



In any reply, please use email rather than physical post.

13 April 2007

**EIP Secretary  
City Hall**

**Dear Secretary**

**I write on behalf of the King's Cross Railway Lands Group to**

- (i) reaffirm our objections to aspects of the draft Further Alterations (as detailed below);**
- (ii) formally seek inclusion in the list of participants;**
- (iii) confirm our support for the proposals that there be an 'equalities' hot-seat and a community groups/NGO hot-seat. We could make our main points effectively through occupying one or other of these seats at relevant points.**
- (iv) confirm our support for the proposal that the panel should consider an additional matter (or perhaps redefine and extend Matter 1) in order to consider the compatibility of the overall growth strategy with the (admirable) sustainability and equalities aims of the Plan and Further Alterations. We understand that this proposal is reaching you via the London Civic Forum which has played an invaluable role in facilitating cooperation among community and voluntary bodies.**

**In terms of specific matters:**

**Matter 1 Climate change.... if extended to consider alternative growth paths for London, or new 'growth' matter otherwise**

We wish to contribute to this discussion, arguing that the sustainability and equalities aspirations of the draft Further Alterations call for at least the evaluation of alternative (lower) growth paths as part of the Strategic Environmental Assessment which the EU requires the Mayor to make.

**Matter 2 Sub-regional structure**

If this heading refers simply to the proposed system of sub-region boundaries then we do not seek to contribute.

If, however, this is the main locus for discussion about the desirable balance of activity between the CAZ, the central area fringe where King's Cross is located and the rest of London then we do wish to contribute, objecting to the degree of centralisation of employment growth embodied in the Plan on the grounds that it is extravagant in energy terms and exacerbates inequalities.

**Matter 3 Adjacent RSS – no comment**

#### **Matter 4 Housing**

The Railway Lands Group and some of our member-groups representing specific ethnic minorities and tenant groups could contribute to the discussion on how the inadequate foreseeable supply of social housing to rent is impacting in and around the centre of London. We wish to propose a much stronger focus on affordable housing in Opportunity Areas such as King's Cross. In addition we would want to scrutinise the requirements for dwelling-size mix.


#### **Matter 5: Designated locations 5.1 CAZ etc and 5.2 OAs**

This is the most obvious location for KXRLG and most of its constituent groups to contribute to the discussion. (cf 2 above) If this is the main locus for discussion about the desirable balance of activity between the CAZ, the central area fringe where King's Cross is located and the rest of London then we do wish to contribute here, objecting to the degree of centralisation of employment growth embodied in the Plan on the grounds that it is extravagant in energy terms and exacerbates inequalities. More space should be allocated to housing relative to employment in and around the centre.

We hope that you find this letter helpful and are able to respond positively to it.

For convenience we append the submission we made in December, slightly corrected.

Signed, on behalf of KXRLG



**Joint chair.**

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#### **Annexe:**

#### **London Plan Further Revisions 2006/7**

#### **Submission on behalf of the King's Cross Railway Lands Group December 2006**

1. Context
2. London's growth
3. Housing/jobs balance in central London and global warming
4. Social rented housing
4. Space for community activity.

**1. Context: the KXRLG** was founded in 1987 to represent the interests of groups and individuals living or working in the areas round the Railway Lands and specifically to work towards a redevelopment of the Railway Lands of a kind which would meet local, alongside other, needs. The Group's members have been (a) representatives of organisations in the area (TAs, TRAs, small businesses, environmental, housing and transport groups) and (b) individuals resident and / or working in the area. The group was highly active in public consultation and debates surrounding the LRC scheme of 1988-90 and the KXT project; then again in calling for the re-routing of the CTRL and lobbying the House of Lords to great effect during the passage of the CTRL Act 1996. It is strongly engaged now in representing local interests to LBI and LBC and in responding to Argent's successive Planning Applications. Its work, supported by the magazine "Network", an excellent web site ([www.kxrlg.org.uk](http://www.kxrlg.org.uk)) and a number of open General Meetings each year, has been supported to varying degrees over the years by small grants from both Boroughs, Central Camden SRB/NR and charitable bodies. It is constituted as a Company Limited by Guarantee and the Management Committee, elected annually at the AGM, constitutes the Board of Directors. **This response** draws upon the KXRLG's established policies, hammered out through months of debate and discussion.

#### **2. London's growth**

On the fundamental issues of population and economic growth, the London Plan is based upon a basic wish to predict and provide and we consider that the Panel should welcome a debate on whether this is in fact in the best interests of London and of the UK. Specifically we consider - and wish to argue - that slower planned growth rates than those presently envisaged could be in the interests of

- \* low- and middle-income Londoners especially, and in central London above all

- \* London as a whole

- \* the UK

especially if progress in solving London's housing crisis falls short of what is required.

Our grounds for this statement are

The Plan's approach is to form projections of employment growth and of population growth and then seek to accommodate the projected levels of expansion. The projections are not related to each other or to housing capacity despite the fact that there must in fact be interconnections. The projections are grounded in the statistics for London's growth during the prolonged boom since the early 1990s while projections based on a series stretching further back in time (notably including London's severe employment downturn from the late 80s) would produce slower rates of future growth. The growth of London and its surrounding regions has been part of a picture of very different performance by UK regions and the disparity in regional growth rates has tended to widen, despite government attempts to narrow it. This disproportionate growth has meant that resources tend to be under-employed in some regions and over-stretched (over-heated) in London and the South East.

This overheating reflects in the severity of London's housing problems (price escalation for owner-occupiers, rent pressures for tenants together with homelessness and overcrowding) and in the direct and indirect costs affecting the competitiveness of businesses operating in London (and the economics of public services too). It also forms part of a vicious circle in the most highly skilled labour markets whereby graduates migrate to London and the South East where the best opportunities are perceived to be; this reinforces the concentration of skilled people in London; and this in turn encourages employers of such labour to expand or locate here. This is not a sustainable basis for medium-term growth and it is not good for UK plc.

The arguments for welcoming growth tend to be based on the assertion that any increment of growth foregone by London would be lost to the UK. This is an unsubstantiated assertion, mainly associated with fears of losing leading financial and business services companies. In our view the GLA/LDA and the government should be scrutinising these assumptions very closely and weighing in the balance any plausible national losses of output against gains which would arise from a more even pattern of development across the UK (and across the EU).

The core issue to which the panel should pay attention is the way in which the growth rate and pattern produce poverty while simultaneously producing wealth. Essentially the mechanism is that housing prices are driven up by

- \* demographic pressures combined with

- \* the disproportionate influence on house prices and market rents from income growth enjoyed by a majority of the population combined with

- \* the added pressure on prices which comes from people thinking of housing as an 'investment', reinforced by lack of confidence in other savings media and the pensions system.

All those demand pressures, confronting a supply which (despite the Mayor's best efforts) grows too slowly, actually worsens housing conditions and increases poverty among the poorer parts of the population. As a community group on the edge of central London, we know that this is the experience of many thousands of households. It is a negative effect of growth and one of the few things the London Plan could do about it is to give really serious consideration to slowing employment growth.

### **3. Housing/jobs growth in central London and global warming**

The further revisions are impressive in the attention they pay to the threat (and the actuality) of global warming and to ways in which the Plan can mitigate or reverse the trend.

We consider, however, that the Plan (and the further alterations) fail to do enough to reduce the need to travel. In particular for Central London the plan envisages continuing employment growth on an excessive scale and not nearly enough growth of housing. This is the case for the areas around King's Cross (including the King's Cross Opportunity Area in respect of which the Panel report on the early alterations was critical of the handling of housing targets) and for many similar areas in and around the CAZ. The new imperatives associated with global warming mean that the Panel should now insist on a radical reduction in provision for job growth and a balancing and radical boost to housing targets in these areas. Every 25 square metres of office space reduction probably saves 2 additional commuters and if those square metres are used as housing space they probably save an additional commuter. If the office space presently planned for the King's Cross OA were switched to residential use we would thus save in the order of 55,000 commuters. This rough estimate would of course have to be refined, and linked with estimates of the travel likely to be generated by a more decentralised pattern of employment. But we have not seen this work done yet and the Panel should require it.

The Railway Lands Group thus adds its weight to those many others who are calling for a more polycentric distribution of employment in London and a rethink of CAZ growth. At present the Plan is the prisoner of market sentiment on an issue where there is little prospect of the market producing sustainable outcomes.

### **4. Social rented housing**

If the government and the Mayor are to be taken seriously in their quest for 'sustainable communities' then the Plan needs to make much stronger provisions to ensure that the backlog of need for social rented housing, including a large proportion of family size units, are brought forward quickly, not tackled over the next decade as envisaged by section 3.8. Established communities in areas like King's Cross - living examples of multi-class and multi-ethnic communities, are already being dispersed and displaced and there is no time to loose if those who want to stay are to be enabled to do so.

### **5. Protection and enhancement of social infrastructure and community facilities.**

#### **(Policy 3A.15)**

#### **Community Meeting Facilities**

The KXOA development site is a wasteland of sixty seven acres separating the surrounding communities from one another. Those communities are further divided along ethnic lines. Adequate Community Meeting Facilities could transform this geographic and racial segregation, and give a heart and coherence to what is widely felt throughout the communities to be an alien fortress to which they will have no connection, have no input, and which is primarily for corporate interests, thus adding a sense of class division to the existing centrifugal forces.

Since the tragedy of 7th July 2005, white and ethnic communities which till then had existed as separate enclaves, resolved to work for mutual understanding and a tolerant, sharing and caring society, in accord with the Mayor's affirmation of "One London". This resolve has found expression and structure in a partnership – "Cultural Interchange at King's Cross" (see attachment listing partners and aims). The modus operandi is for groups to nurture their cultures separately, then to share them with one another as a stimulus to discussion and mutual understanding. For this to occur effectively, adequate meeting facilities are necessary. Such facilities will also be needed by future residents of the site, and their integration with the surrounding communities will be vital to prevent the sense of a "gated community" intensifying feelings of isolation and mistrust.

LB Camden has an exceptionally high suicide rate, and adequate space for shared

entertainment, activity and understanding would help to reduce this incidence.

**For the above reasons**

The Community Meeting Facilities of 370 square metres allocated under S106 to this site of 67 acres should be increased to 1000 square metres, and community groups should be involved from the planning stage. King's Cross Development Forum, representing local communities, voted unanimously on August 23, 2006, in favour of these proposals. Some of the purposes to which this space would be put include meetings, rehearsal, performance (live and screen), storage facilities, toilets, kitchen, café, IT access and administration, all with adequate access for the disabled.

*The forgoing submission addresses the following points of the London Plan -*

3.74 identifies communities most at need

3.75 stresses community involvement

3A.15 stresses the need for social infrastructure and community facilities, e.g adequate community halls, meeting rooms, toilets – particularly important in major areas of new development and regeneration to deal with increased population and existing deficiencies.

Seeks to meet the spatial needs of London's diverse population

3.78 identifies gaps of social infrastructure, including cultural facilities

3.79 highlights need for appropriate space, and the engagement of voluntary and community organisations.