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Draft Replacement London Plan - public consultation

Response and objections from King's Cross Railway Lands Group

Summary: The King's Cross Railway Lands Group welcomes some aspects of the new Plan, has comments on others and objects to policies on Housing, Economy, Opportunity Areas and Regeneration and Walking/Cycling - with proposals for changes. It seeks to be heard at the examination in public, especially on housing and regeneration issues, and would amplify its written evidence in advance.

Context: The Group has been representing local resident and business needs in the King's Cross area for 23 years, seeking to secure benefits for these local communities, especially low and middle-income residents, from the redevelopment of the Railway Lands. It has battled long and hard with Camden and Islington councils to try to secure local benefits (and minimise adverse effects) through Planning Briefs for the area and through Section 106 agreements. The group may have had some ameliorating effect upon the scheme which now has planning permission but this scheme falls far short of what we sought and, together with adjoining completed schemes, it has tended to accelerate, rather than mitigate the displacement and gentrification pressures on residents and businesses in the locality. **If "regeneration" means that local communities can sustain and reproduce themselves, then here it is a failure.**

The group notes that the economic crisis is bringing implementation of King's Cross Central to a halt except for those elements largely funded from public sources - the University of the Arts and some social housing. However Camden's determination in 2006 to give one big outline permission for the whole scheme prevents any reconsideration now of how the rest of the land could best be used. The site may thus be largely sterilised while the developers hope and wait for another speculative office boom.

The King's Cross Railway Lands group's response to the draft London Plan is based upon discussions and policies developed in the Group over some years and on comments received from members after a draft was circulated for comment during the last month to over 200 members.

Observations on the draft replacement Plan:

Particular Areas

Central London (CAZ). We welcome the acknowledgement in

Policy 2.10 b "in appropriate quarters shown on Map 2.3, bring forward development capacity and supporting infrastructure and services to sustain and enhance the CAZ's varied strategic functions without compromising the attractions of residential neighbourhoods where more local uses predominate."

This protection of residential neighbourhoods in the centre is a valuable new element in the Plan. We note, however, that no such "appropriate quarters" are shown on the published draft version of Map 2.3 and we consider that **compromising the attractions of residential neighbourhoods should be ruled out for the CAZ as a whole.**

Opportunity and Intensification Areas Policy 2.14 and Annexe 1

Opportunity areas have hitherto been treated as the places where London's 'strategic' needs can be met without much local inhibition. We consider this wrong because (a) locally-expressed needs should play a part and (b) impacts of development on surrounding populations and activities tend to be disregarded.

Policy 2.14 A c "...contribute towards meeting the minimum guidelines for housing and/or indicative estimates for employment capacity set out in Annex 1

We consider that these targets should be evaluated critically before being embedded in the London Plan. Those for King's Cross were simply accepted by the previous Mayor from the highly controversial proposals Camden had suggested. Local consultation and critical analysis would probably have led to higher housing targets and lower employment targets.

We are shocked to see that the new draft Plan has lowered the housing target to 1900 dwellings from the 2250 shown in the 2008 and 2006 Plans and now fully embodied in planning permissions and S106 agreements. The difference cannot be accounted for by some of the original 2250 dwellings having been completed as we are sure that there have been no completions. We demand an explanation for the change and if it does indeed represent a genuine reduction of 325 dwellings in the Mayor's requirement we oppose it most strongly.

Quite separately, we consider that targets for those OAs not yet finalised (including Euston) should be the subject of full local consultation before they are embodied in the London Plan.

Policy 2.13 e support wider regeneration and integrate development proposals to

the surrounding areas especially Areas for Regeneration.
and

Policy 2.14 Areas for Regeneration (generally)

The draft Plan makes the assumption throughout that what areas of deprivation need is "regeneration". In this it just follows its predecessors. However there is now mounting evidence¹ that much of the "regeneration" practiced in London produces precious few benefits and often adverse effects for the 'deprived' populations in whose name the programmes are launched and in whose localities they happen. We thus object to the policies as currently phrased and propose changes as follows:

Policy 2.13 A (add new sub-section c) [The Mayor will..] Consent to development only when it has been shown that established populations living in and around the areas will benefit and will not be subject to displacement or displacement pressures except where there is full mitigation.

and

Policy 2.14 A (append wording to the same effect)

Housing

Policy 3.3 Housing targets

Target of 33,400 additional homes per year compares with SHMA (Strategic Housing Market Assessment) 32,600 figure, so capacity might appear in excess of requirement. However, we consider that the SHMA figure of 32,600 is an underestimate of need and that there will remain a gap between capacity and requirement. The housing target is well below midpoint (38,900) in the NHPAU 33,100- 44,700 range. Housing waiting lists are steadily increasing, and the London Plan's aspirations do not fulfill the need nor address the scale of the problem.

The GLA MUST impose bold social rented housing quotas on developers and boroughs, to meet the urgent delivery of housing for those who need it most. Far more housing should be social housing, to meet the London Plan's vision of an improved standard of living for all Londoners. Boroughs must not be given the choice to set lower targets.

Housing delivery forms

The most sensible approach to addressing housing need (for low cost rented homes) in the capital would be to invest extensively in building public (council) homes and this should be emphasised in the London Plan.

¹ Imrie, R, L Lees and M Raco, (eds) (2009) *Regenerating London: governance, sustainability and community in a global city*, London: Routledge; Porter, L and K Shaw (2008) *Whose urban renaissance? An international comparison of urban regeneration strategies*, London: Routledge and Punter, J, (ed) (2010) *Urban design and the British urban renaissance*, London: Routledge.

There is also a need for new funding and delivery models for affordable housing. These need to examine how affordable housing is financed and how to deliver far higher numbers of affordable housing to meet local needs. Shelter's *Building Blocks – Exploring ways to deliver more affordable homes in the economic downturn* (May 2009) is a useful contribution to some of the measures that are needed. Innovative delivery mechanisms such as Community Land Trusts are required and should be mentioned. Models from European countries where renting and/or coops are the norm should be carefully considered.

Tenure mixing

King's Cross is typical of the many areas in London where social rental housing is extensive but still in desperately short supply, and where the remaining supply is under continuing pressure from the right to buy, from scattered auction sales, from stock transfer and (in some cases) from demolition to make way for new building in other tenures. Even worse, it is sometimes argued that less social rented housing should be included in new building in such areas on the grounds that this tenure is somehow 'over-represented' in the area. Exactly this argument was used against us by Camden and Argent in the recent Triangle Site public inquiry.

There may be some merit in the introduction of some social rental housing in solidly owner-occupied areas (though the London Plan inconsistently sees no need to plan for this) and, until better means of supplying social housing can be found, it remains essential to oblige developers of private housing schemes to make some of their units available through social renting. But in areas like ours the call for the insertion of other tenures is seen by most of us as threatening to the supply of affordable rented housing and as **condescending**. It is often based on stereotypes in which it is assumed that council tenants are idle folk who need role models, weak organisers who would benefit from more educated community leaders and so on. This is an insult. There is no evidence base to support this insertion and the assumption that poorer people benefit from the 'social mix' which is intended to result has been the subject of very severe academic criticism².

Furthermore, in our experience, the association between tenure and the supposed attributes of residents is weak and full of surprises:

- Council estates in central/inner London often have high proportions of professionals and other employed workers among their established tenants; they are not (or not yet) the residual housing just for the most deprived; many of us lead quiet and settled lives and are pillars of our communities;

² Cheshire, P (2007) *Segregated communities and mixed communities: a critical analysis*, York: Joseph Rowntree Foundation and Cheshire, P (2009) Policies for Mixed Communities: Faith-Based Displacement Activity?, *International Regional Science Review* 32: 343

- Leaseholders on council estates (or nearby private blocks) are often quite transient and no more (or less) likely to be pillars of the community than are council tenants;
- Leaseholders (and the private tenants to whom they may let flats or rooms) are often noisier and more disruptive than the stereotypes assume. "Aggro" on mixed tenure estates is as likely to come from the private as from the socially-rented parts.

Thus

Policy 3.10 Mixed and Balanced Communities

Strategic

A. Communities mixed and balanced by tenure and household income should be promoted across London through incremental small scale as well as larger scale developments which foster social diversity, redress social exclusion and strengthen communities' sense of responsibility for, and identity with, their neighbourhoods. They must be supported by effective and attractive design, adequate infrastructure and an enhanced environment.

B. A more balanced mix of tenures should be sought particularly in neighbourhoods where social renting predominates.

We object to Policy 3.10 and propose that it be deleted. pending research which might form the basis for an evidence-based replacement.

In the event that Policy 3.10 is not deleted, we object to Sub section B of Policy 3.10 and request that it be deleted.

Should Policy 3.10 be deleted, the consequential adjustments in other parts of the Plan should be followed through in detail.

Chapter 4: Economy

We have contributed to the formulation of the comments and objections put by the Just Space Network and we support the views put forward.

We wish to further emphasise the fact that the draft plan has its head in the sand about the economic crisis. Londoners need a plan which can help pull us out of recession, protect the weakest in society from its effects, take advantage of opportunities it presents and not leave us living (yet again) around a sterilised development site. **We consider the Plan unfit for purpose** and would like to be able instead to cooperate in making a plan in which the energies of Londoners can be united in pulling us out of the crisis, out of social inequality and out of the health disparities which afflict us. The Plan must make more provision for the spatial needs of alternative economic models, such as Development Trusts, Community Land Trusts and others, that have proven their ability to generate economic growth at much lower investment levels than those of large corporations.

Lifetime neighbourhoods

Policies 7.1, 7.2 etc

We strongly support the 'lifetime neighbourhoods' concept and consider it should be implemented in Inner London and the CAZ, even though most of the draft

Plan's references to it are in Outer London. Two aspects in particular will be of special concern at King's Cross: (i) the need for progressively more sheltered / supported housing for ageing people without them having to leave their neighbourhood; and (ii) the threat of displacement of public and private services (e.g. shops, pubs) through the pressures of rising rents etc.

Transport

Policy 6.4 Enhancing London's transport connectivity

...B The Mayor will work with strategic partners to improve the public transport system in London, including cross-London and orbital rail links to support future development and regeneration priority areas, and increase public transport capacity by:...

g improving and expanding London's international and national transport links for passengers and freight (for example, High Speed 2)

We are in principle supportive of railway expansion but have been deeply concerned to read in the press that Network Rail and the promoters of High Speed 2 are considering a single London terminal at "Euston, King's Cross and St Pancras". We urge the Mayor to ensure that the local communities in areas of London potentially affected by terminals and works be centrally involved in deliberations about these matters from the outset. The furtive behaviour of British Rail about the CTRL in the 1980s and the subsequent failures of public engagement over 20 years caused untold ill-will, delay and blight: misery for all concerned. Borough Councils cannot be trusted to consult adequately with residents or businesses, or with each other. Network Rail has shown total disregard for the both the considerable knowledge base and quality of life of local people in its handling of the King's Cross station refurbishment (see below) and is thus universally distrusted here. The Mayor must take the lead in ensuring effective citizen engagement here (and in whatever other parts of London might be candidates for the potential terminal, if one is needed).

Policies 6.9 Cycling and 6.10 Walking

These policies both need strengthening to make it clear that the Mayor will use his powers to insist upon good pedestrian and cycle permeability through large development projects, even where these lie near Borough boundaries. When a development is central to a borough then DPD provisions in line with the draft Plan might suffice. But in the case of King's Cross, one borough (Camden) refused to require Network Rail to provide for the east-west pedestrian / wheelchair / cycle route through the refurbished station although it had been policy in all the previous Planning Briefs. Those adversely affected live or work predominantly in a different borough (Islington) and only the Mayor could resolve this kind of meanness in boundary situations.

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