

THE KINGS CROSS RAILWAY LANDS GROUP

working for a community development

Executive Summary of the response by the:

KINGS CROSS RAILWAY LANDS GROUP

to applications submitted by Argent St George, London and Continental Railways and Excel for the development of former railway lands within the King's Cross Opportunity Area (King's Cross Central)

8th October 2004

(NB. error to numbering of bullets on pages 6, 7 and 8 corrected in Jan 2005 for ease of reference)

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The King's Cross Railway Lands Group supports regeneration of the King's Cross Railway Lands. While we welcome some parts of the Argent St George application, it is not acceptable as a whole, and must be revised. If the necessary revisions are not made, then it should be rejected. Any revised application should be subject to a new round of full public consultation.

Introduction

The King's Cross Railway Lands Group (KXRLG) is a voluntary organisation (with a charity application submitted) which comprises individual members and representatives of a large number of groups (ranging from TAs to conservation and transport groups) in Camden and Islington.

We are keen to work constructively with the Councils and developers to make this a genuinely inclusive and sustainable development and we bring a wealth of experience to this, with over 15 years experience of King's Cross development issues. As the only community group dedicated to this issue for years, we aim to help ensure the local community has an effective voice in the planning and development process so it can share in the benefits of this £billion development.

Our group has a strong track record in making successful interventions on behalf of the local community. KXRLG led the campaign to stop the poorly planned Channel Tunnel Rail Link (CTRL) terminal at King's Cross, and proposed its safer relocation at St Pancras, which the Government later adopted. We helped hundreds of local people to petition Parliament on this issue back in 1994. We also produced our own community planning application for the site. In 2003-4, we helped forge a successful partnership of residents, Council and health authority to halt CTRL plans for 24-hour construction which would have disrupted residents' lives unbearably. We have taken an active role in the King's Cross Development Forum, including helping to secure resources for consultation and to organise the Islington meeting with Planning Aid for London.

This response is a distillation from written and oral comments made at our series of consultation meetings this summer, and other comments contributed by our members. This final submission was finalised by the elected Management Committee.

EXECUTIVE SUMMARY

We object to the present proposals for the following reasons: -

- **There is a lack of absolute clarity and detail** in exactly what is being applied for, where and when. "Below the line" Environmental, Transport, Urban Design and Public Realm supporting documents are not part of the application. This is unacceptable for public consultation and because two Conservation Areas and numerous Grade 1 and 2 Listed buildings are directly affected. This may render applications invalid.
- **Overdevelopment** and lack of physical integration. The proposals would dwarf the surrounding areas and be extremely intrusive.
- **It is not a mixed development or a sustainable one**, as a massive "office city". The 30,000 new, mostly office, jobs proposed is almost 3 times the London Plan target for this Area. 17,000 jobs would be more sustainable. There is no commitment to 15% jobs target for local people. This needs an enforceable delivery mechanism.
- A privately managed, office-dominated development has **potentially serious impacts for crime** and anti-social behaviour in surrounding communities.
- **The "public realm"** consists mainly of existing/proposed new highway with little public open green space.
- **Overloading of transport system** - the development would create massive commuting and unacceptable loading on the local bus, tube, road, and rail infrastructure.
- **1800 car parking spaces** on site is too many, with far too much priority for vehicles over pedestrians and cyclists.
- **Housing mix** - we support maximum 2550 new housing units. We would prefer more family housing and social rented housing than the proposed emphasis on single person/childless couples market/intermediate housing. Housing is needed both north and south of the canal, and in every phase of the development.
- **Increased demand on already hard-pressed local community, health and social services** is likely from the new development.
- **Lack of opportunities for community involvement** in the planning, construction or management of the development. No proposals for a Community Development Trust or Community Land Trust have been made.
- **Uncertainty about phasing and implementation** from 2007 over a 15-20 year development programme.
- **No proposals exist for temporary uses of land or buildings.**

We have summarized our comments as follows:

1. Fundamental Concerns

- A fundamental objection to the applications is that they constitute almost a blank cheque: permission would give the applicants and their successors an unprecedented freedom to vary the quantity and composition of what they build over a number of decades. The planning authorities, if they approved applications of this type, would be failing in their responsibility to regulate the development - in response to the development's own performance, the actual growth of transport capacity, changing environmental imperatives, market demands and social needs.
- Instead, permission should only be given for a development at the lowest end of the range of possibilities. Additional volume could always be sought in later applications and the planning authorities could thus exercise their responsibilities properly
- Wherever possible, revisions should be made which reduce the ambiguity and uncertainty surrounding the scale, content and timing of the proposals. Fixed limits would provide a far clearer picture allowing for genuine public comprehension and consultation.
- Critical elements of the application such as the Environmental, Transport, Urban Design and Public Realm Supporting Documents should be brought from "below the line" into the Planning Application itself.

2. Land Uses, Building Heights and Densities

- KXRLG believes there must be a significant reduction in total floorspace.
- A better balance is needed between office development and residential, community, cultural, leisure and recreational development.
- A better range of small medium and large sized business/office accommodation is needed, with some reserved for local community and voluntary sector occupation.
- Residential accommodation should be provided south as well as north of the canal.
- Residential accommodation in the north of the Opportunity Area should be laid out to create an environment suitable for a wide range of population, including older people and families with children.
- Inflexible large footplate developments should be avoided as far as possible. Building forms should allow for flexibility and adaptation to changing circumstances.
- Building heights should be halved/limited to 7 storeys (approx. 21m).
- Buildings along the Canal and Camley Street should not reach the proposed maximum 12 storeys height. They should respect the recent decision by Camden to reject the proposed development at Star Wharf and Pratt Wharf because they were higher than 4 floors. These buildings should be stepped back from the canal floor by floor to avoid overshadowing and domination of an extremely sensitive environment.
- Buildings should generally be stepped back to reduce canyon effects and provide more space for green roofs.
- The basement floor space should be included in the overall figures for the development (maximum 718,275m²) and not be in addition.

- The proposals for the Islington Triangle represent considerable overdevelopment of the site. The 200 units specified in the Joint Planning Brief should be the absolute maximum number allowed on this small and severely constrained site.

10.3. Public Realm and Layout

- More of the proposed Public Realm should be designed to provide facilities that encourage families with children, older people and others from both the new housing and surrounding communities to use and enjoy it.
- Unless development of the Islington Triangle is brought forward into the first phase or early second phase of development, the Plimsoll Viaduct should not be demolished. It should be retained in existing or temporary uses.
- Alternative design options for Stanley and Culross Buildings, Gas Holders, the Canal/Granary Basin and the Long Park should be considered with the developers and the Planning Authorities, and where appropriate, consequential changes to the Public Realm incorporated into a revised scheme.
- A Park of 1 ha of green space should be included in the new proposals.
- There should be no determination of these proposals until they have been assessed in the context of the Joint Supplementary Guidance for York Way
- There should be a marked reduction/rationalisation of vehicular routes throughout the new development, and increased priority for pedestrians and cyclists.

10.4. Conservation / Heritage

- KXRLG wants to see the retention of Culross Buildings and Stanley Buildings North, plus the retention of as much small works (gates, cast iron structures, walls etc) as possible.
- Pancras Road should not be realigned to isolate the German Gym and Stanley Buildings from St Pancras Station.
- A Heritage Centre and Heritage Trail should be created.
- Future public access should be ensured to the Goods Yard Complex of buildings, including the Granary, Assembly Shed, Handyside Canopies etc (Zones L and K).
- Appropriate temporary uses should be found for all the heritage buildings during the first and second phases of development, including the Great Northern Hotel and Plimsoll Viaduct.
- Alternative design options for retention/reuse of Stanley Buildings and Culross Buildings, and the Gas Holders, should be considered jointly with the developers and the Planning Authorities, and where appropriate, consequential changes incorporated into a revised scheme. Neither the Outline Applications nor the Listed Building Consent and Conservation Area Consent applications should be determined until these options have been thoroughly explored.

10.5. Housing

- KXRLG supports provision of maximum 2550 new dwelling units, but we wish to see a far greater emphasis towards provision of more family accommodation of 2, 3, 4 bed units and fewer studio/1 bed apartments.

- This new housing should be on top of the existing social housing units in Stanley and Culross Buildings and the canal boat dwellings.
- A specific commitment to affordable housing (numbers, tenure, mix, location and phasing) and in particular social rented housing needs to be obtained from the developer, consulted upon, and agreed by the two Councils, before any applications are determined.
- Affordable housing, including social rented housing, should be wholly integrated with housing for sale.
- More information is required from the applicants on how they intend to provide, manage and allocate the affordable housing elements of the regeneration package.
- We support the position on housing tenure adopted by both Councils in their joint Planning and Development Brief.
- All residential units should meet the standard for Lifetime homes and an agreed proportion of properties should be suitable for (a) older people with limited mobility (b) lone adult wheelchair users and small households which include a child or adult wheelchair user, and (c) suitable for larger households which include a child or wheelchair user.
- Housing of all types, including affordable and social rented, should be provided north and south of the canal, from the first phase.
- The 12 residential moorings at Goods Way should be retained and extended with improved canalside facilities for the boat owners. The extra moorings should not be sited opposite Camley Street Natural Park.
- Stanley Buildings and Culross Buildings should be renovated and returned to residential use.
- All design and construction of new housing should meet the highest BREEAM standards.
- The number of green/brown roofs should be increased, to contribute, along with trees and other green spaces, to the development of a wildlife corridor from south to north through the site.

10.6. Community Facilities / Open Space

- The new development should include new state-of-the-art community (D1 and D2) facilities, which are affordable and accessible to all, rather than just upgrading already hard-pressed existing facilities.
- This requires much further local debate once more information is known about the additional pressures likely to be placed upon existing facilities and what standards of upgrading will be achieved.
- No decision on any of the Applications should be taken until this consultation has been held and concluded.
- In principle, KXRLG would like to see the child/elder population increased within the new development, and thus new health, community, cultural and leisure facilities incorporated into the new development, affordable and accessible to all.

40.7. Jobs and Training

- KXRLG would like to see the number of jobs provided within the scheme reduced to an overall 17,000 jobs within the development.
- A range of small, medium and large business units should be provided, including affordable premises for start up units, social enterprises, local charitable, voluntary and community based organisations.
- A 15% target of jobs for local people should be delivered through a broadly based mechanism which is legal, accountable and has enforcement powers.
- An Employment and Training Strategy should be developed and delivered by a Partnership that includes broadly based forums such as the King's Cross Development Forum, King's Cross Community Development Trust and the Camden Central Community Umbrella.
- Such a Partnership could take the form of a local Regeneration Company and/or a Community Development or Land Trust.

40.8. Transport

- No permission should be granted unless and until both Local Authorities are certain that the supporting transport infrastructure is in place and able to accommodate the extra demands placed upon it by the new development.
- There should be consideration, and if appropriate, incorporation of recommendations set out above, for bus services and routeing through and around the new development
- There should be a substantial reduction in the 1800 parking spaces proposed on the site.
- If a multi-storey car park is still required, it should be relocated to a position which does not necessitate such deep vehicular penetration into the site.
- There should be a substantial increase in provision for safe pedestrian and cycle movement within the site and to the surrounding areas.
- There should be provision of a safe pedestrian /cycle only route north-south through the site.
- There should be no new pedestrian/cycle bridge as currently proposed at Camley Street Natural Park.
- There should be limited and sensitive improvements to the canal towpath, particularly around Camley Street Natural Park.
- We would like to see the retention of existing alignment of Pancras Road in the vicinity of Stanley Buildings.
- We would like to see the revision of proposals for Goods Way-Copenhagen Street junction.
- There should be consideration, and if appropriate, incorporation, of suggestions for improved connections between the site and the north west and to the east.

40.9. Environment

- Both the Environmental Strategy and the Environmental Impact Assessment, once amended in the light of the consultation process, should become part of the

application itself.

- The companies involved in the development at King's Cross Opportunity Area should be registered under EMAS2 and / or certified under ISO 14001. Thus the local communities could be much more confident that 'significant' impacts were being effectively addressed.
- A firm commitment should be put in place from the developer to use 'green' technologies as they become available, even if their prices are above those of previous technologies, using BATNEEC (Best Available Technique Not Entailing Excessive Costs) or EVABAT (Economically Viable Application of Best Available Technology).
- The historic environment of the canal includes its walls and these should not be altered for any reason. The biodiversity at the southern/eastern end of Camley Street Natural Park should also be conserved and enhanced by extending the park.
- The future decision-making process should include Local Agenda 21 core groups and other groups concerned with sustainability and environmental matters.
- Provision must be made for a similar amount of biomass as currently exists on the derelict site to establish itself in the new development, through a green corridor of parks, squares, trees, hedgerows and green roofs .
- Development of the Main Site and the Triangle should be subject to long term planting and tree management plans, including maximum possible local community involvement, and underwritten by appropriate planning conditions or agreements.
- There should be a minimum of 47 trees per hectare at King's Cross Central - i.e. total 1278 trees- with an aspiration for a higher figure to set a standard for increasing the numbers of trees in new urban developments.
- The trees in Camley Street Natural Park, along the canal frontage and in the area of St Pancras Cruising Club should remain undisturbed.
- All possible salvaged materials should be re-used. An inventory should be made of those materials that are available and have not been reused, and the reasons given in each case why they have not been reused.

10. Construction

- The Code of Construction Practice is submitted as a supporting document. Before any application is determined, the applicants should produce, and commit to, a full regime equivalent to the CTRL one which involves more than just a Code of Construction Practice. This should be part of the planning application rather than a supporting document.
- A formal process for Liaison / Consultation with local communities should be agreed before planning permission is granted and put in place before construction is begun.
- The Applicants should make a commitment to assisting the responsible authorities in their implementation controls to emissions to air, discharges of water and disposal of waste, by allowing access and installation of monitoring equipment.
- Noise and air quality monitoring information should be available to the general public through the local councils.
- Worst case scenarios for extra vehicle movements generated by removal of spoil should be provided over shorter time periods such as one quarter, one month and even one week.

- Mitigation measures with respect to vehicle movements must be extensively explored and all possible measures taken to reduce this major impact including reusing materials on site and using the canal and rail network for transportation
- Strong efforts should be made to train more local people in the construction trades for employment at King's Cross Central, as this would reduce pressure on the public transport network.

11. Phasing and Implementation

- KXRLG would like to see the inclusion in any consent of Housing Triggers that require housing (both affordable and other) to be provided as part of mixed development within each phase of the development, north and south of the canal, before work can start.
- Bring forward the Applicants' commitments on Station Square and a major pedestrian connection between the Southern Hub and the Granary Complex.
- The isolation of the first phase housing in Zone R should be avoided.
- Completion of the Islington Triangle in the Development Programme should be brought forward.
- Permanent or temporary uses should be found for buildings and open spaces which are otherwise likely to remain empty / derelict for 5 years or more.
- The applicants should list the conditions under which they would promote temporary land uses across the project area. These conditions should be discussed and negotiated with the planning authorities and community including the King's Cross Development Forum.
- More legible and understandable phasing illustrative plans should be produced.

12. Community Involvement in Regeneration

- Detailed information should be produced by the Applicants setting out - in far clearer terms than they have done to date - options for future consultation with, and involvement of, the local communities in the regeneration of King's Cross Central over the next 10-20 years.
- These proposals should refer to a variety of partnership models including a Community Development Trust and a Community Land Trust and be the subject of widespread public consultation.
- It must be a condition of any planning permissions that a compact be negotiated early between the developer, the community umbrella bodies in the area (at minimum King's Cross Community Development Trust, Camden Central Community Umbrella, an Islington umbrella group and King's Cross Railway Lands Group) and both local authorities on tripartite working over the lifetime of this development.
- The local community's interest in:
 - securing employment and associated training for local people
 - making the case for a community land trust
 - ensuring that appropriate social and public facilities are developed
 - ensuring that disruption caused by construction works is minimizedmust be explicitly acknowledged and protected in any planning permissions granted.