. As Modular buildings are delivered 90% complete to site the speed from installation to occupancy is 10 fold the speed of traditional construction methods. Airspace developments using this approach can help create significant inroads to the figure of 66,000 units per year.
- We welcome the London plans acknowledgement that existing houses must not be left empty and that private landlords should offer up properties it cannot renovate as affordable housing. The airspace model can help unlock value in these homes and actively encourage refurbishment and renovation using the untapped capital to fund such works.

Chapter 4 Housing

H1 increasing the supply of housing

- The numbers needed to keep up with increasing population in the capital have been estimated at 64,935 dwellings per annum over the next 10 years. Using our wider team HTA have produced a research document that by using residential rooftop developments alone there is potential for the 180,000 Dwellings alone and that a total of 3600 acres of ‘land’ is going unused. The recent positive announcement by government to enable greater freedoms to develop airspace up to two storeys, has the potential to double the numbers set out in the HTA research to 360,000 – more than half of the plans 10 year targets.
- What is yet to be fully understood is the potential for the increase in the development on top of commercial, retail and light industrial properties that we estimate will increase the afore mentioned 180,000 figure by potentially 30%. Recent research by Max Architects has identified that n 25,000 homes could be provided atop commercial and retail in the Central Activities Zone alone.
- Whilst we welcome the ambitious targets that the Mayor has set out the Plan, we are concerned that the plan places significant responsibility on boroughs to set appropriate densities in their local areas and determine locations for tall buildings within their local plans.

- The industry at large has for some time felt that the density matrix should have been scrapped. Instead, it will be expected that schemes delivering housing proposed over certain thresholds, dependent on the site's PTAL, will be accompanied by a management plan. However, the Draft Plan makes clear that *'the higher the density of a development, the greater the level of scrutiny that is required of its design, particularly the qualitative aspects.'* Despite removal of the matrix, the significant emphasis on measures of density in recent years will continue, with a range of new density measurements introduced presumably with the aim of assessing density in a more consistent manner.

With a number of schemes coming through planning that are zero parking it is crucial that an increase in density in these areas are focused around transport hubs across the capital to reduce the emphasis on the car whilst increasing the focus on clean air developments.

H4 Meanwhile use

- We welcome the exploration in using modular housing in under developed land particularly as temporary accommodation can be created using the rooftop model across sites that are awaiting refits or refurbishment.

4.4.2

- Precision manufacture homes can be used as temporary accommodation across London's unutilised rooftops and potentially reused across other land uses provided that a modular package is specified and produced to be moved around from borough to borough to help alleviate homelessness. Apex housing solutions already has a portfolio of temporary accommodation that can be assessed for such a solution to this issue.

H10 Redevelopment of existing housing and estate regeneration.

- We understand and appreciate that loss of existing housing is only acceptable if urban intensification is followed by social and economic impact that is positive to residence that were originally living in the local community. The intensification is part of continual evolution of London as a cosmopolitan city, our approach to regeneration is to retain the original residence and keep the current building 'live' by prefabricating the dwellings off site to a point of 90% completion. This would minimise the disruption to residence, create a residual value that would enable them to improve the landscape that is immediately around them.
- In deciding whether or not to support estate regeneration, the residence must weigh up whether it would be in their interest to do so against their current circumstances. It then becomes a key part of any regeneration offer that the residence are consulted and feel that they are part of the regeneration offer not simply a spectator.

H11 Ensuring Best use of Stock

- We welcome the proposition that local authorities should do everything in their powers to reintegrate vacant properties and put them back into working use. Our proposition in targeting freeholders that lack the immediate capital to undertake these works is to help them use their assets in a worthwhile way to unlock value and put their properties back on the market.

- We are disappointed that the London Plan does not include in this chapter a proactive look at the potential that using existing stock that could increase the volume of housing through Airspace developments. Given that their potential changes to the planning policy will increase the ability of a freeholder to explore the possibility of upwar extensions we feel that this is an opportunity missed.

Chapter 8 Green Infrastructure and the natural Environment

G2 Protecting the Green Belt.

- *The Mayor strongly supports the **continued protection of London's Green Belt**, This has helped to drive the re-use and intensification of London's previously development of brownfield land to ensure London makes efficient use of its land and Infrastructure, and that inner urban areas benefit from regeneration and investment.*
- We fully support the London Mayors continued policy in protecting the Green Belt. We believe that London has the potential to support housing delivery through innovation and intensification. Not through developing Green Belt land that provides many benefits to Londoners rural communities. Further to this it encourages intensification and efficient use of land

Chapter 11 Funding the London plan

- The proposal for more devolved powers in the Capital Is important as It would allow these entities to seek varied revenue streams, that would enable them to increase development of housing across different sectors. It also enables smaller firms to enter the market to assist in the execution of the plan by being able to apply for smaller grants for smaller sites. Apex is currently in discussions with freeholders across the capital to try and deliver housing on their sites. Being able to access funds in the short medium term will help the efficiency and effectiveness of these sites in a more timely fashion. London's airspace could unlock a minimum of £85bn to deliver the homes and wider Housing Strategy of the Mayor.
- We feel that there could be huge potential in delivering airspace developments through modifying planning regulations to incorporate airspace extensions. By encouraging these types of developments there can be significant traction in being able to cut costs for developers and help alleviate the issues around house prices.

