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**Yugo Depot Point,
15-27 Britannia Street,
Kings Cross,
WC1X 9AH**

**Proposed S73 Variation for
additional reconfiguration to
deliver additional bed spaces**

Planning Statement

GSA CLUB GBP UNIT TRUST

October 2024

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1.0 Introduction

- 1.1 Lichfields has been instructed by GSA Club GPB Unit Trust (GSA) to submit a Planning Application for potential enhancements to Yugo Depot Point, 15-27 Britannia Street, Kings Cross, London WC1X 9AH. This involves minor configurations of internal spaces to deliver additional student bedspace.
- 1.2 Yugo Depot Point is a currently operating as studio-based student accommodation and is a *sui generis* use.
- 1.3 It is understood that the property was completed in 2014.
- 1.4 A previous planning application 2023/1222/P, approved 11th October 2023, included proposed minor works and variation of Condition 15 of Planning Approval Ref 2012/3082/P to increase the amount of amenity space in the building.
- 1.5 Now implemented, this increased amenity by 91.25% as highlighted on drawings submitted with this Application.
- 1.6 All of the further configurations proposed as part of this application are wholly internal to within the building and will not require external works to facilitate the changes.
- 1.7 The additional studio and ensuite bed spaces have been created within the existing building footprint in a number of different ways, including:
- Forming studio in existing store; and
 - Utilising redundant space in overly large cluster kitchens whilst still maintaining Camden Councils space standards for HMO occupancy within student accommodation.
- 1.8 GSA are proposing the following changes to the building, resulting in one additional studio and 11 additional cluster bed rooms.

Existing and proposed Accommodation Schedule

| Existing | | |
|-------------|-----------|-------------|
| Floor | Studio | Cluster Bed |
| G | 18 | 6 |
| 1 | 12 | 35 |
| 2 | 12 | 37 |
| 3 | 11 | 37 |
| 4 | 7 | 30 |
| 5 | N/A | N/A |
| BEDS | 60 | 145 |

| Proposed | | |
|-------------|-----------|-------------|
| Floor | Studio | Cluster Bed |
| G | 19 | 7 |
| 1 | 12 | 37 |
| 2 | 12 | 40 |
| 3 | 11 | 40 |
| 4 | 7 | 32 |
| 5 | N/A | N/A |
| BEDS | 61 | 156 |

- 1.9 Pre-application discussions with Officers at the London Borough of Camden earlier in the year noted that the proposals would trigger a S73 Variation of Condition 20 (Floorplans) on the approved planning permission Ref 2012/3082/P.

- 1.10 The Planning Application includes plans to show how the development is to take place and a Design and Access Statement (DAS) which outlines the proposals further and which includes detailed descriptions of the proposed development.
- 1.11 The approval of internal arrangements sought, namely the changes to Bedrooms are achieved against the backdrop of 2023/1222/P, approved 11th October 2023 which increases the amount of amenity space in the building by 91.25%.
- 1.12 This Report is set out in 6 sections, including this introduction:
- Section 2 describes the site and its immediate surroundings;
 - Section 3 reviews the most pertinent planning history associated with the site
 - Section 4 considers the proposals against the development plan and planning history to determine likely acceptability; and
 - Section 5 concludes.

2.0 The Site

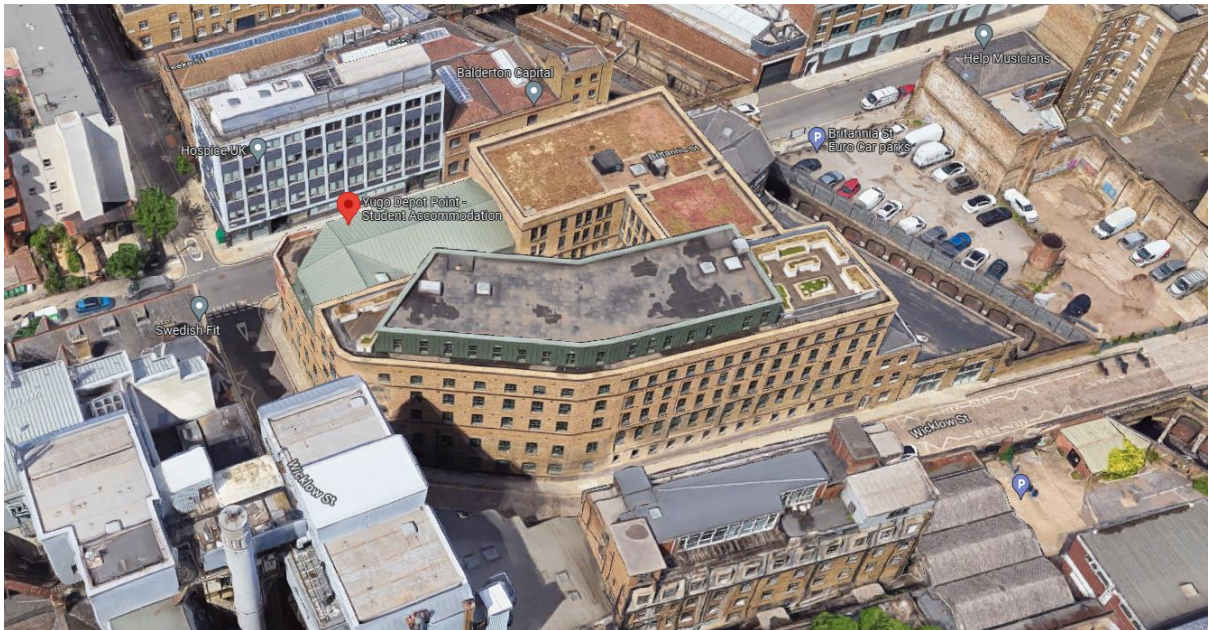
- 2.1 The site comprises the Yugo Depot Point student accommodation block across numbers 15 to 27 Britannia Street¹, Kings Cross, WC1X 9AH.
- 2.2 It is estimated that the block has a total ground floorspace area of approximately 2,291 sqm / 0.23 hectares.
- 2.3 The application site is bound by:
- Britannia Street to the north;
 - Wicklow Street to the south;
 - The junction of Wicklow Street and Britannia Street to the west.
 - A London Underground Line to the east.
- 2.4 A car park is located beyond the railway line, beyond which is the listed Peabody Housing block of Derby Lodge, a six-storey building containing residential apartments. The corner of the junction of Wicklow Street and Britannia Street also comprises the head offices for the Charities and Voluntary Organisations, the three/four storey Grade II listed Centre for Auditory Research and Pioneer House: a six-storey mixed-use commercial and residential building.
- 2.5 To the northern side of Britannia Street are a series of offices, a hospice and the Gagosian Art Gallery.
- 2.6 The site is located approximately 250 metres southeast of Kings Cross and St Pancras Stations, providing immediate access to both mainline UK and European rail connections, as well as the London Underground network.

Site Area Plan



¹ Odd Numbers only

Aerial View



- 2.7 It is understood that the original Depot buildings at the application site date from the nineteenth century and the turn of the twentieth century and have been used for a variety of different uses before their development and conversion for student accommodation in around 2014.
- 2.8 It is understood that the site was developed in stages as a brewery depot and offices for Whitbread, and between 1985 and 2009 the building was used by the University College Union (UCU) as their headquarters, comprising offices and conference facilities.
- 2.9 The application site is located within the Gray's Inn Road subsection of the King's Cross Conservation Area. It is surrounded by the urban centres of King's Cross, Pentonville, Islington, Finsbury, Clerkenwell, Bloomsbury, St Pancras and Somers Town. It is also located within the Central Activities Zone (CAZ), defined in the London Plan.
- 2.10 The site is highly accessible by public transport and has an established Public Transport Accessibility Level (PTAL) of 6b².
- 2.11 As student accommodation, the sites falls to be considered a '*sui generis*' use.
- 2.12 The site has low risk / very low risk of flooding³.

² According to TfL Webcat PTAL Tool

³ According to Environment Agency Flood Risk Maps

3.0 Planning History of the Site

3.1 There is a varied planning history of the site and the wider area.

3.2 For ease, the principal relevant planning permissions are outlined below. These relate to the conversion of the building(s) to student accommodation, and a variation of this planning permission.

Application Ref 2012/3082/P & Conservation Area Consent Ref: 2012/3084/C

3.3 Application Ref 2012/3082/P and Conservation Area Consent Ref: 2012/3084/C was submitted jointly to the London Borough of Camden Council (Camden Council) by the Watkin Jones Group and the University and College Union (UCU) in 2012.

3.4 These, in combination, sought planning permission and conservation area consent for the partial demolition, partial refurbishment and partial rebuilding and extension of 15-27 Britannia Street (odd numbers only) to create a mixed-use development comprising:

- Student accommodation totalling 226 bedspaces (145 cluster rooms, 65 studios and 16 disabled studios) together with common room, TV room, laundrette and other ancillary areas;
- Two studio apartments located on Wicklow Street;
- A performance space/ gallery (290 sq. m) located on and accessed from Wicklow Street; and
- Offices (588 sq. m).

3.5 This application was a resubmission of earlier applications for planning permission (Ref. 2011/2179/P) and conservation area consent (Ref. 2011/2182/C) which were submitted to Camden Council in April 2011 and which sought substantial demolition of buildings student accommodation, four residential dwellings and performance space and gallery areas. These applications were withdrawn following comments received during the application consultation process. It is understood that these objections related to the scale of the proposed development and the level of demolition proposed to the buildings, given their positive contribution to the Kings Cross Conservation Area.

3.6 The revised Planning Application and Conservation Area Consent Application was determined positively on the 11th September 2012.

3.7 Planning permission / conservation area consent approvals Ref 2012/3082/P and Ref: 2012/3084/C are the subject to a number of conditions.

3.8 The following condition is considered pertinent to the proposals now being advanced:

(Condition 20) *The development hereby permitted shall be carried out in accordance with the following approved plans- (00) 001A; (20) 000B, 001C (accessible rooms plan), 001C (proposed ground floor plan), 002B, 003D, 004D, 005C, 006C, 007E, 008B, 100D, 101C, 104A, 102A, 103A, 200B, 201C; (25) 000B; Design and Access Statement by Carey Jones; Construction Management Plan by Watkin Jones; Ecological Assessment by Greengage; Energy Statement by GDM; Noise and Vibration Assessment by PDA; Phase One Preliminary Risk Assessment by Tier Consult; Service Management Plan by ADL*

Transport; Student Management Plan by Fresh Student Living; Sustainability Statement and BREEAM Pre-assessment by Icen; Transport Statement by ADL Transport; Travel Plan by ADL Transport.

- 3.9 A further Planning approval was granted permission last year, Ref:2023/1222/P. this achieved enhancement to the building, both internally and externally and which included:
1. 5 x bins are to be relocated from the existing bin store to a new store at the end of the cycle store;
 2. Existing bin store to be repurposed into ancillary gym for students, with new glazed doors proposed as access from the courtyard;
 3. Existing amenity space becomes laundry room, with new grey aluminium door replacing existing window to courtyard.
 4. New glazed door and fixed casement window proposed for undercroft wall; and
 5. New glass balustrade at roof level to replace existing metal balustrade.
- 3.10 The relocation of the waste area to allow for the incorporation of the ancillary gym / health and wellbeing facility proposed to enhance the development.
- 3.11 The approval of internal arrangements sought, namely the changes to Bedrooms are achieved against the backdrop of 2023/1222/P, approved 11th October 2023 which increases the amount of amenity space in the building by 91.25%.

4.0 **Development Plan Assessment**

4.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning determinations must be made in accordance with the plan unless material considerations indicate otherwise.

4.2 The purposes of the assessment of proposals, the Development Plan for the site is:

- 1 The London Plan (2021); and
- 2 The Camden Local Plan (2017).

4.3 The Camden Plan is subject to a review. However, this is in the very early stages, with a Reg 18 Document consulted on between 17 January to 13 March 2024. Any review is therefore of limited weight.

The London Plan

4.4 The revised London Plan was published in 2021, and set out a strategy for growth within London, as well as providing strategic policies to manage development proposals.

4.5 The Plan places the site within the Central Activities Zone (CAZ)⁴ which favours office and commerce uses, but which recognises the role which other local uses play, including residential and student accommodation, subject to this not being at the expense of the wider commercial focus of the CAZ itself.

4.6 The Plan references the Strategic Housing Market Assessment (SHMA) to advise the need for growth in London. The SHMA has identified need for 66,000 additional homes per year. The SHMA covers overall housing need as well as exploring specific requirements for purpose-built accommodation, such as that for students and specialist older persons' accommodation within this overall figure.

4.7 Policy H15 of the London Plan states that Boroughs should seek to ensure that local and strategic need for purpose-built student accommodation is addressed.

4.8 This is subject to:

- 1) At the neighbourhood level, the development contributing to a mixed and inclusive neighbourhood;
- 2) The use of the accommodation is secured for students;
- 3) The majority of the bedrooms in the development, including all of the affordable student accommodation bedrooms, are secured through a nomination agreement for occupation by students of one or more higher education provider;
- 4) The maximum level of accommodation is secured as affordable student accommodation, as defined through the London Plan and associated guidance.

⁴ The location appears to fall outside the Kings Cross Opportunity Area.

- 4.9 The Plan notes that to follow the Fast Track Route, at least 35 per cent of new accommodation must be secured as affordable student accommodation⁵ unless it can be shown not to be viable.
- 4.10 Policy H15 also notes that the affordable student accommodation bedrooms should be allocated by the higher education provider(s) that operates the accommodation, or has the nomination right to it, to students it considers most in need of the accommodation.
- 4.11 The Policy additionally notes Boroughs, student accommodation providers and higher education providers are encouraged to develop student accommodation in locations well connected to local services by walking, cycling and public transport, as part of mixed-use regeneration and redevelopment schemes. Policy T6.1 notes large-scale purpose-built shared living, student accommodation and other sui generis residential uses should be car-free.
- 4.12 Policy GG1 notes the strategic importance of access to good quality community spaces, whilst Chapter 5 of the Plan considers the need for community / social infrastructure.
- 4.13 Taking account of the above, there is strategic support both for the enhancement of student accommodation and (as part of this), enhancement of infrastructure to support student residential uses, including enhanced facilities and indoor and outdoor social infrastructure / spaces.

The Camden Plan (2017)

- 4.14 The Camden Plan was adopted by the London Borough of Camden Council on 3 July 2017. At adoption, it replaced the Core Strategy and Camden Development Policies as the basis for planning decisions and future development in Camden.
- 4.15 The Council has commenced a review of the Plan, with an early-stage engagement taking place during 2022/23 with a Reg 18 Document consulted on between 17 January to 13 March 2024.. The draft is therefore of limited weight in any planning decisions.
- 4.16 Para 3.21 of the adopted Plan notes that Camden has experienced large growth in student numbers in recent years.
- 4.17 Para 3.263 notes given the anticipated growth of full-time students attending higher education institutions in the borough and the potential for pressure on the wider private rented stock, that the Council will seek to protect existing student housing, including housing managed by education institutions and independent providers, unless it is replaced or there is no longer a demand for it.
- 4.18 Policy H9 seeks to ensure an adequate provision of Student Accommodation within the Borough, with an estimated target of 160 additional places per year.
- 4.19 The Plan also notes it will resist development that involves the net loss of student housing unless:

⁵ This figure is 50 per cent where the development is on public land or industrial land appropriate for residential uses in accordance with Policy E7 Industrial intensification

- It can be demonstrated that the existing accommodation is incapable of meeting contemporary standards or expectations for student housing; or
- Adequate replacement accommodation will be provided and
- It can be demonstrated that the accommodation is no longer needed because the needs of students at the institutions that it serves can be better met in existing accommodation elsewhere.

4.20 The proposals seek minor changes to facilitate additional bed space, so accords with both the principles and policies of the Plan.

4.21 Taking account of the above, the potential options for enhancement of Depot Point are considered in the next section.

5.0 **Summary / Conclusions**

- 5.1 Lichfields has been instructed by GSA Club GPB Unit Trust (GSA) to submit a Planning Application for potential enhancements to Yugo Depot Point, 15-27 Britannia Street, Kings Cross, London WC1X 9AH. Yugo Depot Point is currently operating as studio-based student accommodation and is a *sui generis* use.
- 5.2 A previous planning application 2023/1222/P, approved 11th October 2023, included proposed minor works and variation of Condition 15 of Planning Approval Ref 2012/3082/P to increase the amount of amenity space in the building.
- 5.3 Now implemented, this increased amenity by 91.25% as highlighted on drawings submitted with this Application.
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- Forming studio in existing store; and
 - Utilising redundant space in overly large cluster kitchens whilst still maintaining Camden Councils space standards for HMO occupancy within student accommodation.
- 5.5 All of the configurations proposed as part of this application are wholly internal to within the building and will not require external works to facilitate the changes.
- 5.6 Whilst the proposals require a formal S73 to change the plan references in Condition 20 of Ref 2012/3082/P, the proposals are supported by both the Camden Plan and London Plan.
- 5.7 We therefore conclude that planning permission should be granted.
- 5.8 If there any comments or queries, or clarifications required on any of the points raised in this supporting statement, then please do not hesitate to contact Ian Anderson at ian.anderson@lichfields.uk or 07947 362 618.

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October 2024

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