



Supporting Planning Statement 2 Chesnut Road, London, N17

July 2020

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1.0 Introduction

- 1.1 This supporting planning statement has been prepared on behalf of our client, Chesnut Properties Ltd, in support of a change of use from Student Accommodation to a mix of Student Accommodation and Co-Living for a temporary period of 3 years at 2 Chesnut Road, London, N17 9EN (hereafter referred to as 'the site'). See Appendix 1 for photographs of the site and context.
- 1.2 The site comprises a large four storey (with a basement level) student accommodation block. It comprises a total of 64 student rooms with large shared kitchens / common rooms at each floor. There is also an associated reception at the ground floor and a gym, laundry facility and cycle store at the basement level. The development also contains shared amenity space at the rear of the ground floor and a terrace at roof level.
- 1.3 This planning application comes in response to the substantial blow dealt to the Higher Education and Student Accommodation sector caused by the current Covid-19 pandemic. This has led to increasing vacancy rates at the Site and a low number of room reservations for the 2020/2021 academic year (see 'Background' within Section 3 of this statement for further details).
- 1.4 Therefore, the applicant is applying for a temporary change of use at the site to provide a mix of Student Accommodation and '*Co-Living*' accommodation. It is considered that providing this flexible use would make the building more attractive to a wider range of potential occupiers in the market, thus reducing the likelihood of any prolonged vacancy in the future.
- 1.5 We consider the proposal presents a sustainable short-term solution as the existing Student Accommodation lends itself to the '*Co-Living*' Concept as it would not require any physical works. Therefore, the conversion would make efficient use of the existing building and facilities whilst contributing additional quasi-residential '*Co-Living*' accommodation for young professionals at a vibrant and well-connected location.
- 1.6 The format of this Supporting Planning Statement is set out as follows:
 - Section 2 describes the site and its' context;
 - Section 3 details the relevant planning history and background;
 - Section 4 provides a summary of the '*Co-Living*' concept;
 - Section 5 describes the proposal;
 - Section 6 sets out the planning policy position;
 - Section 7 provides an assessment of the proposal; and
 - Section 8 contains our conclusion.

2.0 The Site

- 2.1 The site is located within the London Borough of Haringey (LBH) in North London and comprises a large 4 storey Student Accommodation building at the western end of Chesnut Road (on the southern side). The eastern boundary of the property lies adjacent Rycroft Way.
- 2.2 It is located 5 minutes' walk (approx.) to the north-west of Tottenham Hale Overground and Underground (Victoria Line) Station and 3-4 minutes' walk (approx.) south-east of Bruce Grove Overground Station. The site has a Public Transport Accessibility Level (PTAL) of 6a, which indicates excellent accessibility. See figure 1.1 below for the site on the PTAL map.

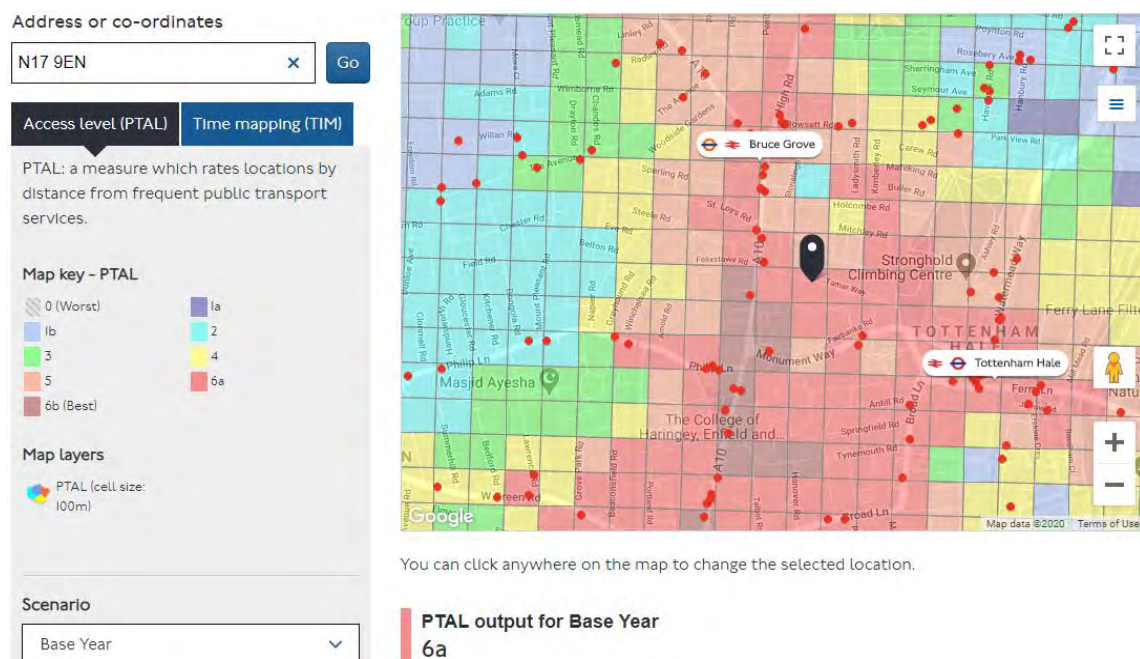


Figure 1.1: PTAL Rating for the Site: source, WebCAT

- 2.3 The local area is mixed in nature with residential use becoming more dominant to the east of the site. The site is situated a short walk (approx. 30 seconds) from Tottenham High Road, which is well served by numerous bars, cafes, restaurants, and shops. It also sits immediately east of the rear of the Police Station, which fronts onto Tottenham High Road.
- 2.4 The built form of the surrounding area provides a variety of architectural styles and sizes. Protheroe House sits immediately east of the site and comprises a new purpose-built extra care apartment building for persons over the age of 55 years. Further east of the site are three storey terraced houses on Hamilton Close and a four-storey residential block on Tamar Way.
- 2.5 The site lies within the Hale Controlled Parking Zone (CPZ), where on-street parking restrictions are imposed between 8:30am-8:30pm from Monday-Friday. The site benefits from nearby areas of open and recreational space such as Down Lane Park, which lies a short walk to the north-east of the site.

- 2.6 The site itself consists of the recently completed Student Accommodation building (see 'Planning History' Section). The historic façade (a mid-19th century villa) fronts onto Chesnut Road. The main body of the building comprises the modern development, which wraps around Chesnut Road and runs along Rycroft Way. Although the site is located within the Tottenham Green Conservation Area, none of the buildings a statutory or locally listed.

3.0 Planning History & Background

Planning History

- 3.1 We have undertaken an online planning history search of the site and can confirm that it has an extensive recent planning history. On 27th July 2010 planning permission (ref: HGY/2009/1665) was granted at the 'Land Rear of 2 Chesnut Road London' for the following development:

'Demolition of existing structures and erection of 3 storey building comprising of 1 x 3 bed flat, 2 x two bed flat with balconies, bin and cycle store.'

- 3.2 Following a series of 'Withdrawn' planning applications in 2011 and 2012, planning permission (ref: HGY/2013/0155) was granted on 26th March 2013 for the comprehensive redevelopment of the site to provide Student Accommodation. The description of development was as follows:

'Partial demolition of existing buildings, retaining existing historical facade, construction of student accommodation over 3 and 4 floors to provide 64 student rooms and amenities areas.'

- 3.3 It should be noted that the site was formerly a night club, which fronted onto Chesnut Road. The permitted scheme (ref: HGY/2013/0155) involved the retention of the 19th Century façade, with a comprehensive development to the side and rear. Copies of the Decision Notice and Planning Committee Report are provided at Appendices 2 and 3, respectively.
- 3.4 Following this approval, a Section 73 planning application was granted on 27th October 2017 to revise and reduce the basement plan, which was granted as part of the original permission (ref: HGY/2013/0155), dated 26th March 2013. A copy of the Decision Notice is provided at Appendix 4. Figure 1.2 provides a photograph of the scheme, which was completed in October 2019.



Figure 1.2: Completed Student Accommodation at 2 Chesnut Road

Background

- 3.5 The new Student Accommodation, which is known as 'Opera House', opened in late 2019, in anticipation of the new academic year in September (2019/2020). The building was becoming increasingly popular with students and vacancy and void periods were reducing. It managed to reach approx. 89% capacity by February 2020.
- 3.6 However, this all changed following the impact of the Covid-19 pandemic and subsequent lockdown in March. As a result, universities across the UK were forced to cease face-to-face teaching and adapt to 'digital learning' measures, which allows students to access classes and resources online.
- 3.7 Subsequently, it is no longer necessary for students to live near the universities they attend. This resulted in many of the students returning home to their families within the UK and abroad. In relation to Opera House, it should be noted that 34-students left the property before the end of their tenancy and 10 requested refunds.
- 3.8 At this stage, it is impossible to predict how the Covid-19 pandemic will impact the Student Accommodation sector in London. However, the uncertainty is influencing the decision of school leavers and a recent study has found that 1 in 5 students (20%) are looking to defer their place at university for the 2020/2021 academic year (see Appendix 5 for the relevant Guardian article).
- 3.9 Furthermore, at the time of submission, we understand from the applicant that vacancy rates were increasing at Opera House, and many students had failed to pay their rent for the previous quarter. This has severely impacted the Purpose Built Student Accommodation (PBSA) sector, with a number of universities and private operators allowing students to request a refund for summer term rent (see Cushman and Wakefield Study at Appendix 6).
- 3.10 We also understand that only 15 students (23%) had indicated a desire to let a room at Opera House for the new academic year (2020/2021) in September with the risk that some, or all these initial bookings may be cancelled before this time, depending upon how the Covid-19 pandemic develops. Clearly, the facility is not profitable with only 23% occupancy and normally approx. 60-70% occupancy is required as an absolute 'minimum' in terms of viability.
- 3.11 On this basis, the applicant is keen to apply for a temporary (3-years) flexible use to provide a mix of both Student Accommodation and 'Co-Living' accommodation. This would allow the use of the premises for a wider range of occupants, including students and 'young professionals', thus reducing the likelihood of significant vacancy at the property.
- 3.12 The aim of this application is to broaden the range of potential tenants (e.g. young professionals) to minimise vacancy levels in the building during these uncertain times.

4.0 The ‘Co-Living’ Concept

The Concept

- 4.1 This section refers to the concept of ‘Co-Living’, which is a type of intentional community that provides shared accommodation for people with shared interests. The concept of ‘Co-Living’ aims to create a community-centred environment that not only provides privacy in individual living arrangements but also promotes social contact through community spaces and events.
- 4.2 The Co-Living concept is an emerging sector within the property industry, which allows young professionals (e.g. ‘Millennials’) to enjoy the independence of living away from home, whilst providing the social and networking advantages of being part of a community. These individuals typically demand flexibility, openness and collaboration and seek to integrate business, work, and play.



Figure 1.3: ‘Co-Living’, an emerging property sector, popular with young professionals

- 4.3 This new and growing market segment has emerged in cities across the world. For example, in North America co-working specialists ‘WeWork’ recently launched its’ Co-Living concept ‘WeLive’ in New York, whilst in East Asia, the Ascott group have created a Co-Living brand called ‘LYF’, which is currently being trialled in China and Singapore.
- 4.4 In addition, ‘The Collective’, which is based in London, is another leading pioneer of the Co-Living concept. The Collective takes pride in promoting collaborative lifestyles, which are centred around community and convenience. Further information of the company and associated projects can be found at The Collective website, which is provided at the following weblink: <https://www.thecollective.com/co-living/>

- 4.5 The Collective has a major Co-Living community at 'Old Oak' in north-west London (Park Royal), which is home to over 500 people. The accommodation combines private en-suite bedrooms with large shared spaces and an extensive programme of inspiring events, which are included in one monthly bill. The services included within the accommodation comprise; all-inclusive bills; broadband; room-cleaning; 24/7 concierge; laundry facilities; communal spaces; a gym; workspaces and an events programme.
- 4.6 An article titled '*London's New Live-Work Flats*', written by David Spittles in Homes & Property discusses the emergence of Co-Living in London (dated 16th March 2016). It notes that the introduction of Co-Living is an imaginative, modern response to high living expenses and commuting hassles, whilst also supporting the green agenda and concerns about work-life balance. It also notes that it enables a like-minded group of young professionals to live and share space, facilities, and services. A copy of the article is provided at Appendix 7.

Co-Living and Flexible Student Accommodation Examples

- 4.7 Although Co-Living is an emerging and growing sector it is interesting to review how similar Co-Living schemes have been dealt with by other Local Planning Authorities in London. This includes schemes by the Collective in the Ealing and Wandsworth. We have also summarised a decision in Haringey, which supports flexible occupancy of a PBSA building, which is similar to the proposal.

The Collective, Old Oak NW10

- 4.8 On 7th September 2017, the London Borough of Ealing (LBE) granted planning permission (ref: 165092OPDFUL) for a Co-Living scheme by The Collective. The description of development was as follows:

'Change of use from student accommodation (inclusive of a maximum of 30% for young professionals (ages 21 to 35) / employed graduates to shared living accommodation for students, employed graduates and young professionals (ages 18 -35) (a maximum of 80%, and inclusive of minimum of 20% for students) with 546 bedspaces (323 - 544 bedrooms) (Departure Application)'

- 4.9 The site is located at Nash House, Old Oak Lane, Park Royal, NW10 6UA and previously comprised a student accommodation planning consent. An image of the Site Location Plan is provided in Figure 1.4 below.

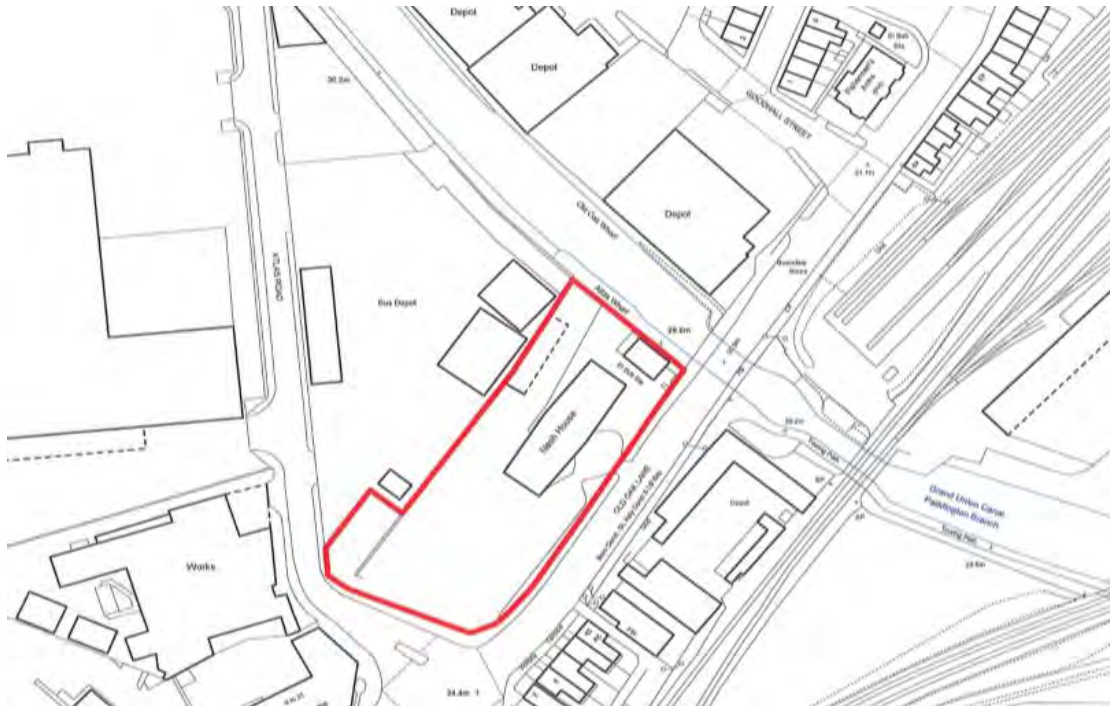


Figure 1.4: Site Location Plan at Nash House, Old Oak Lane, Park Royal, NW10 6UA

- 4.10 The Planning Officers' Report provides a useful summary of 'The Collective' and the notion of the Co-Living Concept. It states (in part):

'As demonstrated by the applicant, The Collective is a new concept that provides high quality ultra-modern and low cost accommodation across London. This particular model is specifically designed for employed graduates and young professionals and would provide individual bedrooms with shared services, a high degree of servicing and 24 hour concierge. The proposal would provide accommodation for the young working population in London who cannot afford to access the traditional C3 residential market through renting or buying a flat.'

- 4.11 The Planning Officers' Report also discusses the suitability of converting the approved student accommodation to shared living (or 'Co-Living') accommodation. It notes (in part):

'The external design of the building would remain unchanged under this proposal. The scale and intensity of the development is considered to be highly suitable for this location. The development would minimise the impact on the amenity and living conditions of adjoining occupiers. Adequate living conditions would be provided for future residents in terms of the internal floorspace and layout. The on-site outdoor amenity space provision would be acceptable and would provide high quality environment for prospective occupiers.'

- 4.12 It continues and comments on the low provision of parking proposed:

'The site is located in an accessible location with a good public transport accessibility level. As such, the shortfall of on-site parking provision is considered acceptable. A parking permit restriction would be secured through a section 106 legal agreement to ensure that future occupiers would not be entitled to parking permits to ensure that parking stress in the area would not be exacerbated by the proposal.'

- 4.13 A copy of the Planning Officers' Report is provided at Appendix 8.
- 4.14 Although the proposal noted above is different to the proposal at 2 Chesnut Road in terms of its' location and scale, we consider that it holds many similarities in terms of its character and proposed function. Both schemes seek to retain the external design of the building and both comprise a previous use (or permitted use e.g. student accommodation) that enables a suitable and logical conversion into Co-Living use. Furthermore, both schemes are located at vibrant and accessible locations, which are ideal for young professionals.
- 4.15 We consider that the Co-Living facility will be similar to that of the existing Student Accommodation in terms of its character and function, which is wholly appropriate for this highly accessible and sustainable location. The proposal requires no physical works whatsoever and the only change will be the provision of an on-site (live-in) concierge and events manager to support the community at the site.

Garratt Mills, Trewint Street, SW18

- 4.16 A Co-Living led mixed-use planning application (ref: 2019/1083) at Garratt Mills, Trewint Street, SW18 4HA, was granted permission at the London Borough of Wandsworth (LBW) Planning Committee on 25th July 2019. The description of development was as follows:

'Demolition of existing buildings and the erection of two blocks between 8 and 6 storeys (including double height ground floor with mezzanine) linked by a single-storey building with mezzanine level, comprising of 292 co-living rooms with internal and external amenity space (Sui Generis), cafe and restaurant use (Class A3), new pedestrian bridge, riverwalk, landscaping, plant, refuse and bicycle stores and associated works.'

- 4.17 The site was formerly occupied by two storage companies and a scrap metal company, which were classified as B8 'Storage or Distribution' Uses. Figure 1.5 below provides a CGI perspective of the scheme.



Figure 1.5: CGI for the Permitted Scheme at Garratt Mills SW18 4HA

- 4.18 The associated Planning Committee Report provides a detailed assessment of the principle of the proposed Co-Living scheme against the tests set out within Policy DMH9 '*Hostels, staff and shared accommodation (including student housing), specialist and supported housing*' of the LBW Development Management Policies Document and Policy H18 '*Large Scale Purpose Built Shared Accommodation*' within the Draft London Plan (DLP) (recently revised to Policy H16).
- 4.19 In short, the proposal was considered to provide high-quality accommodation which catered for an identified need within the Wandsworth Strategic Housing Market Assessment. In addition, the proposal was supported by an appropriate Management Plan and a minimum tenancy agreement of no less than three months. Given these reasons and meeting further criteria, the principle of the Co-Living proposal was supported. A copy of the Planning Committee Report is provided at Appendix 9.
- 4.20 Although the proposal noted above is different to 2 Chesnut Road site in terms of scale, we consider that it holds many similarities in terms of its location, character, and function. In particular both schemes seek to provide a high-quality co-living facility which optimises the development potential at accessible and well-connected sites.
- 4.21 Overall, the decision demonstrates that shared living or '*Co-Living*' accommodation provides specialist residential accommodation which meets the requirements of many young professionals in London. On this basis, subject to meeting amenity and other planning considerations, we consider that the principle of a mixed Student and Co-Living facility should be supported at the site. This assertion is discussed further at Section 8 '*Assessment of Proposal*'.

North Lodge, Tottenham N17

- 4.22 On 16th February 2011 LBH granted planning permission (ref: HGY/2010/2090) for a large Student Accommodation facility at the Former GLS Depot, Ferry Lane, London N17 9QQ, which lies approx. 0.5 miles east of the site. The description of development was as follows:

'Erection of a part 7, part 10 and part 12 storey building at Block NW2 of the Hale village master plan, to comprise student accommodation (524 bed spaces) and associated facilities including reception, office, plant room, store room, refuse store, cycle store, common room, laundry room, courtyard and associated works.'

- 4.23 Following on from this, a Section 96A 'Non-Material Amendment (NMA) application (ref: HGY/2017/0914) was granted on 28th April 2017 to vary condition 19 of the original permission (ref: HGY/2010/2090). The condition related to restrictions placed on the occupancy of the building to be exclusively used by students during University term time.

- 4.24 The application specifically sought to allow a flexible hotel / short-term letting use at the site outside of term times. It was argued that the internal layout and compatibility of the uses would be appropriate at this particular property and location. A photograph of North Lodge is provided at figure 1.6 below.



Figure 1.6: North Lodge Complex

- 4.25 The aim of the non-material amendment was to widen the occupancy of the building in line with changing market demand and conditions for a Student Accommodation building in an accessible location. Therefore, the second part of the Condition 19 was amended to state:

'Outside the academic term the development hereby approved may be for use by persons who are not students in full-time higher education for periods of less than 90 consecutive days.'

- 4.26 A copy of the Decision Notice is provided at Appendix 10. The Planning Officer's Report provides useful commentary in relation to the assessment of the proposal and states (in part):

'London and Haringey planning policy also support greater flexibility in student accommodation schemes; allowing non-students to occupy the building outside of term time improves the viability of student accommodation enabling accommodation providers to effectively subsidise student rents with non-student income.'

- 4.27 Although this decision does not result in the provision of a Co-Living use at the site, it demonstrates that a proposal to provide flexible occupancy (e.g. akin to a hotel or short term lettings use) at a student accommodation facility was supported to provide additional and flexible accommodation during periods of reduced demand. On this basis, we consider that the proposal to provide a mix of Student and Co-Living use also provides a compatible mix that will better reflect the needs of the changing market whilst improving the viability of the facility and provide much needed accommodation locally.
- 4.28 Furthermore, we consider the proposal at Opera House is responding to a more extreme market transition caused by the current Covid-19 pandemic, when compared to the permitted scheme at North Lodge. In addition, the current proposal is only seeking a temporary planning permission. A copy of the Planning Officers' Report is provided at Appendix 11.

5.0 Description of Proposal

- 5.1 As noted, the Student Accommodation sector in London is expected to be severely impacted by Covid-19. As a result, the current facility is unviable in its anticipated state for the 2020 / 2021 academic year (e.g. approx. 23% occupancy) and potentially much longer, as it takes time to generate interest, confidence and generally 'fill up' Student Halls of residence.
- 5.2 It is for this reason that the proposal seeks to use the property for a mix of both Student Accommodation and 'Co-Living' for a temporary period of 3-years. It is envisaged that the property would continue to accommodate those students that wish to rent rooms. However, as many rooms are expected to be vacant the temporary consent (if approved) would allow the remaining rooms to be occupied by young professionals in a Co-Living format.
- 5.3 This approach is being promoted as modern Student Accommodation facilities and Co-Living facilities (as well as some hotels) are physically extremely similar. Therefore, the mixed Student Accommodation and Co-Living facility would not result in the need for any physical changes to the property whatsoever. Furthermore, it would ensure that the facility would remain viable by providing accommodation for young professionals (e.g. 21-35 years olds') who are generally the most popular demographic for Co-Living in London.
- 5.4 This approach would ensure an efficient use of the property during the Covid-19 pandemic as it seems somewhat wasteful for a perfectly good facility to remain largely vacant during a housing crisis. In addition, as no internal changes are proposed, we consider that it will enable an easy conversion back to Student Accommodation at the end of the temporary (3 year) period. The only change would be the provision of an on-site (live-in) concierge & Events Manager, which would be secured via the 'Draft Management Plan', which supports this application. A copy of the proposed ground floor plan is provided at figure 1.7 below.

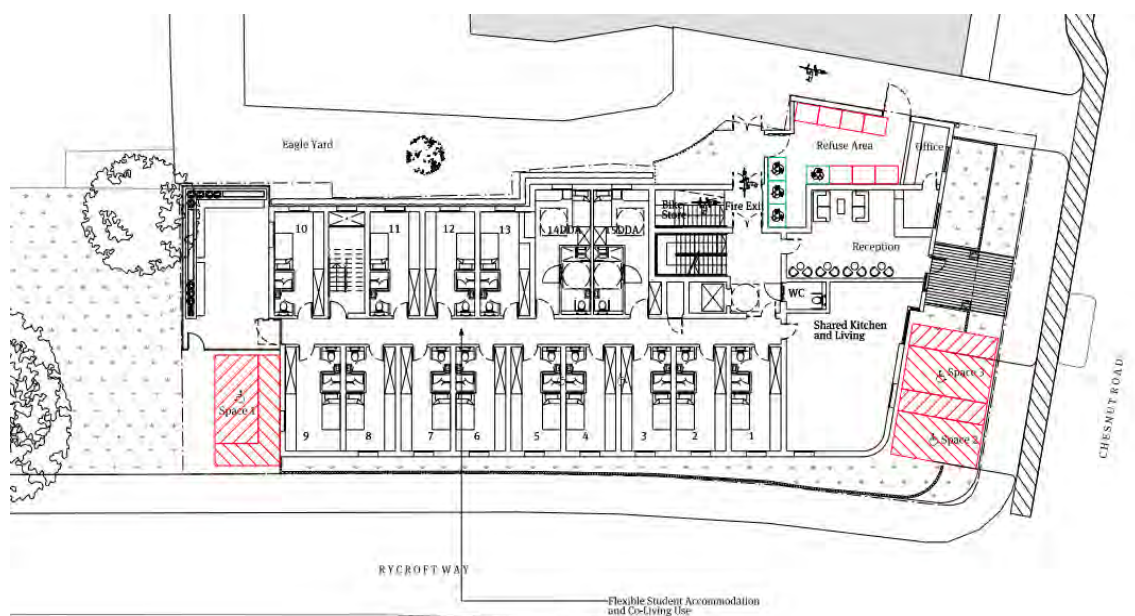


Figure 1.7: Proposed Ground Floor Plan 'Flexible Student Accommodation and Co-Living Use'

6.0 Planning Policy Position

- 6.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the Development Plan unless material considerations indicate otherwise. Specifically, Section 38(6) states:

“If regard is to be had to the development plan for the purpose of any determination to be made under the Planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise.”

- 6.2 In this instance, the relevant Development Plan documents comprise Haringey’s Local Plan: Strategic Policies, (March 2013 consolidated with alterations since 2017), which was adopted in July 2017, the Development Management Development Plan Document (DPD), which was adopted in July 2017 and the London Plan (Consolidated with Alterations since 2011) published in March 2016.

- 6.3 The following documents will also include provisions that are ‘*material considerations*’:

- The National Planning Policy Framework (NPPF), February 2019;
- The GLA Housing SPG, March 2016;
- The Draft London Plan ‘Intend to Publish’ version, December 2019,
- The Tottenham Area Action Plan; July 2017;
- The Tottenham Green Conservation Area Appraisal, February 2016;
- The Planning Obligations SPD, March 2018;
- LBH Urban Characterisation Study, February 2015;
- LBH Adopted CIL Charging Schedule; and
- Sustainable Design and Construction SPD, March 2013.

Proposals Map Designations

- 6.4 The site is located within the following ‘Policies Map’ allocations:

- Within the ‘Tottenham Green Conservation Area’;
- Within the ‘Tottenham High Road Historic Corridor’;
- Within the ‘Historic Core of Tottenham: Archaeological Priority Area’;
- Within a ‘Family Housing Protection Zone’; and
- Within a ‘Article 4 Direction: HMOs’.

- 6.5 Although the property is not listed, the frontage of No.2 Chesnut Road is identified within the Tottenham Green Conservation Area Appraisal and Management Plan. An extract from the LB Haringey Proposals Map is provided below at figure 1.8. The site is located within the central part of the extract.

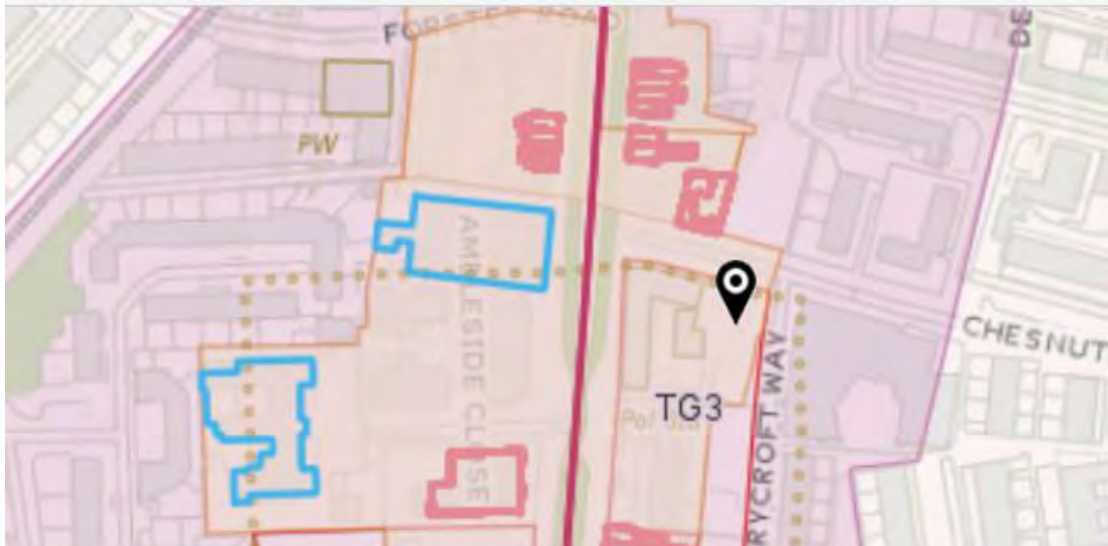


Figure 1.8: Extract from the LB Haringey Proposals Map (location at 'centre east' on map)

Haringey's Local Plan: Tottenham Area Action Plan

- 6.6 The site also forms the north east corner of Site Allocation TG3: 'Tottenham Police Station and Reynardson Court' within Haringey's Local Plan: Tottenham Area Action Plan. The site allocation includes 0.48 ha of land located at 398 High Road and Reynardson Court, N17.
- 6.7 The Site Allocation indicates that the land has an indicative development capacity for 30 residential units, 1,230 sq. m of commercial floorspace, 490 sq. m of town centre floorspace. An extract of the Site Allocation is provided at figure 1.9 below.



Figure 1.9: Site Allocation TG3: 'Tottenham Police Station and Reynardson Court'

The Draft London Plan

- 6.8 The Draft London Plan (DLP) was published for consultation in December 2017. The Examination in Public on the DLP was held between 15th January and 22nd May 2019 and the Panel of Inspectors issued their report and recommendations to the Mayor on 8th October 2019. Furthermore, the Mayor issued his '*Intend to Publish Version*' of the London Plan in December 2019. Although it does not yet form part of the development plan, it is at an advanced stage and is a material consideration in planning decisions.
- 6.9 The DLP will provide a strategic planning policy framework for London, which is expected to grow from a population of 8.9 million today to around 10.8 million by 2041. The DLP includes several new 'Good Growth' (GG) and other policies to significantly increase the delivery of dwellings and various forms of living accommodation across London.
- 6.10 Specifically, the DLP also aims to significantly increase London's annual monitoring housing target from 42,389 homes to approx. 52,000 homes (Policy H1 '*Increasing Housing Supply*'). In addition, Policy H16 '*Large-scale purpose-built shared living*', within DLP identifies large shared living or '*Co-Living*' as a type of development which may provide a new source of single person households in London. We consider that the scheme positively responds to Policy H16.

7.0 Assessment of Proposal

7.1 As noted, the flexible change of use proposal does not require any physical alterations to the building (both internally and externally) whatsoever. As a result, we consider that the proposal is acceptable in heritage and design terms as there would be no change to the existing situation. Therefore, the key planning considerations that relate to the proposal are:

- The Principle of Development and Justification for flexible ‘Co-Living’;
- Character and Amenity Considerations;
- Parking and Servicing; and
- Community Infrastructure Levy (CIL).

Principle of Development and Justification for Flexible ‘Co-Living’

7.2 Principle of Change of Use: Paragraph 59 within the National Planning Policy Framework (NPPF) seeks to increase the supply of homes by ensuring a variety of land comes forward to serve the specific housing requirements of different groups. Furthermore, Paragraph 61 supports the delivery of a wide choice of homes to meet the needs of different groups in the community.

7.3 Paragraph 11 within the NPPF is also relevant and seeks to support Local Authorities that apply a ‘*presumption in favour of sustainable development*’. Part ‘a’ of paragraph 11 is particularly relevant and notes that ‘*plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change*’.

7.4 As established, the Student Accommodation sector is suffering significant disruption and uncertainty as a direct result of the Covid-19 pandemic. Universities closed their physical doors in mid-March and have made a rapid transition to virtual teaching. Subsequently, much of the PBSA sector, including Opera House, has experienced increasing vacancy rates as students opt to return to family homes both in the UK and abroad.

7.5 Whilst at this stage it is hard to determine the impact, immediate or otherwise, recent research from Knight Frank has identified that students are reluctant to make a definitive decision on applying for university in 2020/2021. Drawing on data from UCAS, they found that; “*Some 54,000 have yet to make a decision on their university of choice, compared to 34,000 at this point last year*,”. This increases the likelihood of deferrals and lower rates of enrolment in PBSA, especially if Universities continue to teach via ‘virtual lectures’ etc.

7.6 Furthermore, the Knight Frank research identified that the greatest uncertainty impacting universities, particularly those in London, is the application rates of international students, who typically make up a high proportion of those living in PBSA in the city. A copy of the Knight Frank Student Property and Research Team webinar is provided at Appendix 12.

7.7 We would also like to highlight that this planning application is supported by quantitative and qualitative research conducted by the clients' commercial agent who specialises in the Student Accommodation market and manages all aspects of the property on their behalf (as well as many other PBSA facilities across the UK and London). The research provides insightful information in relation to Opera House and the wider Student Accommodation market. The key findings raised by the agent are summarised below.

- Of the 62 student residents, 34 residents (53%) left the property before the end of their tenancy due to the Covid-19 pandemic and lockdown. 10 residents requested refunds;
- Since the Covid-19 outbreak, a greater proportion of rent remains unpaid compared to normal circumstances, thus adding further financial pressure;
- Approximately 80% of residents were international students and many are not expected to return;
- The tenants at Opera House mainly attend the key London universities including, University College London, London School of Economics and, Kings College London;
- Existing students renewing leases for the next academic year normally account for 20-30% approx. of all leasing activity;
- There are upwards of 150 PBSA properties in London. This includes a total of 30 PBSA in North London, 9 of which are university owned whilst 21 are privately operated. This indicates a highly competitive market for PBSA irrespective of reduced demand from Covid-19 (see Appendix 13).

7.8 In short, the findings indicate that Opera House has been directly impacted and by the uncertainty caused by the Covid-19 pandemic in the UK. In addition, given the high proportion of international students (80%), previously in occupation the client is increasingly concerned about lettings for the next academic year (2020/2021) and the overall viability of the property as a sole Student Accommodation in the short to medium term (1-3 years).

7.9 Therefore, the proposal seeks to provide a temporary change of use of the property from Student accommodation to a mix of both Student Accommodation and '*Co-Living*' accommodation. The conversion will not alter the building internally or externally and would provide an efficient use of a building and facilities, which would otherwise be likely to be largely vacant (see 'Background' within Section 3 of this statement).

7.10 On this basis, we consider the proposal will provide a sustainable temporary use of the property that will contribute much needed housing at an accessible and well-connected site in accordance with the aims of the NPPF. It also accords with Policy SP0 '*Presumption in Favour of Sustainable Development*', within Haringey's 'Local Plan: Strategic Policies'.

- 7.11 Co-Living Considerations: We have reviewed the relevant LBH Development Plan Documents and can confirm that there isn't any specific reference to the provision of 'Co-Living', (or shared living) facilities, which is not unexpected as it is a relatively new housing concept.
- 7.12 However, it is important to note that this new form of accommodation is detailed within the Draft London Plan (Intend to Publish Version). We understand that the new London Plan is expected to be formally adopted in the coming months.
- 7.13 On this basis, we have assessed the proposal against the criteria set out at Policy H16 '*Large-scale purpose-built shared living*' within the DLP. In addition, it is important to note that such accommodation counts towards local council housing targets on a proportional basis.
- 7.14 As noted at paragraph 4.1.9 within the DLP, '*Co-Living*' should indeed be counted towards housing targets as such facilities will free up the amount of self-contained housing that would otherwise be occupied by these residents.
- 7.15 Furthermore, the NPPF, Policies 3.3 '*Increasing Housing Supply*' and 3.4 '*Optimising Housing Potential*' within the London Plan support the principle of additional residential development that optimises the potential of sites in London. We consider that the proposal accords with the aims of these policies by ensuring efficient use of the property.
- 7.16 Policy SP2 '*Housing*' within the Local Plan: Strategic Policies, Policy DM10 '*Housing Supply*' within the Development Management DPD and Policy AAP3 '*Housing*' within the Tottenham AAP seek to improve the supply and choice of homes in the borough. Specifically, Policy AAP3 requires the delivery of 10,000 additional new homes across the Tottenham AAP area.
- 7.17 In response, we consider that '*Co-Living*' constitutes a growing sub-sector within the residential market, which provides the opportunity for young working professionals to enjoy independence whilst having easy access to the social and networking advantages of being part of a community.
- 7.18 It should also be noted that the existing accommodation achieves the Lifetime Homes standards, with 10% designed as wheelchair accessible units. An associated lift is also located at the front of the development, which enables step-free access to all floors of the building.
- 7.19 On this basis, we consider the proposed mix of Student and Co-Living Accommodation offers a compatible scheme that enhances the choice of dwellings within Tottenham. It also contributes to the target of 10,000 dwellings in the AAP area as well assisting LBH with its overall housing target, which is listed at 1,592 dwellings per annum within the DLP.
- 7.20 With specific reference to Policy H16 '*Large-scale purpose-built shared living*', within the DLP, we have listed the specific requirements within the Policy below (*italics*) and have provided our responses in '*red text*' for ease.

'A) Large-scale purpose-built shared living development must meet the following criteria:

- 1) *it is of good quality and design: The proposal represents a high-quality design*

2) it contributes towards mixed and inclusive neighbourhoods: *The proposal is capable of meeting this aim by attracting new young professionals to the area;*

3) it is located in an area well-connected to local services and employment by walking, cycling and public transport, and its design does not contribute to car dependency: *The proposal is located close to the services of Tottenham High Street. It is also located a short distance from several stations such as Tottenham Hale Over and Underground (Victoria Line), which benefits from quick travel times (20 minutes approx.) to Central London*

4) it is under single management: *The facility would be under single management*

5) its units are all for rent with minimum tenancy lengths of no less than three months: *This would be controlled via the management plan and is acceptable to the applicant*

6) communal facilities and services are provided that are sufficient to meet the requirements of the intended number of residents and offer at least: *Communal facilities including, kitchens, laundry and gym are all included as part of the existing building*

a) convenient access to a communal kitchen: *Communal kitchens are provided*

b) outside communal amenity space (roof terrace and/or garden): *A ground floor amenity space (at the rear) and a communal roof terrace are provided as part of the existing building.*

c) internal communal amenity space (dining rooms, lounges): *Such communal spaces are provided at each floor*

d) laundry and drying facilities: *Such facilities are already provided within the basement*

e) a concierge: *A concierge & Events Manager is intended to remain on-site (live-in) to support the co-living use (detailed within Draft Management Plan)*

f) bedding and linen changing and/or room cleaning services: *These services can be provided*

7) the private units provide adequate functional living space and layout, and are not self-contained homes or capable of being used as self-contained homes: *The existing student rooms provide adequate functional living space and are equally well-suited for co-living*

8) a management plan is provided with the application: *A draft management plan has been provided and we are content to amend this as required by LB Haringey*

9) it delivers a cash in lieu contribution towards conventional C3 affordable housing. Boroughs should seek this contribution for the provision of new C3 off-site affordable housing as either an:

a) upfront cash in lieu payment to the local authority, or

b) in perpetuity annual payment to the local authority: *We do not consider that a contribution towards affordable housing is required in this instance. This is because a financial contribution*

has already been made in respect of the student accommodation and because the co-living accommodation is only for a temporary period.

- 7.21 In summary, we consider that the proposal is in general accordance with the criteria detailed at Policy H16 within the DLP. Furthermore, it provides and promotes a high-quality development to meet growing demand from young professional workers in London who are keen to enjoy the social benefits of living as a community. On this basis, we consider that the principle of a flexible student accommodation and Co-Living scheme at the site should be supported, subject to detailed requirements.

Character and Amenity Considerations

- 7.22 The existing property comprises a four-storey building with a basement level. In addition, the Student Accommodation is located on the corner of Chesnut Road and Rycroft Way, a short distance from Tottenham High Road.
- 7.23 The area to the west is mixed in nature, with numerous commercial, retail, office and restaurant uses along Tottenham High Road. To the immediate west is the rear of Tottenham Police Station and the Stoneleigh Road car park is located to the north. Residential use tends to dominate the areas to the south and east of the site.
- 7.24 Part 'A' of Policy DM1 '*Delivering High Quality Design*', within the Development Management DPD requires all new development and changes of use to achieve a high standard of design and respond to the distinctive character and quality of the local area. It also supports development that makes a positive contribution to a place and is respectful of the amenity of an area.
- 7.25 It should be noted that the proposal will not result in any external changes to the existing building. In addition, the proposal retains the existing number of rooms, which are designed for single occupancy (64 in total). On the basis, we consider that the proposal will preserve the volume of people occupying the existing building as well as the appearance of the local townscape.
- 7.26 Furthermore, we consider that the general character and function of the proposed mix of Student Accommodation and Co-Living use would be similar, if not less transient in nature than the sole Student Accommodation use. This is because the occupancy of the Student Accommodation is dictated by academic terms and semester dates. This results in high vacancy rates during out of term months (e.g. Christmas and Summer Holidays), which reduces footfall on the local high street.
- 7.27 Alternatively, Co-Living is targeted at the 'young professional' demographic (e.g. 21-35 years old) who have generally moved out of their family home permanently and who do not follow the structured term / semester timetable. Therefore, this results in a less transient population who are likely to remain in the accommodation all year round. This will be of social and economic benefit to local businesses whilst promoting a mixed and balanced community in the area. On

balance, we consider that the mix of Student and Co-Living Accommodation are compatible uses that will preserve and enhance the character of the local area.

7.28 It should also be noted that the proposal will be supported by a Management Plan. This will demonstrate how the Student and Co-Living scheme will be managed and maintained to the provision of high-quality accommodation, communal facilities, and services. A draft Management Plan has been included at this stage and provides the following key provisions:

- On-site staff: The presence of a member of staff (Concierge and Events Manager Role) at all times will ensure the property is secure and well-run internally whilst providing first-hand assistance in dealing with any issues (e.g. noise, anti-social behaviour etc.) caused by the occupants.
- Minimum Tenancy Agreements: The Management Plan will ensure there is security of tenure with a minimum of 3 months tenancy agreements, with the option for much longer if desired (ideally 6-12 months).
- Maintenance and Servicing: The Management Plan also provides details for; on-site cleaning schedules, delivery arrangements for residents and services; and maintenance plans for internal and external areas of the development.

7.29 A draft Management Plan Briefing Note accompanies this planning application and provides additional provisions and details. Should planning permission be granted, a formal management plan will be secured via a Section 106 Agreement or a planning condition. This can be requested prior to the implementation of consent. We can confirm that we are content to amend the Draft Management Plan as necessary should LBH have any specific requests in relation to this aspect of the proposal.

7.30 In short, we consider that the proposed mix of Student Accommodation and Co-Living community would maintain and enhance the general character of the existing use at the site whilst instilling measures via a Management Plan which will ensure the amenity enjoyed by neighbouring and future occupiers is sufficient. On this basis, we consider this character of the proposed use accords with Part 'A' of Policy DM1 within the Development Management DPD.

Parking and Servicing

7.31 It should be noted that the existing site comprises three on-site disabled car parking spaces; two on the Chesnut Road frontage and one at the rear of the property, which fronts onto Rycroft Way.

7.32 Policy 6.13 '*Parking*' within the London Plan provides maximum car-parking standards for new residential development in line with the table titled '*Parking for new residential development*' at p.269 within the London Plan. Furthermore, it should be noted that the DLP seeks a general reduction in car-parking standards and provides further support for sustainable modes of transport.

- 7.33 Policy DM32 '*Parking*', within Haringey's Development Management DPD reinforces the standards set out in the London Plan and will support limited or 'car-free' parking provision where a site is located near alternative transport, benefits from a PTAL of 4 or above, or is located within a Controlled Parking Zone.
- 7.34 The proposal seeks to retain the existing disabled car-parking spaces at the site (3 in total), with no additional parking proposed. On the basis that the site has a PTAL of 6a and is located within the Hale CPZ, we consider the provision of very limited parking would comply with the relevant policy guidance and should be supported. Furthermore, it is the intention of the applicant that any tenancy agreement for the co-living residents would restrict the ability to own or park a car on-street within the Hale CPZ.
- 7.35 With reference to cycle-parking, Policy DM32 within the Development Management DPD supports the cycle standards provided within the London Plan. Table 10.2 '*Minimum cycle parking standards*', within the DLP supports Policy T5 '*Cycling*' and requires 1 space per 1-bedroom studio (sui generis use).
- 7.36 It should be noted that the proposal re-provides the existing 66 cycle spaces stored in the basement of the building. On this basis, this element of the scheme is compliant with the London Plan.
- 7.37 In terms of servicing, the servicing area which facilitates the existing Student Accommodation within the building will be utilised by the proposed uses as a dedicated refuse and recycling storage area. Waste will be transported to the collection point on collection days, as per the current situation. In short, the servicing arrangement does not alter the existing situation, which was deemed acceptable as part of the planning permission (ref: HGY/2013/0155) granted in March 2013.

Community Infrastructure Levy (CIL)

- 7.38 The London Borough of Haringey CIL requires a 'Nil Rate' financial contribution for '*all other uses*', which the sui generis use would constitute in this instance. However, the GLA Mayoral CIL requires a charge of £60 per sq. m for all new development floorspace (GIA) in 'Band 2' boroughs, such as Haringey. However, a CIL payment is not required in this instance as CIL payments have already been made in relation to the Student Accommodation and because no new floorspace is proposed.

8.0 Conclusion

- 8.1 The site comprises a newly built Student Accommodation facility, which was originally granted planning permission in March 2013. After an increasingly successful occupancy up to February 2020, Opera House has been faced with increasing vacancy rates and reduced interest because of the Covid-19 pandemic. On this basis, we consider the temporary change of use to a mix of Student and Co-Living Accommodation at the site positively responds to these exceptional circumstances and should be permitted.
- 8.2 The concept of Co-Living is becoming more popular with young professionals and provides the opportunity to enjoy the independence of living away from home, alongside the social and networking advantages of being part of a community. In this regard, we consider the site represents an ideal location in accordance with the requirements set out within Policy H16 within the DLP.
- 8.3 We consider that the provision of a well-managed Student and Co-Living facility will be similar to, and arguably less periodic, than that of the existing Student Accommodation in terms of its character and function. We also consider that the temporary proposal is sustainable as it will make efficient use of the existing property and facilities and result in no demolition or internal intervention. This will enable an easy conversion back to Student Accommodation in the future as it will only require a slight change in day-to-day management.
- 8.4 The aim of the flexible uses proposed are to make the unit more attractive to a wider range of potential occupiers in the market (e.g. students and young professionals), thus reducing the likelihood of any prolonged vacancy in the future. Therefore, the proposal will enable the otherwise vacant (largely) Student Accommodation to be occupied whilst delivering 64 high-quality Student or '*Co-Living*' rooms to assist Haringey in achieving their housing needs. It is assumed that there would be more co-living occupants in 2020 – 2021 with an increasing mix or proportion of Students in 2022 / 2023 as the impact of the pandemic hopefully reduces.
- 8.5 In summary, we consider that the proposal results in a flexible temporary mix of Student Accommodation and Co-Living Accommodation that will make efficient use of an under-occupied and accessible facility. We consider the proposal will provide a positive response to the uncertainty caused by the market changes because of the Covid-19 pandemic whilst enhancing the character of the local area. On this basis, we consider that the proposal should be supported, and that the application should be granted in this instance.